

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
NORTH CAROLINA

Catharine G. v. Frank J. Bisignano, Commissioner of Social Security

Catharine G. · No. 1:24-cv-00982 · Decided April 21, 2026

SUMMARY

The United States District Court for the Middle District of North Carolina reviews the denial of Catharine G.'s claim for Disability Insurance Benefits under the Social Security Act. The court concludes that the Administrative Law Judge inadequately evaluated the claimant's subjective complaints and documented obsessive-compulsive disorder symptoms, including the significance of clinical stability findings and other mental-status-examination results. The court remands the matter for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Middle District of North Carolina
WRITING FOR THE COURT	L. Patrick Auld
JURISDICTION	United States District Court for the Middle District of North Carolina
DECIDED	April 21, 2026
DOCKET	1:24-cv-00982
DISPOSITION	vacated
PROCEDURAL POSTURE	Action under 42 U.S.C. § 405(g) seeking judicial review of the Commissioner's final decision denying Disability Insurance Benefits.
STANDARD OF REVIEW	The court must uphold the ALJ's factual findings if supported by substantial evidence and reached through application of the correct legal standard. The court may not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for that of the ALJ.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Catharine G. v. Frank J. Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- agency adjudication

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated Plaintiff's subjective reports concerning the intensity, persistence, and limiting effects of her OCD symptoms.
2. Whether the ALJ improperly relied on generally stable mental-status examinations, normal findings unrelated to Plaintiff's OCD symptoms, and Plaintiff's self-directed benzodiazepine taper to discount her subjective symptom reports.
3. Whether the ALJ adequately evaluated the persuasiveness of the opinions of treating psychiatrist Dr. Matthew Conner and treating therapist Robert Milan, LCSW.
4. Whether the Commissioner's final decision should be vacated and remanded under sentence four of 42 U.S.C. § 405(g).

HOLDINGS

1. The ALJ failed to support with substantial evidence the evaluation discounting Plaintiff's subjective reports concerning the intensity, persistence, and limiting effects of her OCD symptoms.
2. Because the ALJ relied on the same improper rationales to discount the opinions of Dr. Conner and LCSW Milan, the ALJ also erred in evaluating those opinions.

KEY QUOTATIONS

“Thus, Plaintiff’s mental symptoms remained “stable” only insofar as they remained consistently severe and, thus, the observation by the ALJ of overall “stability” in Plaintiff’s mental condition (Tr. 26; see also Tr. 27) does not provide substantial evidence to support the ALJ’s discounting of Plaintiff’s subjective reports of OCD symptoms.” (15-16)

“The ALJ’s repeated reliance on Plaintiff’s ability to self-direct a benzodiazepine taper as evidence inconsistent with Plaintiff’s assertions of disabling OCD symptoms (see Tr. 25-27) represents a fundamental misunderstanding of the symptoms Plaintiff alleged she experienced.” (19-20)

“IT IS THEREFORE ORDERED that the Commissioner’s decision finding no disability is VACATED, and that this action is REMANDED under sentence four of 42 U.S.C. 405(g)” (25)

FACTUAL BACKGROUND

Plaintiff alleged disability based principally on obsessive-compulsive disorder, anxiety, and related symptoms that affected her concentration, stress tolerance, adaptation, and ability to work. The ALJ found severe impairments of asthma, anxiety, and OCD, but determined that Plaintiff retained the residual functional capacity for a full range of work with specified nonexertional limitations and was not disabled. The record included repeated treatment observations of impaired attention, ruminations, anxiety, fixation on a very slow benzodiazepine taper, and treating-provider opinions that Plaintiff's symptoms prevented sustained work.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits, alleging disability beginning July 13, 2019. The application was denied initially and on reconsideration. After an initial ALJ decision denying benefits, the Appeals Council remanded because the vocational expert had not received a hypothetical including a no-production-rate-pace limitation. Following a second hearing, the ALJ again denied benefits, and the Appeals Council denied review. On judicial review, the district court vacated the Commissioner's decision and remanded for further administrative proceedings.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The Commissioner's decision is vacated and the case is remanded under sentence four of 42 U.S.C. § 405(g). On remand, the Commissioner must re-evaluate Plaintiff's subjective symptom reports in accordance with the opinion, reassess the persuasiveness of Dr. Conner's and LCSW Milan's opinions in accordance with the opinion, and redetermine Plaintiff's residual functional capacity. The court suggests, but does not require, assignment to a different ALJ.

CASES CITED

- Hines v. Barnhart, 453 F.3d 559 (4th Cir. 2006)
- Frady v. Harris, 646 F.2d 143 (4th Cir. 1981)
- Oppenheim v. Finch, 495 F.2d 396 (4th Cir. 1974)
- Hunter v. Sullivan, 993 F.2d 31 (4th Cir. 1992)
- Richardson v. Perales, 402 U.S. 389 (1971)
- Mastro v. Apfel, 270 F.3d 171 (4th Cir. 2001)
- Craig v. Chater, 76 F.3d 585 (4th Cir. 1996)
- Hall v. Harris, 658 F.2d 260 (4th Cir. 1981)
- Albright v. Commissioner of Social Security Administration, 174 F.3d 473 (4th Cir. 1999)
- Bennett v. Sullivan, 917 F.2d 157 (4th Cir. 1990)
- Ward v. Colvin, 90 F. Supp. 3d 510 (E.D.N.C. 2015)
- Brooks v. Colvin, No. 7:13CV161, 2014 WL 3535113 (E.D.N.C. June 23, 2014)
- O'Neal v. Commissioner of Social Security, No. 1:10CV531, 2011 WL 4383724 (S.D. Ohio Aug. 24, 2011)
- Lechner v. Barnhart, 321 F. Supp. 2d 1015 (E.D. Wis. 2004)
- Arakas v. Commissioner, Social Security Administration, 983 F.3d 83 (4th Cir. 2020)
- Shelley C. v. Commissioner of Social Security, 61 F.4th 341 (4th Cir. 2023)
- Lloyd v. Astrue, No. 5:09CV292, 2010 WL 2812672 (E.D.N.C. June 9, 2010)
- Travis v. Sullivan, 985 F.2d 919 (7th Cir. 1993)
- Sherman v. Berryhill, Civ. No. 18-439, 2019 WL 2450919 (D.N.M. June 12, 2019)

