

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, TAMPA DIVISION

**Bianca O. Bush, on behalf of K.H. v. Frank Bisignano, Commissioner
of Social Security**

Bush · No. 8:24-cv-2663-KKM-TGW · Decided February 12, 2026

SUMMARY

The United States District Court for the Middle District of Florida overruled Bianca Bush’s objections to the magistrate judge’s Report and Recommendation in her Social Security disability claim on behalf of her minor son, K.H. The court adopted the Report and Recommendation, affirmed the Commissioner’s denial of benefits, directed entry of judgment for the Commissioner, and closed the case.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Tampa Division
WRITING FOR THE COURT	Kathryn Kimball Mizelle
JURISDICTION	United States District Court for the Middle District of Florida, Tampa Division
DECIDED	February 12, 2026
DOCKET	8:24-cv-2663-KKM-TGW
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner of Social Security's denial of a supplemental security income claim. The magistrate judge recommended affirmance, and the district court reviewed and overruled Plaintiff's objections, adopted the Report and Recommendation, and affirmed the Commissioner's decision.
STANDARD OF REVIEW	A district court reviews timely and specific objections to factual findings by a magistrate judge de novo and reviews legal conclusions de novo, even absent an objection. The Commissioner's decision is affirmed when supported by substantial evidence and free of reversible error.
PRECEDENTIAL VALUE	unpublished district court order; precedential status unknown

PARTIES

Bianca O. Bush, on behalf of K.H. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether Bush's objections to the magistrate judge's Report and Recommendation were sufficiently specific to require district-court review.
2. Whether the ALJ adequately considered the supportability of the prior administrative medical findings under 20 C.F.R. § 416.920c.
3. Whether the Commissioner's denial of supplemental security income was supported by substantial evidence and free of reversible error.

HOLDINGS

1. Objections that merely restate arguments previously presented and fail to identify specific errors by the magistrate judge are procedurally improper and do not require responses beyond the review otherwise required by law.
2. The ALJ's discussion of the supportability of the prior administrative medical findings was sufficient under 20 C.F.R. § 416.920c.

KEY QUOTATIONS

"Parties filing objections to a magistrate's report and recommendation must specifically identify those findings objected to. Frivolous, conclusive, or general objections need not be considered by the district court." (Analysis, Part III)

"The regulations do not require an exhaustive discussion of the evidence when evaluating the consistency and supportability of an opinion." (Analysis, Part III)

FACTUAL BACKGROUND

Bianca Bush applied for supplemental security income on behalf of her minor son, K.H., alleging disability beginning September 1, 2017. The ALJ denied the application after evaluating K.H.'s functional limitations and the persuasiveness of prior administrative medical findings. Bush challenged the ALJ's evaluation of those findings and K.H.'s abilities in attending and completing tasks, interacting and relating with others, and moving about and manipulating objects.

PROCEDURAL HISTORY

Bush applied on behalf of her minor son, K.H., for supplemental security income. An administrative law judge denied the application on March 1, 2024, and the Social Security Administration Appeals Council affirmed on September 13, 2024. Bush filed this action on November 15, 2024. The magistrate judge recommended affirmance, and the district court adopted that recommendation after reviewing Bush's objections.

DISPOSITION

affirmed

CASES CITED

- Stokes v. Singletary, 952 F.2d 1567, 1576 (11th Cir. 1992)
- Cooper-Houston v. S. Ry. Co., 37 F.3d 603, 604 (11th Cir. 1994)
- Ashworth v. Glades Cnty. Bd. of Cnty. Comm'rs, 379 F. Supp. 3d 1244, 1246 (M.D. Fla. 2019)
- Barnett-Menzer v. Saul, No. 19-63005-CIV, 2021 WL 1206387, at *4 (S.D. Fla. Mar. 31, 2021)
- United States v. Schultz, 565 F.3d 1353, 1361 (11th Cir. 2009) (per curiam)
- Marsden v. Moore, 847 F.2d 1536, 1548 (11th Cir. 1988)
- Koehler v. Kijakazi, No. 2:22-CV-210-JES-KCD, 2023 WL 1098234, at *6 (M.D. Fla. Jan. 30, 2023)