

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Jacobs v. Bisignano

Jacobs v. Bisignano · No. 4:25-cv-00182 · Decided March 20, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania adopted a magistrate judge's report and recommendation and affirmed the Commissioner's determination that the plaintiff's disability ended on April 30, 2015. The court rejected the plaintiff's objections, finding that the administrative law judge's decision was supported by substantial evidence, and directed the Clerk to enter judgment and close the case.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Joseph F. Saporito, Jr.
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 20, 2026
DOCKET	4:25-cv-00182
DISPOSITION	affirmed
PROCEDURAL POSTURE	Review of a Social Security disability cessation decision after a magistrate judge issued a report and recommendation recommending affirmance and the plaintiff filed objections.
STANDARD OF REVIEW	The district court reviewed the magistrate judge's report and recommendation for clear error under Federal Rule of Civil Procedure 72(b), and reviewed the Commissioner's decision for substantial evidence and application of the proper legal standards.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown.
PARTIES	Tana L. Jacobs v. Frank Bisignano

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly analyzed whether medical improvement had occurred.
2. Whether the ALJ properly considered medical-expert Dr. Ostrow's testimony concerning Jacobs's ability to perform light work.
3. Whether the ALJ erred in finding that Jacobs could perform detailed work.
4. Whether the ALJ erred in finding that Jacobs could perform other jobs existing in significant numbers.
5. Whether the magistrate judge's report and recommendation contained clear error warranting rejection.

HOLDINGS

1. The ALJ did not err in finding medical improvement because the ALJ conducted the required longitudinal analysis and the finding was supported by substantial evidence.
2. The ALJ did not err in finding that Jacobs was capable of performing a full range of light work because Jacobs failed to show that Dr. Ostrow's testimony conflicted with that finding.
3. The ALJ's finding that Jacobs could perform detailed work was supported by substantial evidence.
4. The ALJ did not err in finding that Jacobs could perform a significant number of available jobs because she had the mental capacity for simple, repetitive, and routine tasks.
5. The report and recommendation was adopted in its entirety because, after independent review and reasoned consideration of the objections, the court found no clear error on the face of the record.

KEY QUOTATIONS

“conducted the required longitudinal analysis and found substantial evidence of improvement.” (at 2)

“that there is no clear error on the face of the record,” (at 4)

FACTUAL BACKGROUND

The Commissioner determined that Jacobs's disability ceased on April 30, 2015. In evaluating cessation, the ALJ considered medical records, medical-expert testimony, testimony from Jacobs and her family, medical opinions, and Jacobs's daily activities from 2015 through 2022. The ALJ found medical improvement, capacity for light work and detailed work, mental capacity for simple, repetitive, and routine tasks, and the ability to perform other jobs existing in significant numbers.

PROCEDURAL HISTORY

The Commissioner determined that Jacobs's disability ended on April 30, 2015. An Administrative Law Judge made the cessation determination, and the Appeals Council denied Jacobs's exceptions. Jacobs filed this action challenging the decision as unsupported by substantial evidence. Magistrate Judge Sean A. Camoni recommended affirmance, Jacobs filed three objections, and the district court independently reviewed the report

and record, adopted the recommendation, affirmed the Commissioner's decision, and directed the Clerk to close the case.

DISPOSITION

affirmed

CASES CITED

- M.O.C. v. City of Long Branch, 866 F.3d 93, 99 (3d Cir. 2017)

OPINION

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA TANA L. JACOBS, Plaintiff, CIVIL ACTION NO. 25-CV-182 v. (SAPORITO, J.) (CAMONI, M.J.) FRANK BISIGNANO,! Defendant. ORDER Now before the court is a report and recommendation of United States Magistrate Judge Sean A. Camoni, in which he recommends that the court affirm the decision of Commissioner Bisignano declaring that the plaintiff's disability ended on April 30, 2015.

(Doc. 15). Judge Camoni's report and recommendation comes in light of the Appeals Council's decision to deny the plaintiff's Exceptions filing in response to an Administrative Law Judge's decision to find that her disability ended on April 80, 2015. (Doc. 11).

