

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Jimmy Friese v. Frank Bisignano

No. 2:25-CV-00701-CCW, United States District Court for the Western District of Pennsylvania (February 27, 2026)

SUMMARY

The United States District Court for the Western District of Pennsylvania reviews an ALJ's denial of Jimmy Friese's applications for disability insurance benefits and supplemental security income. The Court denies the Commissioner's motion for summary judgment and grants Friese's motion insofar as he seeks remand, concluding that the ALJ inadequately explained the rejection of medical opinions concerning Friese's ability to perform detailed tasks and interact socially. The matter is remanded for further administrative proceedings under sentence four 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	February 27, 2026
DOCKET	2:25-CV-00701-CCW
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of disability insurance benefits and supplemental security income. The parties filed cross-motions for summary judgment.
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 contain sufficient development and explanation to permit meaningful judicial review and must build an accurate and logical bridge between the evidence and the result.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Jimmy Friese v. Frank Bisignano

TOPICS

judicial review of agency action

administrative law

summary judgment

civil procedure

ada / disability

PRACTICE AREAS

Social Security disability benefits

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ was required to explicitly compare the consistency of each medical opinion with every other medical opinion in the record.
2. Whether substantial evidence supported the ALJ's rejection of the opinions of Drs. Brelsford and Williams concerning Plaintiff's limitation to one- to two-step tasks.
3. Whether substantial evidence supported the ALJ's rejection of the opinions of Drs. Chiodo and Berger concerning Plaintiff's social limitations.
4. Whether the ALJ should provide supplemental explanation for differing RFC limitations concerning interaction with the public, coworkers, and supervisors.

HOLDINGS

1. The ALJ must explicitly address a medical opinion's consistency with the other evidence in the record, but need not explicitly compare that opinion with every other medical opinion.
2. The ALJ's rejection of the opinions limiting Plaintiff to one- to two-step tasks was not supported by substantial evidence because the cited daily activities did not demonstrate an ability to carry out detailed instructions.
3. The ALJ's rejection of the opinions of Drs. Chiodo and Berger concerning Plaintiff's social limitations was not supported by substantial evidence.

KEY QUOTATIONS

“The Court thus finds that the ALJ’s rejection of the opinions of Dr. Chiodo and Dr. Berger regarding Plaintiff’s social limitations was not supported by substantial evidence.”

“The ALJ’s reported activities of daily living do not, therefore, indicate that Plaintiff can carry out multi-step instructions.”

“Accordingly, the ALJ’s decision to discount the opinion of Dr. Brelsford and Dr. Williams regarding Plaintiff’s limitation to one to two step tasks was not supported by substantial evidence.”

FACTUAL BACKGROUND

Plaintiff alleged disability beginning January 17, 2022, based primarily on mental impairments including bipolar disorder, depression, anxiety disorder, and ADHD. The ALJ found that Plaintiff could perform work at all exertional levels with non-exertional limitations, including the ability to understand, retain, and carry out simple and detailed instructions and specified restrictions on social interaction. In reaching that RFC, the ALJ

discounted medical opinions concerning Plaintiff's ability to perform one- to two-step tasks and his social limitations based in part on his reported daily activities and treatment records.

PROCEDURAL HISTORY

Plaintiff applied for DIB and SSI, was denied initially, and received a telephonic hearing before an ALJ. The ALJ found Plaintiff not disabled on January 30, 2025, and the Appeals Council denied review, making the ALJ's decision the final agency determination. The district court denied Defendant's motion for summary judgment, granted Plaintiff's motion insofar as it sought remand, and remanded for further administrative proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

On remand, the ALJ must reexamine the opinions of Drs. Brelsford and Williams concerning Plaintiff's limitation to one- to two-step tasks and explain how, if at all, Plaintiff's daily activities demonstrate an ability to carry out detailed instructions. The ALJ must also reexamine the opinions of Drs. Chiodo and Berger concerning Plaintiff's social limitations. The ALJ may also consider whether supplemental explanation is warranted for differing limitations concerning interaction with the public, coworkers, and supervisors.

CASES CITED

- Frontier Dev. LLC v. Craig Test Boring Co., No. 16-778, 2017 WL 4082676, at *3 (D.N.J. Sept. 15, 2017)
- Schauddeck 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)
- Edwards v. Berryhill, No. CV 16-475, 2017 WL 1344436, at *1 (W.D. Pa. Apr. 12, 2017)
- 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)
- Graham v. Kijakazi, No. 21-CV-1334, 2022 WL 10514312, at *3 (W.D. Pa. Oct. 18, 2022)
- Alhabash v. Commissioner of Social Security, No. 23-CV-310, 2024 WL 4729505, at *1 n.1 (W.D. Pa. Nov. 8, 2024)
- Abiodun O. v. Bisignano, No. 25-CV-3585, 2026 WL 114261, at *7 (E.D. Pa. Jan. 15, 2026)

- Carpentertown Coal & Coke Co. v. Director, Office of Workers' Compensation Programs, United States Department of Labor, No. 20-3617, 2023 WL 21464, at *2 (3d Cir. Jan. 3, 2023)
- Nicholas B. v. O'Malley, No. 3:24-CV-00169-CRS, 2025 WL 597085, at *5 (W.D. Ky. Feb. 7, 2025)
- Wozniak v. Berryhill, No. CV 16-139, 2017 WL 930791, at *4 (W.D. Pa. Mar. 9, 2017)
- Killiebrew v. Commissioner of Social Security Administration, No. 21-cv-8975, 2023 WL 2674768, at *6 (D.N.J. Mar. 29, 2023)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-western-district-of-pen/2026/jimmy-friese-v-frank-bisignano-b9g2j2hj>