

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

Marianita M. v. Frank Bisignano, Commissioner of Social Security

Marianita M. · No. No. 24 CV 7695 · Decided February 19, 2026

SUMMARY

The United States District Court for the Northern District of Illinois reviewed the denial of Marianita M.’s application for disabled widow’s benefits and supplemental security income. The court held that the administrative law judge’s evaluation of her physical and mental impairments, residual functional capacity, and subjective symptom allegations was supported by substantial evidence. Plaintiff’s motion for summary judgment was denied, the Commissioner’s motion was granted, and the denial of benefits was affirmed.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Heather K. McShain
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	February 19, 2026
DOCKET	No. 24 CV 7695
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner of Social Security's denial of disabled widow's benefits and supplemental security income; the parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews the ALJ's decision deferentially to determine whether it is supported by substantial evidence. The court may not reweigh evidence, resolve debatable evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's so long as substantial evidence supports the decision. An ALJ's subjective-symptom evaluation is overturned only if patently wrong.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive value only.

TOPICS

judicial review of agency action

administrative law

agency adjudication

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's determination that plaintiff could perform restricted light work.
2. Whether the ALJ's evaluation of plaintiff's subjective symptom allegations was patently erroneous.
3. Whether the ALJ built a logical bridge from the evidence to the determination that plaintiff could perform simple work despite a moderate limitation in concentration, persistence, or pace.
4. Whether the ALJ adequately considered the combined effects of plaintiff's physical and mental impairments in assessing residual functional capacity.

HOLDINGS

1. The ALJ's determination that plaintiff's subjective symptom allegations were not fully credible was not patently erroneous and was supported by substantial evidence.
2. The ALJ's determination that plaintiff could perform simple work despite a moderate limitation in concentration, persistence, or pace was supported by substantial evidence.
3. The ALJ was not required to discuss every piece of evidence or include additional RFC restrictions where the decision demonstrated consideration of the relevant subject matter and plaintiff did not identify evidence requiring greater limitations.

KEY QUOTATIONS

"Substantial evidence is "not a high threshold: it means only 'such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.'"" (at 2)

"When reviewing a disability decision for substantial evidence, we will not reweigh the evidence, resolve debatable evidentiary conflicts, determine credibility, or substitute our judgment for the ALJ's determination so long as substantial evidence supports it." (at 2)

"The Court will overturn an ALJ's evaluation of a claimant's subjective symptom allegations only if it is patently wrong." (at 3)

"The RFC assessment must include a narrative discussion describing how the evidence supports each conclusion, citing specific medical facts (e.g., laboratory findings) and nonmedical evidence (e.g., daily activities, observations)." (at 7)

FACTUAL BACKGROUND

Plaintiff applied for disabled widow's benefits and supplemental security income based on an alleged onset date of December 10, 2021. The ALJ found severe physical and mental impairments, including bipolar disorder or depression, anxiety, ADHD, lumbar degenerative disc disease, asthma, and left-ankle conditions, but determined that plaintiff retained the residual functional capacity for restricted light work and simple tasks. The ALJ relied on largely unremarkable objective findings, conservative treatment, daily activities, and state-agency psychological and medical opinions. The district court concluded that substantial evidence supported the ALJ's findings.

PROCEDURAL HISTORY

The Commissioner denied plaintiff's application initially, on reconsideration, and after an administrative law judge hearing. The Appeals Council denied review in August 2024, making the ALJ's decision the Commissioner's final decision. Plaintiff appealed under 42 U.S.C. § 405(g). The court denied plaintiff's motion for summary judgment, granted the Commissioner's motion, and affirmed the denial of benefits.

DISPOSITION

affirmed

CASES CITED

- Karr v. Saul, 989 F.3d 508, 511 (7th Cir. 2021)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Warnell v. O'Malley, 97 F.4th 1050, 1052-54 (7th Cir. 2024)
- Alejandro D. v. O'Malley, No. 21 CV 5250, 2024 WL 4465475, at *5 (N.D. Ill. Oct. 10, 2024)
- Halsell v. Astrue, 357 F. App'x 717, 722 (7th Cir. 2009)
- Zayda Z. v. Bisignano, No. 23 CV 2590, 2025 WL 2624869, at *3 (N.D. Ill. Sept. 11, 2025)
- Renee E. v. Kijakazi, No. 19 CV 7840, 2022 WL 3576662, at *12 (N.D. Ill. Aug. 19, 2022)
- Brian J. v. Saul, 438 F. Supp. 3d 903, 909-10 (N.D. Ill. 2020)
- Gedatus v. Saul, 994 F.3d 893, 903-04 (7th Cir. 2021)
- Burmester v. Berryhill, 920 F.3d 507, 511 (7th Cir. 2019)
- Jennifer M. v. Bisignano, No. 23 CV 2219, 2025 WL 2463059, at *2 (N.D. Ill. Aug. 26, 2025)
- Pavlicek v. Saul, 994 F.3d 777, 783 (7th Cir. 2021)
- Lisa G. v. O'Malley, No. 21 CV 5660, 2024 WL 4590745, at *7 (N.D. Ill. Oct. 28, 2024)
- Marshall L. v. Dudek, 2025 WL 4069855, at *1 (C.D. Ill. Aug. 11, 2025)
- Patricia N. v. O'Malley, Case No. 20-cv-50388, 2024 WL 366466, at *4 (N.D. Ill. Jan. 3, 2024)
- Acera B. v. Saul, No. 20-cv-1674, 2021 WL 2222605, at *9 (N.D. Ill. June 2, 2021)
- Jane Y. v. O'Malley, No. 23 C 1814, 2024 WL 689993, at *7 (N.D. Ill. Feb. 20, 2024)

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