

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS, HOUSTON DIVISION

William B. v. Frank J. Bisignano, Commissioner of the Social
Security Administration

Browning · No. H-24-4454 · Decided March 18, 2026

SUMMARY

The United States District Court for the Southern District of Texas reviews the Commissioner of the Social Security Administration’s denial of William B.’s application for disability insurance benefits for a closed period. The court concludes that the ALJ’s findings, including the residual functional capacity and step-four past-relevant-work determination, were supported by substantial evidence, although the ALJ erred by failing to address the claimant’s post-hearing objections. The court finds that error harmless, denies the claimant’s motion for summary judgment, grants the Commissioner’s cross-motion, and affirms the final decision.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Houston Division
WRITING FOR THE COURT	Peter Bray
JURISDICTION	United States District Court for the Southern District of Texas, Houston Division
DECIDED	March 18, 2026
DOCKET	H-24-4454
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner of the Social Security Administration's final decision denying William B.'s application for disability insurance benefits. The parties consented to the jurisdiction of the magistrate judge, and both parties moved for summary judgment.
STANDARD OF REVIEW	The court reviews the Commissioner's decision to determine whether substantial evidence supports it and whether the correct legal standards were used. The court may not reweigh the evidence or substitute its judgment for that of the Commissioner. Procedural error warrants

	remand only if it violated substantial rights or casts doubt on the existence of substantial evidence supporting the decision.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	William B. v. Frank J. Bisignano, Commissioner of the Social Security Administration

TOPICS

judicial review of agency action administrative law administrative procedure act disability definition

PRACTICE AREAS

Social Security disability benefits administrative law federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's failure to expressly rule on William's post-hearing objections and vocational rebuttal evidence required remand.
2. Whether William's past work as a senior marketing manager was a composite job requiring classification under multiple Dictionary of Occupational Titles occupations.
3. Whether substantial evidence supported the ALJ's finding that William could perform his past work as a marketing manager as generally performed in the national economy.
4. Whether the ALJ was required to make step-five findings for the closed period after finding William not disabled at step four.

HOLDINGS

1. The ALJ erred by failing to directly rule on William's post-hearing objections as required by agency policy, but the error was harmless because William did not show that the omission violated substantial rights or cast doubt on the substantial evidence supporting the decision.
2. William's past work was not established to be a composite job because he did not show that it involved significant elements of two or more occupations. Additional duties beyond the DOT description, standing alone, do not make a job composite.
3. Substantial evidence supported the ALJ's finding that William could perform his past work as a marketing manager as generally performed in the national economy, notwithstanding his inability to perform the job as he actually performed it.
4. The ALJ was not required to proceed to step five or make step-five findings for the closed period because the ALJ properly found William not disabled at step four.

KEY QUOTATIONS

"The court does not substitute its judgment or weigh the evidence. The court's role is to decide whether the ALJ's decision is supported by substantial evidence. It is." (Analysis § 3.E)

“To establish that the position was a composite job, William had to show that it involved significant elements of two or more occupations.” (Analysis § 3.E)

FACTUAL BACKGROUND

William alleged disability from major depressive disorder, aortic aneurysm, pre-diabetes, and lower-back and foot problems, later focusing primarily on physical impairments during a closed period ending when he returned to full-time work. Medical-expert testimony supported a sedentary residual functional capacity, and the vocational expert testified that William could perform his past work as a marketing manager as generally performed in the national economy, although he had performed it at a higher exertional level. William argued that his marketing-manager position was a composite job because it included lifting and event-setup duties not reflected in the Dictionary of Occupational Titles. The court concluded that those additional duties were not shown to be significant elements of a second occupation and that the vocational testimony provided substantial evidence for the ALJ's decision.

PROCEDURAL HISTORY

William B. applied for disability insurance benefits in January 2021. The Social Security Administration denied the application initially and on reconsideration. After a January 2024 administrative hearing, the ALJ amended the claim to a closed period from May 13, 2020, through January 15, 2022, and found William not disabled because he could perform his past work as a marketing manager as generally performed. The Appeals Council denied review, and William filed this action. The district court denied William's motion for summary judgment, granted the Commissioner's cross-motion, and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Schofield v. Saul, 950 F.3d 315, 317 (5th Cir. 2020)
- Keel v. Saul, 986 F.3d 551, 555 (5th Cir. 2021)
- Garcia v. Berryhill, 880 F.3d 700, 704 (5th Cir. 2018)
- Salmond v. Berryhill, 892 F.3d 812, 817 (5th Cir. 2018)
- Whitehead v. Colvin, 820 F.3d 776, 779, 781 (5th Cir. 2016)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Consolidated Edison Co. of N.Y. v. NLRB, 305 U.S. 197, 229 (1938)
- Perez v. Barnhart, 415 F.3d 457, 461-62 (5th Cir. 2005)
- Webster v. Kijakazi, Webster v. Kijakazi, 19 F.4th 715, 718 (5th Cir. 2021)
- Ripley v. Chater, 67 F.3d 552, 557 (5th Cir. 1995)
- Morgan v. Colvin, 803 F.3d 773, 777 (5th Cir. 2015)
- Nunley v. Berryhill, No. 17-0072, 2018 WL 1167700, at *7 (S.D. Tex. Feb. 14, 2018)
- Cortez v. Berryhill, No. 17-1493, 2018 WL 4103622, at *2 (S.D. Tex. July 23, 2018)

- Treadaway v. Berryhill, No. 17-1093, 2018 WL 3862106, at *4 (S.D. Tex. Aug. 13, 2018)
- Frank v. Barnhart, 326 F.3d 618, 622 (5th Cir. 2003)
- Newton v. Apfel, 209 F.3d 448, 459 (5th Cir. 2000)
- Morris v. Bowen, 864 F.2d 333, 335 (5th Cir. 1988)
- Mays v. Bowen, 837 F.2d 1362, 1364 (5th Cir. 1988)
- Brock v. Chater, 84 F.3d 726, 728-29 (5th Cir. 1996)
- Finch v. Commissioner, Social Security Administration, No. 23-13417, 2024 WL 2368475, at *2-*3 (11th Cir. May 23, 2024)
- Carey v. Apfel, 230 F.3d 131, 135, 145 (5th Cir. 2000)
- Fields v. Bowen, 805 F.2d 1168, 1170 (5th Cir. 1986)
- Leggett v. Chater, 67 F.3d 558, 565 (5th Cir. 1995)
- Brunson v. Astrue, 387 F. App'x 459, 461 (5th Cir. 2010)
- Robinson v. Saul, No. 19-2695, 2020 WL 4480872, at *4 (S.D. Tex. July 14, 2020)

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