

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Martha C. v. Frank Bisignano

Martha C. · No. No. 23 C 14848 · Decided January 26, 2026

SUMMARY

The United States District Court for the Northern District of Illinois reviewed the denial of Martha C.’s applications for supplemental security income and disability insurance benefits. The court held that the Administrative Law Judge adequately evaluated Plaintiff’s subjective symptoms, mental impairments, residual functional capacity, and claimed fibromyalgia under the substantial-evidence standard. The court denied Plaintiff’s request for reversal or remand and granted the Commissioner’s motion for summary judgment.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Laura K. McNally
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	January 26, 2026
DOCKET	No. 23 C 14848
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's final decision denying her applications for supplemental security income and disability insurance benefits. The parties consented to magistrate-judge jurisdiction, and the court considered Plaintiff's request for reversal or remand and Defendant's motion for summary judgment.
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, resolve debatable evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's. The ALJ's subjective-symptom determination would not be overturned unless patently wrong.

PRECEDENTIAL VALUE

Unknown; the opinion is a district-court order and the source metadata identifies its precedential status as Unknown.

PARTIES

Martha C. 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's evaluation of Plaintiff's subjective symptoms was patently wrong or unsupported by substantial evidence.
2. Whether the ALJ adequately considered Plaintiff's nonsevere anxiety and depressive disorders when determining her residual functional capacity.
3. Whether the ALJ erred in finding that Plaintiff's alleged fibromyalgia was not a medically determinable impairment and in failing to impose additional RFC limitations based on fibromyalgia-related symptoms.

HOLDINGS

1. The ALJ reasonably evaluated Plaintiff's subjective symptoms by considering them alongside objective medical evidence, treatment effectiveness, daily activities, and other record evidence; the determination was not patently wrong.
2. The ALJ adequately considered Plaintiff's mental impairments and reasonably omitted mental limitations from the RFC because the impairments caused no more than minimal functional limitation and the record contained no supported mental workplace limitations.
3. The ALJ did not err in finding that Plaintiff's alleged fibromyalgia was not a medically determinable impairment because the record did not establish the required fibromyalgia findings or show symptoms attributable only to fibromyalgia rather than other impairments.

KEY QUOTATIONS

"The Court does not "merely rubber stamp the ALJ's decision on judicial review." (R. 61)

"All we require is that ALJs provide an explanation for how the evidence leads to their conclusions that is sufficient to allow us, as a reviewing court, to assess the validity of the agency's ultimate findings and afford the appellant meaningful judicial review." (R. 61)

FACTUAL BACKGROUND

Plaintiff alleged disability based on multiple physical conditions, including heart disease, spinal degeneration, osteoarthritis, and symptoms she attributed to fibromyalgia, as well as anxiety and depression. The ALJ found several severe physical impairments, nonsevere anxiety and depressive disorders, and determined that fibromyalgia was not a medically determinable impairment because the record did not establish tender points or widespread pain distinct from symptoms attributable to other impairments. The ALJ limited Plaintiff to sedentary work with additional postural and environmental restrictions and found that she could perform her past work as an accounting clerk and collections clerk.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income and disability insurance benefits, alleging disability beginning November 14, 2016. The claims were denied initially and on reconsideration. After two administrative hearings, the ALJ issued a decision on July 17, 2019, finding Plaintiff not disabled and capable of performing past relevant work. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court denied Plaintiff's request for reversal or remand and granted Defendant's motion for summary judgment.

DISPOSITION

affirmed

CASES CITED

- Bertaud v. O'Malley, 88 F.4th 1242, 1244 (7th Cir. 2023)
- Young v. Sec'y of Health & Human Servs., 957 F.2d 386, 389 (7th Cir. 1992)
- Prill v. Kijakazi, 23 F.4th 738, 746 (7th Cir. 2022)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Warnell v. O'Malley, 97 F.4th 1050, 1053-54 (7th Cir. 2024)
- Morales v. O'Malley, 103 F.4th 469, 471 (7th Cir. 2024)
- Chavez v. O'Malley, 96 F.4th 1016, 1021 (7th Cir. 2024)
- Deborah M. v. Saul, 994 F.3d 785, 789 (7th Cir. 2021)
- Schrank v. Saul, 843 F. App'x 786, 789 (7th Cir. 2021)
- Gedatus v. Saul, 994 F.3d 893, 905 (7th Cir. 2021)
- Zellweger v. Saul, 984 F.3d 1251, 1252 (7th Cir. 2021)
- Swiecichowski v. Dudek, 133 F.4th 751, 757 (7th Cir. 2025)
- Wilder v. Kijakazi, 22 F.4th 644, 653 (7th Cir. 2022)