

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, RICHMOND DIVISION

Debora D. v. Frank Bisignano, Commissioner of Social Security

Civil No. 3:24-cv-766 (SLS) (E.D. Va. Mar. 30, 2026) · No. Civil No. 3:24-cv-766 (SLS) · Decided March 30, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia reviewed a pro se claimant’s challenge to the denial of Title II disability insurance benefits. The court held that the Administrative Law Judge properly evaluated the medical opinion evidence and step-four past relevant work analysis, and that substantial evidence supported the decision. The court declined to consider new medical evidence submitted after the administrative decision, denied the claimant’s motion for summary judgment, granted the Commissioner’s motion, and affirmed the denial of benefits.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Richmond Division
WRITING FOR THE COURT	Summer L. Speight
JURISDICTION	United States District Court for the Eastern District of Virginia, Richmond Division
DECIDED	March 30, 2026
DOCKET	Civil No. 3:24-cv-766 (SLS)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Social Security claimant sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits. The parties filed cross-motions for summary judgment, and the action proceeded before a United States magistrate judge by consent under 28 U.S.C. § 636(c)(1).
STANDARD OF REVIEW	The court determines whether the ALJ applied correct legal standards and whether the factual findings are supported by substantial evidence. Substantial evidence is more than a scintilla but less than a preponderance and is evidence a reasonable mind could accept as adequate. The court may not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for the ALJ's.

PRECEDENTIAL VALUE	nonprecedential
PARTIES	Debora D. v. Frank Bisignano, Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security disability benefits administrative law judicial review of agency action summary judgment

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the persuasiveness of the medical opinions and prior administrative medical findings under 20 C.F.R. § 404.1520c.
2. Whether substantial evidence supported the ALJ's step-four finding that Plaintiff could perform her past relevant work as a legislative aide as generally performed.
3. Whether the district court could consider medical evidence that Plaintiff had not previously presented to the Commissioner and that postdated the decision under review.

HOLDINGS

1. The ALJ applied the correct legal standards in evaluating medical opinions and prior administrative medical findings, adequately addressed supportability and consistency, and reasonably found certain light-work opinions persuasive while finding more restrictive opinions unpersuasive.
2. Substantial evidence supported the ALJ's finding that Plaintiff could perform her past relevant work as a legislative aide as generally performed at the sedentary level.
3. The court would not consider medical evidence submitted for the first time in the district court when the evidence postdated the ALJ's decision and was not material to the disability period under review.

KEY QUOTATIONS

“In reviewing a decision to deny benefits, the Court will affirm the SSA’s “disability determination ‘when an ALJ has applied correct legal standards and the ALJ’s factual findings are supported by substantial evidence.’” (Section II)

“The two tests [in SSR 82-61] are clearly meant to be disjunctive. If the claimant is found to satisfy either test, then a finding of not disabled is appropriate.” (Section IV.B)

“For the reasons set for above, the Court will DENY Plaintiff’s Motion for Summary Judgment and Brief in Support (ECF No. 10), GRANT the Commissioner’s Motion for Summary Judgment and Brief in Support Thereof (ECF No. 12), and AFFIRM the final decision of the Commissioner.” (Section V)

FACTUAL BACKGROUND

Plaintiff alleged disability based primarily on cervical degenerative disc disease and right shoulder impairments following shoulder surgeries and a cervical discectomy and fusion. The ALJ found that Plaintiff retained the residual functional capacity for a restricted range of light work, including limited overhead reaching and frequent handling, fingering, and forward reaching with the right upper extremity. Plaintiff had previously worked as a legislative aide, an occupation classified as sedentary as generally performed in the national economy. Plaintiff submitted medical records from 2024 and 2025 that postdated the disability period and the ALJ's decision.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits alleging disability beginning October 24, 2019. The Commissioner denied the application initially and on reconsideration. After hearings before an administrative law judge, the ALJ issued an unfavorable decision on October 30, 2023, finding Plaintiff not disabled through her December 31, 2022 date last insured. The Appeals Council denied review on October 9, 2024, making the ALJ's decision the Commissioner's final decision. The district court denied Plaintiff's motion for summary judgment, granted the Commissioner's motion, affirmed the final decision, and declined to consider medical evidence postdating the ALJ's decision.

DISPOSITION

affirmed

CASES CITED

- Mascio v. Colvin, 780 F.3d 632, 634-35 (4th Cir. 2015)
- Bowen v. Yuckert, 482 U.S. 137, 146 n.5 (1987)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Dunn v. Colvin, 607 F. App'x 264, 274 (4th Cir. 2015)
- Clarke v. Bowen, 843 F.2d 271, 272-73 (8th Cir. 1988)
- Johnson v. Barnhart, 434 F.3d 650, 653 (4th Cir. 2005)
- Breeden v. Weinberger, 493 F.2d 1002, 1007 (4th Cir. 1974)
- Universal Camera Corp. v. N.L.R.B., 340 U.S. 474, 488 (1951)
- Smith v. Chater, 99 F.3d 635, 638 (4th Cir. 1996)
- Laber v. Harvey, 438 F.3d 404, 413 n.3 (4th Cir. 2006)
- Beaudett v. City of Hampton, 775 F.2d 1274, 1276, 1278 (4th Cir. 1985)
- Monroe v. Colvin, 826 F.3d 176, 189 (4th Cir. 2016)
- Pearson v. Colvin, 810 F.3d 204, 207-08 (4th Cir. 2015)
- Pass v. Chater, 65 F.3d 1200, 1207 (4th Cir. 1995)
- Babcock v. Commissioner of Social Security, No. 3:10-cv-431, 2011 WL 2899169, at *6 (E.D. Va. July 18, 2011)
- Wilkins v. Secretary, Department of Health & Human Services, 953 F.2d 93, 96 (4th Cir. 1991)

- Keith v. Astrue, No. 4:11-cv-37, 2012 WL 2425658, at *2 (W.D. Va. June 22, 2012)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-eastern-district-of-vir/2026/debora-d-v-frank-bisignano-commissioner-of-social-security-bifzco60>