

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Gregory Joseph Neifert v. Frank Bisignano, Commissioner of Social
Security

Neifert · No. 3:24-CV-866 · Decided December 11, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania reviews Gregory Joseph Neifert’s third appeal from the denial of Social Security disability insurance benefits for a closed period following a traumatic brain injury. The court concludes that substantial evidence supports the Administrative Law Judge’s residual functional capacity assessment and recommends affirming the Commissioner’s decision. The opinion discusses Neifert’s medical history, activities of daily living, employment, and the weight assigned to medical opinions.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Martin C. Carlson
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 11, 2025
DOCKET	3:24-CV-866
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner of Social Security's denial of a closed-period Title II disability-insurance-benefits claim.
STANDARD OF REVIEW	The court reviewed the Commissioner's factual findings under the deferential substantial-evidence standard and reviewed legal issues plenary. It did not reweigh the evidence or substitute its judgment for that of the ALJ.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive rather than precedential under the applicable rules.
PARTIES	Gregory Joseph Neifert v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's residual functional capacity assessment despite the absence of a medical opinion mirroring every limitation adopted by the ALJ.
2. Whether the ALJ properly discounted the 2021 opinion of treating source Dr. Denny John that Neifert was completely disabled during the earlier disability period.
3. Whether substantial evidence supported the ALJ's finding that Neifert had no exertional limitations and could perform work at all exertional levels.
4. Whether the ALJ adequately articulated the reasons for evaluating the medical opinions, subjective allegations, and other evidence.

HOLDINGS

1. The ALJ's decision denying Neifert's closed-period disability claim was supported by substantial evidence and was reached through a correct application of law.
2. An ALJ is not required to base the residual functional capacity assessment on a medical opinion that mirrors the assessment or contains the particular findings adopted by the ALJ.
3. The ALJ properly afforded little weight to Dr. John's opinion that Neifert was completely disabled because the opinion conflicted with objective examination findings, the longitudinal record, and Neifert's demonstrated ability to work and manage daily activities.

KEY QUOTATIONS

“Substantial evidence, this Court has said, is “more than a mere scintilla.”” (at 3-4)

“the proposition that an ALJ must always base his RFC on a medical opinion from a physician is misguided.” (at 35-36)

“Accordingly, under the deferential standard of review that applies to appeals of Social Security disability determinations, we find that substantial evidence supported the ALJ’s evaluation of this case.” (at 40-41)

FACTUAL BACKGROUND

Neifert suffered a traumatic brain injury after slipping and falling on ice on December 7, 2012. Although he reported residual memory, concentration, personality, and balance problems, the medical record showed largely normal physical examinations, mild cognitive impairment, improving balance, independent activities of daily living, and a return to working approximately thirty hours per week at his autobody shop. The ALJ found that Neifert could perform work at all exertional levels subject to postural, environmental, and mental limitations, but denied benefits because other work existed in significant numbers in the national economy.

PROCEDURAL HISTORY

Neifert filed a Title II application alleging disability beginning December 7, 2012, based on traumatic brain injury. An ALJ issued a third unfavorable decision denying benefits for the period from December 7, 2012, through June 30, 2016. The case had previously been remanded twice by the district court, once because of an internally inconsistent residual-functional-capacity finding and once because the ALJ improperly allowed Neifert to proceed pro se. On the third appeal, the court held that the ALJ's decision was supported by substantial evidence and affirmed the Commissioner's final decision.

