

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Daniel V. Reyes v. Frank Bisignano, Commissioner of Social Security

No. 2:24-cv-425 (N.D. Ind. Mar. 25, 2026) · No. 2:24-cv-425 · Decided March 25, 2026

SUMMARY

The United States District Court for the Northern District of Indiana affirmed the Social Security Administration’s denial of Daniel V. Reyes’s application for disability benefits. The court held that the administrative law judge applied the correct legal standards, supported the residual functional capacity determination with substantial evidence, properly evaluated Reyes’s subjective symptoms, and adequately considered obesity and colitis.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Philip P. Simon
JURISDICTION	United States District Court for the Northern District of Indiana, Hammond Division
DECIDED	March 25, 2026
DOCKET	2:24-cv-425
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal of denial of Social Security disability benefits by the Administration
STANDARD OF REVIEW	Deferential review limited to determining whether the ALJ applied correct legal standards and whether the decision is supported by substantial evidence.
PRECEDENTIAL VALUE	unpublished
PARTIES	Daniel V. Reyes v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- exhaustion of remedies
- ada / disability
- disability definition
- administrative law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated Reyes' subjective symptoms regarding the intensity, persistence, and limiting effects of his impairments
2. Whether the ALJ sufficiently articulated the reasons for her RFC determination
3. Whether the ALJ properly considered the effects of Reyes' obesity and colitis in reaching her conclusions

HOLDINGS

1. The ALJ's credibility determination regarding Reyes' subjective statements about his symptoms was not patently wrong and was well supported by the record, as the ALJ followed boilerplate language with a multi-page, specific analysis of the medical evidence showing Reyes' functional capabilities inconsistent with his claimed limitations.
2. The ALJ sufficiently articulated the reasons for her RFC determination, as she considered the medical opinions in the record and any disagreements were in favor of giving Reyes a more restrictive RFC, which benefits rather than harms the claimant.
3. The ALJ properly considered Reyes' obesity in combination with his other impairments and adequately addressed his colitis, satisfying minimal articulation requirements.

KEY QUOTATIONS

“This review of the ALJ's decision is deferential, mostly because the 'substantial evidence' standard is not a very rigorous one. In fact, the Supreme Court announced long ago that the standard can be met so long as there is 'more than a mere scintilla' of evidence and 'such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.'” (at 5)

“If the ALJ has otherwise explained his [credibility] conclusion adequately, the inclusion of [the template] language can be harmless.” (at 6)

“When no doctor's opinion indicates greater limitations than those found by the ALJ, there is no error.” (at 9-10)

“[S]ocial-security adjudicators are subject to only the most minimal of articulation requirements. An ALJ need not address every piece or category of evidence identified by a claimant, fully summarize the record, or cite support for every proposition or chain of reasoning.” (at 12)

FACTUAL BACKGROUND

Daniel Reyes applied for disability benefits alleging disability beginning August 30, 2021, later amended to December 20, 2021. He had multiple physical impairments including bilateral torn rotator cuffs operated on multiple times, mild degenerative changes to his right hip, sleep apnea, obesity, history of coronary artery disease, and ischemia on the brain. He previously worked as a crane operator, food delivery driver, and Lyft taxi

driver. The ALJ found these conditions were severe but not disabling, determining Reyes could perform light work with certain restrictions.

PROCEDURAL HISTORY

Plaintiff applied for disability benefits, which were denied after a hearing by an Administrative Law Judge. The ALJ's decision became the final decision of the Commissioner. Plaintiff then sought judicial review in federal district court.

DISPOSITION

affirmed

CASES CITED

- 42 U.S.C. § 405(g)
- Shideler v. Astrue, 688 F.3d 306, 310 (7th Cir. 2012)
- Castile v. Astrue, 617 F.3d 923, 926-27 (7th Cir. 2010)
- Overman v. Astrue, 546 F.3d 456, 462 (7th Cir. 2008)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- 42 U.S.C. § 423(a)(1)(E)
- 42 U.S.C. § 423(d)(1)(A)
- 42 U.S.C. § 423(d)(2)(A)
- Summers v. Berryhill, 864 F.3d 523, 528 (7th Cir. 2017)
- Grotts v. Kijakazi, 27 F.4th 1273, 1279 (7th Cir. 2022)
- Bjornson v. Astrue, 671 F.3d 640, 644–46 (7th Cir.2010)
- Parker v. Astrue, 597 F.3d 920, 922 (7th Cir.2010)
- Punzio v. Astrue, 630 F.3d 704, 709 (7th Cir. 2011)
- Filus v. Astrue, 694 F.3d 863, 868 (7th Cir. 2012)
- Pepper v. Colvin, 712 F.3d 351, 362 (7th Cir. 2013)
- Engstrand v. Colvin, 788 F.3d 655 (7th Cir. 2015)
- Young v. Barnhart, 362 F.3d 995, 1000 (7th Cir. 2004)
- Lothridge v. Saul, 948 F.3d 1227, 1233 (7th Cir. 2021)
- Suide v. Astrue, 371 F. App'x. 684, 690 (7th Cir. 2010)
- Shirley v. O'Malley, 2024 WL 1341077, at *6 (N.D. Ind. Mar. 29, 2024)
- Dudley v. Berryhill, 773 Fed.Appx. 838, 843 (7th Cir. 2019)
- Rice v. Barnhart, 384 F.3d 363, 370 (7th Cir. 2004)
- Denton v. Astrue, 596 F.3d 419, 425 (7th Cir. 2010)
- Villano v. Astrue, 556 F.3d 558, 562 (7th Cir. 2009)
- Gentle v. Barnhart, 430 F.3d 865 (7th Cir. 2005)

- Warnell v. O'Malley, 97 F.4th 1050, 1054 (7th Cir. 2024)
- Hammerslough v. Berryhill, 758 Fed.Appx. 534 (7th Cir. 2019)

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