

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Gary Eugene Paris v. Frank Bisignano, Commissioner of Social Security

Paris · No. Civil Action No. CJC-25-1051 · Decided February 18, 2026

SUMMARY

The United States District Court for the District of Maryland reviewed Gary Eugene Paris’s challenge to the Commissioner of Social Security’s decision regarding disability insurance benefits and supplemental security income. The court held that the Administrative Law Judge inadequately evaluated the supportability and consistency of two medical opinions from Dr. Ursula Poydras and failed to address one of those opinions. Pursuant to sentence four of 42 U.S.C. § 405(g), the court reversed and remanded for further proceedings.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Chelsea J. Crawford
JURISDICTION	United States District Court for the District of Maryland
DECIDED	February 18, 2026
DOCKET	Civil Action No. CJC-25-1051
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying disability insurance benefits and awarding supplemental security income beginning after the claimant's date last insured.
STANDARD OF REVIEW	The court reviews whether the ALJ's factual findings are supported by substantial evidence and whether the correct legal standard was applied. Substantial evidence is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; precedential status unknown.
PARTIES	Gary Eugene Paris v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security

administrative law

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QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the supportability and consistency of Dr. Poydras's April 8, 2021 medical opinion under the Social Security regulations.
2. Whether the ALJ was required to address Dr. Poydras's March 28, 2018 medical opinion because it conflicted with the ALJ's finding that Paris could perform light work before July 13, 2023.
3. Whether the ALJ's inadequate evaluation of Dr. Poydras's opinions was harmless.

HOLDINGS

1. The ALJ erred by failing to adequately analyze the supportability of Dr. Poydras's April 8, 2021 opinion. Comparing the opinion with a separate examination and with the remainder of the record addressed consistency, but did not explain the objective evidence, data, or supporting explanations underlying Dr. Poydras's opinion.
2. The ALJ erred by failing to mention or evaluate Dr. Poydras's March 28, 2018 opinion, because that opinion conflicted with the ALJ's finding that Paris could perform light work before July 13, 2023.
3. The errors were not harmless because the inadequate analysis substantially hindered judicial review and could have affected the RFC and the ultimate disability determination.

KEY QUOTATIONS

“Thus, in reviewing medical opinions, the ALJ must explain how the ALJ considered the medical opinion’s supportability and consistency by citing to specific evidence and resolving conflicting conclusions in the opinions.” (Discussion)

“Because the ALJ’s analysis erroneously equates a consistency analysis for a supportability analysis and otherwise fails to explain whether Dr. Poydras’s opinion is supported, the ALJ erred.” (Discussion)

FACTUAL BACKGROUND

Paris sought DIB and SSI based on physical and mental impairments, including obesity, degenerative disc disease, diabetes, osteoarthritis, peripheral neuropathy, and peripheral vascular disease. The ALJ found that Paris had the residual functional capacity for light work before July 13, 2023, and sedentary work thereafter, concluding that he became disabled only on July 13, 2023. Dr. Ursula Poydras issued an April 8, 2021 physical assessment imposing significant functional limitations and a March 28, 2018 opinion stating that Paris could not perform work involving lifting or stair climbing.

PROCEDURAL HISTORY

Paris applied for DIB and SSI, alleging disability beginning June 16, 2017. After the claims were denied initially and on reconsideration, an ALJ held a hearing and determined that Paris became disabled on July 13, 2023, after his December 31, 2022 date last insured; the ALJ therefore denied DIB but awarded SSI beginning June 13, 2023. The Appeals Council denied review on February 21, 2025, and Paris sought judicial review. The district court remanded because the ALJ inadequately evaluated two medical opinions from Dr. Ursula Poydras.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded for further proceedings. The ALJ must explain how the supportability and consistency of Dr. Poydras's April 8, 2021 and March 28, 2018 medical opinions were considered under 20 C.F.R. §§ 404.1520c and 416.920c. The court expressed no opinion on whether Paris is ultimately entitled to benefits.

CASES CITED

- *Hancock v. Astrue*, 667 F.3d 470, 472 (4th Cir. 2012)
- *Brown v. Commissioner of Social Security Administration*, 873 F.3d 251, 254 (4th Cir. 2017)
- *Shelley C. v. Commissioner of Social Security Administration*, 61 F.4th 341, 353, 358 (4th Cir. 2023)
- *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019)
- *Drumgold v. Commissioner of Social Security*, 144 F.4th 596, 605 & n.9 (4th Cir. 2025)
- *Lauren P. v. Dudek*, Civil Action No. SAG-24-0480, 2025 WL 754522, at *3, *5 (D. Md. Mar. 10, 2025)
- *Cody C. v. Bisignano*, Civil Action No. EA-24-3739, 2025 WL 3077642, at *4 (D. Md. Nov. 4, 2025)
- *Charles H. v. Kijakazi*, Civil Action No. BAH-22-3331, 2023 WL 5984150, at *3-*4 (D. Md. Sept. 14, 2023)
- *Reid v. Commissioner of Social Security*, 769 F.3d 861, 865 (4th Cir. 2014)
- *Fauble v. Commissioner of Social Security*, No. 5:24-CV-00203-SCR, 2025 WL 2813903, at *2 n.3 (W.D.N.C. Sept. 30, 2025)
- *Godfrey v. Kijakazi*, No. CV 6:20-2504-TMC-KFM, 2021 WL 8014681, at *4 (D.S.C. Sept. 10, 2021), R&R adopted, 2022 WL 951620 (D.S.C. Mar. 30, 2022)