

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Ozelle H. v. Frank Bisignano, Commissioner of Social Security

No. 25-cv-3050 (N.D. Ill. Apr. 6, 2026) · No. No. 25-cv-3050 · Decided April 6, 2026

SUMMARY

The United States District Court for the Northern District of Illinois affirmed the Commissioner of Social Security’s denial of disability insurance benefits to Ozelle H. The court held that the Administrative Law Judge properly evaluated the lumbar MRI and related medical evidence, the VA disability determination and underlying evidence, and the plaintiff’s mental-interaction limitations in formulating the residual functional capacity.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Keri L. Holleb Hotaling
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	April 6, 2026
DOCKET	No. 25-cv-3050
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner's final denial of disability insurance benefits on cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews whether the Commissioner's final decision rests on substantial evidence and the proper legal criteria under 42 U.S.C. § 405(g). It may not reweigh evidence, resolve evidentiary conflicts, assess credibility anew, or substitute its judgment for the Commissioner's. The ALJ must build an accurate and logical bridge between the evidence and the conclusion.
PRECEDENTIAL VALUE	unpublished
PARTIES	Ozelle H. v. Frank Bisignano, Commissioner of Social Security

TOPICS

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PRACTICE AREAS

Social Security disability benefits

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QUESTIONS PRESENTED

1. Whether the ALJ improperly interpreted Plaintiff's June 2024 lumbar MRI without adequate medical scrutiny or adequately explained the resulting physical residual functional capacity.
2. Whether the ALJ was required to analyze the VA's disability rating and obtain documentation underlying that rating.
3. Whether the ALJ adequately connected the evidence to the mental limitations in the residual functional capacity, including occasional interaction with supervisors, coworkers, and the public and restrictions to simple and detailed but not complex directions.

HOLDINGS

1. The ALJ did not improperly play doctor or fail to support the physical RFC because the ALJ relied on Dr. Hurh's medical review of the MRI and functional assessment, which supported a limitation to light work with additional postural restrictions.
2. The ALJ was not required to analyze the VA's disability rating itself, and the Commissioner acted within statutory authority in promulgating 20 C.F.R. § 404.1504. The regulation requires consideration of supporting evidence received into the SSA record but does not require the VA rating to be treated as binding or persuasive evidence.
3. The ALJ adequately supported the mental RFC limiting Plaintiff to occasional interaction with supervisors, coworkers, and the public and to simple and detailed but not complex directions.

KEY QUOTATIONS

“Rather than interpreting the functional limitations stemming from these MRI results, the ALJ discussed Plaintiff’s June 2024 exam with Dr. Hurh where Plaintiff “showed generally intact motor strength, normal neurological exam, and some mild limitation in range of motion.”” (R. 25)

“The Court finds the Commissioner’s rationale to be compelling and finds the Commissioner acted within its statutory authority in enacting 20 C.F.R. §404.1504.” (R. 34)

“The record indicates Plaintiff is capable of interacting with others in different settings and a reasonable mind would find this adequate to support the ALJ’s conclusion that Plaintiff can interact with supervisors, coworkers, and the public up to one-third of the workday.” (R. 38)

FACTUAL BACKGROUND

Plaintiff alleged disability based principally on lumbar degenerative disc disease and mental impairments including depression, anxiety, and posttraumatic stress disorder. A June 2024 lumbar MRI showed multilevel degenerative changes, including severe bilateral neural foraminal stenosis at L5-S1, and a subsequent examination by Dr. Peter Hurh assessed functional limitations consistent with light work. The record also contained evidence of interpersonal difficulties and mental-health treatment, but it showed generally cooperative examinations, participation in therapy, and some educational and other activities. The VA's 100 percent disability determination was referenced in the record, but the underlying determination document itself was not submitted.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits alleging disability beginning February 4, 2022. The application was denied initially and on reconsideration; following a June 24, 2024 administrative hearing, an ALJ issued an unfavorable decision on September 27, 2024. The Appeals Council denied review on January 17, 2025, and Plaintiff filed this action on March 21, 2025. The district court denied Plaintiff's motion for summary judgment, granted the Commissioner's cross-motion, and affirmed the denial of benefits.

DISPOSITION

affirmed

CASES CITED

- *Schloesser v. Berryhill*, 870 F.3d 712, 717 (7th Cir. 2017)
- *Stephens v. Berryhill*, 888 F.3d 323, 327 (7th Cir. 2018)
- *Hess v. O'Malley*, 92 F.4th 671, 676 (7th Cir. 2024)
- *Biestek v. Berryhill*, 139 S. Ct. 1148, 1154 (2019)
- *Elder v. Astrue*, 529 F.3d 408, 413 (7th Cir. 2008)
- *Berger v. Astrue*, 516 F.3d 539, 545 (7th Cir. 2008)
- *Rice v. Barnhart*, 384 F.3d 363, 371 (7th Cir. 2004)
- *Fitschen v. Kijakazi*, 86 F.4th 797, 802 (7th Cir. 2023)
- *Tobias B. v. Kijakazi*, No. 20-cv-2959, 2022 WL 4356857, at *6 (N.D. Ill. Sept. 20, 2022)
- *McHenry v. Berryhill*, 911 F.3d 866, 871 (7th Cir. 2018)
- *Akin v. Berryhill*, 887 F.3d 314, 317 (7th Cir. 2018)
- *Durham v. Kijakazi*, 53 F.4th 1089, 1094-1096 (7th Cir. 2022)
- *Goins v. Colvin*, 764 F.3d 677, 680 (7th Cir. 2014)
- *Stage v. Colvin*, 812 F.3d 1121, 1125 (7th Cir. 2016)
- *Rita v. Dudek*, No. 24-cv-5157, 2025 WL 1141179, at *4 (N.D. Ill. Apr. 16, 2025)
- *Bird v. Berryhill*, 847 F.3d 911, 913 (7th Cir. 2017)
- *Rogers v. Kijakazi*, 62 F.4th 872, 878 (4th Cir. 2023)
- *Kitchen v. Kijakazi*, 82 F.4th 732, 739 (9th Cir. 2023)
- *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 402-403, 412 (2024)

- Chevron, U.S.A., Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837 (1984)
- Skidmore v. Swift & Co., 323 U.S. 134, 140 (1944)
- Warnell v. O'Malley, 97 F.4th 1050, 1053 (7th Cir. 2024)
- Sims v. Apfel, 530 U.S. 103, 110-111 (2000)
- Smith v. Apfel, 231 F.3d 433, 437 (7th Cir. 2000)
- Jester v. Saul, No. 19-cv-793, 2020 WL 4040586, at *3 (E.D. Wis. July 17, 2020)
- Schmidt v. Astrue, 496 F.3d 833, 845 (7th Cir. 2007)

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