

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS, HOUSTON DIVISION

Christopher M. v. Frank J. Bisignano, Commissioner of the Social
Security Administration

Christopher M. · No. Civil Action H-24-5053 · Decided March 3, 2026

SUMMARY

The United States District Court for the Southern District of Texas grants Christopher M.'s motion for summary judgment and remands his Social Security disability benefits case for further administrative proceedings. The court holds that the Administrative Law Judge inadequately evaluated the supportability and consistency of the state agency physicians' opinions when determining Christopher's residual functional capacity, and that the error was not harmless.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Houston Division
WRITING FOR THE COURT	Peter Bray
JURISDICTION	United States District Court for the Southern District of Texas, Houston Division
DECIDED	March 3, 2026
DOCKET	Civil Action H-24-5053
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from the Commissioner of the Social Security Administration's final decision denying applications for disability insurance benefits and supplemental security income; the parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews whether substantial evidence supports the ALJ's decision and whether the correct legal standards were employed. The court may not reweigh the evidence or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	unknown
PARTIES	Christopher M. v. Frank J. Bisignano, Commissioner of the Social Security Administration

TOPICS

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated and explained the supportability and consistency of the state-agency physicians' medical opinions under 20 C.F.R. §§ 404.1520c and 416.920c.
2. Whether the ALJ's unexplained acceptance and rejection of portions of the state-agency physicians' opinions prevented meaningful judicial review and rendered the RFC determination unsupported by substantial evidence.
3. Whether the error was harmless in light of the vocational-expert testimony and the possibility that a more restrictive RFC could affect the available jobs.

HOLDINGS

1. The ALJ erred by addressing the two state-agency physicians' opinions together and failing to explain the supportability of their findings or which portions of each opinion he accepted or rejected.
2. The ALJ's decision denying benefits was not supported by substantial evidence because the deficient evaluation of the medical opinions left the court unable to determine whether the RFC and resulting vocational findings were properly formulated.

KEY QUOTATIONS

“Because the ALJ addressed both opinions together, did not fully address the necessary factors, and gave no explanation for incorporating certain limitations and excluding others, the court is unable to perform the statutorily mandated judicial review.” (at 25)

“The court will not guess what the ALJ would have done had he considered both doctors’ findings separately and addressed the consistency and supportability of each.” (at 26)

FACTUAL BACKGROUND

Christopher alleged disability based on conditions including a fractured right hip, diabetes with neuropathy and foot ulcers, a partial left-foot amputation, knee problems, and lower-extremity pain. He testified that he had not returned to work, had limited standing and walking ability, and had difficulty performing household activities. The ALJ assessed an RFC for light work with limitations and relied on vocational-expert testimony that jobs existed in the national economy. The state-agency physicians offered differing limitations, including different assessments of Christopher's ability to stand and walk.

PROCEDURAL HISTORY

Christopher applied for Title II and Title XVI benefits, and the SSA denied his applications initially and on reconsideration. After a hearing, the ALJ found him not disabled; the Appeals Council vacated that decision and remanded because the ALJ had not considered a third-party function report. Following a second hearing, the ALJ again found Christopher not disabled, and the Appeals Council denied review. Christopher then sought judicial review, and the district court granted his motion for summary judgment, denied the Commissioner's cross-motion, and remanded for additional administrative proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for additional administrative proceedings consistent with the opinion, including separate and adequately explained consideration of the state-agency physicians' medical opinions and the supportability and consistency factors, followed by reconsideration of the RFC and vocational evidence as necessary.

CASES CITED

- Schofield v. Saul, 950 F.3d 315, 317 (5th Cir. 2020)
- Keel v. Saul, 986 F.3d 551, 555 (5th Cir. 2021)
- Garcia v. Berryhill, 880 F.3d 700, 704 (5th Cir. 2018)
- Salmond v. Berryhill, 892 F.3d 812, 817 (5th Cir. 2018)
- Whitehead v. Colvin, 820 F.3d 776, 779, 781 (5th Cir. 2016)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Consol. Edison Co. of N.Y. v. NLRB, 305 U.S. 197, 229 (1938)
- Perez v. Barnhart, 415 F.3d 457, 461-62 (5th Cir. 2005)
- Stone v. Heckler, 752 F.2d 1099, 1101 (5th Cir. 1985)
- Esparza v. Saul, No. 3:19-CV-2284, 2020 WL 6551272, at *13 (N.D. Tex. Oct. 2, 2020)
- Taylor v. Astrue, 706 F.3d 600, 602-03 (5th Cir. 2012)
- Rai R. v. Kijakazi, No. 4:21-CV-2270, 2022 WL 4450487, at *5 (S.D. Tex. Sept. 23, 2022)
- Christina M. v. Bisignano, No. 24-CV-3636, 2025 WL 2689668, at *5-6 (S.D. Tex. July 28, 2025), R. & R. adopted, 2025 WL 2687862 (S.D. Tex. Sept. 16, 2025)
- Newton v. Apfel, 209 F.3d 448, 455 (5th Cir. 2000)
- Copeland v. Colvin, 771 F.3d 920, 923 (5th Cir. 2014)
- Carpenter v. Astrue, 537 F.3d 1264, 1267 (10th Cir. 2008)