DISPOSITION

affirmed

CASES CITED

- T-Mobile South, LLC v. Roswell, 574 U.S. ___, 135 S. Ct. 808, 815, 190 L. Ed. 2d 679 (2015)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229, 59 S. Ct. 206, 83 L. Ed. 126 (1938)
- Perales, 402 U.S. at 401, 91 S. Ct. 1420
- Dickinson v. Zurko, 527 U.S. 150, 153, 119 S. Ct. 1816, 144 L. Ed. 2d 143 (1999)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Johnson v. Comm'r of Soc. Sec., 529 F.3d 198, 200 (3d Cir. 2008)
- Ficca v. Astrue, 901 F. Supp. 2d 533, 536 (M.D. Pa. 2012)
- Pierce v. Underwood, 487 U.S. 552, 565 (1988)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Mason v. Shalala, 994 F.2d 1058, 1064 (3d Cir. 1993)
- Consolo v. Fed. Maritime Comm'n, 383 U.S. 607, 620 (1966)
- Leslie v. Barnhart, 304 F. Supp. 2d 623, 627 (M.D. Pa. 2003)
- Arnold v. Colvin, No. 3:12-CV-02417, 2014 WL 940205, at *1 (M.D. Pa. Mar. 11, 2014)
- Burton v. Schweiker, 512 F. Supp. 913, 914 (W.D. Pa. 1981)
- Wright v. Sullivan, 900 F.2d 675, 678 (3d Cir. 1990)
- Zirnsak v. Colvin, 777 F.3d 607, 611 (3d Cir. 2014)
- Rutherford v. Barnhart, 399 F.3d 546, 552 (3d Cir. 2005)
- Burnett v. Comm'r of Soc. Sec. Admin., 220 F.3d 112, 119-21 (3d Cir. 2000)
- Jones v. Barnhart, 364 F.3d 501, 505 & n.3 (3d Cir. 2004)
- Diaz v. Comm'r of Soc. Sec., 577 F.3d 500, 504 (3d Cir. 2009)
- Biller v. Acting Comm'r of Soc. Sec., 962 F. Supp. 2d 761, 778-79 (W.D. Pa. 2013)
- Gormont v. Astrue, No. 11-2145, 2013 WL 791455, at *7 (M.D. Pa. Mar. 4, 2013)
- Titterington v. Barnhart, 174 F. App'x 6, 11 (3d Cir. 2006)
- Cummings v. Colvin, 129 F. Supp. 3d 209, 214-15 (W.D. Pa. 2015)
- Burns v. Barnhart, 312 F.3d 113, 129 (3d Cir. 2002)

- Metzger v. Berryhill, No. 3:16-CV-1929, 2017 WL 1483328, at *5 (M.D. Pa. Mar. 29, 2017)
- Rathbun v. Berryhill, No. 3:17-CV-00301, 2018 WL 1514383, at *6 (M.D. Pa. Mar. 12, 2018)
- Cotter v. Harris, 642 F.2d 700, 704, 706-07 (3d Cir. 1981)
- Schauddeck v. Comm'r of Soc. Sec., 181 F.3d 429, 433 (3d Cir. 1999)
- Chandler v. Comm'r of Soc. Sec., 667 F.3d 356, 360-61 (3d Cir. 2011)
- Durden v. Colvin, 191 F. Supp. 3d 429, 454 (M.D. Pa. 2016)
- Hess v. Comm'r Soc. Sec., 931 F.3d 198, 212, 214 (3d Cir. 2019)
- Shoemaker v. Colvin, No. 3:16-CV-2304, 2018 WL 3245011, at *11 (M.D. Pa. Apr. 5, 2018)
- Martinez v. Colvin, No. 3:14-CV-1090, 2015 WL 5781202, at *14 (M.D. Pa. Sept. 30, 2015)
- Sweeney v. Colvin, No. 3:13-CV-02233-GBC, 2014 WL 4294507, at *13 (M.D. Pa. Aug. 28, 2014)
- Newcomer v. Comm'r of Soc. Sec., No. CIV.A. 14-161J, 2015 WL 1780205, at *6 (W.D. Pa. Apr. 20, 2015)
- Miller v. Comm'r of Soc. Sec., 524 F. App'x 191, 194 (6th Cir. 2013)
- Monsour Med. Ctr. v. Heckler, 806 F.2d 1185, 1190-91 (3d Cir. 1986)
- Hunter Douglas, Inc. v. NLRB, 804 F.2d 808, 812 (3d Cir. 1986)
- Naomi Rodriguez v. Berryhill, No. 1:18-CV-684, 2019 WL 2296582, at *3 (M.D. Pa. May 30, 2019)
- Yorkus v. Astrue, No. 10-2197, 2011 WL 7400189, at *4 (E.D. Pa. Feb. 28, 2011)
- Bryant v. Colvin, No. 4:14-CV-981, 2015 WL 1401001, at *4 (M.D. Pa. Mar. 26, 2015)