

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS

Philip K. v. Frank Bisignano, Commissioner of Social Security

Philip K. · No. 25 C 2339 · Decided December 23, 2025

SUMMARY

The United States District Court for the Northern District of Illinois denied Philip K.'s motion to reverse and remand the Commissioner's decision denying disability benefits and granted the Commissioner's motion for summary judgment. The court held that the ALJ's residual functional capacity assessment, evaluation of medical opinions, and assessment of the claimant's subjective statements were supported by substantial evidence and were not patently wrong. The decision was entered by Magistrate Judge Gabriel A. Fuentes on December 23, 2025.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois
WRITING FOR THE COURT	Gabriel A. Fuentes
JURISDICTION	United States District Court for the Northern District of Illinois
DECIDED	December 23, 2025
DOCKET	25 C 2339
DISPOSITION	affirmed
PROCEDURAL POSTURE	Social Security claimant sought judicial review of an administrative decision denying disability benefits. The parties proceeded before a United States magistrate judge by consent. Plaintiff moved to reverse and remand, and Defendant moved for summary judgment affirming the Commissioner's decision.
STANDARD OF REVIEW	The court affirmed if the ALJ's decision was supported by substantial evidence, defined as such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. The court would not reweigh evidence, make credibility determinations, or substitute its judgment for the ALJ's. The ALJ's evaluation of subjective symptoms would be overturned only if patently wrong, meaning the decision lacked any explanation or support.
PRECEDENTIAL VALUE	Unknown; district-court memorandum opinion and order

TOPICS

judicial review of agency action

administrative law

ada / disability

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's residual functional capacity assessment, including the limitation against overhead work without additional reaching restrictions and the absence of mental functional limitations.
2. Whether substantial evidence supported the ALJ's evaluation of the persuasiveness of the medical opinions from Dr. Hermes, APRN Suzette Chevere, and therapist Simone Gillen.
3. Whether the ALJ adequately evaluated Plaintiff's subjective statements concerning the intensity, persistence, and limiting effects of his symptoms.

HOLDINGS

1. The ALJ's residual functional capacity assessment was supported by substantial evidence because the record supported limitations on pushing, pulling, and overhead reaching but did not identify additional evidence-based restrictions on reaching in other directions or functional limitations from Plaintiff's nonsevere mental impairments.
2. The ALJ's evaluation of the medical opinions was supported by substantial evidence. Any inconsistency in the treatment of Dr. Hermes's opinion was harmless because the ALJ incorporated its relevant limitations into the RFC, and the ALJ adequately explained why the opinions of APRN Suzette Chevere and therapist Simone Gillen were unpersuasive or inconsistent with the record.
3. The ALJ's evaluation of Plaintiff's subjective statements was not patently wrong because the ALJ discussed the relevant evidence, including treatment history, symptom improvement, daily activities, and inconsistencies between Plaintiff's allegations and the longitudinal record.
4. The court's decision satisfied the applicable minimal articulation requirement because it provided enough information for the parties to follow the material reasoning supporting the judgment.

KEY QUOTATIONS

"An ALJ's decision will be affirmed if it is supported by "substantial evidence," which means "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion."" (Section III)

"The ALJ's discussion with regard to Plaintiff's mental impairments was also not patently wrong." (Section IV.C)

FACTUAL BACKGROUND

Plaintiff alleged disability based principally on degenerative disc disease and stenosis of the cervical and lumbar spine, along with mental-health symptoms. The ALJ found severe spinal impairments but determined that Plaintiff retained the residual functional capacity for light work with restrictions on pushing, pulling, overhead work, breaks, and occasional squatting, bending, or stooping. The record included medical examinations showing generally normal or mildly abnormal physical and mental findings, improvement with treatment, and activities including returning to work, performing a work detail, biking, walking, traveling, and managing an apartment building.

PROCEDURAL HISTORY

Plaintiff applied for disability benefits on January 20, 2022, alleging disability beginning November 17, 2020. After a hearing, the ALJ denied the applications on December 12, 2023. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court denied Plaintiff's motion to reverse and remand and granted Defendant's motion for summary judgment.

DISPOSITION

affirmed

CASES CITED

- *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019)
- *Warnell v. O'Malley*, 97 F.4th 1050, 1053-54 (7th Cir. 2024)
- *Cain v. Bisignano*, 148 F.4th 490, 496-97 (7th Cir. 2025)
- *Morales v. O'Malley*, 103 F.4th 469, 471 (7th Cir. 2024)
- *Bertaud v. O'Malley*, 88 F.4th 1242, 1244 (7th Cir. 2023)
- *Thorlton v. King*, 127 F.4th 1078, 1080-81 (7th Cir. 2025)
- *Padua v. Bisignano*, 145 F.4th 784, 791-92 (7th Cir. 2025)
- *Rabdeau v. Bisignano*, 155 F.4th 908, 913 (7th Cir. 2025)
- *Reynolds v. Kijakazi*, 25 F.4th 470, 473 (7th Cir. 2022)
- *Chrisman on behalf of N.R.C. v. Bisignano*, 137 F.4th 618, 624 (7th Cir. 2025)
- *Pufahl v. Bisignano*, 142 F.4th 446, 458 (7th Cir. 2025)