

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, EASTERN DIVISION

Tonya T. v. Frank Bisignano, Commissioner of Social Security

Tonya T. · No. 3:25-cv-136-JTA · Decided March 2, 2026

SUMMARY

The court granted Plaintiff Tonya T.’s motion for summary judgment, denied the Commissioner of Social Security’s motion, reversed the Commissioner’s decision, and remanded the case for further proceedings. The court held that the Appeals Council erred by failing to consider new, chronologically relevant, and material medical evidence concerning Plaintiff’s pain, spinal conditions, and functional limitations.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Eastern Division
WRITING FOR THE COURT	Jerusha T. Adams
JURISDICTION	United States District Court for the Middle District of Alabama, Eastern Division
DECIDED	March 2, 2026
DOCKET	3:25-cv-136-JTA
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final denial of her application for a period of disability and Disability Insurance Benefits. The parties' briefs were construed as cross-motions for summary judgment, and the parties consented to dispositive jurisdiction by a magistrate judge.
STANDARD OF REVIEW	The court reviewed whether the Commissioner's decision was supported by substantial evidence and whether the correct legal standards were applied. The Appeals Council's refusal to consider additional evidence based on the legal criteria for consideration was reviewed de novo.
PRECEDENTIAL VALUE	Unknown; memorandum opinion and order with no reporter citation or stated precedential designation.

PARTIES

Tonya T. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

summary judgment

civil procedure

remedies

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the Appeals Council erred by refusing to consider new evidence submitted after the ALJ's decision.
2. Whether the evidence was chronologically relevant to the period adjudicated by the ALJ.
3. Whether the evidence was material because there was a reasonable possibility it could change the administrative result.
4. Whether remand under sentence four of 42 U.S.C. § 405(g) was appropriate.

HOLDINGS

1. When the Appeals Council erroneously refuses to consider evidence that is new, material, and chronologically relevant, it commits legal error and remand is appropriate.
2. An RFC assessment completed after the ALJ's decision is chronologically relevant when the assessment specifically states that the described symptoms and limitations applied beginning before the ALJ's decision.
3. Additional evidence is material when there is a reasonable possibility that it would change the administrative result, including by altering the claimant's RFC or the available-work determination.

KEY QUOTATIONS

“Judicial review of disability claims is limited to whether the Commissioner’s decision is supported by substantial evidence and whether the correct legal standards were applied.” (Section II)

“When the Appeals Council “erroneously refuses to consider evidence, it commits legal error and remand is appropriate.”” (Section V)

“Because Dr. Myers specifically indicated the RFC assessment related back to October 25, 2023, which was six weeks before the ALJ’s hearing decision, the RFC assessment is chronologically relevant.” (Section V.1)

“The Court finds the Appeals Council erred by failing to consider new, chronologically relevant, and material evidence.” (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning June 30, 2020, based primarily on hand problems and carpal tunnel syndrome. The ALJ found severe carpal tunnel syndrome, cervical degenerative disc disease, and obesity, assessed a sedentary residual functional capacity with additional restrictions, and concluded that Plaintiff could perform other work existing in significant numbers in the national economy. After the ALJ's decision, Plaintiff submitted treatment notes, an x-ray report, and a residual-functional-capacity assessment from Dr. Caroline Herring Myers; the district court found that the evidence related to the period before the ALJ's decision and could reasonably affect the assessment of Plaintiff's pain, limitations, and ability to work.

PROCEDURAL HISTORY

Plaintiff's claim was denied initially and on reconsideration. After an administrative hearing, the ALJ issued an unfavorable decision on December 13, 2023, and the Appeals Council denied review while declining to consider or exhibit additional evidence. Plaintiff filed this action on February 18, 2025. The district court granted Plaintiff's motion for summary judgment, denied the Commissioner's motion, reversed the Commissioner's decision, and remanded for further proceedings under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for the Commissioner to consider the new evidence identified at R. 128, 217-19, and 227-31 in conjunction with the record as a whole.

CASES CITED

- Winschel v. Commissioner of Social Security, 631 F.3d 1176, 1178, 1180 (11th Cir. 2011)
- Crawford v. Commissioner of Social Security, 363 F.3d 1155, 1158 (11th Cir. 2004)
- Buckwalter v. Acting Commissioner of Social Security, 5 F.4th 1315, 1320 (11th Cir. 2021)
- Bloodsworth v. Heckler, 703 F.2d 1233, 1239 (11th Cir. 1983)
- Jackson v. Chater, 99 F.3d 1086, 1092 (11th Cir. 1996)
- Fleeton v. O'Malley, No. 2:23-CV-62-JTA, 2024 WL 235216, at *1 (M.D. Ala. Jan. 22, 2024)
- Ingram v. Commissioner of Social Security Administration, 496 F.3d 1253, 1260-61 (11th Cir. 2007)
- Dubose v. Commissioner of Social Security, No. 24-13554, 2025 WL 2529598, at *3 (11th Cir. Sept. 3, 2025)
- Washington v. Social Security Administration, Commissioner, 806 F.3d 1317, 1320-21 (11th Cir. 2015)
- Calloway v. Kijakazi, No. 3:20-CV-228-JTA, 2021 WL 5227068, at *4 (M.D. Ala. Nov. 8, 2021)
- Douglas v. Commissioner of Social Security, 764 F. App'x 862, 862-63 (11th Cir. 2019)
- Falge v. Apfel, 150 F.3d 1320, 1323 (11th Cir. 1998)
- Chapman v. Commissioner, Social Security Administration, No. 22-13863, 2023 WL 8441514, at *2 (11th Cir. Dec. 5, 2023)
- Hunter v. Social Security Administration, Commissioner, 705 F. App'x 936, 940 (11th Cir. 2017)

- Simon v. Commissioner, Social Security Administration, 7 F.4th 1094, 1101-02 (11th Cir. 2021)
- Goode v. Commissioner of Social Security, 966 F.3d 1277, 1279 (11th Cir. 2020)
- Harner v. Social Security Administration, Commissioner, 38 F.4th 892, 894 (11th Cir. 2022)
- Whiddon v. Social Security Administration, Commissioner, 549 F. Supp. 3d 1315, 1324 (N.D. Ala. 2021)
- Dorsey v. Commissioner of Social Security, No. 8:24-cv-489-DNF, 2025 WL 678817, at *5 (M.D. Fla. Mar. 4, 2025)

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