

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Roy K. v. Frank Bisignano, Commissioner of Social Security

Roy K. · No. No. 25 C 5199 · Decided December 29, 2025

SUMMARY

The United States District Court for the Northern District of Illinois reviewed the Commissioner of Social Security’s denial of Roy K.’s claims for Disability Insurance Benefits and Supplemental Security Income. The court held that the Administrative Law Judge failed to address a medical expert’s opinion concerning Plaintiff’s limitations in handling small objects due to visual impairments. The court granted Plaintiff’s motion in part, denied the Commissioner’s cross-motion for summary judgment, and remanded for further proceedings.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Daniel P. McLaughlin
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	December 29, 2025
DOCKET	No. 25 C 5199
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability benefits for the period from November 1, 2014 through January 4, 2021. Plaintiff moved to reverse and remand, and the Commissioner moved for summary judgment.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for substantial evidence and legal error under 42 U.S.C. § 405(g). It may not substitute its judgment for the Commissioner's, reweigh evidence, resolve evidentiary conflicts, or decide credibility questions.
PRECEDENTIAL VALUE	unpublished
PARTIES	Roy K. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

summary judgment

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual-functional-capacity assessment was supported by substantial evidence when it omitted the medical expert's opinion regarding Plaintiff's limitation in handling small objects.
2. Whether the Commissioner could defend the ALJ's decision through a post hoc explanation that the visual-acuity limitation accommodated Plaintiff's ability to work with small objects.

HOLDINGS

1. The ALJ erred by failing to account for the medical expert's opinion that Plaintiff was limited in handling small objects because of his visual impairments and by failing to explain the omission from the residual functional capacity assessment.
2. The Commissioner may not defend the ALJ's decision with a post hoc rationalization that does not appear in the ALJ's decision.

KEY QUOTATIONS

"The Court agrees with Plaintiff that the ALJ erred by failing to account for Dr. Schaffzin's opinion that Plaintiff was limited in handling small objects due to his visual impairments."

"As that reasoning appears nowhere in the ALJ's decision, the Court finds that Defendant's contention amounts to an impermissible post hoc rationalization."

FACTUAL BACKGROUND

Plaintiff alleged disability based in part on visual impairments associated with neurosyphilis, as well as mental-health and other impairments. The medical expert opined that Plaintiff would have difficulty reading very small print and handling very small objects because of his visual impairments. Although the ALJ found that opinion persuasive and included reading and visual-acuity restrictions in the residual functional capacity, the ALJ did not address the handling limitation or explain its omission, even though the representative jobs identified by the vocational expert required frequent handling.

PROCEDURAL HISTORY

Plaintiff filed claims for Disability Insurance Benefits and Supplemental Security Income. After an earlier district-court remand, a second ALJ found that Plaintiff was not disabled during the relevant period, and the Appeals Council denied review. The district court granted Plaintiff's motion in part, denied the Commissioner's cross-motion for summary judgment, and remanded for further proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further proceedings, properly consider and account for Plaintiff's limitation in handling small objects, explain the residual-functional-capacity treatment of that limitation, and take special care to consider all evidence concerning Plaintiff's visual impairments and mental-health limitations.

CASES CITED

- Haynes v. Barnhart, 416 F.3d 621, 626 (7th Cir. 2005)
- Young v. Secretary of Health & Human Services, 957 F.2d 386, 389 (7th Cir. 1992)
- Clifford v. Apfel, 227 F.3d 863, 869 (7th Cir. 2000)
- Stevenson v. Chater, 105 F.3d 1151, 1153 (7th Cir. 1997)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Skinner v. Astrue, 478 F.3d 836, 841 (7th Cir. 2007)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Warnell v. O'Malley, 97 F.4th 1050, 1053–54 (7th Cir. 2024)
- Herr v. Sullivan, 912 F.2d 178, 181 (7th Cir. 1990)
- Elder v. Astrue, 529 F.3d 408, 413 (7th Cir. 2008)
- Edie M. S. v. Bisignano, No. 22 C 6777, 2025 WL 1399141, at *7 (N.D. Ill. May 14, 2025)
- Edward T. v. Kijakazi, No. 20 C 2996, 2021 WL 5578757, at *3 (N.D. Ill. Nov. 30, 2021)
- Jennifer S. v. Kijakazi, No. 22 C 6491, 2023 WL 5289433, at *3 (N.D. Ill. Aug. 17, 2023)