

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

Laronda T. v. Frank Bisignano, Commissioner of Social Security

Laronda T. · No. No. 25 C 6206 · 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 Laronda T.’s claims for Disability Insurance Benefits and Supplemental Security Income. The court granted Plaintiff’s motion to reverse in part and denied the Commissioner’s cross-motion for summary judgment, finding errors in the step-five vocational analysis, consideration of medical-opinion evidence concerning the need for a companion, and assessment of daily activities and subjective symptoms. The matter was remanded to the Commissioner 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 6206
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Disability Insurance Benefits and Supplemental Security Income. The parties consented to jurisdiction before a United States magistrate judge. Plaintiff moved to reverse the Commissioner's decision, and the Commissioner cross-moved for summary judgment.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and free of legal error. It may not substitute its judgment for the Commissioner's, reweigh evidence, resolve evidentiary conflicts, or decide credibility questions. The ALJ's symptom finding receives special deference and will be overturned only if patently wrong.

PRECEDENTIAL VALUE	Unpublished district-court memorandum opinion; persuasive authority only.
PARTIES	Laronda T. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action administrative law summary judgment civil procedure

PRACTICE AREAS

Social Security disability benefits administrative law federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ properly established at step five that significant numbers of jobs existed that Plaintiff could perform.
2. Whether the ALJ adequately considered the medical expert's opinion that Plaintiff should not be left alone.
3. Whether the ALJ adequately evaluated Plaintiff's subjective symptoms and daily activities.

HOLDINGS

1. The ALJ's step-five finding was inadequately supported because the ALJ mistakenly characterized the identified jobs as unskilled when they were semi-skilled and did not explain how Plaintiff could transition from her prior unskilled custodial work to those jobs.
2. The ALJ erred by failing to address the medical expert's opinion that Plaintiff should not be left alone, despite finding the expert's opinions markedly persuasive and despite vocational-expert testimony that a person requiring a companion throughout the workday would have no competitive work.
3. The ALJ's symptom assessment was inadequate because it did not explain how Plaintiff's ability to perform limited household activities, such as wiping counters, was inconsistent with her alleged disabling symptoms or with the medical evidence.

KEY QUOTATIONS

“The Commissioner ‘bears the burden at step five to show that there exist substantial numbers of jobs in the national economy that the claimant can actually do.’”

“The ALJ must ‘explain the ‘inconsistencies’ between [a claimant’s] activities of daily living . . . complaints of pain, and the medical evidence.’”

“The ALJ must ‘adequately explain how Plaintiff’s ability to perform his daily activities undermined his allegations of disability.’”

FACTUAL BACKGROUND

Plaintiff alleged disability based on severe cardiovascular and other impairments, including hypertension with end-organ damage, chronic cardiomyopathy and heart failure, ventricular arrhythmia requiring defibrillator implantation and repair, morbid obesity, and diabetes. The ALJ found that she retained the residual functional capacity for sedentary work with additional postural, environmental, and safety restrictions, but could not perform her past work as a cleaner. At step five, the ALJ relied on vocational-expert testimony identifying sorter, appointment-clerk, and data-examination-clerk jobs, although those jobs were semi-skilled rather than the unskilled positions described by the ALJ. The record also included medical-expert testimony supporting a recommendation that Plaintiff not be left alone because of possible defibrillator shocks.

PROCEDURAL HISTORY

Plaintiff filed claims for DIB and SSI on July 11, 2022, alleging disability beginning January 1, 2020. The claims were denied initially and on reconsideration; following a telephonic ALJ hearing on March 26, 2024, the ALJ denied benefits on May 1, 2024. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court granted Plaintiff's motion to reverse in part, denied the Commissioner's cross-motion for summary judgment, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to the Commissioner for further proceedings. On remand, the ALJ must clarify the step-five vocational finding, address how Plaintiff could perform the identified semi-skilled jobs, properly evaluate all medical opinions including the opinion that Plaintiff should not be left alone, properly account for Plaintiff's fatigue, and provide a sufficiently specific assessment of her subjective symptoms and daily activities.

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)
- Schmitz v. Colvin, 124 F.4th 1029, 1033 (7th Cir. 2024)
- Martinez v. Kijakazi, 71 F.4th 1076, 1079 (7th Cir. 2023)
- Carla S. v. O'Malley, No. 20 CV 3755 n.14 (N.D. Ill. Jan. 10, 2024)

- Heather W. v. Kijakazi, No. 20 CV 132 (N.D. Ill. Sept. 22, 2022)
- Summers v. Berryhill, 864 F.3d 523, 528 (7th Cir. 2017)
- Charles B. v. Saul, No. 19 C 1980 (N.D. Ill. Oct. 19, 2020)
- Rainey v. Berryhill, 731 F. App'x 519, 522 (7th Cir. 2018)
- Steven L. v. Saul, No. 19-CV-6047, 2021 WL 1531603, at *2, *4 (N.D. Ill. Apr. 19, 2021)
- Donte A. R. v. Saul, No. 19 C 2363 (N.D. Ill. Dec. 9, 2020)
- Galarza v. Berryhill, No. 17 C 3804 (N.D. Ill. Sept. 19, 2018)
- Phillips v. Berryhill, No. 17 C 4509 (N.D. Ill. Sept. 18, 2018)
- Pearline P. v. Saul, No. 17 C 8996 (N.D. Ill. Jan. 22, 2020)

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