

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
NORTH CAROLINA

Michael F. v. Frank J. Bisignano

Michael F. v. Bisignano, No. 1:25CV42 (M.D.N.C. Mar. 16, 2026) · No. 1:25CV42 · Decided March 16, 2026

SUMMARY

The United States District Court for the Middle District of North Carolina reviewed the Commissioner of Social Security’s denial of Michael F.’s application for Supplemental Security Income. The court addressed whether the Administrative Law Judge adequately explained the residual functional capacity limitation allowing sufficient social interaction during a 30-day training period. The court concluded that the ALJ’s findings were supported by substantial evidence and entered judgment for the Commissioner.

CASE DETAILS

COURT	United States District Court for the Middle District of North Carolina
WRITING FOR THE COURT	L. Patrick Auld
JURISDICTION	United States District Court for the Middle District of North Carolina
DECIDED	March 16, 2026
DOCKET	1:25CV42
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Plaintiff's claim for Supplemental Security Income.
STANDARD OF REVIEW	The court must uphold the ALJ's factual findings if supported by substantial evidence and reached through application of the correct legal standard. The court may not try the case de novo, reweigh conflicting evidence, make credibility determinations, or substitute its judgment for that of the ALJ.
PRECEDENTIAL VALUE	unpublished
PARTIES	Michael F. v. Frank J. Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication

PRACTICE AREAS

Social Security

administrative law

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the distinction between Plaintiff's social-interaction limitations during a 30-day training period and those applicable after training.
2. Whether substantial evidence supported the ALJ's residual functional capacity assessment and step-five finding that Plaintiff could perform work existing in significant numbers in the national economy.
3. Whether Plaintiff forfeited the challenge to the sufficiency of the vocational expert's testimony by failing to question the vocational expert at the hearing about the training requirements and interaction levels of the identified jobs.

HOLDINGS

1. The ALJ adequately connected the evidence of record to the finding that Plaintiff could interact sufficiently with others to complete a 30-day training period notwithstanding more restrictive social-interaction limitations on a regular and continuing basis.
2. An ALJ is not required to fashion an RFC that exactly matches an opinion in the record, and the RFC determination need not be based on a single medical opinion so long as it considers the relevant evidence and is supported by substantial evidence.
3. Plaintiff forfeited the challenge because her attorney had the opportunity to cross-examine the vocational expert but did not ask about whether the identified jobs required training, the duration of any training period, or the interaction required during training.

KEY QUOTATIONS

““courts are not to try [a Social Security] case de novo.”” (4)

““must uphold the factual findings of the ALJ if they are supported by substantial evidence and were reached through application of the correct legal standard.”” (4)

““such relevant evidence as a reasonable mind might accept as adequate to support [her] conclusion.”” (11)

FACTUAL BACKGROUND

Plaintiff applied for Supplemental Security Income on September 1, 2020, alleging disability based on mental impairments including depression, dissociative identity disorder, gender dysphoria disorder, post-traumatic stress disorder, and attention deficit hyperactivity disorder. The ALJ found that Plaintiff had moderate limitations in interacting with others and fashioned a residual functional capacity limiting Plaintiff to work near, but not in coordination with, coworkers and supervisors, with superficial public contact, while permitting sufficient interaction to complete a 30-day training period. The ALJ relied on Plaintiff's work history, including work at Subway involving extensive customer interaction, treatment records showing generally managed symptoms, and the vocational expert's identification of jobs existing in significant numbers. The district court concluded that the

ALJ adequately explained the training-period limitation and that substantial evidence supported the disability determination.

PROCEDURAL HISTORY

Plaintiff applied for SSI, and the application was denied initially and on reconsideration. After a de novo hearing, an administrative law judge found Plaintiff not disabled. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The parties submitted briefs on the certified administrative record, and the district court affirmed the Commissioner's decision and dismissed the action with prejudice.

DISPOSITION

affirmed

CASES CITED

- Hines v. Barnhart, 453 F.3d 559, 561 (4th Cir. 2006)
- Frady v. Harris, 646 F.2d 143, 144 (4th Cir. 1981)
- Oppenheim v. Finch, 495 F.2d 396, 397 (4th Cir. 1974)
- Hunter v. Sullivan, 993 F.2d 31, 34-35 (4th Cir. 1992)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Mastro v. Apfel, 270 F.3d 171, 176-80 (4th Cir. 2001)
- Craig v. Chater, 76 F.3d 585, 589 & n.1 (4th Cir. 1996)
- Hall v. Harris, 658 F.2d 260, 264-65 (4th Cir. 1981)
- Albright v. Commissioner of the Social Security Administration, 174 F.3d 473, 475 n.2 (4th Cir. 1999)
- Bennett v. Sullivan, 917 F.2d 157, 159 (4th Cir. 1990)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Jess B. v. Kijakazi, No. 2:23CV7, 2023 WL 6457322, at *9 (S.D.W. Va. Aug. 21, 2023)
- Szczepanski v. Saul, 946 F.3d 152, 155, 157 (2d Cir. 2020)
- Bowen v. Commissioner of Social Security, No. 3:25CV1142, 2026 WL 479071, at *13, *22 (N.D. Ohio Feb. 20, 2026)
- Karrissa D. v. Bisignano, No. 24CV2685, 2025 WL 2936876, at *4 (D. Minn. July 21, 2025)
- Reggie N. v. Kijakazi, No. 21CV63, 2023 WL 5277877, at *3-4 (N.D. Ill. Aug. 16, 2023)
- Leitz v. Kijakazi, No. 22-35356, 2023 WL 4342114, at *2 (9th Cir. July 5, 2023)
- Peter T.S. v. Dudek, Civ. No. 22C3984, 2025 WL 964959, at *5-7 (N.D. Ill. Mar. 31, 2025)
- Clarissa W.-J. v. O'Malley, No. 23CV729, 2024 WL 3541932, at *20 (D. Minn. July 10, 2024)
- Clampit v. Commissioner of Social Security, No. 3:22CV1561, 2023 WL 2958158, at *6 (N.D. Ohio Mar. 30, 2023)
- Slate v. Kijakazi, No. 3:21CV298, 2022 WL 1046290, at *6 (D. Nev. Apr. 6, 2022)
- Gilmore v. Kijakazi, No. 1:21CV420, 2022 WL 2869407, at *8 (M.D.N.C. July 21, 2022)

- Felton-Miller v. Astrue, 459 F. App'x 226, 230-31 (4th Cir. 2011)
- Town v. Astrue, No. 3:12CV105, 2012 WL 6150836, at *4 (N.D. Ind. Dec. 10, 2012)
- Fruit v. Colvin, No. 2:14CV7643, 2015 WL 1021309, at *22 (S.D.W. Va. Mar. 9, 2015)
- Brown v. Colvin, No. 3:14CV4237, 2015 WL 6501547, at *9 (N.D. Tex. Oct. 27, 2015)
- Wyrock v. Commissioner of Social Security Administration, No. 1:19CV1052, 2020 WL 1322846, at *3 (N.D. Ohio Mar. 20, 2020)
- Bunton v. Colvin, No. 1:10CV786, 2014 WL 639618, at *5 (M.D.N.C. Feb. 18, 2014)
- Vargas v. Saul, No. 1:19CV1858, 2020 WL 2468401, at *4, *9 (M.D. Pa. May 13, 2020)
- Littlejohn v. Kijakazi, Civ. No. 22-4678, 2023 WL 4564548, at *4 (E.D. Pa. July 17, 2023)

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