

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Michael E. v. Frank Bisignano, Commissioner of Social Security
Administration

Michael E. · No. 4:25-CV-321-ACL · Decided February 19, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri affirmed the Commissioner of Social Security’s denial of Michael E.’s application for Disability Insurance Benefits. The court held that the ALJ fully and fairly developed the record and that the residual functional capacity assessment was supported by substantial evidence, including medical examinations, imaging, treatment records, and state-agency opinions. The court rejected the argument that an updated medical opinion was required to address the claimant’s shoulder and hand osteoarthritis.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Abbie Crites-Leoni
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	February 19, 2026
DOCKET	4:25-CV-321-ACL
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner’s final decision denying Disability Insurance Benefits. The parties consented to disposition by a United States Magistrate Judge.
STANDARD OF REVIEW	The Commissioner’s decision must be affirmed if supported by substantial evidence on the record as a whole. Substantial evidence is less than a preponderance but sufficient for a reasonable person to find the conclusion adequate. The court reviews the entire administrative record, including evidence supporting and detracting from the decision, and will disturb the ALJ’s decision only if it falls outside the available zone of choice.

PRECEDENTIAL VALUE	unpublished district court memorandum; precedential status unknown
PARTIES	Michael E. v. Frank Bisignano, Commissioner of Social Security Administration

TOPICS

judicial review of agency action administrative law agency adjudication disability definition

PRACTICE AREAS

Social Security disability federal administrative law judicial review of agency action
residual functional capacity record development

QUESTIONS PRESENTED

1. Whether the ALJ failed to fully and fairly develop the record by not obtaining an updated medical opinion addressing Plaintiff's left-shoulder and hand osteoarthritis diagnosed or confirmed after the state-agency medical consultants issued their opinions.
2. Whether substantial evidence supported the ALJ's residual-functional-capacity finding that Plaintiff could perform a limited range of light work.

HOLDINGS

1. The ALJ did not err by failing to obtain an additional medical opinion because the existing medical records, examination findings, imaging, treatment notes, and consultative examination provided sufficient evidence to determine Plaintiff's functional limitations and disability status.
2. Substantial evidence supported the ALJ's determination that Plaintiff could perform a limited range of light work, including frequent overhead reaching with the left upper extremity and frequent bilateral handling and fingering.

KEY QUOTATIONS

"The ALJ determines a claimant's RFC "based on all relevant evidence, including medical records, observations of treating physicians and others, and claimant's own descriptions of [his or her] limitations.""
(14)

"The July 2023 x-rays do not reflect a new condition that was not considered by the ALJ. Instead, the x-rays provided radiographic confirmation of Plaintiff's existing complaints of pain and weakness in these areas for which he received treatment." (15)

"Upon review of the record as a whole, the Court finds substantial evidence supports the ALJ's determination that Plaintiff was capable of a limited range of light work." (16)

FACTUAL BACKGROUND

Plaintiff alleged disability based on stroke, heart problems, hypertension, high cholesterol, sleep apnea, and low-back arthritis. The ALJ found severe impairments including a history of stroke, left knee osteoarthritis, degenerative disc disease, obstructive sleep apnea, obesity, and bilateral thumb arthritis, and assessed a residual functional capacity for a limited range of light work. Later imaging showed moderate osteoarthritis in Plaintiff's left shoulder and hands, but examinations generally showed normal range of motion, normal sensation and strength, intact hand function, and unassisted ambulation, with some left-shoulder weakness and pain. The district court concluded that the ALJ adequately considered these conditions and that the record contained sufficient evidence to assess Plaintiff's functional limitations without obtaining an additional medical opinion.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits on August 1, 2022, alleging disability beginning January 15, 2022. The application was denied initially, and an ALJ found on April 3, 2024, that Plaintiff was not disabled because he could perform other work existing in significant numbers in the national economy. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Estes v. Barnhart, 275 F.3d 722, 724 (8th Cir. 2002)
- Johnson v. Apfel, 240 F.3d 1145, 1147 (8th Cir. 2001)
- Coleman v. Astrue, 498 F.3d 767, 770 (8th Cir. 2007)
- Stewart v. Secretary of Health & Human Services, 957 F.2d 581, 585-86 (8th Cir. 1992)
- Warburton v. Apfel, 188 F.3d 1047, 1050 (8th Cir. 1999)
- Pearsall v. Massanari, 274 F.3d 1211, 1217 (8th Cir. 2001)
- Young v. Apfel, 221 F.3d 1065, 1068 (8th Cir. 2000)
- Weikert v. Sullivan, 977 F.2d 1249, 1252 (8th Cir. 1992)
- Jones ex rel. Morris v. Barnhart, 315 F.3d 974, 977 (8th Cir. 2003)
- Papesh v. Colvin, 786 F.3d 1126, 1131 (8th Cir. 2015)
- Kirby v. Astrue, 500 F.3d 705, 707 (8th Cir. 2007)
- Dixon v. Barnhart, 343 F.3d 602, 605 (8th Cir. 2003)
- Bowen v. Yuckert, 482 U.S. 137, 141 (1987)
- Page v. Astrue, 484 F.3d 1040, 1043 (8th Cir. 2007)
- Kelley v. Callahan, 133 F.3d 583, 588 (8th Cir. 1998)
- Lewis v. Barnhart, 353 F.3d 642, 646 (8th Cir. 2003)
- Bladow v. Apfel, 205 F.3d 356, 358-59 n.5 (8th Cir. 2000)

- Eichelberger v. Barnhart, 390 F.3d 584, 591 (8th Cir. 2004)
- Stormo v. Barnhart, 377 F.3d 801, 806 (8th Cir. 2004)
- Martise v. Astrue, 641 F.3d 909, 923 (8th Cir. 2011)
- Kraus v. Saul, 988 F.3d 1019, 1024 (8th Cir. 2021)
- Papesch v. Colvin, 786 F.3d 1126, 1131 (8th Cir. 2015)
- Lauer v. Apfel, 245 F.3d 700, 704 (8th Cir. 2001)
- Singh v. Apfel, 222 F.3d 448, 451 (8th Cir. 2000)
- Hensley v. Colvin, 829 F.3d 926, 932-34 (8th Cir. 2016)
- Cox v. Astrue, 495 F.3d 614, 619 (8th Cir. 2007)
- Nevland v. Apfel, 204 F.3d 853, 858 (8th Cir. 2000)
- Byes v. Astrue, 687 F.3d 913, 915-16 (8th Cir. 2012)
- McCoy v. Astrue, 648 F.3d 605, 612 (8th Cir. 2011)
- Freeman v. Apfel, 208 F.3d 687, 692 (8th Cir. 2000)
- Reeves v. Heckler, 734 F.2d 519, 522 n.1 (11th Cir. 1984)
- Hurst v. Kijakazi, No. 4:20-CV-00080-MTS, 2021 WL 3021424, at *7 (E.D. Mo. July 16, 2021)
- Noerper v. Saul, 964 F.3d 738, 745-47 (8th Cir. 2020)