

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

James L. v. Frank Bisignano, Commissioner of Social Security

James L. · No. No. 1:25-cv-3201-EFS · Decided April 17, 2026

SUMMARY

The U.S. District Court for the Eastern District of Washington reversed the Administrative Law Judge’s denial of Social Security disability benefits to James L. The court held that the ALJ improperly discounted the plaintiff’s reported mental-health symptoms, particularly his social-functioning limitations, and that the error affected the residual functional capacity assessment. The case was remanded to the Commissioner for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Eastern District of Washington
WRITING FOR THE COURT	Edward F. Shea
JURISDICTION	U.S. District Court for the Eastern District of Washington
DECIDED	April 17, 2026
DOCKET	No. 1:25-cv-3201-EFS
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review of the Commissioner's denial of Title II and Title XVI Social Security disability benefits under sentence four of 42 U.S.C. § 405(g).
STANDARD OF REVIEW	The court reviews the ALJ's decision to determine whether it is supported by substantial evidence and free of legal error, and whether any error affected the nondisability determination. Substantial evidence is more than a mere scintilla but less than a preponderance and is evidence a reasonable mind might accept as adequate.
PRECEDENTIAL VALUE	Unknown; district-court order with no reporter citation or stated precedential status in the source metadata.
PARTIES	James L. v. Frank Bisignano, Commissioner of Social Security

TOPICS

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ improperly discounted Plaintiff's reported mental-health symptoms.
2. Whether the ALJ's evaluation of Plaintiff's symptom reports was supported by substantial evidence and sufficiently specific and convincing.
3. Whether the errors in evaluating Plaintiff's symptoms affected the residual functional capacity and sequential disability determination.
4. Whether the court needed to decide Plaintiff's remaining challenges to the ALJ's evaluation of medical opinions.

HOLDINGS

1. When an ALJ finds a claimant's reported symptoms inconsistent with the evidence, the ALJ must identify the symptom claims being discounted and clearly and convincingly explain the reasons for discounting them, with support from specific evidence relevant to the claimed limitations.
2. An ALJ may not rely on isolated reports of improvement, normal mental-status findings, or normal findings from brief physical-ailment appointments to reject alleged mental-health limitations without considering the claimant's overall diagnostic picture and the relevance of the findings to the claimed workplace limitations.
3. Because the ALJ's erroneous symptom evaluation affected the formulation of the RFC and the sequential disability analysis, the nondisability decision must be reversed and the matter remanded for a new evaluation.

KEY QUOTATIONS

"The ALJ's reasons for discounting Plaintiff's reported symptoms from his PTSD, depression, anxiety, and other mental disorders are not supported by substantial evidence and are unconvincing." (at 27)

"Crucially, the ALJ concluded based on his evaluation that Plaintiff could have occasional interactions with others at work." (at 27)

"The ALJ is to develop the record and reevaluate—with meaningful articulation and evidentiary support—the sequential process." (at 28)

FACTUAL BACKGROUND

Plaintiff alleged disability based in substantial part on mental-health impairments, including major depressive disorder, anxiety, borderline personality disorder, PTSD, and substance use disorder, as well as physical conditions. The record included repeated reports of agitation, anger, panic, trauma-related symptoms, difficulty

interacting with others, and problems with concentration and memory, including conflicts and angry outbursts while Plaintiff was receiving medication. The ALJ found Plaintiff not disabled and limited him to simple instructions, occasional interactions, and occasional workplace changes, but relied on selected normal findings, daily activities, conservative treatment, limited therapy, and a statement that Plaintiff was willing to work.

PROCEDURAL HISTORY

Plaintiff applied for Title II and Title XVI benefits in July 2022, alleging disability beginning April 20, 2022. After a May 2025 hearing, the ALJ found Plaintiff not disabled. The Appeals Council denied review, and Plaintiff sought review in the district court. The district court reversed the ALJ's nondisability decision and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The ALJ must develop the record and reevaluate Plaintiff's reported symptoms and the sequential disability analysis with meaningful articulation and evidentiary support. The ALJ must specifically evaluate alleged social-functioning symptoms relevant to workplace interpersonal capabilities and, if discounting those reports, identify the rejected symptoms, cite specific relevant evidence, and provide clear and convincing reasons. The court did not decide the remaining challenges to the evaluation of medical opinions.

CASES CITED

- Smartt v. Kijakazi, 53 F.4th 489, 498-99 (9th Cir. 2022)
- Hill v. Astrue, 698 F.3d 1153, 1158-59 (9th Cir. 2012)
- Molina v. Astrue, 674 F.3d 1104, 1115 (9th Cir. 2012)
- Sandgathe v. Chater, 108 F.3d 978, 980 (9th Cir. 1997)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035 (9th Cir. 2007)
- Black v. Apfel, 143 F.3d 383, 386 (8th Cir. 1998)
- Nadon v. Bisignano, 145 F.4th 1133, 1138 (9th Cir. 2025)
- Ghanim v. Colvin, 763 F.3d 1154, 1163-64 (9th Cir. 2014)
- Holohan v. Massanari, 246 F.3d 1195, 1205 (9th Cir. 2001)
- Lester v. Chater, 81 F.3d 821, 833 (9th Cir. 1995)
- Garrison v. Colvin, 759 F.3d 995, 1017 (9th Cir. 2014)
- Burrell v. Colvin, 775 F.3d 1133, 1138 (9th Cir. 2014)
- Gallant v. Heckler, 753 F.2d 1450, 1456 (9th Cir. 1984)
- Ford v. Saul, 950 F.3d 1141, 1156 (9th Cir. 2020)
- Diedrich v. Berryhill, 874 F.3d 634, 641, 643 (9th Cir. 2017)
- Jajo v. Astrue, 273 F. App'x 658, 660 (9th Cir. 2008)

- Vertigan v. Halter, 260 F.3d 1044, 1050 (9th Cir. 2001)
- Leon v. Berryhill, 880 F.3d 1041, 1045 (9th Cir. 2018)

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