

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA, INDIANAPOLIS DIVISION

Cheyenne U. v. Frank Bisignano, Commissioner of Social Security

No. 1:24-cv-02112-MG-SEB (S.D. Ind. Mar. 12, 2026) · No. 1:24-cv-02112-MG-SEB · Decided March 12, 2026

SUMMARY

The United States District Court for the Southern District of Indiana denied Plaintiff Cheyenne U.'s motion for judgment on the pleadings and affirmed the Commissioner's denial of Social Security disability benefits. The court held that the ALJ adequately evaluated Plaintiff's subjective symptoms, obtained a valid waiver of representation, developed the record sufficiently, and properly permitted questioning of the vocational expert.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana, Indianapolis Division
WRITING FOR THE COURT	Mario Garcia
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	March 12, 2026
DOCKET	1:24-cv-02112-MG-SEB
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's denial of Social Security disability benefits and moved for judgment on the pleadings.
STANDARD OF REVIEW	The court reviewed whether the ALJ applied the correct legal standard and whether substantial evidence supported the decision. It reviewed the record as a whole, did not reweigh the evidence or substitute its judgment for the ALJ's, deferred to credibility findings unless patently wrong, and required an accurate and logical bridge between the evidence and the conclusion.
PRECEDENTIAL VALUE	unpublished
PARTIES	Cheyenne U. v. Frank Bisignano, Commissioner of Social Security

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QUESTIONS PRESENTED

1. Whether the ALJ's evaluation of Plaintiff's subjective symptoms and alleged limitations was patently wrong or lacked adequate evidentiary support.
2. Whether the ALJ obtained a valid waiver of Plaintiff's right to representation at the administrative hearing.
3. Whether the ALJ adequately developed the record despite Plaintiff's unrepresented status, including whether the ALJ was required to obtain a treating-source opinion.
4. Whether the ALJ adequately developed the record concerning Plaintiff's alleged need for frequent bathroom use.
5. Whether Plaintiff was properly informed of her opportunity to question the vocational expert and whether the vocational-expert testimony lacked a sufficient foundation.

HOLDINGS

1. The ALJ's evaluation of Plaintiff's subjective symptoms was supported by the record and was not patently wrong; the ALJ adequately explained why Plaintiff's allegations of disabling pain and functional limitation were inconsistent with other evidence.
2. Plaintiff validly waived her right to representation because she received written notice and oral explanation concerning the benefits of representation, the availability of free or contingent representation, and the applicable attorney-fee limitation, and she confirmed her understanding and desire to proceed without representation.
3. The ALJ retained and satisfied the duty to develop the record despite Plaintiff's valid waiver of representation.
4. The ALJ was not required to obtain a treating physician's opinion, and the absence of such an opinion did not require remand because the record was not incomplete or skeletal.
5. The ALJ adequately developed the record concerning Plaintiff's alleged need for frequent bathroom use; the record did not make the issue sufficiently obvious to require additional inquiry.
6. Plaintiff was adequately informed of her opportunity to question the vocational expert, and the ALJ was entitled to rely on the vocational expert's unchallenged testimony because Plaintiff identified no specific flaw in its foundation, methodology, or job estimates.

KEY QUOTATIONS

"The record does not support greater limitation. Although the claimant alleged she had severe, constant abdominal pain that interfered with her ability to perform activities of daily living, she also told her pain

management provider multiple times that medication worked for her and she was able to function "reasonably well." The claimant did not have emergency room or urgent care visits during the period at issue for abdominal pain. Accordingly, the evidence is not consistent with the severe limitations alleged by the claimant." (Filing No. 7-2 at 25)

"Plainly, the Commissioner clearly satisfied the Seventh Circuit's waiver of representation requirements." (Discussion, subsection i)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning November 23, 2021, primarily based on chronic gastrointestinal pain and related symptoms. The ALJ found severe impairments of chronic pancreatitis and obesity, determined that Plaintiff retained the residual functional capacity for a restricted range of light work, and found that she could perform her past work as a production assembler. Treatment records reflected varying reports of pain, including reports that oxycodone reasonably managed the pain and allowed Plaintiff to function at a reasonable level, as well as mixed evidence concerning constipation, diarrhea, and bowel frequency.

