

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Dakita P. v. Frank Bisignano, Commissioner of Social Security

Dakita P. v. Bisignano · No. 1:24-cv-11717 · Decided March 12, 2026

SUMMARY

The court grants plaintiff’s motion for summary remand, denies the Commissioner’s motion for summary judgment, and remands the Social Security disability-benefits case for further administrative proceedings. The court concludes that the ALJ failed to explain whether and how the plaintiff’s chronic migraines and related symptoms caused work-related limitations or were incorporated into the residual functional capacity assessment. The court holds that the omission prevents meaningful judicial review and is not harmless.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Heather K. McShain
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	March 12, 2026
DOCKET	1:24-cv-11717
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's denial of disability benefits. Plaintiff moved for summary remand, and the Commissioner moved for summary judgment.
STANDARD OF REVIEW	The court reviews the ALJ's decision for substantial evidence under 42 U.S.C. § 405(g), and will not reweigh evidence, resolve debatable evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's so long as substantial evidence supports the decision.
PRECEDENTIAL VALUE	Unknown; district-court memorandum opinion and order with no reported citation.
PARTIES	Dakita P. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

summary judgment

subject matter jurisdiction

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment was supported by substantial evidence when the ALJ found plaintiff's migraines non-severe but did not explain whether the migraines caused work-related limitations or how the RFC accounted for them.
2. Whether the omission was harmless because the vocational expert identified jobs available under additional restrictions.

HOLDINGS

1. The ALJ's decision was not supported by substantial evidence because it did not explain whether plaintiff's migraines caused work-related limitations or whether the RFC incorporated any such limitations.
2. An ALJ must evaluate all limitations arising from medically determinable impairments, including impairments found not severe, and must provide a narrative explanation connecting the evidence to each RFC conclusion.

KEY QUOTATIONS

"The ALJ's RFC assessment must incorporate all the claimant's limitations supported by the medical record."

"When determining an individual's RFC, the ALJ must evaluate all limitations that arise from medically determinable impairments, even those that are not severe[.]"

"The ALJ's findings that medication helped plaintiff's migraines, and that the migraines were caused by external stressors, do not permit the Court to trace the path of the ALJ's reasoning with respect to how, if at all, plaintiff's migraines affected her ability to work."

FACTUAL BACKGROUND

Plaintiff alleged disability beginning September 29, 2020, based on several impairments, including chronic migraines. Her migraines involved photophobia, phonophobia, nausea, and vomiting, occurred several times per week at points, and were treated with prescription medication and CGRP-antagonist injections. Although treatment temporarily reduced the frequency and duration of the headaches, later stressors were associated with increased frequency. The ALJ found the migraines non-severe and assessed an RFC for light work without explaining whether the migraines caused work-related limitations or whether the RFC accounted for them.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and supplemental security income. Her claims were denied initially, on reconsideration, and by an administrative law judge after a hearing; the Appeals Council denied review, making the ALJ's decision the final agency decision. The district court granted plaintiff's motion for summary remand, denied the Commissioner's motion for summary judgment, reversed the agency decision, and remanded for further administrative proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further administrative proceedings consistent with the memorandum opinion and order, including adequate consideration of plaintiff's migraine-related limitations in the RFC assessment and any resulting step-five analysis.

CASES CITED

- Karr v. Saul, 989 F.3d 508, 511 (7th Cir. 2021)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Warnell v. O'Malley, 97 F.4th 1050, 1052-53 (7th Cir. 2024)
- Jennifer M. v. Bisignano, No. 23 CV 2219, 2025 WL 2463059, at *2 (N.D. Ill. Aug. 26, 2025)
- Brandon W. v. Bisignano, No. 23 C 4373, 2025 WL 3215775, at *6 (N.D. Ill. Nov. 18, 2025)
- Fazekas v. Bisignano, No. 3:24-CV-79, 2025 WL 3223782, at *3 (N.D. Ind. Nov. 18, 2025)
- Sahar R. v. O'Malley, No. 20 C 504, 2024 WL 117806, at *3 (N.D. Ill. Mar. 19, 2024)
- Brady v. Berryhill, Cause No. 2-16-CG-523-PRC, 2018 WL 1167216, at *7 (S.D. Ind. Mar. 6, 2018)
- Brett D. v. Saul, Case No. 19 C 8352, 2021 WL 2660753, at *4 (N.D. Ill. June 29, 2021)
- Moon v. Colvin, 763 F.3d 718, 722 (7th Cir. 2014)
- Leslie T. v. Saul, Case No. 4:19-cv-113-SEB-DML, 2020 WL 6586658, at *3 (S.D. Ind. Oct. 19, 2020)
- Wilder v. Kijakazi, 22 F.4th 644, 654 (7th Cir. 2022)