

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS

Rodney H. v. Frank Bisignano

Rodney H. v. Bisignano, No. 4:24-cv-4150 (S.D. Tex. Jan. 6, 2026) · No. 4:24-cv-4150 · Decided January 6, 2026

SUMMARY

The United States District Court for the Southern District of Texas reviews the denial of Rodney H.’s application for supplemental security income. The court grants Plaintiff’s motion for summary judgment, denies the Commissioner’s motion, and reverses and remands because the ALJ’s residual functional capacity determination was not supported by substantial evidence and relied on an unsupported interpretation of the medical record. The court does not reach the plaintiff’s remaining arguments concerning vocational-expert testimony, assistive-device use, and Listing 1.18.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas
WRITING FOR THE COURT	Dena Hanovice Palermo
JURISDICTION	United States District Court for the Southern District of Texas
DECIDED	January 6, 2026
DOCKET	4:24-cv-4150
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying supplemental security income. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviewed whether the Commissioner's decision was supported by substantial evidence on the record as a whole and whether the Commissioner applied the proper legal standards. The court could not reweigh the evidence, try the issues de novo, or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	unpublished district-court memorandum and order; persuasive authority only
PARTIES	Rodney H. v. Frank Bisignano, Acting Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

agency adjudication

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PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity determination was supported by substantial evidence when the ALJ rejected or lacked medical opinions addressing Plaintiff's work-related functional limitations.
2. Whether the ALJ's failure to develop evidence concerning Plaintiff's functional capacity was harmful.
3. Whether the ALJ properly resolved conflicts between the vocational expert's testimony and the Dictionary of Occupational Titles, incorporated Plaintiff's assistive-device use into the RFC, and evaluated Listing 1.18.

HOLDINGS

1. The ALJ's RFC determination was not supported by substantial evidence because the ALJ inferred Plaintiff's exertional and functional capacities from medical records without a medical opinion or other evidence establishing how Plaintiff's impairments affected his ability to sustain work-related functions.
2. The RFC error was harmful because further development of the record could produce evidence that would lead to a different disability determination.

KEY QUOTATIONS

"In sum, if 'the ALJ rejects the only medical opinions of record, interprets the raw medical data, and imposes a different RFC, the ALJ has committed reversible error.'" (Section V.A.)

"The ALJ's written decision shows that he infers from his own review of the medical evidence what Plaintiff is capable of doing—this amounts to nothing more than the ALJ's unaided interpretation of the medical records and is not substantial evidence." (Section V.A.)

FACTUAL BACKGROUND

Rodney H. alleged disability based on multiple physical impairments, including fractures and surgical repairs involving his lower extremities, ankles, spine, ribs, left humerus, and skull, as well as tarsal tunnel syndrome, osteoarthritis, chronic kidney disease, asthma, and migraines. The ALJ found that he had severe impairments but retained the residual functional capacity for sedentary work with additional postural, environmental, and upper-extremity restrictions. The ALJ relied on treatment records, examination findings, Plaintiff's testimony, and the absence of contrary state-agency findings, but the record contained no medical opinion addressing the functional effects of Plaintiff's conditions on his ability to work.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income under Title XVI of the Social Security Act. The Commissioner denied the claim initially and on reconsideration. After a hearing at which Plaintiff and a vocational expert testified, the ALJ denied benefits. The Appeals Council denied review, and Plaintiff appealed to the district court. The court granted Plaintiff's motion for summary judgment, denied the Commissioner's motion, reversed the Commissioner's decision, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to the Social Security Administration for further proceedings consistent with the opinion, including proper development of evidence concerning the effects of Plaintiff's impairments on his ability to perform work-related functions.

