

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Jeffrey W. v. Frank Bisignano, Commissioner of Social Security

Jeffrey W. · No. 2:24-cv-06035 · Decided February 25, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania affirmed the Commissioner of Social Security’s denial of Jeffrey W.’s application for disability insurance benefits. The court held that the Administrative Law Judge’s decision was supported by substantial evidence, including the assessment of medical opinions and the determination that Plaintiff could perform his past relevant work as a procurement supervisor.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Caroline Goldner Cinquanto
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	February 25, 2026
DOCKET	2:24-cv-06035
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his application for disability insurance benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and reviews legal issues plenary.
PRECEDENTIAL VALUE	unpublished district court memorandum and order
PARTIES	Jeffrey W. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law

PRACTICE AREAS

- Social Security disability benefits
- administrative law
- judicial review

QUESTIONS PRESENTED

1. Whether the ALJ properly considered the consultative examiner's medical opinion under the regulatory supportability and consistency factors.
2. Whether the ALJ permissibly relied on the state-agency medical consultant's opinion despite the consultant's inability to review later-developed medical evidence.
3. Whether substantial evidence supported the Commissioner's conclusion that Plaintiff was not disabled.

HOLDINGS

1. The ALJ properly considered the consultative examiner's opinion and reasonably found that Plaintiff's lifting, sitting, standing, and walking limitations were consistent with light work rather than sedentary work.
2. The ALJ did not err by relying on the state-agency medical consultant's opinion even though the consultant had not reviewed all medical records later submitted before the ALJ's decision.
3. The Commissioner's determination that Plaintiff was not disabled was supported by substantial evidence.

KEY QUOTATIONS

“The court’s role on judicial review is to determine whether the Commissioner’s decision is supported by substantial evidence.” (Legal Standard)

“because state agency review precedes ALJ review, there is always some time lapse between the consultant’s report and the ALJ hearing and decision.” (Discussion § III.D.2)

FACTUAL BACKGROUND

Plaintiff alleged disability based on back, shoulder, knee, and neck problems and a hernia. The medical record showed cervical fusion, degenerative changes in the hips and lumbar spine, lumbosacral spondylosis, physical therapy, and medial branch block injections. The ALJ found that Plaintiff retained the residual functional capacity for a restricted range of light work and could perform his past relevant work as a procurement supervisor.

PROCEDURAL HISTORY

Plaintiff filed an application for disability insurance benefits that was denied initially and on reconsideration. After an administrative hearing, the ALJ issued an unfavorable decision, and the Appeals Council denied review, making the ALJ's decision the final decision of the Commissioner. Plaintiff then filed this action in the Eastern District of Pennsylvania, which affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- *Schaudeck v. Commissioner of Social Security*, 181 F.3d 429, 431 (3d Cir. 1999)
- *Zirnsak v. Colvin*, 777 F.3d 607, 610 (3d Cir. 2014)
- *Rutherford v. Barnhart*, 399 F.3d 546, 552 (3d Cir. 2005)
- *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019)
- *Consolidated Edison Co. v. NLRB*, 305 U.S. 197, 229 (1938)
- *Poulos v. Commissioner of Social Security*, 474 F.3d 88, 92 (3d Cir. 2007)
- *Chandler v. Commissioner of Social Security*, 667 F.3d 356, 360-61 (3d Cir. 2011)
- *Andrea P. v. Kijakazi*, Civ. No. 21-307, 2022 WL 2128727, at *15 (D.N.J. June 14, 2022)
- *Wilson v. Astrue*, 331 F. App'x 917, 919 (3d Cir. 2009)

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