

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

Richard N. v. Frank Bisignano, Commissioner of Social Security

Richard N. · No. 23 C 6338 · Decided February 13, 2026

SUMMARY

The United States District Court for the Northern District of Illinois reviewed an Administrative Law Judge’s denial of disability benefits for the period from March 5, 2013, through August 11, 2015. The court held that substantial evidence supported the residual functional capacity determination, including the omission of additional bathroom-break limitations related to the plaintiff’s inflammatory bowel disease, and that the ALJ’s subjective-symptom analysis was not patently wrong. The court granted the Commissioner’s motion for summary judgment and denied the plaintiff’s request for remand.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Laura K. McNally
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	February 13, 2026
DOCKET	23 C 6338
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of an administrative decision denying his applications for Disability Insurance Benefits and Supplemental Security Income for specified periods. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews the ALJ's decision for substantial evidence and will not reweigh evidence, resolve evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's. An ALJ's subjective-symptom determination will not be overturned unless it is patently wrong.
PRECEDENTIAL VALUE	unpublished
PARTIES	Richard N. v. Frank Bisignano, Commissioner of Social Security

TOPICS

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity determination was supported by substantial evidence despite omitting limitations for additional or unscheduled bathroom breaks related to Plaintiff's inflammatory bowel disease.
2. Whether the ALJ properly evaluated Plaintiff's subjective symptoms under SSR 16-3p.
3. Whether the ALJ was required to adopt a limitation included in a prior ALJ's decision.

HOLDINGS

1. An ALJ is not required to include a particular RFC limitation merely because an impairment is classified as severe; the RFC must instead be supported by substantial evidence. The ALJ's omission of additional bathroom-break limitations for Plaintiff's inflammatory bowel disease was supported by substantial evidence.
2. The ALJ's evaluation of Plaintiff's subjective symptoms was not patently wrong and was supported by specific reasons grounded in the record.
3. The second ALJ was not required to adopt the prior ALJ's finding of one extra unscheduled break so long as the new decision was supported by substantial evidence.

KEY QUOTATIONS

"An ALJ's decision will be affirmed if it is supported by "substantial evidence," which means "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion."" (at 3)

"the ALJ was only required to support the RFC determination with substantial evidence." (at 4)

"As long as an ALJ gives specific reasons supported by the record, the Court "will not overturn a credibility determination unless it is patently wrong."" (at 11)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning March 5, 2013 based principally on inflammatory bowel disease, degenerative disc and joint disease, and peripheral neuropathy. He testified that during the relevant period he used the bathroom frequently, sometimes up to 30 times per day, experienced bowel accidents, and needed adult diapers. The medical record, however, included many normal abdominal examinations, limited complaints during the relevant period, and opinions from state-agency physicians that Plaintiff could perform light work without additional bathroom-break limitations.

PROCEDURAL HISTORY

Plaintiff applied for DIB and SSI in 2014. After prior administrative decisions, an Appeals Council remand, and a prior district-court remand concerning evaluation of musculoskeletal pain, an ALJ held a further hearing on February 27, 2023 and found Plaintiff not disabled during the relevant periods. The district court granted the Commissioner's motion for summary judgment and denied Plaintiff's request for remand.

DISPOSITION

affirmed

CASES CITED

- Young v. Sec'y of Health & Human Servs., 957 F.2d 386, 389 (7th Cir. 1992)
- Prill v. Kijakazi, 23 F.4th 738, 746 (7th Cir. 2022)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Warnell v. O'Malley, 97 F.4th 1050, 1053-54 (7th Cir. 2024)
- Morales v. O'Malley, 103 F.4th 469, 471 (7th Cir. 2024)
- Chavez v. O'Malley, 96 F.4th 1016, 1021 (7th Cir. 2024)
- Michael J. M. v. King, No. 1:22-CV-3946, 2025 WL 446252, at *3 (N.D. Ill. Feb. 10, 2025)
- Sampson v. Kijakazi, No. 21 C 318, 2022 WL 1135037, at *7 (E.D. Wis. Apr. 18, 2022)
- Lisa C. v. Kijakazi, No. 20-CV-5173, 2023 WL 3436400, at *8-*9 (N.D. Ill. May 12, 2023)
- Jacob D. v. Kijakazi, No. 20-CV-0554, 2021 WL 3674610, at *3 (N.D. Ill. Aug. 19, 2021)
- Bollas v. Astrue, 694 F. Supp. 2d 978, 990 (N.D. Ill. 2010)
- Jones v. Shalala, 10 F.3d 522, 525 n.4 (7th Cir. 1993)
- Rabdeau v. Bisignano, 155 F.4th 908, 909 (7th Cir. 2025)
- Zellweger v. Saul, 984 F.3d 1251, 1255 (7th Cir. 2021)
- Deborah M. v. Saul, 994 F.3d 785, 789 (7th Cir. 2021)
- Schrank v. Saul, 843 F. App'x 786, 789 (7th Cir. 2021)
- Simila v. Astrue, 573 F.3d 503, 517 (7th Cir. 2009)
- Elder v. Astrue, 529 F.3d 408, 413-14 (7th Cir. 2008)

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