

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Jonathan Steadman v. Frank J. Bisignano

Steadman · No. 1:24-CV-00305-CCW · Decided December 16, 2025

SUMMARY

The United States District Court for the Western District of Pennsylvania reviewed the denial of Jonathan Steadman’s application for supplemental security income. The court held that the administrative law judge did not sufficiently explain the treatment of consultative examiner Dr. Spinks’ opinions concerning limitations on the claimant’s left arm, and remanded the matter for further administrative proceedings under the fourth sentence of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Christy Criswell Wiegand
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	December 16, 2025
DOCKET	1:24-CV-00305-CCW
DISPOSITION	remanded
PROCEDURAL POSTURE	Cross motions for summary judgment in an action seeking judicial review of the Commissioner's final denial of supplemental security income benefits.
STANDARD OF REVIEW	The court reviews legal questions plenary and reviews the ALJ's factual findings for substantial evidence under 42 U.S.C. § 405(g). The ALJ's decision must sufficiently develop the record and explain the findings to permit meaningful judicial review, including indicating the evidence rejected and the reasons for rejecting it.
PRECEDENTIAL VALUE	unpublished
PARTIES	Jonathan Steadman v. Frank J. Bisignano, substituted as Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication
- ada / disability

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

summary judgment

QUESTIONS PRESENTED

1. Whether the ALJ sufficiently explained the rejection of, or failure to address, Dr. Spinks' opinions concerning Steadman's left-arm limitations when formulating the residual functional capacity.
2. Whether the ALJ's residual-functional-capacity determination and resulting vocational findings were supported by substantial evidence.

HOLDINGS

1. The ALJ's decision did not sufficiently explain why it rejected or failed to address Dr. Spinks' opinions that Steadman had limited bilateral reaching and pushing or pulling capacity, particularly because the RFC imposed right-arm restrictions but no left-arm restrictions.
2. Remand for further administrative proceedings was warranted because the ALJ's explanation of the RFC and treatment of Dr. Spinks' report was insufficient for meaningful judicial review.

KEY QUOTATIONS

“The Court agrees with Plaintiff that, in light of the ALJ’s failure to even mention the portion of Dr. Spinks’ report regarding left arm limitations, there is insufficient explanation for the ALJ’s rejection of that portion of the Spinks report and corresponding failure to include a left arm limitation in the RFC.” (R. 25)

“The ALJ’s determination that Plaintiff is capable of frequent reaching with his upper right extremity, occasional pushing/pulling with his upper right extremity, and limitless use of his upper left extremity is at odds with Dr. Spinks’ opinion that Plaintiff is capable of only occasional reaching or pushing/pulling with either his right or left upper extremity.” (R. 25)

FACTUAL BACKGROUND

Steadman applied for supplemental security income based on alleged disability and was found by the ALJ to have numerous severe impairments, including degenerative disc disease, right shoulder impingement syndrome, left-knee osteoarthritis, mental impairments, asthma, diabetes, and obesity. The ALJ found that Steadman could perform light work with limitations affecting his right upper extremity but imposed no limitations on use of his left arm. A consultative examiner, Dr. Spinks, had opined that Steadman had only occasional reaching and pushing or pulling capacity in both upper extremities.

PROCEDURAL HISTORY

Steadman applied for SSI benefits, alleging disability beginning June 2, 2022. After the application was denied initially, an ALJ held a telephonic hearing and found Steadman not disabled on January 31, 2024; the Appeals Council denied review. Steadman then sought review in the district court, which denied the Commissioner's motion for summary judgment, granted Steadman's motion insofar as he sought remand, and remanded for further administrative proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The Commissioner must remand the matter to the ALJ for further proceedings consistent with the opinion, including supplementing the discussion of Dr. Spinks' report and explaining the reasons for excluding left-arm limitations from the RFC. The ALJ may also reconsider and explain any perceived conflict between the vocational-expert testimony and the Dictionary of Occupational Titles.

CASES CITED

- *Schaudeck v. Commissioner of Social Security*, 181 F.3d 429, 431 (3d Cir. 1999)
- *Biestek v. Berryhill*, 587 U.S. 97, 99, 103 (2019)
- *Consolidated Edison Co. v. NLRB*, 305 U.S. 197, 229 (1938)
- *Rutherford v. Barnhart*, 399 F.3d 546, 552 (3d Cir. 2005)
- *Hartranft v. Apfel*, 181 F.3d 358, 360 (3d Cir. 1999)
- *Jones v. Barnhart*, 364 F.3d 501, 505 (3d Cir. 2004)
- *Cotter v. Harris*, 642 F.2d 700, 705 (3d Cir. 1981)
- *Gamret v. Colvin*, 994 F. Supp. 2d 695, 698 (W.D. Pa. 2014)
- *Bryan v. Commissioner of Social Security*, 383 F. App'x 140, 144 (3d Cir. 2010)
- *Salles v. Commissioner of Social Security*, 229 F. App'x 140, 147 (3d Cir. 2007)
- *Smith v. Commissioner of Social Security*, 631 F.3d 632, 634 (3d Cir. 2010)
- *Horodenski v. Commissioner of Social Security*, 215 F. App'x 183, 188-89 (3d Cir. 2007)
- *Atlantic Limousine, Inc. v. NLRB*, 243 F.3d 711, 718 (3d Cir. 2001)
- *Burnett v. Commissioner of Social Security Administration*, 220 F.3d 112, 121 (3d Cir. 2000)
- *Gober v. Matthews*, 574 F.2d 772, 777 (3d Cir. 1978)