

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

Sheresa Exum v. Frank Bisgnano, Commissioner, Social Security
Administration

Exum · No. 3:25-cv-00118-JM-JJV · Decided November 25, 2025

SUMMARY

The document is a proposed findings and recommended disposition in Sheresa Exum’s appeal from the Social Security Administration’s denial of disability insurance benefits. The magistrate judge recommends affirming the Commissioner’s decision and dismissing the complaint with prejudice, concluding that the ALJ’s findings were supported by substantial evidence and were not based on legal error.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Northern Division
JURISDICTION	United States District Court for the Eastern District of Arkansas, Northern Division
DECIDED	November 25, 2025
DOCKET	3:25-cv-00118-JM-JJV
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits. The magistrate judge issued proposed findings and a recommended disposition to the referring district judge.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence on the record as a whole and whether the claimant was denied benefits because of legal error. Substantial evidence is evidence that a reasonable mind would accept as adequate; the court must consider evidence detracting from and supporting the decision but may not reverse merely because substantial evidence would support an alternative outcome.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Sheresa Exum v. Frank Bisgnano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

administrative law

standard of review

disability definition

appellate procedure

PRACTICE AREAS

social security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the Commissioner's denial of disability insurance benefits was supported by substantial evidence and free of legal error.
2. Whether the ALJ improperly failed to include mental limitations in the residual functional capacity assessment after finding mild limitations under the paragraph B criteria.
3. Whether the ALJ improperly discounted the alleged work-related effects of dizziness and light sensitivity.

HOLDINGS

1. The Commissioner's decision was supported by substantial evidence on the record as a whole and was not based on legal error.
2. The ALJ was not required to include mental limitations in the RFC solely because the ALJ found mild limitations under the paragraph B criteria.
3. The objective evidence did not establish that Exum's dizziness and light sensitivity substantially impaired her ability to perform work-related activities.

KEY QUOTATIONS

“A court’s function on review is to determine whether the Commissioner’s decision is supported by substantial evidence on the record as a whole and to analyze whether Plaintiff was denied benefits due to legal error.”

“Substantial evidence is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.”

“The limitations identified in the “paragraph B” criteria are not a residual functional capacity assessment but are used to rate the severity of mental impairments at steps 2 and 3 of the sequential evaluation process.”
(Tr. 19)

FACTUAL BACKGROUND

Exum, who was sixty-two at the time of the administrative hearing, alleged disability following a heart attack and had a past relevant work history as a controller. The ALJ found severe physical impairments including

chronic ischemic heart disease, diabetes, congestive heart failure, atrial fibrillation, aortic aneurysm, bradycardia, thyroid problems, high cholesterol, and obesity, but found no listed impairment and assessed a slightly reduced range of light work. Exum challenged the RFC assessment based on alleged mental limitations, dizziness, and light sensitivity, but the magistrate judge concluded that the objective medical evidence, treatment records, and medical consultants' opinions did not substantiate work-preclusive limitations.

PROCEDURAL HISTORY

The Administrative Law Judge found that Exum was not disabled because she retained the residual functional capacity to perform a slightly reduced range of light work and could perform her past relevant work as a controller. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. Exum filed a complaint in federal district court, and the magistrate judge recommended affirming the Commissioner's decision and dismissing the complaint with prejudice.

DISPOSITION

dismissed

CASES CITED

- Long v. Chater, 108 F.3d 185, 187 (8th Cir. 1997)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Reynolds v. Chater, 82 F.3d 254, 257 (8th Cir. 1996)
- Woolf v. Shalala, 3 F.3d 1210, 1213 (8th Cir. 1993)
- Lacroix v. Barnhart, 465 F.3d 881, 888 n.3 (8th Cir. 2006)
- Chismarich v. Berryhill, 888 F.3d 978, 980 (8th Cir. 2018)
- Sykes v. Bowen, 854 F.2d 284, 285 (8th Cir. 1988)
- Thomas v. Sullivan, 928 F.2d 255, 260 (8th Cir. 1991)
- Robertson v. Sullivan, 925 F.2d 1124, 1126-27 (8th Cir. 1991)
- Mapes v. Chater, 82 F.3d 259, 262 (8th Cir. 1996)
- Pratt v. Sullivan, 956 F.2d 830, 833 (8th Cir. 1992)
- Reutter ex rel. Reutter v. Barnhart, 372 F.3d 946, 950 (8th Cir. 2004)