

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

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

Ernest M. · No. 1:25-cv-00061-KRS · Decided March 24, 2026

SUMMARY

The United States District Court for the District of New Mexico reviewed the Commissioner of the Social Security Administration’s denial of Ernest M.’s application for supplemental security income. The court held that the Administrative Law Judge did not err in evaluating the claimant’s mental impairments or residual functional capacity, including the limitation to simple work, and that substantial evidence supported the decision. The court denied the claimant’s motion for judgment on the pleadings and affirmed the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the District of New Mexico
WRITING FOR THE COURT	Kevin R. Sweazea
JURISDICTION	United States District Court for the District of New Mexico
DECIDED	March 24, 2026
DOCKET	1:25-cv-00061-KRS
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of supplemental security income and moved for judgment on the pleadings.
STANDARD OF REVIEW	The court determines whether substantial evidence supports the Commissioner's factual findings and whether the ALJ applied the correct legal standards. The court may not reweigh the evidence or substitute its judgment for the Commissioner's.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Ernest M. v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- ada / disability

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ's RFC adequately accounted for Plaintiff's moderate limitation in understanding, remembering, and carrying out simple instructions after finding a corresponding medical opinion persuasive.
2. Whether the ALJ's evaluation of Plaintiff's daily activities and subjective symptoms was supported by substantial evidence.
3. Whether the ALJ's hypothetical question to the vocational expert was supported by substantial evidence.

HOLDINGS

1. An RFC limitation to simple work may adequately account for a moderate limitation in understanding, remembering, and applying information when the record supports the relationship between the claimant's mental capacity and the restricted skill level. In this case, the ALJ's limitation to simple work sufficiently incorporated Plaintiff's moderate limitation.
2. Any error in the ALJ's characterization of some of Plaintiff's daily activities was harmless because substantial evidence, including objective medical evidence and medical opinions, supported the RFC assessment and evaluation of Plaintiff's symptoms.
3. The hypothetical question was not flawed because it included the limitations ultimately adopted in the RFC, and the ALJ was not required to include limitations the ALJ reasonably determined were not part of the RFC.

KEY QUOTATIONS

"The Court finds that the ALJ's limitation to "simple work" sufficiently accounts for Plaintiff's moderate limitation in understanding, remembering, and applying information." (Section IV.A)

"For the reasons set forth above, the Court DENIES Plaintiff's Motion for Judgment on the Pleadings (Doc. 11) and AFFIRMS the Commissioner's decision." (Section V)

FACTUAL BACKGROUND

Plaintiff alleged disability from bipolar disorder, depression, antisocial personality disorder, schizophrenia, anxiety, and related mental-health symptoms, including hallucinations, panic attacks, impaired concentration, and difficulty interacting with others. The administrative record also showed intermittent treatment, inconsistent medication compliance, generally intact cognition and judgment during several examinations, and daily activities including preparing simple meals, shopping, self-care, reading, fishing, playing chess, and working on motors. The ALJ found moderate limitations in understanding, remembering or applying information; concentrating, persisting or maintaining pace; and adapting or managing oneself, and a marked limitation in interacting with others. The ALJ assigned an RFC for simple work, occasional interaction with coworkers and

supervisors, no interaction with the general public, no strict production-pace work, and occasional workplace changes.

PROCEDURAL HISTORY

Plaintiff applied for SSI on August 30, 2022. The application was denied initially and on reconsideration. After an August 27, 2024 hearing, the ALJ issued an unfavorable decision on September 4, 2024, and the Appeals Council denied review on November 1, 2024. Plaintiff filed this action on January 22, 2025, and the parties consented to dispositive proceedings before the magistrate judge. The court denied Plaintiff's motion and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Allman v. Colvin, 813 F.3d 1326, 1330 (10th Cir. 2016)
- Lax v. Astrue, 489 F.3d 1080, 1084 (10th Cir. 2007)
- Langley v. Barnhart, 373 F.3d 1116, 1118 (10th Cir. 2004)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Grogan v. Barnhart, 399 F.3d 1257, 1261-62 (10th Cir. 2005)
- Clifton v. Chater, 79 F.3d 1007, 1009-10 (10th Cir. 1996)
- Byron v. Heckler, 742 F.2d 1232, 1235 (10th Cir. 1984)
- Barnhart v. Thomas, 540 U.S. 20, 24-25 (2003)
- Wall v. Astrue, 561 F.3d 1048, 1051-52, 1070 (10th Cir. 2009)
- Winfrey v. Chater, 92 F.3d 1017, 1023-25 (10th Cir. 1996)
- Bales v. Colvin, 576 F. App'x 792, 798 (10th Cir. 2014)
- Wells v. Colvin, 727 F.3d 1061, 1068-71 (10th Cir. 2013)
- Parker v. Commissioner, 922 F.3d 1169, 1172-73 (10th Cir. 2019)
- Vigil v. Colvin, 805 F.3d 1199, 1203-04 (10th Cir. 2015)
- Smith v. Colvin, 821 F.3d 1264, 1269-70 (10th Cir. 2016)
- Berumen v. Colvin, 640 F. App'x 763, 766 (10th Cir. 2016)
- Lager v. Commissioner, 2023 U.S. App. LEXIS 25630, 2023 WL 6307490, at *2 & n.1 (10th Cir. Sept. 28, 2023)
- Evans v. Colvin, 640 F. App'x 731, 738 (10th Cir. 2016)
- Keyes-Zachary v. Astrue, 695 F.3d 1156, 1161, 1166 (10th Cir. 2012)
- Haga v. Astrue, 482 F.3d 1205, 1208 (10th Cir. 2007)
- Nelson v. Colvin, 655 F. App'x 626, 628-29 (10th Cir. 2016)
- Fulton v. Colvin, 631 F. App'x 498, 508 (10th Cir. 2015)

- L.H. v. Bisignano, No. 25-1052-JWB, 2025 U.S. Dist. LEXIS 420537 (D. Kan. Oct. 20, 2025)
- Gutierrez v. Kijakazi, No. 20-552 KK, 2021 U.S. Dist. LEXIS 194833, at 10-11 (D.N.M. Oct. 8, 2021)
- Garcia v. Colvin, No. 14-cv-02914-NYW, 2016 U.S. Dist. LEXIS 33284, 2016 WL 1028297, at *6-7 (D. Colo. Mar. 15, 2016)
- Kruse v. Astrue, 436 F. App'x 879, 885 (10th Cir. 2011)
- State Farm Fire & Casualty Co. v. Mhoon, 31 F.3d 979, 984 n.7 (10th Cir. 1994)
- Berna v. Chater, 101 F.3d 631, 632-33 (10th Cir. 1996)
- Sadeghi v. INS, 40 F.3d 1139, 1143 (10th Cir. 1994)
- Sitsler v. Astrue, 410 F. App'x 112, 117 (10th Cir. 2011)
- Hardman v. Barnhart, 362 F.3d 676, 678-79 (10th Cir. 2004)

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