PROCEDURAL HISTORY

The ALJ found that Plaintiff was not disabled under the Social Security Act after applying the five-step evaluation process, determining that Plaintiff could perform light work and past relevant work as a production assembler. Plaintiff, proceeding without representation at the administrative hearing, challenged the ALJ's decision based on the subjective-symptom evaluation, waiver of counsel, development of the record, bathroom-use limitations, and vocational-expert testimony. The district court denied Plaintiff's motion for judgment on the pleadings and affirmed the Commissioner's determination.

DISPOSITION

affirmed

CASES CITED

- *Biestek v. Berryhill*, 587 U.S. 97, 98, 103 (2019)
- *Stephens v. Berryhill*, 888 F.3d 323, 327 (7th Cir. 2018)
- *Zoch v. Saul*, 981 F.3d 597, 601 (7th Cir. 2020)
- *Summers v. Berryhill*, 864 F.3d 523, 528 (7th Cir. 2017)
- *Peeters v. Saul*, 975 F.3d 639, 641 (7th Cir. 2020)
- *Beardsley v. Colvin*, 758 F.3d 834, 837 (7th Cir. 2014)
- *Warnell v. O'Malley*, 97 F.4th 1050, 1053 (7th Cir. 2024)
- *Zellweger v. Saul*, 984 F.3d 1251, 1252 (7th Cir. 2021)
- *Murphy v. Colvin*, 759 F.3d 811, 815 (7th Cir. 2014)
- *Sherlyn M. v. Saul*, 408 F. Supp. 3d 931, 950 (S.D. Ind. 2019)
- *Elder v. Astrue*, 529 F.3d 408, 413–14 (7th Cir. 2008)

- Prochaska v. Barnhart, 454 F.3d 731, 738 (7th Cir. 2006)
- Martinez v. Astrue, 630 F.3d 693, 697 (7th Cir. 2011)
- Brindisi v. Barnhart, 315 F.3d 783, 787 (7th Cir. 2003)
- Gedatus v. Saul, 994 F.3d 893, 901 (7th Cir. 2021)
- Tilley v. Colvin, 2015 WL 926178, at *5 (S.D. Ind. Mar. 3, 2015)
- Sawyer v. Colvin, 512 F. App'x 603, at *5 (7th Cir. 2013)
- Lindsay M. v. O'Malley, 2024 WL 759962, at *7 (S.D. Ind. Jan. 31, 2024)
- Lindsay A. M. v. O'Malley, 2024 WL 758030 (S.D. Ind. Feb. 22, 2024)
- Breeanna P. v. Kijakazi, 2022 WL 4591462, at *5 (S.D. Ind. Sept. 30, 2022)
- Skinner v. Astrue, 478 F.3d 836, 841 (7th Cir. 2007)
- Binion v. Shalala, 13 F.3d 243, 245 (7th Cir. 1994)
- Jozefyk v. Berryhill, 923 F.3d 492, 496–97 (7th Cir. 2019)
- Joseph M. v. Saul, 2019 WL 6918281 (N.D. Ill. Dec. 19, 2019)
- Figaro v. Commissioner of Social Security, 2022 WL 4647102, at *4–5 (E.D.N.Y. Sept. 30, 2022)
- Ayala v. Kijakazi, 2022 WL 3211463, at *21 (S.D.N.Y. Aug. 9, 2022)
- Flener ex rel. Flener v. Barnhart, 361 F.3d 442, 448 (7th Cir. 2004)
- Luna v. Shalala, 22 F.3d 687, 692 (7th Cir. 1994)
- Ransom v. Bowen, 844 F.2d 1326, 1330 n.4 (7th Cir. 1988)
- Nancy J. H. v. Saul, 2019 WL 2559543, at *2 (S.D. Ind. June 21, 2019)
- Seals v. Berryhill, 2017 WL 2416293, at *5 (S.D. Ind. June 5, 2017)
- Sharp v. Colvin, 2015 WL 926190, at *4 (S.D. Ind. Mar. 4, 2015)
- Thomas v. Commissioner of Social Security, 550 F. App'x 289, 291 (6th Cir. 2014)
- Montgomery v. Saul, 2020 WL 5757983, at *5 (N.D. Ind. Sept. 28, 2020)
- Schmitz v. Colvin, 124 F.4th 1029, 1033 (7th Cir. 2024)
- Liskowitz v. Astrue, 559 F.3d 736, 746 (7th Cir. 2009)
- Donahue v. Barnhart, 279 F.3d 441, 446 (7th Cir. 2002)

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