CASES CITED

- Boyd v. Apfel, 239 F.3d 698, 704 (5th Cir. 2001)
- Loza v. Apfel, 219 F.3d 378, 393 (5th Cir. 2000)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Carey v. Apfel, 230 F.3d 131, 135 (5th Cir. 2000)
- Conley-Clinton v. Saul, 787 F. App'x 214, 216 (5th Cir. 2019)
- Martinez v. Chater, 64 F.3d 172, 174 (5th Cir. 1995)
- Brown v. Apfel, 192 F.3d 492, 496 (5th Cir. 1999)
- Singletary v. Brown, 798 F.2d 818, 822-23 (5th Cir. 1986)
- Cook v. Heckler, 750 F.2d 391, 393 (5th Cir. 1985)
- Qualls v. Astrue, 339 F. App'x 461, 464 (5th Cir. 2009)
- Anthony v. Sullivan, 954 F.2d 289, 293 (5th Cir. 1992)
- Milam v. Bowen, 782 F.2d 1284, 1286 (5th Cir. 1986)
- Roberts v. Colvin, 946 F. Supp. 2d 646, 657 (S.D. Tex. 2013)
- Greenspan v. Shalala, 38 F.3d 232, 236 (5th Cir. 1994)
- Perez v. Barnhart, 415 F.3d 457, 461 (5th Cir. 2005)
- Ware v. Schweiker, 651 F.2d 408, 411 (5th Cir. 1981)
- Torres v. Colvin, No. 4:13-cv-2571, 2014 WL 4064002, at *6 (S.D. Tex. Aug. 15, 2014)
- Farr v. Astrue, No. G-10-205, 2012 WL 6020061, at *2 (S.D. Tex. Nov. 30, 2012)
- Sprowl v. Commissioner of Social Security, No. SA-24-CV-01125-ESC, 2025 WL 2264602, at *5-*6 (W.D. Tex. Aug. 6, 2025)
- Taylor v. Astrue, 706 F.3d 600, 602-03 (5th Cir. 2012)
- Newton v. Apfel, 209 F.3d 448, 455 (5th Cir. 2000)
- Miller v. Kijakazi, No. 22-60541, 2023 WL 234773, at *4 (5th Cir. Jan. 18, 2023) (per curiam)

- Donna A. v. Commissioner of Social Security, No. 5:22-CV-111-H-BQ, 2023 WL 5004867, at *3-*6 (N.D. Tex. July 17, 2023)
- Nic R. v. Kijakazi, No. 3:22-cv-00106-K-BT, 2023 WL 2529930, at *5 (N.D. Tex. Feb. 21, 2023)
- Joseph-Jack v. Barnhart, 80 F. App'x 317, 318 (5th Cir. 2003) (per curiam)
- Williams v. Astrue, 355 F. App'x 828, 831-32 & n.6 (5th Cir. 2009) (per curiam)
- Sims v. Apfel, 530 U.S. 103, 111 (2000)
- Moreno v. Astrue, No. 5:09-CV-123-BG, 2010 WL 3025525, at *3 (N.D. Tex. June 30, 2010)
- Garcia v. Berryhill, No. EP-17-cv-00263-ATB, 2018 WL 1513688, at *2 (W.D. Tex. Mar. 27, 2018)
- Beachum v. Berryhill, No. 1:17-cv-00095-AWA, 2018 WL 4560214, at *4 (W.D. Tex. Sept. 21, 2018)
- Tiede v. Dudek, 770 F. Supp. 3d 965, 971-73 (W.D. Tex. 2025)
- Griffin v. O'Malley, No. SA-23-CV-01090-FB-ESC, 2025 WL 440284, at *7-*9 (W.D. Tex. Jan. 17, 2025), adopted sub nom. Griffin v. Colvin, 2025 WL 440281 (W.D. Tex. Feb. 7, 2025)
- Raper v. Colvin, 262 F. Supp. 3d 415, 422-23 (N.D. Tex. 2017)
- Fitzpatrick v. Colvin, No. 3:15-CV-3202-D, 2016 WL 1258477, at *8 (N.D. Tex. Mar. 31, 2016)
- Thornhill v. Colvin, No. 3:14-CV-335-M, 2015 WL 232844, at *10 (N.D. Tex. Jan. 16, 2015)
- Mays v. Bowen, 837 F.2d 1362, 1364 (5th Cir. 1988)
- Jones v. Astrue, 691 F.3d 730, 735 (5th Cir. 2012)
- Kirkland v. Commissioner of Social Security, No. 4:22-cv-759-O-BP, 2023 WL 3357597, at *6 (N.D. Tex. Apr. 25, 2023)
- Lozano v. Commissioner, Social Security Administration, No. 4:21-CV-1365-P, 2023 WL 2618132, at *6 (N.D. Tex. Mar. 2, 2023)
- Graves v. Kijakazi, No. 3:22-CV-0107-L-BH, 2023 WL 2025247, at *17 (N.D. Tex. Jan. 31, 2023)
- Martinez v. Kijakazi, No. 3:20-CV-3282-BH, 2022 WL 4590577, at *22 (N.D. Tex. Sept. 29, 2022)