

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

Todd B. v. Frank J. Bisignano, Commissioner of Social Security

Todd B. · No. 3:25-cv-50095 · Decided April 9, 2026

SUMMARY

The United States District Court for the Northern District of Illinois affirmed the Commissioner of Social Security’s denial of Todd B.’s applications for disability insurance benefits. The court rejected challenges concerning the evaluation of subjective symptoms, adjustment disorder, and obesity, concluding that the ALJ’s residual functional capacity finding was supported by substantial evidence and adequately explained.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Western Division
WRITING FOR THE COURT	Michael F. Iasparro
JURISDICTION	United States District Court for the Northern District of Illinois, Western Division
DECIDED	April 9, 2026
DOCKET	3:25-cv-50095
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying a period of disability and disability insurance benefits. The parties filed cross-motions for summary judgment and consented to magistrate-judge jurisdiction.
STANDARD OF REVIEW	The court reviewed whether the Commissioner's decision was supported by substantial evidence or resulted from an error of law. Factual findings supported by substantial evidence are conclusive, and the court would not reweigh evidence, resolve evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's. The ALJ's evaluation of subjective symptoms could be overturned only if patently wrong.
PRECEDENTIAL VALUE	Unknown; district-court memorandum opinion and order with no stated precedential designation

PARTIES

Todd B. v. Frank J. Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

agency adjudication

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ improperly evaluated Plaintiff's subjective symptoms.
2. Whether the ALJ inadequately considered Plaintiff's adjustment disorder and resulting concentration, persistence, or pace limitations in determining the residual functional capacity.
3. Whether the ALJ inadequately considered the effects of Plaintiff's obesity in determining the residual functional capacity.
4. Whether the ALJ's residual functional capacity determination and resulting denial of benefits were supported by substantial evidence.

HOLDINGS

1. The ALJ's evaluation of Plaintiff's subjective symptoms was not patently wrong because the ALJ considered the relevant regulatory factors and adequately explained the decision to find that Plaintiff's symptoms were not as limiting as alleged.
2. The ALJ adequately considered Plaintiff's adjustment disorder and mild limitation in concentration, persistence, or maintaining pace, and substantial evidence did not require additional RFC restrictions.
3. The ALJ adequately considered the effects of Plaintiff's obesity and incorporated obesity-related restrictions into the RFC.
4. The Commissioner's final decision denying benefits was supported by substantial evidence and did not result from legal error.

KEY QUOTATIONS

"The threshold for substantial evidence 'is not high.'"

"The Court will not overturn this well-reasoned decision."

FACTUAL BACKGROUND

Plaintiff alleged disability beginning November 13, 2020, based on physical and mental impairments including knee problems, neuropathy, asthma, obesity, non-severe obstructive sleep apnea, and adjustment disorder. The ALJ found that Plaintiff retained the residual functional capacity for light work with restrictions involving lower-extremity pushing and pulling, postural activities, environmental exposure, balance, and hazards. The ALJ

determined that Plaintiff could not perform past relevant work but could perform other jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for disability and disability insurance benefits alleging disability beginning November 13, 2020. An administrative law judge issued an unfavorable decision on February 7, 2024, finding that Plaintiff could perform light work subject to specified limitations and could perform jobs existing in significant numbers in the national economy. The Appeals Council denied review on February 6, 2025, making the ALJ's decision final. Plaintiff then filed this action, and the court denied Plaintiff's motion for summary judgment and granted the Commissioner's motion.

DISPOSITION

affirmed

CASES CITED

- Thorlton v. King, 127 F.4th 1078, 1081–83 (7th Cir. 2025)
- Mandrell v. Kijakazi, 25 F.4th 514, 515 (7th Cir. 2022)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Warnell v. O'Malley, 97 F.4th 1050, 1052–54 (7th Cir. 2024)
- Beardsley v. Colvin, 758 F.3d 834, 836 (7th Cir. 2014)
- Gedatus v. Saul, 994 F.3d 893, 900, 903–05 (7th Cir. 2021)
- Jozefyk v. Berryhill, 923 F.3d 492, 498 (7th Cir. 2019)
- Pufahl v. Bisignano, 142 F.4th 446, 458 (7th Cir. 2025)
- Hess v. O'Malley, 92 F.4th 671, 679 (7th Cir. 2024)
- Schrank v. Saul, 843 Fed. App'x 786, 789 (7th Cir. 2021) (unpublished)
- Jeske v. Saul, 955 F.3d 583, 592 (7th Cir. 2020)
- Tutwiler v. Kijakazi, 87 F.4th 853, 859–60 (7th Cir. 2023)
- Shideler v. Astrue, 688 F.3d 306, 312 (7th Cir. 2012)
- Martin v. Saul, 950 F.3d 369, 375 (7th Cir. 2020)
- Myles v. Astrue, 582 F.3d 672, 677 (7th Cir. 2009)
- Thomas v. Colvin, 745 F.3d 802, 808 (7th Cir. 2014)
- Summers v. Berryhill, 864 F.3d 523, 527–28 (7th Cir. 2017)
- Simila v. Astrue, 573 F.3d 503, 522 (7th Cir. 2009)
- Morales v. O'Malley, 103 F.4th 469, 471 (7th Cir. 2024)
- Reynolds v. Kijakazi, 25 F.4th 470, 473 (7th Cir. 2022)
- Jens v. Barnhart, 347 F.3d 209, 213 (7th Cir. 2003)
- Schomas v. Colvin, 732 F.3d 702, 708 (7th Cir. 2013)

- Schmidt v. Barnhart, 395 F.3d 737, 745–46 (7th Cir. 2005)
- Shumaker v. Colvin, 632 Fed. App'x 861, 868 (7th Cir. 2015) (unpublished)
- Burmester v. Berryhill, 920 F.3d 507, 510 (7th Cir. 2019)
- Padua v. Bisignano, 145 F.4th 784, 792 (7th Cir. 2025)
- John S. v. Bisignano, No. 23 C 2041 (N.D. Ill. May 27, 2025)
- Renee S. v. Commissioner of Social Security, No. 3:20-cv-5522-DWC, 2021 WL 12177933, at *2 (W.D. Wash. Oct. 12, 2021)
- Kenlee F. v. Colvin, No. 3:21-cv-50355, 2025 WL 92589, at *6 (N.D. Ill. 2025)

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