

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, WESTERN DIVISION

William D. v. Frank J. Bisignano, Commissioner of Social Security

William D. · No. 3:24-cv-50429 · Decided November 25, 2025

SUMMARY

The United States District Court for the Northern District of Illinois reviewed the denial of William D.'s application for disability insurance benefits under 42 U.S.C. § 405(g). The court held that the Administrative Law Judge sufficiently evaluated the medical opinions of Dr. Levitan and Dr. Hoffman and supported the decision with substantial evidence. Plaintiff's motion to remand was denied, Defendant's motion for summary judgment was granted, and the Commissioner's decision was affirmed.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Western Division
WRITING FOR THE COURT	Michael F. Iasparro
JURISDICTION	United States District Court for the Northern District of Illinois, Western Division
DECIDED	November 25, 2025
DOCKET	3:24-cv-50429
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's denial of disability insurance benefits. The parties consented to proceed before a United States Magistrate Judge. Plaintiff moved for remand, and Defendant moved for summary judgment.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence or resulted from an error of law. Factual findings supported by substantial evidence are conclusive, and the court may not reweigh evidence, resolve evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's. An ALJ's decision is reversed only if the record compels a contrary result.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

PARTIES

William D. v. Frank J. Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

summary judgment

civil procedure

PRACTICE AREAS

Social Security disability benefits

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of Dr. Levitan's medical opinion.
2. Whether the ALJ adequately evaluated the supportability and consistency of Dr. Hoffman's medical opinion.
3. Whether any deficiencies in the ALJ's articulation required remand under the substantial-evidence and harmless-error standards.

HOLDINGS

1. The ALJ minimally articulated sufficient reasons for finding Dr. Levitan's opinion unpersuasive by identifying normal mental-status examinations, Plaintiff's activities, and the absence of supporting clinical evidence.
2. The ALJ minimally articulated sufficient reasons for finding Dr. Hoffman's opinion unsupported and unpersuasive, notwithstanding an inaccurate statement concerning the paragraph C criteria.
3. Remand was not required because the alleged errors were harmless and the ALJ's decision was supported by substantial evidence and did not result from an error of law.

KEY QUOTATIONS

"The threshold for substantial evidence 'is not high.'" (Discussion)

"we will reverse an ALJ's decision only if the record compels a contrary result." (Discussion)

"The ALJ's analysis of medical opinions must be allowed 'to stand so long as the ALJ minimally articulated his reasons—a very deferential standard that the Seventh Circuit has, in fact, deemed lax.'" (Discussion)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning May 15, 2020. The ALJ determined that Plaintiff had the residual functional capacity for light work with specified postural and environmental limitations and could perform his past relevant work as an outside salesperson. Plaintiff challenged the ALJ's treatment of opinions from psychological consultative examiner Dr. Levitan and primary-care provider Dr. Hoffman, asserting that the ALJ inadequately addressed supportability and consistency. The record included numerous normal mental-status

findings and no mental-health treatment records, while Dr. Levitan's and Dr. Hoffman's opinions included mental limitations that the ALJ found unsupported or inconsistent with the longitudinal record.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and alleged disability beginning May 15, 2020. An administrative law judge issued an unfavorable decision on December 27, 2023, finding Plaintiff not disabled at step four because he could perform his past relevant work as an outside salesperson. The Appeals Council denied review on September 3, 2024, making the ALJ's decision final. The district court denied Plaintiff's motion to remand, granted Defendant's motion for summary judgment, and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Thorlton v. King, 127 F.4th 1078, 1081 (7th Cir. 2025)
- Mandrell v. Kijakazi, 25 F.4th 514, 515 (7th Cir. 2022)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Warnell v. O'Malley, 97 F.4th 1050, 1052-54 (7th Cir. 2024)
- Beardsley v. Colvin, 758 F.3d 834, 836 (7th Cir. 2014)
- Moore v. Colvin, 743 F.3d 1118, 1121 (7th Cir. 2014)
- Fetting v. Kijakazi, 62 F.4th 332, 336 (7th Cir. 2023)
- Bakke v. Kijakazi, 62 F.4th 1061, 1067-68 (7th Cir. 2023)
- Crowell v. Kijakazi, 72 F.4th 810, 816 (7th Cir. 2023)
- Grotts v. Kijakazi, 27 F.4th 1273, 1278 (7th Cir. 2022)
- Gedatus v. Saul, 994 F.3d 893, 903 (7th Cir. 2021)
- Winsted v. Berryhill, 923 F.3d 472, 478 (7th Cir. 2019)
- Molnar v. Astrue, 395 Fed. App'x 282, 287 (7th Cir. 2010)
- McKinzey v. Astrue, 641 F.3d 884, 891-92 (7th Cir. 2011)
- Karr v. Saul, 989 F.3d 508, 513 (7th Cir. 2021)
- Jacqueline J. v. Berryhill, No. 18 C 2401, 2019 WL 339588, at *5 (N.D. Ill. Jan. 28, 2019)
- O'Connor-Spinner v. Colvin, 832 F.3d 690, 698 (7th Cir. 2016)
- Summers v. Berryhill, 864 F.3d 523, 527 (7th Cir. 2017)
- Green v. Kijakazi, No. 21-C-678, 2022 WL 1644936, at *22 (E.D. Wis. May 23, 2022)
- Ellison v. Kijakazi, No. 22-3134, 2023 WL 8794989, at *3 (7th Cir. Dec. 20, 2023)
- Reynolds v. Kijakazi, 25 F.4th 470, 473 (7th Cir. 2022)
- Chambers v. Commissioner of Social Security Administration, No. 05-cv-827-DGW, 2008 WL 895443, at *5 (S.D. Ill. Mar. 31, 2008)

- Clifford v. Apfel, 227 F.3d 863, 868 n. 2 (7th Cir. 2000)
- Swiecichowski v. Dudek, 133 F.4th 751, 755 (7th Cir. 2025)

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