In her complaint, the plaintiff alleges that the Commissioner's decision to deny her claim is not supported by substantial evidence. (Doc. 1, ¶ 5). She timely filed her 1 Frank Bisignano became the new Social Security Commissioner as of May 7, 2025, replacing Michelle King as the defendant. complaint in this court on January 30, 2025.

The plaintiff raises four issues on appeal: (1) whether the ALJ erred in failing to properly analyze whether medical improvement occurred; (2) whether the ALJ failed to acknowledge that the medical expert, Dr. Ostrow, testified that the plaintiff was capable of less than a full range of light work; (3) whether the ALJ erred in finding that the plaintiff could perform detailed work; and (4) whether the ALJ erred in finding that the plaintiff could perform other jobs in significant numbers.

(Doc. 15, at 12) (citing (Doe. 11, at 8)). Judge Camoni analyzed each appeal individually. Judge Camoni first analyzed whether the ALJ erred in failing to properly analyze whether the plaintiff experienced medical improvement from her original disability diagnosis. He found that the ALJ did not err, explaining that the ALJ "conducted the required longitudinal analysis and found substantial evidence of improvement." (Doc.

15, at 13). Judge Camoni further found that the ALJ reviewed medical records, testimony from the plaintiff and her family, and the plaintiff's daily activities in making the decision. Therefore, Judge Camoni recommends that the court affirm the ALJ's finding as that finding is supported by

substantial evidence in the record. _9- Judge Camoni next analyzed whether the ALJ properly considered the testimony of medical expert, Dr. Ostrow.

Judge Camoni concluded, however, that the plaintiff failed to explain how Dr. Ostrow's opinion conflicted with the ALJ's finding that the plaintiff was capable of performing a full range of light work. Indeed, Judge Camoni determined that Dr. Ostrow's testimony was consistent with that finding. Judge Camoni then analyzed the plaintiff's allegation that the ALJ erred in determining that the plaintiff could perform detailed work.

Judge Camoni found that the ALJ's determination was supported by substantial evidence because he based his decision on the plaintiff's medical records, doctor's opinions, and daily activities from 2015 to 2022. Finally, Judge Camoni analyzed whether the ALJ erred in finding that the plaintiff could perform other jobs in significant numbers. Judge Camoni determined that the ALJ's decision was supported by substantial evidence in the record, finding that the plaintiff had the mental capacity for simple, repetitive, and routine tasks, and thus, could perform a significant number of available jobs.

Therefore, because Judge Camoni reasoned that the ALJ based his determinations on substantial evidence in the record and did not err in those decisions, he recommends that the court affirm the Commissioner's conclusion that the plaintiff's disability ended on April 30, 2015.

The plaintiff filed three objections to Judge Camoni's report and recommendation on March 12, 2026. (Doc. 16). But upon review, we find those objections unpersuasive. Two of the plaintiff's objections merely disagree with two of the ALJ's factual findings rather than engage with the ALJ's conclusions, and Judge Camoni's affirmations, that those determinations were supported by substantial evidence in the record.

See (Doc. 16, 1, 3). Moreover, while the third objection cites legal authority in support of that objection, the plaintiff fails to tailor that authority to the facts of this case to establish that the ALJ's finding was not supported by substantial evidence in the record. See Ud., § 2).

We conclude that following an independent review of the report and the record, and having afforded "reasoned consideration" to the uncontested and contested portions of the report, #.4.0.C. v. City of Long Branch, 866 F.3d 93, 99 (8d Cir. 2017), we are satisfied "that there is no clear error on the face of the record," Fed. R. Civ. P. 72(b) advisory committee note to 1983 amendment.

We find Judge Camoni's analysis to be well-reasoned and fully supported by the record and applicable law. -4- Accordingly, the court will adopt the report and recommendation in its entirety as the decision of the court.

Accordingly, IT IS HEREBY ORDERED THAT: 1. The report and recommendation of Judge Camoni (Doe. 15) is ADOPTED in its entirety; 2. The decision of the Commissioner declaring that

the plaintiff's disability ended on April 30, 2015, is AFFIRMED; and 3.

The Clerk of Court shall enter judgment and close this case. Dated: March 10, 2026 Mag Fo
acpercls x. SEPH F. SAPQRITO, JR. United States District Judge -5-