

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
WISCONSIN

Renee C. Kent v. Frank J. Bisignano, Commissioner of Social  
Security

Kent · No. 25-C-326 · Decided January 7, 2026

SUMMARY

The United States District Court for the Eastern District of Wisconsin reviewed the Commissioner of Social Security’s denial of Renee C. Kent’s applications for disability benefits. The court held that the administrative law judge failed to adequately consider evidence concerning Kent’s left shoulder impairment and related functional limitations. The court reversed the Commissioner’s decision and remanded the matter for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Wisconsin                                                                                                                                                                                                                                                                                                                           |
| WRITING FOR THE COURT | William C. Griesbach                                                                                                                                                                                                                                                                                                                                                                         |
| JURISDICTION          | United States District Court for the Eastern District of Wisconsin                                                                                                                                                                                                                                                                                                                           |
| DECIDED               | January 7, 2026                                                                                                                                                                                                                                                                                                                                                                              |
| DOCKET                | 25-C-326                                                                                                                                                                                                                                                                                                                                                                                     |
| DISPOSITION           | reversed_and_remanded                                                                                                                                                                                                                                                                                                                                                                        |
| PROCEDURAL POSTURE    | Action for judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying disability benefits. The court reviewed the administrative law judge's decision and reversed and remanded for further proceedings.                                                                                                                                       |
| STANDARD OF REVIEW    | The court upholds the Commissioner's decision if the ALJ applied the correct legal standards and supported the decision with substantial evidence. The court may not reweigh evidence, resolve evidentiary conflicts, or substitute its judgment for the Commissioner's, but it must remand when the ALJ fails to build an accurate and logical bridge from the evidence to the conclusions. |
| PRECEDENTIAL VALUE    | Unknown; federal district court decision with no reporter citation appearing in the source.                                                                                                                                                                                                                                                                                                  |
| PARTIES               | Renee C. Kent v. Frank J. Bisignano, Commissioner of Social Security                                                                                                                                                                                                                                                                                                                         |

## TOPICS

judicial review of agency action

agency adjudication

administrative law

## PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

## QUESTIONS PRESENTED

1. Whether the ALJ adequately considered evidence of Plaintiff's left shoulder impairment, pain, and functional limitations in determining her residual functional capacity.
2. Whether the ALJ's residual functional capacity finding was supported by substantial evidence and adequately explained through an accurate and logical bridge from the evidence to the conclusion.

## HOLDINGS

1. The ALJ erred by failing to address all relevant evidence concerning Plaintiff's left shoulder pain, impairment, and limitations and by failing to explain whether that evidence supported additional residual functional capacity restrictions.
2. Remand was warranted because the ALJ's failure to consider and explain the left-shoulder evidence prevented meaningful judicial review of the RFC and disability determination.

## KEY QUOTATIONS

*"The Commissioner's final decision will be upheld "if the ALJ applied the correct legal standards and supported his decision with substantial evidence.""* (Legal Standard)

*"The ALJ "must build an accurate and logical bridge from the evidence to his conclusion[s].""* (Legal Standard)

*"An ALJ has the obligation to consider all relevant medical evidence and cannot simply cherry-pick facts that support a finding of non-disability while ignoring evidence that points to a disability finding." (Analysis)*

## FACTUAL BACKGROUND

Renee C. Kent alleged disability based on, among other conditions, arthritis, knee and shoulder problems, and spinal impairments. She had undergone right knee replacement and revision surgeries, lumbar fusion, and right shoulder surgery, and testified that she had significant pain and limitations in both shoulders, including difficulty raising her left arm or lifting a gallon of milk. The ALJ limited her residual functional capacity to sedentary work with restrictions involving the right upper extremity but imposed no express restrictions for the left shoulder, despite medical evidence and testimony concerning left shoulder impairment.

## PROCEDURAL HISTORY

Plaintiff applied for supplemental security income and disability insurance benefits. After a hearing, the ALJ found her not disabled, and the Appeals Council denied review. The district court previously reversed and remanded the matter for further proceedings. Following a second hearing, the ALJ again found Plaintiff not

disabled, the Appeals Council denied review, and Plaintiff returned to the district court. The court reversed and remanded because the ALJ failed to adequately consider Plaintiff's left shoulder impairment and related limitations.

## DISPOSITION

reversed\_and\_remanded

## REMAND INSTRUCTIONS

The Commissioner must reconsider Plaintiff's left shoulder impairment, related pain, and functional limitations; explain the evidentiary basis for any RFC restrictions or findings; and address Plaintiff's other asserted errors concerning right leg pain, nonexertional activities, sedentary work, and daily activities.

## CASES CITED

- Jelinek v. Astrue, 662 F.3d 805, 811 (7th Cir. 2011)
- Castile v. Astrue, 617 F.3d 923, 926 (7th Cir. 2010)
- Terry v. Astrue, 580 F.3d 471, 475 (7th Cir. 2009)
- Crowell v. Kijakazi, 72 F.4th 810, 813 (7th Cir. 2023)
- Villano v. Astrue, 556 F.3d 558, 562 (7th Cir. 2009)
- Clifford v. Apfel, 227 F.3d 863, 872 (7th Cir. 2000)
- Groves v. Apfel, 148 F.3d 809, 811 (7th Cir. 1998)
- Prochaska v. Barnhart, 454 F.3d 731, 736–37 (7th Cir. 2006)
- Estok v. Apfel, 152 F.3d 636, 638 (7th Cir. 1998)
- Steele v. Barnhart, 290 F.3d 936, 941 (7th Cir. 2002)
- SEC v. Chenery Corp., 318 U.S. 80, 93–95 (1943)
- Johnson v. Apfel, 189 F.3d 561, 564 (7th Cir. 1999)
- Sarchet v. Charter, 78 F.3d 305, 307 (7th Cir. 1996)
- Pepper v. Colvin, 712 F.3d 351, 362–63 (7th Cir. 2013)
- Thomas v. Colvin, 745 F.3d 802, 807 (7th Cir. 2014)
- Denton v. Astrue, 596 F.3d 419, 425 (7th Cir. 2010)
- Thomas v. Colvin, 826 F.3d 953, 961 (7th Cir. 2016)
- Kent v. O'Malley, No. 22-CV-1523 (E.D. Wis.)