

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PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown.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)

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