

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA

Sean M. v. Frank Bisignano, Commissioner of Social Security

Sean M. v. Bisignano, No. 25-CV-4533 (E.D. Pa. Feb. 5, 2026) · No. No. 25-CV-4533 · Decided February 5, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania recommends denying Sean M.’s request for review of the Commissioner of Social Security’s denial of Disability Insurance Benefits and Supplemental Security Income. The court concludes that the ALJ’s residual functional capacity assessment and evaluation of treating psychiatrist Daniel Buhalo’s opinion were supported by substantial evidence. Judgment is recommended in favor of the Commissioner.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                         |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Pennsylvania                                                                                                                                                                                                   |
| WRITING FOR THE COURT | Scott W. Reid                                                                                                                                                                                                                                                           |
| JURISDICTION          | United States District Court for the Eastern District of Pennsylvania                                                                                                                                                                                                   |
| DECIDED               | February 5, 2026                                                                                                                                                                                                                                                        |
| DOCKET                | No. 25-CV-4533                                                                                                                                                                                                                                                          |
| DISPOSITION           | other                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | Action under 42 U.S.C. § 405(g) seeking review of the Commissioner's denial of Disability Insurance Benefits and Supplemental Security Income; the magistrate judge recommended denial of the claimant's Request for Review and entry of judgment for the Commissioner. |
| STANDARD OF REVIEW    | The court reviews whether the Commissioner's decision is supported by substantial evidence and whether the ALJ applied the correct legal standards.                                                                                                                     |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                         |
| PARTIES               | Sean M. v. Frank Bisignano, Commissioner of Social Security                                                                                                                                                                                                             |

TOPICS

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

## PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

## QUESTIONS PRESENTED

1. Whether the ALJ's mental RFC assessment was supported by substantial evidence despite the rejection of certain state-agency and treating-source opinions.
2. Whether the ALJ adequately explained the distinction between Sean M.'s permitted interactions with the public, supervisors, and co-workers.
3. Whether the ALJ properly evaluated Dr. Buhalo's treating-source opinion under the applicable supportability, consistency, and relationship factors.
4. Whether any inconsistency or lack of explanation in the ALJ's RFC findings required remand.

## HOLDINGS

1. An ALJ may independently formulate a claimant's RFC from all relevant medical and other evidence; the RFC need not be based exclusively on a medical opinion.
2. Remand was unnecessary because the RFC's interaction limitations were adequately supported by substantial evidence and any discrepancy between the step-two findings and the RFC would not affect the outcome.
3. The ALJ properly evaluated Dr. Buhalo's opinion under the applicable regulations and reasonably found his marked and extreme limitations unpersuasive.

## KEY QUOTATIONS

*"The ALJ is empowered to independently formulate an RFC based on "all of the relevant medical and other evidence." (Record at 21)*

*"It is hard to see how much more clearly the ALJ could have explained how she formulated the mental health aspects of the RFC." (Record at 21)*

*"I respectfully recommend that the Plaintiff's Request for Review be DENIED, and judgment entered in favor of the Commissioner." (Conclusion)*

## FACTUAL BACKGROUND

Sean M. alleged disability based on HIV, ADHD, anxiety, depression, and bipolar disorder. The ALJ found severe impairments including a history of HIV, bipolar disorder, depressive disorder, and ADHD, but determined that no impairment met or equaled a listed impairment. The ALJ found that Sean M. could perform medium work with physical, social, and mental restrictions, including simple instructions and only occasional interaction with the public, and identified other jobs he could perform. Sean M. challenged the mental restrictions and the ALJ's rejection of treating psychiatrist Daniel Buhalo's more restrictive opinion.

## PROCEDURAL HISTORY

Sean M. applied for DIB and SSI in September 2022. The claims were denied initially and on reconsideration. After a de novo hearing, the ALJ denied benefits on July 11, 2024, and the Appeals Council denied review on June 10, 2025. Sean M. then filed this action challenging the mental-impairment portions of the RFC assessment and the evaluation of treating psychiatrist Daniel Buhalo's opinion.

## DISPOSITION

other

## CASES CITED

- Richardson v. Perales, 402 U.S. 389 (1971)
- Newhouse v. Heckler, 753 F.2d 283, 285 (3d Cir. 1985)
- Coria v. Heckler, 750 F.2d 245 (3d Cir. 1984)
- Palmisano v. Saul, Civ. A. No. 20-1628, 2021 WL 162805, at \*3 (E.D. Pa. Apr. 27, 2021)
- Rutherford v. Barnhart, 399 F.3d 546 (3d Cir. 2005)
- Lori O.S. v. O'Malley, Civ. A. No. 23-3859, 2024 WL 3522190, at \*7 (E.D. Pa. July 24, 2024)
- Hartranft v. Apfel, 181 F.3d 358, 360 (3d Cir. 1999)
- Williams v. Sullivan, 970 F.2d 1178, 1182 (3d Cir. 1992)