

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
NORTH CAROLINA

Richard Williams v. Frank Bisignano, Commissioner of Social
Security

No. 5:24-CV-485-FL (E.D.N.C. Feb. 20, 2026) · No. No. 5:24-CV-485-FL · Decided February 20, 2026

SUMMARY

This Memorandum and Recommendation addresses Richard Williams’s action seeking judicial review of the denial of Social Security disability insurance benefits. The magistrate judge recommends allowing Plaintiff’s brief and remanding the matter to the Commissioner for further proceedings because the ALJ did not adequately address evidence suggesting a possible mental impairment or apply the required special technique. The document is from the United States District Court for the Eastern District of North Carolina.

CASE DETAILS

COURT	United States District Court for the Eastern District of North Carolina
WRITING FOR THE COURT	Brian S. Meyers
JURISDICTION	United States District Court for the Eastern District of North Carolina
DECIDED	February 20, 2026
DOCKET	No. 5:24-CV-485-FL
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner’s denial of disability insurance benefits. The magistrate judge issued a Memorandum and Recommendation recommending that the denial be remanded for further administrative proceedings.
STANDARD OF REVIEW	The court reviews the Commissioner’s decision to determine whether it is supported by substantial evidence and whether the correct legal standards were applied. The court may not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for the Commissioner’s, but meaningful review requires an adequate explanation of the ALJ’s findings and reasoning.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Richard Williams v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

disability definition

ada / disability

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

mental impairment evaluation

QUESTIONS PRESENTED

1. Whether the ALJ adequately considered evidence suggesting that Williams had a medically determinable mental impairment.
2. Whether the ALJ was required to apply and document the regulatory special technique for evaluating mental impairments.
3. Whether the ALJ's failure to discuss contradictory evidence prevented meaningful judicial review and required remand.

HOLDINGS

1. The ALJ was required to address the medical-record references to adjustment-disorder-spectrum symptoms and cognitive difficulties because they constituted contradictory evidence to the ALJ's finding that the record contained no evidence of a psychiatric impairment.
2. Where the record raises a colorable claim of a mental impairment, the ALJ must evaluate the pertinent symptoms, signs, and laboratory findings under the regulatory special technique and adequately document the resulting findings.
3. The Commissioner may not sustain the ALJ's decision through post-hoc reasoning that the ALJ did not provide, and reliance on state-agency psychological opinions did not cure the ALJ's failure to analyze the relevant mental-health evidence.

KEY QUOTATIONS

"[T]he weight of authority suggests that failure to properly document application of the special technique will rarely, if ever, be harmless because such a failure prevents, or at least substantially hinders, judicial review." (10)

"Here, the absence of any meaningful discussion on references in the medical record to Plaintiff's mental limitations leaves the undersigned unable to determine whether the ALJ's decision is supported by substantial evidence." (14)

FACTUAL BACKGROUND

Williams alleged disability based principally on physical impairments but also listed PTSD and presented evidence of possible mental symptoms. Medical records included references to adjustment-disorder-spectrum symptoms, questionable judgment and insight, difficulty with abstract thinking, medication-compliance problems, and observations by his ex-wife concerning depression, sleep, concentration, cognition, and stress tolerance. The ALJ found no medically determinable mental impairment and did not discuss those references in the decision, relying in part on state-agency psychological opinions that likewise did not address them.

PROCEDURAL HISTORY

Williams applied for disability insurance benefits, alleging a closed period of disability from April 2, 2018, through August 3, 2021. Following an initial denial, reconsideration denial, an ALJ hearing, and an adverse ALJ decision, the Appeals Council remanded the matter for further proceedings. After a second hearing, the ALJ again denied benefits, and the Appeals Council denied review on June 27, 2024. Williams then filed this action, and the magistrate judge recommended remand because the ALJ failed to meaningfully address evidence suggesting a mental impairment and failed to apply or document the required special technique.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The Commissioner must reconsider the evidence concerning possible mental impairments, make findings that sufficiently explain the probative evidence, apply and document the required special technique as appropriate, and provide an explanation permitting meaningful judicial review.

CASES CITED

- Coffman v. Bowen, 829 F.2d 514, 517 (4th Cir. 1987)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Pierce v. Underwood, 487 U.S. 552, 565 (1988)
- Mastro v. Apfel, 270 F.3d 171, 176 (4th Cir. 2001)
- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Sterling Smokeless Coal Co. v. Akers, 131 F.3d 438, 439-40 (4th Cir. 1997)
- DeLoatch v. Heckler, 715 F.2d 148, 150 (4th Cir. 1983)
- Albright v. Comm'r of the Soc. Sec. Admin., 174 F.3d 473, 475 n.2 (4th Cir. 1999)
- Pass v. Chater, 65 F.3d 1200, 1203 (4th Cir. 1995)
- Pittman v. Astrue, No. 5:08-CV-83-FL, 2008 WL 4594574, at *4 (E.D.N.C. Oct. 10, 2008)
- Monroe v. Colvin, 826 F.3d 176, 189 (4th Cir. 2016)
- Mascio v. Colvin, 780 F.3d 632, 636 (4th Cir. 2015)
- Thomas v. Berryhill, 916 F.3d 307, 311 (4th Cir. 2019)

- Woods v. Berryhill, 888 F.3d 686, 694 (4th Cir. 2018)
- Patterson v. Comm’r of Soc. Sec. Admin., 846 F.3d 656, 662 (4th Cir. 2017)
- Barfield v. Colvin, No. 4:15-CV-135-F, 2016 WL 4705672, at *3 (E.D.N.C. Aug. 19, 2016)
- Jones v. Astrue, No. 5:07-CV-452-FL, 2009 WL 455414, at *2 (E.D.N.C. Feb. 23, 2009)
- Tarrant v. Kijakazi, No. 5:20-CV-258-FL, 2021 U.S. Dist. LEXIS 185376, at *4-5 (E.D.N.C. Sept. 28, 2021)
- Cunningham v. Comm’r of Soc. Sec., No. SA-23-CV-00299-XR, 2024 U.S. Dist. LEXIS 30448, at *4-5 (W.D. Tex. Feb. 1, 2024)
- Johnnie M. v. Berryhill, No. 2:18-cv-00066-MJD-JMS, 2019
- Bird v. Comm’r of SSA, 699 F.3d 337, 340 (4th Cir. 2012)
- McNeill v. Saul, No. 5:20-CV-244-M, 2021 WL 3701348, at *3 (E.D.N.C. June 2, 2021)
- Lewis v. Saul, No. 7:19-CV-246-FL, 2021 WL 826777, at *5 (E.D.N.C. Feb. 8, 2021)
- Arakas v. Comm’r, Soc. Sec. Admin., 983 F.3d 83, 109 (4th Cir. 2020)
- Patterson v. Bowen, 839 F.2d 221, 225 n.1 (4th Cir. 1988)
- Smith v. Schweiker, 795 F.2d 343, 346 (4th Cir. 1986)
- Cole v. Colvin, No. 2:12-CV-44-FL, 2013 WL 3984019, at *4-5 (E.D.N.C. Aug. 1, 2013)
- Reid v. Comm’r of Soc. Sec., 769 F.3d 861, 865 (4th Cir. 2014)
- Wright v. Collins, 766 F.2d 841, 846-47 (4th Cir. 1985)