

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OKLAHOMA

Eric Lee Steiert v. Frank Bisignano, Commissioner of the Social
Security Administration

No. 24-cv-326-JDR-MTS · No. No. 24-cv-326-JDR-MTS · Decided December 1, 2025

SUMMARY

The United States District Court for the Northern District of Oklahoma overruled Eric Lee Steiert’s objections to a magistrate judge’s Report and Recommendation and affirmed the Commissioner of Social Security’s denial of disability benefits. The court held that all but one objection was waived for failure to specifically identify errors in the Report and Recommendation. After de novo review of the remaining objection and clear-error review of the others, the court concluded that the ALJ’s evaluation of medical opinion evidence and subjective symptoms was supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Northern District of Oklahoma
WRITING FOR THE COURT	John D. Russell
JURISDICTION	United States District Court for the Northern District of Oklahoma
DECIDED	December 1, 2025
DOCKET	No. 24-cv-326-JDR-MTS
DISPOSITION	affirmed
PROCEDURAL POSTURE	The plaintiff sought judicial review of the Commissioner of Social Security's denial of supplemental income benefits. After referral to a magistrate judge, the magistrate judge recommended affirmance. The district court reviewed the plaintiff's objections, conducting de novo review of the properly raised objection and clear-error review of the waived objections.
STANDARD OF REVIEW	The district court reviews a properly raised objection to a magistrate judge's report and recommendation de novo. Waived objections are reviewed, at the court's discretion, for clear error. In reviewing the Commissioner's final decision, the court determines whether it is supported by substantial evidence and whether the correct legal standards were applied; it may not reweigh the evidence or substitute its judgment for the Commissioner's.

PRECEDENTIAL VALUE	unpublished
PARTIES	Eric Lee Steiert v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

judicial review of agency action standard of review administrative law appellate procedure
civil procedure

PRACTICE AREAS

Social Security disability administrative law federal civil procedure

QUESTIONS PRESENTED

1. Whether Steiert's objections to the magistrate judge's Report and Recommendation were sufficiently specific to preserve them for de novo review.
2. Whether the ALJ's finding that Mackey's medical opinion was unpersuasive was supported by substantial evidence and adequately addressed the opinion's supportability and consistency.
3. Whether the ALJ properly analyzed Steiert's interaction and concentration limitations.
4. Whether the ALJ's subjective-symptom analysis was improper.

HOLDINGS

1. Objections must identify particular factual or legal errors in the magistrate judge's recommendation; objections directed only to the underlying ALJ decision, or merely expressing disagreement with the recommendation, do not preserve the issue for de novo review. Steiert waived all but one objection.
2. The ALJ's determination that Mackey's June 28, 2023 medical opinion was inconsistent and unpersuasive was supported by substantial evidence.
3. The district court may review waived objections to a magistrate judge's report for clear error and found no clear error in the Report's treatment of the remaining issues.

KEY QUOTATIONS

“The record shows sufficient evidence for the ALJ to find Ms. Mackey’s opinion unpersuasive.” (Dkt. 20 at 10)

“The Court concludes that the ALJ’s finding that Ms. Mackey’s opinion was inconsistent and unpersuasive was based on substantial evidence and adopts the Report on the issue.” (Dkt. 20 at 10)

FACTUAL BACKGROUND

Eric Lee Steiert suffers from major depressive disorder, post-traumatic stress disorder, and panic disorder, with reported panic attacks, suicidal ideation, obsessions, and concentration difficulties. Rebekah Mackey, APRN,

issued a June 28, 2023 opinion asserting that Steiert would be unable to perform several basic workplace functions for substantial portions of the workday, but she did not explain the bases for those limitations. Other reports by Mackey and other medical professionals described Steiert as adequately groomed, cooperative, organized, coherent, and adequately attentive, although the record also contained reports of intermittent concentration and memory problems.

PROCEDURAL HISTORY

An administrative law judge denied Steiert's claim for supplemental income benefits after finding that, despite severe impairments, he could perform medium work existing in significant numbers in the national economy. Steiert appealed to the district court and objected to Magistrate Judge Steele's Report and Recommendation, which recommended affirmance. The district court overruled the objections, adopted the Report and Recommendation, and affirmed the ALJ's findings.

DISPOSITION

affirmed

CASES CITED

- Wofford v. Colvin, 570 F. App'x 744, 745-46 (10th Cir. 2014)
- United States v. One Parcel of Real Prop., 73 F.3d 1057, 1060 (10th Cir. 1996)
- Strepka v. Sailors, 494 F. Supp. 2d 1209, 1230 (D. Colo. 2007)
- Saleh v. Silco Oil Co., No. 19-cv-02973-PAB-NRN, 2020 WL 4915604, at *3 (D. Colo. Aug. 20, 2020)
- Thomas v. Arn, 474 U.S. 140, 154 (1986)
- Hufft v. Tr. for Child Support Payments for State of Missouri, No. 25-cv-057-JFH-SH, 2025 WL 2169989, at *3 (N.D. Okla. July 31, 2025)
- Maes v. Astrue, 522 F.3d 1093, 1096 (10th Cir. 2008)
- Hamilton v. Sec'y of Health & Hum. Servs., 961 F.2d 1495, 1497-98 (10th Cir. 1992)
- Doyal v. Barnhart, 331 F.3d 758, 760 (10th Cir. 2003)
- Hamlin v. Barnhart, 365 F.3d 1208, 1214 (10th Cir. 2004)
- Sherman v. Liberty Mut. Ins. Co., No. 21-cv-00938-PAB-KLM, 2023 WL 559203, at *1 (D. Colo. Jan. 27, 2023)
- Vilela v. Off. of Recovery Servs., No. 22CV00699 DBB DBP, 2023 WL 2807249, at *3 (D. Utah Apr. 6, 2023)
- Christina M. v. United Healthcare, No. 1:22-cv-00136, 2025 WL 315888, at *2 (D. Utah Jan. 28, 2025)