

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Sean Patrick McDonald v. Frank Bisignano, Commissioner of Social
Security

McDonald v. Bisignano · No. 2:25-cv-01174 · Decided March 16, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania reviews the Commissioner of Social Security’s denial of Sean Patrick McDonald’s applications for disability insurance benefits and supplemental security income. The court concludes that the administrative record supports the ALJ’s findings and residual functional capacity assessment, rejects the plaintiff’s arguments concerning mental and physical impairments, denies his motion for summary judgment, and grants judgment for the Commissioner.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Nora Barry Fischer
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	March 16, 2026
DOCKET	2:25-cv-01174
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his applications for disability insurance benefits and supplemental security income. The district court considered Plaintiff's motion for summary judgment and affirmed the administrative decision.
STANDARD OF REVIEW	The court reviews legal questions de novo and reviews the ALJ's factual findings for substantial evidence, considering the administrative record as a whole. The court may not reweigh the evidence or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court memorandum opinion
PARTIES	Sean Patrick McDonald v. Frank Bisignano, Commissioner of Social Security

TOPICS

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QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's determination that Plaintiff was not disabled under the Social Security Act.
2. Whether the ALJ properly evaluated Plaintiff's alleged carpal tunnel syndrome and vertebral-fracture-related limitations.
3. Whether the ALJ properly evaluated the opinions and testimony of Plaintiff's treating psychiatrist under the applicable medical-opinion regulations.
4. Whether the ALJ properly evaluated Plaintiff's subjective symptoms and formulated the residual functional capacity.
5. Whether the ALJ properly relied on vocational-expert testimony based on a hypothetical reflecting the limitations credibly established by the record.

HOLDINGS

1. The ALJ's decision denying disability benefits was supported by substantial evidence and complied with applicable legal standards.
2. The ALJ did not err by declining to treat Plaintiff's alleged recurrent carpal tunnel symptoms or vertebral-fracture-related limitations as work-preclusive impairments or include related restrictions in the RFC.
3. The ALJ reasonably evaluated and declined to adopt the more restrictive opinions of Plaintiff's treating psychiatrist.
4. The ALJ's RFC and hypothetical to the vocational expert were sufficient because they included the limitations credibly established by the record.

KEY QUOTATIONS

"This evidentiary threshold is not high, and "substantial evidence" means only "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion."" (Section IV)

"Plaintiff's Motion for Summary Judgment [11] is therefore denied and the decision of the SSA/Commissioner is affirmed." (Section VI)

FACTUAL BACKGROUND

Plaintiff alleged disability from generalized anxiety disorder, depression, bipolar disorder, PTSD, and drug addiction, with an alleged onset date of September 30, 2016. His treatment history included prior inpatient

treatment and ongoing outpatient psychiatric and substance-use treatment, but the record reflected sobriety since July 2019 and generally normal or mildly impaired mental-status findings during the relevant period. The ALJ found severe mental impairments but determined that Plaintiff retained the residual functional capacity for all exertional levels with restrictions to simple, routine tasks, limited workplace interaction, no public interaction, and few changes in the work process or setting. The district court concluded that substantial evidence supported the ALJ's findings, including the treatment records, medical opinions, subjective-symptom analysis, and vocational evidence.

PROCEDURAL HISTORY

Plaintiff applied for DIB and SSI on December 30, 2022, alleging disability based primarily on mental-health impairments. The SSA denied the applications initially and on reconsideration. After two telephonic hearings, an administrative law judge denied benefits on July 3, 2024, and the Appeals Council denied review. Plaintiff filed this action on August 4, 2025. The district court denied Plaintiff's motion for summary judgment and entered judgment for the Commissioner.

DISPOSITION

affirmed

CASES CITED

- Brewster v. Heckler, 786 F.2d 581, 583 (3d Cir. 1986)
- Barnhart v. Thomas, 540 U.S. 20, 24-25 (2003)
- Edwards v. Berryhill, No. CV 16-475, 2017 WL 1344436, at *1 (W.D. Pa. Apr. 12, 2017)
- Doak v. Heckler, 790 F.2d 26, 28 (3d Cir. 1986)
- Schauddeck v. Commissioner of Social Security, 181 F.3d 429, 431 (3d Cir. 1999)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1152, 1154 (2019)
- Burns v. Barnhart, 312 F.3d 113, 118 (3d Cir. 2002)
- Kent v. Schweiker, 710 F.2d 110 (3d Cir. 1983)
- Ventura v. Shalala, 55 F.3d 900, 901 (3d Cir. 1995)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Hansford v. Astrue, 805 F. Supp. 2d 140, 143 (W.D. Pa. 2011)
- Hartranft v. Apfel, 181 F.3d 358, 360 (3d Cir. 1999)
- FCC v. Prometheus Radio Project, 592 U.S. 414, 423 (2021)
- FCC v. Fox Television Stations, Inc., 556 U.S. 502, 513 (2009)
- Motor Vehicle Manufacturers Association of United States, Inc. v. State Farm Mutual Automobile Insurance Co., 463 U.S. 29, 43 (1983)
- Ohio v. EPA, 2024 U.S. LEXIS 2846, at *18 (June 27, 2024)
- Cotter v. Harris, 642 F.2d 700, 704-05 (3d Cir. 1981)
- Palmer v. Apfel, 995 F. Supp. 549, 552 (E.D. Pa. 1998)

- S.E.C. v. Chenery Corp., 332 U.S. 194, 196-97 (1947)
- Hur v. Barnhart, 94 F. App'x 130, 133 (3d Cir. 2004)
- Fargnoli v. Massanari, 247 F.3d 34, 42 (3d Cir. 2001)
- Rutherford v. Barnhart, 399 F.3d 546, 552 (3d Cir. 2005)
- Williams v. Sullivan, 970 F.2d 1178, 1186 (3d Cir. 1992)
- Hammond v. O'Malley, 735 F. Supp. 3d 567, 579 (E.D. Pa. 2024)
- Zaborowski v. Commissioner of Social Security, 115 F.4th 637, 639 (3d Cir. 2024)

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