

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Anthony G. v. Frank Bisignano, Social Security Administration

Anthony G. · No. 8:25-cv-01841-JMC · Decided February 20, 2026

SUMMARY

The United States District Court for the District of Maryland reviews the denial of Anthony Gray’s claims for disability insurance benefits and supplemental security income. The court holds that the Administrative Law Judge’s residual functional capacity analysis, particularly the two-hour limitation on concentration, persistence, and pace, lacks an adequate logical explanation supported by substantial evidence. The court reverses and remands the Social Security Administration’s decision under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	J. Mark Coulson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	February 20, 2026
DOCKET	8:25-cv-01841-JMC
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Social Security Administration's final decision denying disability insurance benefits and supplemental security income benefits.
STANDARD OF REVIEW	The court must uphold the agency decision if it is supported by substantial evidence and reached through application of the proper legal standard. The court may not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for that of the ALJ.
PRECEDENTIAL VALUE	Unknown; letter memorandum opinion and order from a federal district court with no reporter citation.
PARTIES	Anthony G. v. Frank Bisignano, Social Security Administration

TOPICS

- judicial review of agency action
- administrative law
- civil procedure

PRACTICE AREAS

Social Security

Administrative Law

Disability Benefits

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity determination was supported by substantial evidence and adequately explained.
2. Whether the ALJ adequately connected the evidence of moderate limitations in concentration, persistence, and pace to the RFC limitation permitting Plaintiff to concentrate, persist, and maintain pace for two hours at a time.

HOLDINGS

1. The ALJ's RFC determination was not supported by substantial evidence because the decision did not provide a sufficient narrative explanation connecting the evidence to its conclusions.
2. The ALJ failed to explain how the evidence supporting moderate limitations in concentration, persistence, and pace translated into the specific finding that Plaintiff could maintain concentration, persistence, and pace for two hours at a time.

KEY QUOTATIONS

"The Court reviews an ALJ's decision to ensure that the ALJ's findings are supported by substantial evidence and were reached through an application of correct legal standards." (at 3)

"A proper RFC analysis proceeds in the following order: (1) evidence, logical explanation, and conclusion." (at 7)

"Based on the analysis provided, it is unclear how two hours, rather than any other selection, would address Plaintiff's CPP limitations." (at 8)

"Plaintiff correctly avers that the RFC determination here 'is a naked conclusion, devoid of analysis.'" (at 8)

FACTUAL BACKGROUND

Anthony Gray alleged disability based on physical and mental impairments including Wolff-Parkinson-White syndrome, atrial fibrillation, nonepileptic seizures, chronic kidney disease, diabetes, obesity, anxiety, affective disorder, and PTSD. The ALJ determined that Gray had the residual functional capacity for a restricted range of light work, including an ability to concentrate, persist, and maintain pace for two hours at a time. The district court found that the ALJ did not adequately explain how the evidence supported the specific two-hour concentration, persistence, and pace limitation.

PROCEDURAL HISTORY

Plaintiff filed applications for DIB and SSI, which the SSA initially denied and later affirmed upon reconsideration. After a telephonic hearing, the ALJ denied the claims, and the Appeals Council declined review,

making the ALJ's decision final. The district court reviewed the administrative record and the parties' dispositive filings and reversed and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The SSA judgment is reversed and remanded under sentence four of 42 U.S.C. § 405(g) for further proceedings consistent with the opinion, including an adequate explanation of Plaintiff's RFC and the relationship between the evidence and the limitation concerning concentration, persistence, and pace. The Clerk was directed to close the case.

CASES CITED

- Mastro v. Apfel, 270 F.3d 171, 176 (4th Cir. 2001)
- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Mascio v. Colvin, 780 F.3d 632, 634-36, 638 (4th Cir. 2015)
- Lewis v. Berryhill, 858 F.3d 858, 862 (4th Cir. 2017)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Johnson v. Barnhart, 434 F.3d 650, 653 (4th Cir. 2005)
- Rodney M. v. Kijakazi, No. CV 23-0947-CDA, 2024 WL 1097192, at *3 (D. Md. Mar. 13, 2024)
- Thomas v. Berryhill, 916 F.3d 307, 311 (4th Cir. 2019)
- Monroe v. Colvin, 826 F.3d 176, 188-89 (4th Cir. 2016)
- Dowling v. Commissioner of Social Security Administration, 986 F.3d 377, 387-88 (4th Cir. 2021)
- Lail v. Kijakazi, No. 21-2133, 2022 WL 1711809, at *1 (4th Cir. May 27, 2022)
- Delesline-Meggett v. Commissioner of Social Security, No. 21-1859, 2023 WL 8230802, at *1 (4th Cir. Nov. 28, 2023)
- Woods v. Berryhill, 888 F.3d 686, 694 (4th Cir. 2018)
- John A. v. O'Malley, Civil No. 23-905-CDA, 2024 WL 1465925, at *3-4 (D. Md. Apr. 4, 2024)
- Lee v. Berryhill, Civil No. TMD 15-3307, 2017 WL 3007068, at *8 (D. Md. July 14, 2017)
- Lobbes v. Colvin, No. 4:13-cv-RLY-WGH, 2014 WL 1607617, at *20 (S.D. Ind. Apr. 22, 2014)

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