

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Jennifer Smith v. Frank Bisignano, Commissioner of Social Security

Smith v. Bisignano · No. CJC-25-0803 · Decided March 10, 2026

SUMMARY

The United States District Court for the District of Maryland reviewed Jennifer Smith’s claims for disability insurance benefits and supplemental security income. The court held that the Administrative Law Judge improperly evaluated Smith’s subjective symptoms by relying on objective medical evidence, failing to address material evidence, and inadequately assessing her daily activities. The court reversed the Commissioner’s decision and remanded the case for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Chelsea J. Crawford
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 10, 2026
DOCKET	CJC-25-0803
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Petition for judicial review of the Commissioner of Social Security's final decision denying Smith's claim for disability insurance benefits and denying supplemental security income for the period before July 26, 2019.
STANDARD OF REVIEW	The court affirms the ALJ's factual findings if they are supported by substantial evidence and were reached through application of the correct legal standard. Substantial evidence is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.
PRECEDENTIAL VALUE	unknown
PARTIES	Jennifer Smith v. Frank Bisignano, Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

disability discrimination and disability law

QUESTIONS PRESENTED

1. Whether the ALJ improperly relied on objective medical evidence to discount Smith's subjective complaints concerning symptoms of major depressive disorder.
2. Whether the ALJ adequately explained the intensity and persistence of Smith's symptoms and resolved material inconsistencies and ambiguities in the record.
3. Whether the ALJ properly considered the extent of Smith's daily activities and explained how those activities demonstrated an ability to sustain full-time work.

HOLDINGS

1. When a claimant has major depressive disorder, the ALJ may not rely on objective medical evidence, even as one of multiple factors, to discount the claimant's subjective complaints concerning the intensity and persistence of symptoms. The ALJ violated that rule by relying on normal or near-normal thought processes, thought content, memory, orientation, insight, and judgment to discount Smith's complaints.
2. An ALJ must adequately discuss material evidence concerning the intensity and persistence of a claimant's symptoms and explain how material inconsistencies or ambiguities were considered and resolved. The ALJ's failure to address significant contrary subjective evidence prevented meaningful judicial review and required remand.
3. When evaluating daily activities, an ALJ must consider the extent to which the claimant can perform those activities and must explain how the activities demonstrate an ability to sustain a full-time, 40-hour work week. The ALJ failed both requirements here.

KEY QUOTATIONS

"As a result, the ALJ could not rely on objective medical evidence as a factor in discounting Smith's subjective complaints." (Discussion § I)

"Other than this recitation of Smith's daily activities, the ALJ 'provided no explanation as to how those particular activities ... showed that [s]he could persist through an eight-hour workday.'" (Discussion § III)

"Pursuant to sentence four of 42 U.S.C. § 405(g), the SSA's judgment is REVERSED due to inadequate analysis." (Conclusion)

FACTUAL BACKGROUND

Smith alleged disability beginning December 11, 2011, and her date last insured for DIB was December 31, 2013. The ALJ found severe osteoarthritis, degenerative disc disease, obesity, affective mood disorder, and anxiety-related disorder, but determined that Smith retained the residual functional capacity for limited light work before July 26, 2019. In reviewing the ALJ's symptom analysis, the court relied on evidence that Smith reported severe depressive episodes, mood swings, sleep impairment, concentration difficulties, limited activity

outside the home, and highly restricted grocery shopping and household activities. The court concluded that the ALJ improperly discounted Smith's subjective complaints using objective mental-status findings and failed to place her daily activities in proper context.

PROCEDURAL HISTORY

Smith applied for DIB and SSI in 2012. After multiple administrative hearings, Appeals Council remands, and two prior judicial remands, an ALJ denied DIB and denied SSI for the period before July 26, 2019, while the prior finding of disability beginning July 26, 2019, remained in place. The Appeals Council declined review, and Smith timely sought judicial review. The district court reversed and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The SSA must conduct further proceedings consistent with the opinion, including a proper analysis of Smith's subjective complaints, symptoms, and daily activities. The court also permitted the ALJ to consider arguments raised by Smith that the court did not reach.

CASES CITED

- *Hancock v. Astrue*, 667 F.3d 470, 472 (4th Cir. 2012)
- *Brown v. Commissioner of Social Security Administration*, 873 F.3d 251, 254 (4th Cir. 2017)
- *Shelley C. v. Commissioner of Social Security Administration*, 61 F.4th 341, 353, 360-61 (4th Cir. 2023)
- *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019)
- *Drumgold v. Commissioner of Social Security*, 144 F.4th 596, 605 (4th Cir. 2025)
- *Arakas v. Commissioner, Social Security Administration*, 983 F.3d 83, 95, 97-98, 100-01 (4th Cir. 2020)
- *Harper v. Virginia Department of Taxation*, 509 U.S. 86, 97 (1993)
- *Hultz v. Bisignano*, 162 F.4th 111, 123 (4th Cir. 2025)
- *Oakes v. Kijakazi*, 70 F.4th 207, 215-16 (4th Cir. 2023)
- *Ari T. v. Dudek*, No. 2:23CV686, 2025 WL 963057, at *7-9 (E.D. Va. Mar. 31, 2025)
- *David R. v. Kijakazi*, Civil Action No. DLB-20-1277, 2021 WL 3144528, at *4 (D. Md. July 26, 2021)
- *Leniya S. v. Saul*, Civil Action No. DLB-19-2990, 2021 WL 1224067, at *2-3 (D. Md. Mar. 31, 2021)
- *Cynthia P. v. Kijakazi*, Civil Action No. BPG-21-434, 2022 WL 20699809, at *2 (D. Md. Mar. 2, 2022)
- *Theodore F. v. Kijakazi*, Civil Action No. ADC-22-1658, 2023 WL 2837585, at *5 (D. Md. Apr. 7, 2023)
- *Kevin T. v. O'Malley*, Civil Action No. CDA-23-0312, 2023 WL 8993664, at *4 (D. Md. Dec. 28, 2023)
- *Willie B. v. O'Malley*, Civil Action No. CDA-23-307, 2024 WL 404405, at *3-4 (D. Md. Feb. 2, 2024)

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