

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Mercedes U. v. Commissioner of Social Security

Mercedes U. · No. 24-cv-2656-RJD · Decided March 16, 2026

SUMMARY

The United States District Court for the Southern District of Illinois reviews the denial of Mercedes U.'s applications for Disability Insurance Benefits and Supplemental Security Income. The court concludes that the administrative law judge did not adequately explain or incorporate limitations concerning social interaction and adaptation into the residual functional capacity assessment, and that the treatment of the state-agency psychological opinions was insufficiently supported. The court therefore finds that remand is warranted.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Reona J. Daly
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 16, 2026
DOCKET	24-cv-2656-RJD
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying her applications for Disability Insurance Benefits and Supplemental Security Income. The district court reversed and remanded for rehearing.
STANDARD OF REVIEW	The court reviewed whether the ALJ's findings were supported by substantial evidence and whether the ALJ applied the correct legal standards. It did not reweigh evidence, resolve evidentiary conflicts, assess credibility independently, or substitute its judgment for the ALJ's.
PRECEDENTIAL VALUE	Unknown
PARTIES	Mercedes U. v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately incorporated Plaintiff's mental-health limitations concerning social interaction and adaptation into the RFC and vocational hypothetical.
2. Whether the ALJ adequately explained his rejection of the state-agency psychological consultants' opinions that Plaintiff required limited sustained public interaction and reasonable support to adapt to workplace changes.
3. Whether the ALJ adequately accounted for moderate limitations in concentration, persistence, and pace, including the consultants' opinion that Plaintiff required simple, direct supervision for routine work tasks.

HOLDINGS

1. The ALJ failed to adequately incorporate the state-agency consultants' limitations concerning limited sustained interaction with the public and reasonable support for adapting to workplace changes, and failed to adequately explain rejecting those limitations.
2. The ALJ erred by limiting Plaintiff to simple instructions without adequately incorporating or explaining the rejection of the consultants' opinion that she required simple, direct supervision for routine work tasks.

KEY QUOTATIONS

“Accordingly, the ALJ failed to build a logical breach between the record and his decision to reject the state consultant’s more severe limitations in Plaintiff’s capacity for social interaction and adaptivity to work changes.” (16)

“Accordingly, the ALJ erred in failing either to adequately support his rejection of the opined limitation or to adequately incorporate it into the RFC and the hypothetical presented to the vocational expert.” (20)

“The Commissioner’s final decision denying Plaintiff’s application for disability insurance benefits and supplemental security income is REVERSED and REMANDED to the Commissioner for rehearing and consideration of the evidence, pursuant to sentence four of 42 U.S.C. § 405(g).” (21)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning in April 2022 based on a left ankle fracture, back pain, bipolar disorder, anxiety, panic attacks, and related mental-health symptoms. The ALJ found moderate limitations in understanding, remembering, or applying information; interacting with others; concentrating, persisting, or maintaining pace; and adapting or managing herself, but limited her RFC primarily to simple instructions, occasional public interaction, and occasional changes in a routine work setting. State-agency psychological

consultants also opined that Plaintiff needed simple, direct supervision for routine work tasks, limited sustained public contact, and reasonable support to adapt to workplace changes. The district court concluded that the ALJ failed either to incorporate those limitations or adequately explain their rejection.

PROCEDURAL HISTORY

Plaintiff protectively filed applications for DIB and SSI on May 18, 2022. After a video hearing on April 22, 2024, the ALJ issued an unfavorable decision on June 1, 2024. The Appeals Council denied review in October 2024, making the ALJ's decision final. The district court found errors in the ALJ's treatment of mental-health limitations in the RFC and vocational hypothetical and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct a rehearing and reconsider the evidence under sentence four of 42 U.S.C. § 405(g). On remand, the ALJ should reconsider the mental-health limitations concerning social interaction, adaptation, concentration, persistence, and pace, as well as the unaddressed arguments concerning headaches and the physical RFC, taking the entire record into account.

CASES CITED

- Zurawski v. Halter, 245 F.3d 881, 886 (7th Cir. 2001)
- Lopez ex rel. Lopez v. Barnhart, 336 F.3d 535, 539 (7th Cir. 2003)
- Biestek v. Berryhill, 587 U.S. 97, 139 S. Ct. 1148, 1154, 203 L. Ed. 2d 504 (2019)
- Burmester v. Berryhill, 920 F.3d 507, 510 (7th Cir. 2019)
- Parker v. Astrue, 597 F.3d 920, 921 (7th Cir. 2010), as amended on reh'g in part (May 12, 2010)
- Weber v. Kijakazi, No. 20-2990, 2021 WL 3671235, at *5 (7th Cir. Aug. 19, 2021)
- Clifford v. Apfel, 227 F.3d 863, 872 (7th Cir. 2000), as amended (Dec. 13, 2000)
- Pepper v. Colvin, 712 F.3d 351, 367 (7th Cir. 2013)
- Reynolds v. Kijakazi, 25 F.4th 470, 473 (7th Cir. 2022)
- Grotts v. Kijakazi, 27 F.4th 1273, 1276 (7th Cir. 2022)
- Douglas H. v. Bisignano, No. 24-CV-03364, 2025 WL 2483398, at *3 (N.D. Ill. Aug. 28, 2025)
- Bruno v. Saul, 817 F. App'x 238, 241-42 (7th Cir. 2020)
- Crump v. Saul, 932 F.3d 567, 570 (7th Cir. 2019)
- Martin v. Saul, 950 F.3d 369, 373-74 (7th Cir. 2020)
- Recha v. Saul, 843 F. App'x 1, 3-5 (7th Cir. 2021)
- Lockett v. Saul, 834 F. App'x 236 (7th Cir. 2020)
- Dudley v. Berryhill, 773 F. App'x 838 (7th Cir. 2019)
- Simons v. Saul, 817 F. App'x 227 (7th Cir. 2020)

- Varga v. Colvin, 794 F.3d 809, 813 (7th Cir. 2015)
- Smithee v. Social Security Administration, No. 3:17-CV-175-BD, 2018 WL 3132603, at *1 (E.D. Ark. June 26, 2018)
- Smith v. Commissioner, SSA, No. 4:18-CV-274, 2019 WL 4564832, at *2 (E.D. Tex. Sept. 20, 2019)
- Elaina R. v. Kijakazi, No. 6:21-CV-1683-SI, 2023 WL 6213295, at *3 (D. Or. Sept. 25, 2023)
- Mary W. v. Bisignano, No. 25 C 4427, 2026 WL 252560, at *2 (N.D. Ill. Jan. 30, 2026)

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