

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, RICHMOND DIVISION

Shaniqua J. v. Frank Bisignano, Commissioner of Social Security

Civil No. 3:25-cv-231-SLS · No. Civil No. 3:25-cv-231-SLS · Decided March 31, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia reviews the Commissioner of Social Security’s denial of the plaintiff’s applications for disability insurance benefits and Supplemental Security Income. The court holds that the Administrative Law Judge properly evaluated the plaintiff’s physical and mental impairments, residual functional capacity, and medical opinion evidence, including alleged off-task time and absenteeism. The court denies the plaintiff’s motion, grants the Commissioner’s motion, and affirms the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Richmond Division
WRITING FOR THE COURT	Summer L. Speight
JURISDICTION	United States District Court for the Eastern District of Virginia, Richmond Division
DECIDED	March 31, 2026
DOCKET	Civil No. 3:25-cv-231-SLS
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's final denial of her applications for disability insurance benefits and Supplemental Security Income. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews whether the Commissioner applied correct legal standards and whether the factual findings are supported by substantial evidence. It may not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for the ALJ's.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion
PARTIES	Shaniqua J. v. Frank Bisignano, Commissioner of Social Security

TOPICS

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administrative law

disability definition

PRACTICE AREAS

Social Security disability

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federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity determination was supported by substantial evidence despite not including additional limitations for off-task time, unscheduled breaks, or absenteeism.
2. Whether the ALJ properly evaluated the persuasiveness of psychiatrist Randall Scott's medical opinion under 20 C.F.R. §§ 404.1520c and 416.920c.
3. Whether the vocational-expert hypotheticals were legally insufficient because they omitted alleged additional RFC limitations.

HOLDINGS

1. The ALJ reasonably accounted for Plaintiff's supported physical and mental limitations in an RFC restricting her to a reduced range of light work, and substantial evidence did not require additional limitations for off-task time, unscheduled breaks, or absenteeism.
2. The ALJ properly evaluated Dr. Scott's opinion by addressing its supportability and consistency and reasonably found it unpersuasive.
3. Because the RFC determination was not erroneous, the vocational-expert hypotheticals were not legally insufficient for omitting unsupported additional limitations.

KEY QUOTATIONS

"can understand, remember, and carry out simple tasks requiring no more than scheduled breaks" (R. at 25)

"The ALJ therefore found Dr. Scott's opinion unpersuasive." (R. at 37-38)

"Therefore, the Court will DENY Plaintiff's Motion for Summary Judgment or, in the Alternative, Motion for Remand (ECF No. 13), GRANT the Commissioner's Motion for Summary Judgment and Brief in Support Thereof (ECF No. 19), and AFFIRM the final decision of the Commissioner." (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability from multiple physical and mental impairments, including multiple sclerosis, migraines, cardiac dysrhythmias, diabetes, urinary disorders, depression, anxiety, somatic/conversion disorder, ADHD, and trauma-related disorder. During the relevant period, she had one hospitalization for an MS exacerbation, received medication and infusion treatment, and underwent a bladder implant that eliminated her need for catheterization. The record also reflected generally stable or improved symptoms, largely unremarkable examinations, daily activities including caregiving and household tasks, and work as a home-health patient-care assistant.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and SSI alleging disability beginning July 31, 2021. The SSA denied the applications initially and on reconsideration. After an ALJ hearing on February 7, 2024, the ALJ found Plaintiff not disabled on March 26, 2024. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court denied Plaintiff's motion, granted the Commissioner's motion, and affirmed.

DISPOSITION

affirmed

CASES CITED

- Mascio v. Colvin, 780 F.3d 632, 634-35 (4th Cir. 2015)
- Bowen v. Yuckert, 482 U.S. 137, 146 n.5 (1987)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Bird v. Comm'r of Soc. Sec. Admin., 699 F.3d 337, 340 (4th Cir. 2012)
- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Dunn v. Colvin, 607 F. App'x 264, 274 (4th Cir. 2015)
- Clarke v. Bowen, 843 F.2d 271, 272-73 (8th Cir. 1988)
- Johnson v. Barnhart, 434 F.3d 650, 653 (4th Cir. 2005)
- Breeden v. Weinberger, 493 F.2d 1002, 1007 (4th Cir. 1974)
- Universal Camera Corp. v. N.L.R.B., 340 U.S. 474, 488 (1951)
- Smith v. Chater, 99 F.3d 635, 638 (4th Cir. 1996)
- Monroe v. Colvin, 826 F.3d 176, 189 (4th Cir. 2016)
- Clifford v. Apfel, 227 F.3d 863, 872 (7th Cir. 2000)
- Mascio v. Colvin, 780 F.3d 632, 637-38 (4th Cir. 2015)
- Jonathan M. H. v. Kijakazi, No. 3:21-cv-600, 2022 WL 3643385, at *7 n.6 (E.D. Va. Aug. 8, 2022), report and recommendation adopted, 2022 WL 3635441 (E.D. Va. Aug. 23, 2022)
- United States v. Zannino, 895 F.2d 1, 17 (1st Cir. 1990)

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