

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Steven S. v. Frank Bisignano, Commissioner, Social Security Administration

Civil No. 1:24-cv-03001-AAQ (D. Md. Mar. 18, 2026) · No. Civil No. 1:24-cv-03001-AAQ · Decided March 19, 2026

SUMMARY

The United States District Court for the District of Maryland remands a Social Security disability case for further consideration. The court concludes that the Administrative Law Judge improperly discounted the claimant’s depressive symptoms based on objective medical findings and improperly relied on work history before and after the claimed closed period of disability.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Ajmel A. Quereshi
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 19, 2026
DOCKET	Civil No. 1:24-cv-03001-AAQ
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Social Security Administration's final decision denying disability insurance benefits and supplemental security income for a closed period. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The Court must uphold the SSA's decision if it is supported by substantial evidence and the agency employed proper legal standards.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown
PARTIES	Steven S. v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

- judicial review of agency action
- administrative law
- disability definition

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ improperly discounted the intensity, persistence, and limiting effects of Plaintiff's depressive symptoms by relying on objective medical findings.
2. Whether the ALJ improperly relied on Plaintiff's work history before and after the closed period to assess his ability to work during the closed period.

HOLDINGS

1. The ALJ committed legal error by relying on objective medical evidence, including generally normal mental-status findings, to discount Plaintiff's subjective symptoms of depression after finding that depression was a medically determinable severe impairment.
2. The ALJ improperly relied on Plaintiff's employment before and after the closed period to discount his allegations without explaining how that work demonstrated an ability to work during the closed period.

KEY QUOTATIONS

“At the second step, generally, the plaintiff is not required to produce objective evidence of the pain itself or its intensity.” (at 5)

“In closed period cases, the ALJ should consider evidence within the closed period of disability to determine whether [p]laintiff was entitled to benefits for that limited duration.” (at 7)

“such evidence must be viewed ‘with caution,’ as it should only be considered to support a finding of disability during the relevant period.” (at 7)

FACTUAL BACKGROUND

Plaintiff alleged disability during a closed period from June 19, 2013, through March 22, 2019, based primarily on schizoaffective disorder, depression, and autism. He had been psychiatrically hospitalized in May 2013 for suicidal ideation and auditory hallucinations, reported continuing difficulties with concentration, memory, depression, and hallucinations, and underwent several medication changes. The ALJ found that Plaintiff retained the residual functional capacity for a restricted range of work and relied in part on medical findings and Plaintiff's employment before and after the closed period.

PROCEDURAL HISTORY

Plaintiff filed disability claims in 2013, and the claims were denied through multiple administrative decisions, Appeals Council remands, and hearings. After the Appeals Council denied review of a 2022 ALJ decision, this Court remanded the case on October 3, 2023. Following another hearing, the ALJ again found Plaintiff not disabled for any twelve-month period from June 19, 2013, through March 22, 2019. The Court denied both parties' motions for summary judgment, vacated the SSA's decision, and remanded for further proceedings.

DISPOSITION

REMAND INSTRUCTIONS

The SSA's decision is vacated, and the case is remanded for further proceedings consistent with the opinion, including reconsideration of the evaluation of Plaintiff's depressive symptoms and the use of work history outside the closed period.

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- Arakas v. Commissioner, Social Security Administration, 983 F.3d 83 (4th Cir. 2020)
- Shelley C. v. Commissioner, Social Security Administration, 61 F.4th 341 (4th Cir. 2023)
- Walker v. Bowen, 889 F.2d 47, 49 (4th Cir. 1989)
- Lonnell J. v. Bisignano, No. 24-3673-DRM, 2026 WL 693344, at *4-5 (D. Md. Mar. 12, 2026)
- Danielle W. v. Bisignano, No. 24-3516-DRM, 2026 WL 636844, at *4 (D. Md. Mar. 6, 2026)
- Matthew E. v. Bisignano, No. 24-2166-DRM, 2025 WL 1919995, at *5 (D. Md. July 10, 2025)
- Charlene L. v. Saul, No. 3:19cv626 (REP), 2021 WL 725822, at *8 (E.D. Va. Feb. 3, 2021)
- Adkins v. Berryhill, No. 3:17-CV-01927, 2017 WL 3781167, at *11 (S.D. W. Va. Aug. 9, 2017)
- Hill v. Colvin, No. 15-1027, 2016 WL 3181762, at *10 (D. Md. June 8, 2016)
- Hayden v. Martin Marietta Materials, Inc. Flexible Benefits Program, 763 F.3d 598, 605 (6th Cir. 2014)
- Williams v. Astrue, No. 3:11cv208-JAG, 2012 WL 1267890, at *3 (E.D. Va. Mar. 28, 2012)
- Alicia M. F. v. Saul, No. TMD 19-877, 2020 WL 3100627, at *5 (D. Md. June 11, 2020)
- Moore v. Commissioner of Social Security Administration, 278 F.3d 920, 924 (9th Cir. 2002)