

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
KENTUCKY, OWENSBORO DIVISION

Lana W. v. Frank Bisignano, Commissioner of Social Security

Lana W. · No. 4:25-CV-00050-HBB · Decided February 23, 2026

SUMMARY

The United States District Court for the Western District of Kentucky reviewed a final decision denying Lana W.'s application for Disability Insurance Benefits. The court rejected challenges concerning the omission of mental limitations from the residual functional capacity assessment and the evaluation of Dr. Cook's opinions. The court held that the Commissioner's decision was supported by substantial evidence and affirmed it.

CASE DETAILS

COURT	United States District Court for the Western District of Kentucky, Owensboro Division
WRITING FOR THE COURT	H. Brent Brennenstuhl
JURISDICTION	United States District Court for the Western District of Kentucky, Owensboro Division
DECIDED	February 23, 2026
DOCKET	4:25-CV-00050-HBB
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Disability Insurance Benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner's findings are supported by substantial evidence and whether the correct legal standards were applied. The court may not conduct a de novo review, resolve evidentiary conflicts, or decide credibility questions.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion; persuasive only
PARTIES	Lana W. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- administrative procedure act

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to include mental limitations in Plaintiff's residual functional capacity after finding a medically determinable anxiety impairment producing mild limitations.
2. Whether the ALJ adequately evaluated the supportability and consistency of Dr. Cook's medical opinions under 20 C.F.R. § 404.1520c.

HOLDINGS

1. The ALJ did not err by omitting specific mental limitations from the residual functional capacity after finding that Plaintiff's anxiety caused only mild or no limitations in the paragraph B functional areas and was not a severe impairment.
2. The ALJ adequately evaluated Dr. Cook's opinions by addressing their supportability and consistency and reasonably found the opinions only generally persuasive because the recommended restrictions were vague.

KEY QUOTATIONS

“Substantial evidence exists when a reasonable mind could accept the evidence as adequate to support the challenged conclusion, even if that evidence could support a decision the other way.” (p. 3)

“In reviewing a case for substantial evidence, the Court “may not try the case de novo, nor resolve conflicts in evidence, nor decide questions of credibility.”” (p. 3)

“As long as substantial evidence supports the Commissioner’s decision, we must defer to it, even if there is substantial evidence in the record that would have supported an opposite conclusion” (p. 10)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning September 14, 2021, based primarily on spinal stenosis, degenerative disc disease, bone spurs, and arthritis. The ALJ found severe lumbar degenerative disc disease and obesity, but found Plaintiff's anxiety non-severe and determined that she retained the residual functional capacity for a restricted range of light work. The ALJ concluded that Plaintiff could perform her past work as a laboratory technician food tester and other jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits, and the claim was denied initially and on reconsideration. After a telephonic hearing, the ALJ denied the claim, finding Plaintiff capable of performing past relevant work and other work in the national economy. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The parties consented to proceedings before the magistrate judge, who affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Cotton v. Sullivan, 2 F.3d 692, 695 (6th Cir.)
- Wyatt v. Sec'y of Health & Hum. Servs., 974 F.2d 680, 683 (6th Cir.)
- Landsaw v. Sec'y of Health & Hum. Servs., 803 F.2d 211, 213 (6th Cir.)
- Casey v. Sec'y of Health & Hum. Servs., 987 F.2d 1230, 1233 (6th Cir.)
- Cohen v. Sec'y of Health & Hum. Servs., 964 F.2d 524, 528 (6th Cir.)
- Garner v. Heckler, 745 F.2d 383, 387 (6th Cir.)
- Barnhart v. Walton, 535 U.S. 212, 214 (2002)
- Abbott v. Sullivan, 905 F.2d 918, 923 (6th Cir.)
- Higgs v. Bowen, 880 F.2d 860, 863 (6th Cir.) (per curiam)
- Cline v. Comm'r of Soc. Sec., 96 F.3d 146, 148 (6th Cir.)
- Chastity M. v. Kijakazi, No. 1:23-CV-00016-HBB, 2024 WL 102613, at *5 (W.D. Ky. Jan. 9, 2024)
- Little v. Comm'r of Soc. Sec., No. 2:14-cv-532, 2015 WL 5000253, at *13-14 (S.D. Ohio Aug. 24, 2015)
- Caudill v. Comm'r of Soc. Sec., No. 2:16-CV-818, 2017 WL 3587217, at *5 (S.D. Ohio Aug. 21, 2017)
- Walker v. Astrue, No. 3:11-cv-142, 2012 WL 3187862, at *5-6 (S.D. Ohio Aug. 3, 2012)
- Hunt v. Comm'r of Soc. Sec., No. 1:24-CV-01619-BMB, 2025 WL 1303482, at *12 (N.D. Ohio May 6, 2025)
- Maldonado v. Comm'r of Soc. Sec., No. 1:24-CV-00415, 2025 WL 1104886, at *22 (N.D. Ohio Apr. 14, 2025)
- Warner v. Comm'r of Soc. Sec., 375 F.3d 387, 390 (6th Cir.)
- Kornecky v. Comm'r of Soc. Sec., 167 F. App'x 496, 508 (6th Cir.)