

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Autumn D. S. v. Frank Bisignano, Commissioner of Social Security

Autumn D. S. · No. 2:25-CV-43-SJF · Decided March 9, 2026

SUMMARY

The United States District Court for the Northern District of Indiana reviewed the denial of Autumn D. S.’s application for Disability Insurance Benefits. The court held that the administrative law judge improperly characterized and relied on the claimant’s hobbies and daily activities when evaluating medical opinions and the Paragraph B criteria. The court reversed and remanded the Commissioner’s decision for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Scott J. Frankel
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	March 9, 2026
DOCKET	2:25-CV-43-SJF
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Disability Insurance Benefits after a prior remand for further administrative proceedings.
STANDARD OF REVIEW	The court reviews whether the ALJ applied the correct legal standards and whether the decision is supported by substantial evidence. The court may not reweigh evidence, resolve evidentiary conflicts, or substitute its judgment for the ALJ's, but the ALJ must adequately explain the reasoning and build a logical bridge from the evidence to the conclusions.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Autumn D. S. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- ada / disability

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the persuasiveness of the medical opinions by considering plaintiff's daily activities.
2. Whether the ALJ's RFC assessment and evaluation of plaintiff's symptoms were supported by substantial evidence when the ALJ relied on a mischaracterized account of plaintiff's hobbies.

HOLDINGS

1. The ALJ did not adequately evaluate the medical opinions because the ALJ relied on a mischaracterized account of plaintiff's hobbies and failed to address plaintiff's reported limitations in performing those activities.
2. The RFC assessment was not supported by substantial evidence because the ALJ again relied on a misconstrued account of plaintiff's hobbies without acknowledging plaintiff's reported difficulties and limitations in performing them.

KEY QUOTATIONS

"She enjoys crocheting, playing games, sewing, and making jewelry, all of which requires a considerable amount of concentration, persistence, and maintaining pace to complete these tasks" (AR 535)

"The ALJ makes these conclusions without any explanation—notably, without addressing Ms. S's reports that she rarely engage in these activities anymore because of her alleged limitations with memory, concentration, and persistence." (AR 535-36)

"Thus, the ALJ's treatment of Ms. S's daily activities appears to construe Ms. S's answer to "What are your hobbies and interests" as an admission that she regularly engaged in mentally challenging activities." (AR 535-36)

FACTUAL BACKGROUND

Plaintiff applied for Disability Insurance Benefits, alleging disability beginning January 1, 2021, based primarily on panic disorder, depression, social anxiety disorder, anxiety, and bipolar disorder. The ALJ found that plaintiff could perform a full range of work with nonexertional mental limitations and could perform several jobs existing in significant numbers. In evaluating medical opinions and plaintiff's symptoms, the ALJ relied repeatedly on plaintiff's reported hobbies, including crocheting, sewing, making jewelry, and playing games, but did not address plaintiff's statements that she rarely or could no longer perform many of those activities because of crying, impaired concentration, and memory problems.

PROCEDURAL HISTORY

The ALJ initially denied plaintiff's application in 2022, and the Appeals Council denied review. Plaintiff filed an earlier federal action, which was jointly remanded for further administrative proceedings. After a second

hearing, the ALJ again denied benefits on September 27, 2024. Plaintiff filed this action, and the district court remanded the Commissioner's decision because the ALJ mischaracterized plaintiff's daily activities when evaluating medical opinions and the RFC.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further administrative proceedings consistent with the opinion, including reevaluation of plaintiff's daily activities, the medical opinions, the RFC, and related allegations. The court declined to resolve plaintiff's remaining arguments, leaving them for consideration on remand.

CASES CITED

- Fast v. Barnhart, 397 F.3d 468, 470 (7th Cir. 2005)
- Clifford v. Apfel, 227 F.3d 863, 868 (7th Cir. 2000), as amended (Dec. 13, 2000)
- Elder v. Astrue, 529 F.3d 408, 413 (7th Cir. 2008)
- Roddy v. Astrue, 705 F.3d 631, 636 (7th Cir. 2013)
- Simila v. Astrue, 573 F.3d 503, 513 (7th Cir. 2009)
- Skinner v. Astrue, 478 F.3d 836, 841 (7th Cir. 2007)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Summers v. Berryhill, 864 F.3d 523, 526 (7th Cir. 2017)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Young v. Barnhart, 362 F.3d 995, 1001 (7th Cir. 2004)
- Lopez v. Barnhart, 336 F.3d 535, 539 (7th Cir. 2003)
- Scott v. Barnhart, 297 F.3d 589, 595 (7th Cir. 2002)
- Craft v. Astrue, 539 F.3d 668, 673 (7th Cir. 2008)
- Moore v. Colvin, 743 F.3d 1118, 1123 (7th Cir. 2014)
- Indoranto v. Barnhart, 374 F.3d 470, 474 (7th Cir. 2004)
- Liskovitz v. Astrue, 559 F.3d 736, 742-43 (7th Cir. 2009)
- Michelle D. v. Kijakazi, No. 21 C 1561, 2022 WL 972280, at *4 (N.D. Ill. Mar. 31, 2022)
- Taylor v. Kijakazi, No. 2:22-cv-32-PPS-JPK, 2023 WL 334601, at *3 (N.D. Ind. Jan. 20, 2023)
- Denton v. Astrue, 596 F.3d 419, 425 (7th Cir. 2010)
- Wilson v. Colvin, 48 F. Supp. 3d 1140, 1147 (N.D. Ill. 2014)
- Susan Marie R. v. Kijakazi, No. 20 C 2565, 2023 WL 1992182, at *5 (N.D. Ill. Feb. 14, 2023)
- Reinaas v. Saul, 953 F.3d 461, 467 (7th Cir. 2020)

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