

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Autumn C. v. Frank J. Bisignano, Commissioner of Social Security

Autumn C. · No. EA-25-1592 · Decided April 20, 2026

SUMMARY

The United States District Court for the District of Maryland reviews the Social Security Administration’s denial of Autumn C.’s application for Supplemental Security Income benefits. The court holds that the Administrative Law Judge adequately supported the claimant’s residual functional capacity, including a limitation concerning specific production rates, and that the hypothetical question posed to the vocational expert was sufficiently explained. The Commissioner’s decision is affirmed.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Erin Aslan
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 20, 2026
DOCKET	EA-25-1592
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner of Social Security's final decision denying Supplemental Security Income benefits.
STANDARD OF REVIEW	The court must affirm if the agency applied correct legal standards and its factual findings are supported by substantial evidence. The court may not reweigh evidence or substitute its judgment for that of the Commissioner, but it must determine whether the ALJ analyzed the relevant evidence and sufficiently explained the findings and rationale to permit meaningful review.
PRECEDENTIAL VALUE	unpublished
PARTIES	Autumn C. v. Frank J. Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication
- disability definition
- administrative procedure act

PRACTICE AREAS

Social Security

Administrative Law

Disability Benefits

Judicial Review

QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the residual functional capacity limitation restricting Plaintiff from work requiring a specific production rate.
2. Whether the ALJ's hypothetical question to the vocational expert adequately defined the term specific production rate and accurately reflected Plaintiff's supported limitations.

HOLDINGS

1. The ALJ adequately explained the limitation restricting Plaintiff to work not requiring a specific production rate because the decision identified relevant medical and other evidence and connected that evidence to the limitation.
2. The hypothetical question adequately described the production-rate limitation by giving examples such as assembly-line work and work requiring hourly quotas; the absence of a Dictionary of Occupational Titles definition did not require remand.

KEY QUOTATIONS

“This Court must uphold the decision of the SSA if it is supported by substantial evidence and if the SSA employed proper legal standards.”

“The second component of this analysis, “the ALJ’s logical explanation, is just as important as the other two.””

“In sum, the ALJ’s decision with respect to Plaintiff’s production-rate limitation in the residual functional capacity determination is supported by substantial evidence.”

FACTUAL BACKGROUND

Plaintiff alleged disability based on epilepsy, depression, bipolar disorder, personality disorder, and anxiety with panic attacks. The ALJ found several severe impairments, determined that Plaintiff did not meet or equal a listed impairment, and assessed a residual functional capacity for all exertional levels subject to physical and mental limitations, including simple, routine, repetitive work without a specific production rate or hourly quotas. Relying on vocational-expert testimony, the ALJ found that jobs existed in significant numbers in the national economy that Plaintiff could perform.

PROCEDURAL HISTORY

Autumn C. applied for Supplemental Security Income benefits under Title XVI of the Social Security Act. The Social Security Administration denied the application initially and on reconsideration. Following a hearing, an Administrative Law Judge found that Plaintiff was not disabled, and the Appeals Council denied further review. The district court, exercising jurisdiction under 42 U.S.C. § 405(g), affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Sims v. Apfel, 530 U.S. 103, 106-107 (2000)
- Barnhart v. Thomas, 540 U.S. 20, 21 (2003)
- Smith v. Berryhill, 587 U.S. 471, 475 (2019)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Pass v. Chater, 65 F.3d 1200, 1203 (4th Cir. 1995)
- Mascio v. Colvin, 780 F.3d 632, 634-637 (4th Cir. 2015)
- Monroe v. Colvin, 826 F.3d 176, 179-180, 187-189 (4th Cir. 2016)
- Britt v. Saul, 860 Fed. Appx. 256, 259, 261-262 (4th Cir.)
- Coffman v. Bowen, 829 F.2d 514, 517 (4th Cir. 1987)
- Hays v. Sullivan, 907 F.2d 1453, 1456 (4th Cir. 1990)
- Biestek v. Berryhill, 587 U.S. 97, 102-103 (2019)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Sterling Smokeless Coal Co. v. Akers, 131 F.3d 438, 439-440 (4th Cir. 1997)
- T-Mobile S., LLC v. City of Roswell, 574 U.S. 293, 302 (2015)
- Garland v. Ming Dai, 593 U.S. 357, 369 (2021)
- Ladda v. Berryhill, 749 Fed. Appx. 166, 172 (4th Cir.)
- Brown v. Commissioner, Soc. Sec. Admin., 873 F.3d 251, 255 (4th Cir. 2017)
- Thomas v. Berryhill, 916 F.3d 307, 311-312 (4th Cir. 2019), as amended (Feb. 22, 2019)
- Autumn T. v. Saul, Civil Action No. DLB-19-1572, 2020 WL 4194145, at *3 (D. Md. July 21, 2020)
- Catherine B. v. Kijakazi, Civil Action No. CDA-22-3089, 2023 WL 8361643, at *4 (D. Md. Dec. 1, 2023)
- Brook H. v. Dudek, Civil Action No. CDA-24-49, 2025 WL 949389, at *3-*4 (D. Md. Mar. 28, 2025)
- Estelle G. v. Dudek, Civil Action No. CDA-24-12, 2025 WL 923411, at *4 (D. Md. Mar. 26, 2025)
- Raushaun F. v. Bisignano, Civil Action No. CDA-24-1792, 2025 WL 2774126, at *3 (D. Md. Sept. 26, 2025)
- Michelle W. v. O'Malley, Civil Action No. CDA-23-2898, 2024 WL 3925065, at *4 (D. Md. Aug. 23, 2024)
- Chad H. v. Bisignano, Civil Action No. DRM-25-380, 2026 WL 483338, at *2, *5 (D. Md. Feb. 20, 2026)
- Pearson v. Colvin, 810 F.3d 204, 205 n.1, 207 (4th Cir. 2015)
- Linger v. Commissioner of Social Security, No. 22-2192, 2025 WL 40548, at *5 (4th Cir. Jan. 7, 2025)
- Kenneth L. v. Kijakazi, Civil Action No. SAG-20-624, 2021 WL 4198408, at *2 (D. Md. Sept. 15, 2021)
- Shuronn S. v. Kijakazi, Civil Action No. TJS-20-3756, 2022 WL 391434, at *2 (D. Md. Feb. 9, 2022)
- Delonte C. v. Kijakazi, Civil Action No. TMD 20-2436, 2021 WL 4391089, at *5 (D. Md. Sept. 24, 2021)

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