

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Derek M. v. Frank Bisignano, Commissioner, Social Security Administration

Derek M. · No. Civil No. 24-3520-DRM · Decided March 18, 2026

SUMMARY

The United States District Court for the District of Maryland reviews the Social Security Administration’s denial of Derek M.’s claim for Disability Insurance Benefits. The court reverses the Commissioner’s decision and remands for further proceedings because the residual functional capacity limitation concerning high-quota production-rate work was inadequately defined, preventing meaningful judicial review and assessment of the vocational expert’s testimony.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Douglas R. Miller
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 18, 2026
DOCKET	Civil No. 24-3520-DRM
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 Disability Insurance Benefits.
STANDARD OF REVIEW	The court reviews whether the ALJ's factual findings are supported by substantial evidence and whether the ALJ applied the correct legal standards. Substantial evidence is more than a mere scintilla and is evidence that a reasoning mind would accept as sufficient to support the conclusion.
PRECEDENTIAL VALUE	Unknown; memorandum opinion from a federal district court
PARTIES	Derek M. v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

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PRACTICE AREAS

Social Security

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QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the evidentiary basis for the RFC limitation barring high-quota production-rate-pace jobs requiring strict hourly quotas.
2. Whether the undefined production-rate-pace limitation permitted meaningful judicial review and provided an adequate basis for the vocational expert's testimony.

HOLDINGS

1. The ALJ's decision was not supported by substantial evidence because the limitation against high-quota production-rate-pace jobs requiring strict hourly quotas was not clearly defined or adequately connected to the evidence.
2. An agency decision must state its conclusions in terms that permit the reviewing court to understand and evaluate the evidentiary basis for those conclusions.

KEY QUOTATIONS

“With “production rate” and “demand pace” left undefined, the court concluded that it was “difficult, if not impossible” to determine whether the RFC finding was supported by substantial evidence.” (4)

“Without any clear definition of “high quota production rate pace jobs where workers must meet strict, hourly quotas,” it is not possible for the Court to discern whether the RFC determination was supported by substantial evidence, nor whether it was possible for the VE to know whether a person with this limitation could perform the job functions of a postage machine operator, price marker, or routing clerk.” (5)

FACTUAL BACKGROUND

Plaintiff alleged disability based on impairments including traumatic brain injury with balance problems, migraine headaches and light sensitivity, spinal disorders, obsessive-compulsive disorder, and anxiety disorder. The ALJ found that Plaintiff could perform light work with several restrictions, including a limitation against high-quota production-rate-pace jobs requiring strict hourly quotas. The ALJ determined that Plaintiff could not perform his past work but could perform other jobs, including postage machine operator, price marker, and routing clerk.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits, and the claim was denied initially and on reconsideration. After a hearing, the ALJ determined that Plaintiff was not disabled, and the Appeals Council denied review. On

judicial review, the district court found that the ALJ inadequately explained an RFC limitation concerning high-quota production-rate work, reversed the Commissioner's decision, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded for further proceedings and further explanation of the RFC limitation concerning high-quota production-rate jobs requiring strict hourly quotas. The ALJ must clarify the intended scope of the limitation and its evidentiary basis sufficiently to permit meaningful judicial review and evaluation of the vocational expert's testimony.

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- Kiser v. Saul, 821 F. App'x 211, 212 (4th Cir. 2020)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Coffman v. Bowen, 829 F.2d 514, 517 (4th Cir. 1987)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Sterling Smokeless Coal Co. v. Akers, 131 F.3d 438, 439-40 (4th Cir. 1997)
- DeLoatche v. Heckler, 715 F.2d 148, 150 (4th Cir. 1983)
- Trena Sue Y. v. Kijakazi, No. DLB-20-1075, 2021 WL 4034264, at *2, *4 (D. Md. Sept. 3, 2021)
- Biestek v. Berryhill, 587 U.S. 97, 102 (2019)
- Thomas v. Berryhill, 916 F.3d 307, 312 & n.5 (4th Cir. 2019), as amended (Feb. 22, 2019)
- Linger v. Commissioner of Social Security, No. 22-2192, 2025 WL 40548, at *5 (4th Cir. Jan. 7, 2025)
- Perry v. Berryhill, 765 F. App'x 869, 872 (4th Cir. 2019)
- Geneva W. v. Commissioner, Social Security Administration, No. SAG-18-1812, 2019 WL 3254533, at *3 (D. Md. July 19, 2019)
- Jason M. v. Bisignano, No. DRM-25-0358, 2026 WL 523879, at *4 (D. Md. Feb. 25, 2026)