

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
NORTH CAROLINA

Lawanda Denisa Price v. Frank J. Bisignano, Commissioner of Social
Security

Price · No. 5:24-CV-746-FL · Decided March 23, 2026

SUMMARY

The United States District Court for the Eastern District of North Carolina reviews the denial of Lawanda Denisa Price’s application for supplemental security income. The court adopts the magistrate judge’s memorandum and recommendation, rejects plaintiff’s objections concerning the explanation of her mental-impairment limitations and residual functional capacity, and holds that the Commissioner’s decision is supported by substantial evidence. The Commissioner’s decision is affirmed, and the case is closed.

CASE DETAILS

COURT	United States District Court for the Eastern District of North Carolina
JURISDICTION	United States District Court for the Eastern District of North Carolina
DECIDED	March 23, 2026
DOCKET	5:24-CV-746-FL
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of supplemental security income. After a magistrate judge issued a memorandum and recommendation recommending affirmance, plaintiff filed timely objections, and the district court conducted de novo review of the objected-to portions.
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence and determines whether the correct legal standards were applied. It may not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for the Commissioner's. For timely specific objections to a magistrate judge's memorandum and recommendation, the district court conducts de novo review of the objected-to portions; absent specific and timely objections, review is for clear error.
PRECEDENTIAL VALUE	unknown

PARTIES

Lawanda Denisa Price v. Frank J. Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ sufficiently explained how the RFC limitations accounted for plaintiff's mental impairments.
2. Whether the ALJ adequately defined the RFC limitation to a low-stress work setting that was not production-pace or quota-based and was goal-oriented.
3. Whether the magistrate judge properly distinguished *Dichiara v. O'Malley* and properly relied on *Sizemore v. Berryhill* in recommending affirmance.

HOLDINGS

1. The ALJ provided sufficient narrative discussion linking the severity of plaintiff's mental impairments to the RFC limitation requiring work in a typical eight-hour day with normal breaks. The court therefore rejected plaintiff's request for remand on this ground.
2. The RFC limitation to a low-stress work setting, further defined as work that was not production-pace or quota-based, was goal-oriented, primarily involved things rather than people, and involved no more than occasional social interaction, was sufficiently clear.
3. The Commissioner's final decision denying benefits is supported by substantial evidence and was reached through application of the correct legal standards; the decision is affirmed.

KEY QUOTATIONS

"The court must uphold the factual findings of the ALJ "if they are supported by substantial evidence and were reached through application of the correct legal standard." (Discussion A)

"A necessary predicate to engaging in substantial evidence review . . . is a record of the basis for the ALJ's ruling, [which] should include a discussion of which evidence the ALJ found credible and why, and specific application of the pertinent legal requirements to the record evidence." (Discussion A)

"Thus, the ALJ in this case provided sufficient narrative discussion to explain how the RFC limitations will account for the severity of mental impairments the ALJ found plaintiff to have." (Discussion B.1)

FACTUAL BACKGROUND

Price applied for supplemental security income alleging disability beginning August 10, 2021. The ALJ found several severe impairments, including chronic pain syndrome, anxiety, major depressive disorder, degenerative joint disease, asthma, and lupus, but determined that she retained the residual functional capacity for restricted light work. The ALJ found that Price had no past relevant work but could perform jobs such as marker, linking machine operator, and toy weigher. The district court focused on whether the RFC adequately addressed Price's mental impairments and whether its low-stress, non-production-pace, goal-oriented limitations were sufficiently defined.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income, and the claim was denied initially and on reconsideration. An administrative law judge denied the claim after a hearing, and the Social Security Appeals Council denied review. Plaintiff then filed this action seeking reversal or remand. The magistrate judge recommended affirmance; the district court overruled plaintiff's objections, adopted the memorandum and recommendation, affirmed the Commissioner's final decision, and directed the clerk to close the case.

DISPOSITION

affirmed

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Radford v. Colvin, 734 F.3d 288, 295 (4th Cir. 2013)
- Mascio v. Colvin, 780 F.3d 632, 636 (4th Cir. 2015)
- Monroe v. Colvin, 826 F.3d 176, 189 (4th Cir. 2016)
- Johnson v. Barnhart, 434 F.3d 650, 654 n.1 (4th Cir. 2005)
- Pass v. Chater, 65 F.3d 1200, 1203 (4th Cir. 1995)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Camby v. Davis, 718 F.2d 198, 200 (4th Cir. 1983)
- Dichiaro v. O'Malley, No. 3:23-CV-285-FDW, 2024 WL 3220728, at *1, *2, *4-*5 (W.D.N.C. June 27, 2024)
- Thomas v. Berryhill, 916 F.3d 307, 312 (4th Cir. 2019)
- Perry v. Berryhill, 765 F. App'x 869, 872 & n.1 (4th Cir. 2019)
- Sizemore v. Berryhill, 878 F.3d 72, 79 (4th Cir. 2017)