

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Dacia Talbot v. Frank Bisignano, Commissioner of Social Security

No. 4:24-CV-00457 (M.D. Pa. Mar. 27, 2026) · No. No. 4:24-CV-00457 · Decided March 27, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania reviewed the Commissioner of Social Security’s denial of Dacia Talbot’s claim for supplemental security income benefits. The court rejected Talbot’s challenges concerning evaluation of her mental impairments, migraines at step three, obesity, and her alleged need to nap. The court affirmed the Commissioner’s decision, concluding that it was supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Sean A. Camoni
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 27, 2026
DOCKET	No. 4:24-CV-00457
DISPOSITION	affirmed
PROCEDURAL POSTURE	Action under 42 U.S.C. § 1383(c)(3) seeking judicial review of the Commissioner's final decision denying supplemental security income benefits under Title XVI of the Social Security Act.
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence and reviews legal issues plenary. It may not reweigh the evidence or substitute its judgment for that of the fact-finder, and reversal requires evidence that not only supports a contrary conclusion but compels it. The ALJ must articulate sufficient reasons to permit judicial review.
PRECEDENTIAL VALUE	unpublished
PARTIES	Dacia Talbot v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

agency adjudication

disability definition

PRACTICE AREAS

Social Security

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QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated Talbot's mental impairments and incorporated any resulting limitations into the residual functional capacity assessment.
2. Whether substantial evidence supported the ALJ's step-three determination that Talbot's migraines did not meet or medically equal Listing 11.02 under SSR 19-4p.
3. Whether substantial evidence supported the physical residual functional capacity assessment, including the treatment of obesity and Talbot's alleged need to nap during the day.

HOLDINGS

1. The ALJ adequately considered Talbot's non-severe mental impairments and sufficiently explained why they did not require additional functional limitations in the residual functional capacity assessment.
2. Substantial evidence supported the ALJ's determination that Talbot's migraines did not meet or medically equal Listing 11.02, and any deficiency in the ALJ's explanation was harmless.
3. The ALJ sufficiently considered Talbot's obesity in determining her limitations and residual functional capacity, and remand was not warranted.
4. The ALJ was not required to include a limitation for Talbot's alleged need to nap because the record did not establish it as a medically supported impairment or limitation.

KEY QUOTATIONS

"About once a month." (doc. 9-2 at 58)

"the ALJ need not include limitations in the RFC that are not credibly established by the evidence."
(Conclusion footnote 2)

FACTUAL BACKGROUND

Talbot applied for supplemental security income on September 23, 2020, alleging disability beginning February 29, 2020. The ALJ found severe impairments including thyroid neoplasm, Graves' disease, cardiac arrhythmia, tachycardia, right-knee osteoarthritis, migraines, and obesity, but determined that she retained the residual functional capacity for a limited range of light work. Although she could not perform past relevant work, the ALJ found that jobs existed in significant numbers in the national economy that she could perform. The district court concluded that the ALJ adequately evaluated Talbot's mental impairments, migraines, obesity, and alleged need to nap.

PROCEDURAL HISTORY

Talbot applied for supplemental security income, received an initial denial, and obtained a hearing before an Administrative Law Judge. The ALJ found that she was not disabled, and the Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. Talbot then filed this action, and the parties

consented to magistrate-judge jurisdiction under 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73. The district court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Williams v. Sullivan, 970 F.2d 1178, 1181 (3d Cir. 1992)
- Bowen v. Yuckert, 482 U.S. 137, 146 n.5 (1987)
- Johnson v. Comm'r of Soc. Sec., 529 F.3d 198, 200 (3d Cir. 2008)
- Ficca v. Astrue, 901 F. Supp. 2d 533, 536 (M.D. Pa. 2012)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Pierce v. Underwood, 487 U.S. 552, 565 (1988)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Mason v. Shalala, 994 F.2d 1058, 1064 (3d Cir. 1993)
- Consolo v. Fed. Mar. Comm'n, 383 U.S. 607, 620 (1966)
- Leslie v. Barnhart, 304 F. Supp. 2d 623, 627 (M.D. Pa. 2003)
- Immigr. & Naturalization Serv. v. Elias-Zacarias, 502 U.S. 478, 481 n.1 (1992)
- Arnold v. Colvin, No. 12-2417, 2014 WL 940205, at *1 (M.D. Pa. Mar. 11, 2014)
- Burton v. Schweiker, 512 F. Supp. 913, 914 (W.D. Pa. 1981)
- Wright v. Sullivan, 900 F.2d 675, 678 (3d Cir. 1990)
- Burnett v. Comm'r of Soc. Sec., 220 F.3d 112, 119 (3d Cir. 2000)
- Poulos v. Comm'r of Social Security, 474 F.3d 88, 92 (3d Cir. 2007)
- Sullivan v. Zebley, 493 U.S. 521, 531 (1990)
- Scuderi v. Comm'r of Soc. Sec., 302 F. App'x 88, 90 (3d Cir. 2008)
- Jones v. Barnhart, 364 F.3d 501, 505 (3d Cir. 2004)
- Thompson v. Colvin, No. 13-1311, 2015 WL 1198103, at *20 (M.D. Pa. Mar. 16, 2015)
- Rivera v. Comm'r of Soc. Sec., 164 F. App'x 260, 263 (3d Cir. 2006)
- Diaz v. Comm'r of Soc. Sec., 577 F.3d 500, 504 (3d Cir. 2009)
- Rutherford v. Barnhart, 399 F.3d 546, 553 (3d Cir. 2005)
- Cosme v. Comm'r of Soc. Sec., 845 F. App'x 128, 132 (3d Cir. 2021)
- Carter v. Comm'r of Soc. Sec., 805 F. App'x 140, 143 (3d Cir. 2020)