

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

Nicki Jackson v. Frank Bisignano, Commissioner of Social Security

Jackson v. Bisignano · No. 2:24-cv-619-BL-JTA · Decided March 31, 2026

SUMMARY

The United States District Court for the Middle District of Alabama overruled Nicki Jackson’s objections to a magistrate judge’s recommendation in a Social Security disability benefits case. The court adopted the recommendation, denied the plaintiff’s motion for summary judgment, granted the Commissioner’s motion for summary judgment, and affirmed the denial of benefits.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
WRITING FOR THE COURT	Bill Lewis
JURISDICTION	United States District Court for the Middle District of Alabama, Northern Division
DECIDED	March 31, 2026
DOCKET	2:24-cv-619-BL-JTA
DISPOSITION	affirmed
PROCEDURAL POSTURE	The district court reviewed objections to a magistrate judge's recommendation in an action seeking review of the Commissioner's denial of Social Security benefits.
STANDARD OF REVIEW	The district court conducts de novo review of portions of a magistrate judge's report and recommendation to which a specific objection is made. The Commissioner's decision is affirmed if supported by substantial evidence; the court may not decide facts anew, make credibility determinations, or reweigh the evidence.
PRECEDENTIAL VALUE	Unpublished federal district court order; precedential status is not identified in the opinion.

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 committed reversible error by failing to specifically reference Plaintiff's hearing testimony when evaluating her subjective symptoms.
2. Whether any failure by the ALJ to reference Plaintiff's hearing testimony was harmless.
3. Whether substantial evidence supported the ALJ's residual functional capacity determination and the Commissioner's denial of benefits.

HOLDINGS

1. The ALJ did not commit reversible error by failing to specifically cite Plaintiff's hearing testimony because an ALJ need not examine every piece of evidence or cite particular phrases or formulations when the decision demonstrates consideration of the claimant's medical condition as a whole.
2. The ALJ was not required to treat symptoms allegedly caused by endometriosis as affecting Plaintiff's ability to work where the record contained no evidence that endometriosis was a medically determinable impairment.
3. Substantial evidence supported the ALJ's residual functional capacity determination and the Commissioner's denial of benefits.

KEY QUOTATIONS

“considered all symptoms and the extent to which these symptoms can reasonably be expected as consistent with the medical evidence and other evidence, based on the requirements of 20 CFR 404.1529 and 416.929 and SSR 16-3p.” (Doc. 14-2 at 29)

“the ALJ’s decision is not a broad rejection of Plaintiff’s subjective complaints but rather shows the ALJ considered Plaintiff’s medical condition as a whole.” (Doc. 24 at 10-11)

FACTUAL BACKGROUND

The ALJ found that Plaintiff had severe impairments including inflammatory arthritis, depression, anxiety, a spine disorder, and obesity, and determined that she could perform light work with additional limitations. Plaintiff alleged that the ALJ failed to address her hearing testimony concerning limitations involving sitting, standing, walking, use of her arms and hands, shortness of breath, fatigue, and endometriosis symptoms. The district court concluded that the ALJ considered Plaintiff's symptoms as a whole and supported the residual functional capacity determination with medical records, examinations, imaging, medical opinions, and other substantial evidence.

PROCEDURAL HISTORY

The Magistrate Judge recommended affirming the Commissioner's decision, denying Plaintiff's motion for summary judgment, and granting the Commissioner's motion for summary judgment. Plaintiff objected to the

recommendation concerning the ALJ's consideration of her hearing testimony and the alleged harmlessness of any error. The district court overruled the objections, adopted the recommendation, denied Plaintiff's motion, granted the Commissioner's motion, and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- United States v. Raddatz, 447 U.S. 667, 673, 675 (1980)
- Brito v. Comm'r, Soc. Sec. Admin., 687 F. App'x 801, 804 (11th Cir. 2017)
- Mitchell v. Comm'r, Soc. Sec. Admin., 771 F.3d 780, 782 (11th Cir. 2014)
- Chatham v. Comm'r of Soc. Sec., 764 F. App'x 864, 868 (11th Cir. 2019)
- Thomas v. Comm'r of Soc. Sec., 497 F. App'x 916, 918-19 (11th Cir. 2012)
- Nance-Goble v. Saul, No. 4:20-cv-00369-CLM, 2021 WL 2401178, at *3-*5 (N.D. Ala. June 11, 2021)
- Buckwalter v. Acting Comm'r of Soc. Sec., 5 F.4th 1315, 1320 (11th Cir. 2021)