

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
NORTH CAROLINA

Janelle C. v. Frank Bisignano, Commissioner of Social Security

Janelle C. · No. 1:24CV390 · Decided March 31, 2026

SUMMARY

This memorandum opinion and order concerns judicial review of the denial of Social Security Disability Insurance and Supplemental Security Income benefits to Janelle C. The court examines whether the Administrative Law Judge properly evaluated Plaintiff’s subjective complaints concerning fibromyalgia and chronic pain, particularly in light of Fourth Circuit precedent prohibiting reliance on a lack of objective evidence to discount fibromyalgia symptoms.

CASE DETAILS

COURT	United States District Court for the Middle District of North Carolina
WRITING FOR THE COURT	United States Magistrate Judge Joi Elizabeth Peake
JURISDICTION	United States District Court for the Middle District of North Carolina
DECIDED	March 31, 2026
DOCKET	1:24CV390
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner's denial of Disability Insurance Benefits and Supplemental Security Income. The parties filed cross-motions for judgment, and the court reviewed the certified administrative record.
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PRECEDENTIAL VALUE	unpublished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	Janelle C. v. Frank Bisignano, Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security

administrative law

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ improperly discounted Plaintiff's subjective complaints concerning fibromyalgia by relying on the lack of objective medical evidence.
2. Whether the ALJ's evaluation of Plaintiff's symptoms and residual functional capacity complied with *Arakas v. Commissioner of Social Security* and *Hultz v. Bisignano*.
3. Whether the case should be remanded for further administrative proceedings or an immediate award of benefits.

HOLDINGS

1. An ALJ may not rely on objective medical evidence, or the lack thereof, even as one of multiple factors, to discount a claimant's subjective complaints about fibromyalgia symptoms because fibromyalgia generally does not produce objective evidence corresponding to symptom severity, persistence, or functional limitation.
2. The ALJ's symptom evaluation and RFC assessment were legally deficient because the decision relied on the absence of objective evidence in assessing Plaintiff's fibromyalgia-related symptoms.

KEY QUOTATIONS

"ALJs may not rely on objective medical evidence (or the lack thereof)—even as just one of multiple factors—to discount a claimant's subjective complaints regarding symptoms of fibromyalgia or some other disease that does not produce such evidence." (at 15)

"In the circumstances, given the Fourth Circuit's direction in a similar scenario in Hultz, the Court concludes that remand is necessary so that these issues can be addressed by the ALJ under Arakas and the recent decision in Hultz." (at 16)

FACTUAL BACKGROUND

Plaintiff alleged disability based primarily on chronic pain and fibromyalgia, along with psychiatric and other physical impairments. She testified that her pain was widespread, flared daily, limited her ability to stand, walk, sit, bend, lift, and perform household activities, and persisted despite medication and other treatment. The ALJ found that Plaintiff had numerous severe impairments and could perform a restricted range of light work, but discounted her subjective symptom statements in part because of a lack of objective physical abnormalities and medical findings.

PROCEDURAL HISTORY

Plaintiff filed applications for DIB and SSI in 2018. After an ALJ denied benefits and the Appeals Council denied review, Plaintiff filed an earlier action in the Middle District of North Carolina. The Commissioner moved to remand, and the court remanded the matter to the agency in December 2022. Following a second

hearing, the ALJ again found Plaintiff not disabled in a decision issued January 23, 2024. Plaintiff then filed this action, and the court reversed and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must remand the matter to the ALJ for proceedings consistent with the order, including reconsideration of Plaintiff's symptoms and RFC under Arakas and Hultz. Plaintiff's request for an immediate award of benefits was denied.

CASES CITED

- Hines v. Barnhart, 453 F.3d 559 (4th Cir. 2006)
- Frady v. Harris, 646 F.2d 143 (4th Cir. 1981)
- Oppenheim v. Finch, 495 F.2d 396 (4th Cir. 1974)
- Hancock v. Astrue, 667 F.3d 470 (4th Cir. 2012)
- Hunter v. Sullivan, 993 F.2d 31 (4th Cir. 1992)
- Richardson v. Perales, 402 U.S. 389 (1971)
- Mastro v. Apfel, 270 F.3d 171 (4th Cir. 2001)
- Craig v. Chater, 76 F.3d 585 (4th Cir. 1996)
- Hall v. Harris, 658 F.2d 260 (4th Cir. 1981)
- Bennett v. Sullivan, 917 F.2d 157 (4th Cir. 1990)
- Arakas v. Commissioner of Social Security, 983 F.3d 83 (4th Cir. 2020)
- Hultz v. Bisignano, 162 F.4th 111 (4th Cir. 2025)
- Cowan v. Kijakazi, 2022 WL 3446078 (M.D.N.C. Aug. 17, 2022), report and recommendation adopted, 2022 WL 17831951 (M.D.N.C. Sept. 21, 2022)
- Crystal H. v. O'Malley, 2024 WL 3677338 (M.D.N.C. Aug. 6, 2024)

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