

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

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

No. 25 cv 50009, United States District Court for the Northern District of Illinois, Western Division (March 10, 2026)

SUMMARY

The United States District Court for the Northern District of Illinois reviewed the Commissioner of Social Security’s denial of Helen L.’s application for disability benefits. The court held that the Administrative Law Judge adequately accounted for Helen L.’s moderate limitations in concentration, persistence, and pace, and affirmed the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Western Division
WRITING FOR THE COURT	Margaret J. Schneider
JURISDICTION	United States District Court for the Northern District of Illinois, Western Division
DECIDED	March 10, 2026
DOCKET	25 cv 50009
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her application for disability insurance benefits. The parties consented to magistrate-judge jurisdiction, and Plaintiff moved to reverse and remand.
STANDARD OF REVIEW	The court reviews whether the ALJ's decision is supported by substantial evidence and confines review to the reasons offered by the ALJ. The court may not reweigh evidence, resolve evidentiary conflicts, make independent credibility determinations, or substitute its judgment for the ALJ's; reversal is warranted only if the record compels a contrary result.
PRECEDENTIAL VALUE	Unknown
PARTIES	Helen L. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment adequately accounted for Plaintiff's moderate limitation in concentration, persistence, and pace.
2. Whether the ALJ's evaluation of Plaintiff's symptoms and the supporting medical and daily-activity evidence was supported by substantial evidence.

HOLDINGS

1. The ALJ adequately accounted for Plaintiff's moderate concentration, persistence, and pace limitation by limiting her to simple instructions and simple work-related decisions, with sufficient persistence, concentration, or pace to timely and appropriately complete job duties, together with other restrictions supported by the record.
2. The ALJ's evaluation of Plaintiff's subjective symptoms and the medical and other evidence was adequately explained and supported by substantial evidence.

KEY QUOTATIONS

“The reviewing court evaluates the ALJ’s determination to establish whether it is supported by “substantial evidence,” meaning “such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.””

“The Court finds that the ALJ adequately addressed Plaintiff’s moderate limitations in CPP and sufficiently supported her reasoning.”

“Here, the ALJ’s evaluation of Plaintiff’s symptoms adequately supported her finding that in a work environment, Plaintiff could carry out simple instructions with sufficient persistence, concentration, or pace to timely and appropriately complete job duties.”

FACTUAL BACKGROUND

Helen L. applied for Title II disability insurance benefits, alleging disability beginning August 15, 2019. The ALJ found severe physical and mental impairments, including PTSD, depression, borderline personality disorder, traumatic brain injury, and substance-induced mood and anxiety disorder, but determined that Plaintiff retained the residual functional capacity for light work with physical, social, and mental restrictions. The ALJ found that Plaintiff could perform simple work with sufficient persistence, concentration, or pace to complete job duties and that jobs existed in significant numbers in the national economy. Plaintiff challenged the RFC, principally arguing that it failed to account adequately for her moderate limitation in concentration, persistence, and pace.

PROCEDURAL HISTORY

Plaintiff filed a Title II application for disability insurance benefits alleging disability beginning August 15, 2019. The Social Security Administration denied the application initially and on reconsideration; following a telephonic hearing, the ALJ denied the claim, and the Appeals Council denied review. The district court reviewed the Commissioner's final decision and affirmed it.

DISPOSITION

affirmed

CASES CITED

- Cain v. Bisignano, No. 24-1590, 2025 WL 2202133, at *3 (7th Cir. Aug. 4, 2025)
- Crowell v. Kijakazi, 72 F.4th 810, 813-14 (7th Cir. 2023)
- Biestek v. Berryhill, 587 U.S. 97, 97, 103 (2019)
- Elder v. Astrue, 529 F.3d 408, 413 (7th Cir. 2008)
- Green v. Astrue, No. 11 CV 8907, 2013 WL 709642, at *7 (N.D. Ill. Feb. 27, 2013)
- Warnell v. O'Malley, 97 F.4th 1050, 1053-54 (7th Cir. 2024)
- Thorlton v. King, 127 F.4th 1078, 1081 (7th Cir. 2025)
- Jeske v. Saul, 955 F.3d 583, 587 (7th Cir. 2020)
- Bakke v. Kijakazi, 62 F.4th 1061, 1066 (7th Cir. 2023)
- Varga v. Colvin, 794 F.3d 809, 813 (7th Cir. 2015)
- Amey v. Astrue, No. 09 C 2712, 2012 WL 366522, at *13 (N.D. Ill. Feb. 2, 2012)
- Briscoe ex rel. Taylor v. Barnhart, 425 F.3d 345, 352 (7th Cir. 2005)
- Jarnutowski v. Kijakazi, 48 F.4th 769, 774 (7th Cir. 2022)
- Pavlicek v. Saul, 994 F.3d 777, 783 (7th Cir. 2021)
- Crump v. Saul, 932 F.3d 567, 570 (7th Cir. 2019)
- Bruno v. Saul, 817 Fed. Appx. 238, 242 (7th Cir. 2020)
- Grotts v. Kijakazi, 27 F.4th 1273, 1279 (7th Cir. 2022)
- Cullinan v. Berryhill, 878 F.3d 598, 603 (7th Cir. 2017)
- Recha v. Saul, 843 Fed. Appx. 1 (7th Cir. 2021)
- Urbanek v. Saul, 796 Fed. Appx. 910, 914 (7th Cir. 2019)
- Deborah M. v. Saul, 994 F.3d 785, 788 (7th Cir. 2021)
- Schmidt v. Astrue, 496 F.3d 833, 841 (7th Cir. 2007)