

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

Rodney Paul F. Sr. v. Frank Bisignano

Rodney Paul F. Sr. · No. 4:25-cv-683 · Decided February 18, 2026

SUMMARY

This Memorandum and Recommendation addresses cross-motions for summary judgment in a Social Security disability benefits action. The magistrate judge recommends granting the Commissioner's motion, denying the plaintiff's motion, affirming the denial of benefits, and dismissing the case with prejudice. The recommendation rejects challenges concerning the residual functional capacity assessment, evaluation of medical opinions, and the step-five vocational evidence.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Houston Division
WRITING FOR THE COURT	Richard W. Bennett, United States Magistrate Judge
JURISDICTION	United States District Court for the Southern District of Texas, Houston Division
DECIDED	February 18, 2026
DOCKET	4:25-cv-683
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Social Security disability insurance benefits. The parties filed cross-motions for summary judgment, and the magistrate judge issued a Memorandum and Recommendation recommending that the Commissioner's motion be granted, Plaintiff's motion be denied, the administrative decision be affirmed, and the case be dismissed with prejudice.
STANDARD OF REVIEW	The court reviews the Commissioner's decision to determine whether it is supported by substantial evidence on the record as a whole and whether the Commissioner applied the proper legal standard. The court may not reweigh the evidence, try the issues de novo, or substitute its judgment for the Commissioner's.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Rodney Paul F. Sr. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

summary judgment

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment adequately accounted for the mental limitations identified under the paragraph B criteria.
2. Whether the ALJ sufficiently articulated the evaluation of the medical opinion of consultative examiner Dr. Faiyaz Bhojani under 20 C.F.R. § 404.1520c.
3. Whether substantial evidence supported the ALJ's step-five finding that Plaintiff could perform other work existing in significant numbers in the national economy.

HOLDINGS

1. An ALJ is not required to incorporate paragraph B findings word-for-word into the residual functional capacity assessment, provided the assessed RFC reasonably accounts for the supported functional limitations and is supported by substantial evidence.
2. The ALJ satisfied the articulation requirements of 20 C.F.R. § 404.1520c by addressing the supportability and consistency of Dr. Bhojani's opinion and reasonably finding it only somewhat persuasive.
3. A typographical error in the written DOT code does not require remand where the vocational expert provided the correct code at the hearing, the ALJ relied on the vocational testimony, and the error did not affect the substance of the step-five finding.
4. The ALJ could rely on uncontradicted vocational-expert testimony that the identified jobs, as generally performed, required only occasional interaction with supervisors, notwithstanding greater interaction during training.

KEY QUOTATIONS

“The Court’s review of a final decision of the Commissioner on a Social Security disability claim is exceedingly deferential.” (at 4)

“review of Social Security disability cases ‘is limited to two inquiries: (1) whether the decision is supported by substantial evidence on the record as a whole, and (2) whether the Commissioner applied the proper legal standard.’” (at 4)

“The ALJ is not required to incorporate the ‘paragraph B’ functional limitations into the RFC assessment ‘word-for-word.’” (at 8)

“Because the ALJ posed a hypothetical that incorporated the limitations supported by the record, and relied on uncontradicted VE testimony identifying jobs existing in significant numbers in the national economy, substantial evidence supports the ALJ’s step-five determination.” (at 14)

FACTUAL BACKGROUND

Plaintiff alleged disability based on physical and mental impairments including obesity, lumbar degenerative disc disease, bilateral knee osteoarthritis, diabetes, sleep apnea, migraine headaches, PTSD, depression, anxiety, and alcohol abuse. The ALJ found moderate limitations in interacting with others and in concentrating, persisting, or maintaining pace, but assessed a reduced range of light work with detailed-but-not-complex instructions, no production-rate work, and occasional interaction with others. Relying on medical evidence and vocational-expert testimony, the ALJ found that Plaintiff could perform jobs such as storage-facility rental clerk, office helper, and photocopy-machine operator.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits on August 18, 2023, alleging disability beginning August 14, 2023. The Social Security Administration denied the claim initially and on reconsideration; after a hearing, the ALJ found Plaintiff not disabled at step five on September 18, 2024. The Appeals Council denied review on December 19, 2024, making the ALJ’s decision the Commissioner’s final decision. Plaintiff then filed this action, and the magistrate judge recommended judgment for the Commissioner.

DISPOSITION

other

CASES CITED

- Masterson v. Barnhart, 309 F.3d 267, 271 (5th Cir. 2002)
- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- Taylor v. Astrue, 706 F.3d 600, 602 (5th Cir. 2012)
- Copeland v. Colvin, 771 F.3d 920, 923 (5th Cir. 2014)
- Perez v. Barnhart, 415 F.3d 457, 461 (5th Cir. 2005)
- Singletary v. Bowen, 798 F.2d 818, 822-23 (5th Cir. 1986)
- Hardman v. Colvin, 820 F.3d 142, 147 (5th Cir. 2016)
- Newton v. Apfel, 209 F.3d 448, 452 (5th Cir. 2000)
- Heck v. Colvin, 674 F. App’x 411, 413 (5th Cir. 2017)
- Brown v. Apfel, 192 F.3d 492, 496 (5th Cir. 1999)
- Johnson v. Colvin, 595 F. App’x 443, 444 (5th Cir. 2015)
- Harrell v. Bowen, 862 F.2d 471, 475 (5th Cir. 1988)

- Miller v. Kijakazi, No. 4:22-cv-03905, 2024 WL 1075485, at *5 (S.D. Tex. Mar. 12, 2024)
- Honaker v. Kijakazi, No. 2:22-cv-00285, 2023 WL 9503412, at *6 (S.D. Tex. June 12, 2023)
- Scott v. Commissioner, Social Security Administration, No. 4:20-cv-01136, 2022 WL 4240888, at *10 (N.D. Tex. Sept. 14, 2022)
- Bonner v. Berryhill, No. 4:17-cv-0641, 2018 WL 3756837, at *5 (S.D. Tex. Aug. 8, 2018)
- K.L.J. v. Commissioner, Social Security Administration, No. 24-cv-3065, 2025 WL 3170490 (D. Colo. Nov. 7, 2025)
- Glynn v. Social Security Administration, No. 24-cv-183, 2024 WL 5706063, at *7 (E.D. La. Nov. 22, 2024)
- Claudio v. Commissioner of Social Security, No. 4:23-cv-108, 2023 WL 4748218, at *5 (N.D. Tex. July 25, 2023)
- Harris v. Apfel, 209 F.3d 413, 417 (5th Cir. 2000)
- Qualls v. Astrue, 339 F. App'x 461, 466 (5th Cir. 2009)
- Bradley v. Bowen, 809 F.2d 1054, 1057 (5th Cir. 1987)
- Joseph v. Astrue, 231 F. App'x 327, 331 (5th Cir. 2007)
- Mays v. Bowen, 837 F.2d 1362, 1364 (5th Cir. 1988)
- Carter v. Massey-Ferguson, Inc., 716 F.2d 344, 349 (5th Cir. 1983)
- Carey v. Apfel, 230 F.3d 131, 145-47 (5th Cir. 2000)