

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

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

Lashonda W. · No. 3:24-CV-00562-DRL-SJF-SJF · Decided February 6, 2026

SUMMARY

The United States District Court for the Northern District of Indiana reviews the denial of Lashonda W.'s applications for Disability Insurance Benefits and Supplemental Security Income. The court holds that the Administrative Law Judge adequately evaluated the medical evidence, assessed the claimant's residual functional capacity, and addressed the alleged need for a service animal. The court affirms the Commissioner's decision denying benefits.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Scott J. Frankel
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	February 6, 2026
DOCKET	3:24-CV-00562-DRL-SJF-SJF
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner of Social Security's final decision denying Plaintiff's applications for Disability Insurance Benefits and Supplemental Security Income.
STANDARD OF REVIEW	The court reviews whether the ALJ applied the correct legal standards and whether the decision is supported by substantial evidence. The court reviews the entire administrative record but may not reweigh evidence, resolve evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's. The ALJ must minimally articulate the reasoning and build a logical bridge from the evidence to the conclusions.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Lashonda W. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

service animals

disability definition

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the persuasiveness of the medical evidence and opinions under 20 C.F.R. § 404.1520c.
2. Whether the ALJ's RFC assessment failed to include physical limitations identified in a consultative examination.
3. Whether the ALJ's treatment of Plaintiff's alleged need for a service or emotional-support animal required remand.
4. Whether substantial evidence supported the Commissioner's denial of benefits.

HOLDINGS

1. The ALJ adequately explained the persuasiveness of the opinions of the medical experts who testified at the hearing by addressing their longitudinal review of the record, supporting rationale, questioning at the hearing, and consistency with the clinical findings and treatment history.
2. The ALJ erred by stating that the consultative examination did not mention reduced range of motion or right-upper-extremity limitations, but the error was harmless because the record permitted the court to predict with great confidence that the ALJ would reach the same result on remand.
3. The RFC and the determination that Plaintiff could perform her past relevant work as a housekeeping cleaner were supported by substantial evidence.
4. The ALJ did not commit reversible error in declining to include a service-animal limitation because Plaintiff did not establish that an animal was medically necessary; any factual error concerning whether the record mentioned an animal was harmless.

KEY QUOTATIONS

“The RFC is the most someone “can do despite their mental and physical limitations.”” (AR 23)

“The use of a service dog must be medically necessary to be considered in an RFC assessment.” (AR 32)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning in June 2021 based principally on physical and mental impairments, including depression, bipolar disorder, panic disorder, ADHD, PTSD, and various physical conditions. The ALJ found several severe mental impairments but found the physical impairments non-severe, assessed an RFC for work at all exertional levels with non-exertional restrictions, and determined that Plaintiff could perform her past

work as a housekeeping cleaner. Plaintiff also testified that an emotional support animal helped with anxiety, depression, and PTSD, but the record did not establish that an animal was medically required.

PROCEDURAL HISTORY

Plaintiff applied for DIB and SSI, and the claims were denied initially and upon reconsideration. After two hearings, the ALJ issued an unfavorable decision on November 1, 2023. The Appeals Council denied review on May 7, 2024, making the ALJ's decision the Commissioner's final decision. The district court reviewed the decision under 42 U.S.C. § 405(g) and affirmed.

DISPOSITION

affirmed

CASES CITED

- Pufahl v. Bisignano, 142 F.4th 446, 452-53 (7th Cir. 2025)
- Sevec v. Kijakazi, 59 F.4th 293, 298 (7th Cir. 2023)
- Lothridge v. Saul, 984 F.3d 1227, 1233
- Clifford v. Apfel, 227 F.3d 863, 868 (7th Cir. 2000), as amended (Dec. 13, 2000)
- Elder v. Astrue, 529 F.3d 408, 413
- Roddy v. Astrue, 705 F.3d 631, 636
- Simila v. Astrue, 573 F.3d 503, 513
- Skinner v. Astrue, 478 F.3d 836, 841
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Summers v. Berryhill, 864 F.3d 523, 526
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Young v. Barnhart, 362 F.3d 995, 1001
- Lopez v. Barnhart, 336 F.3d 535, 539
- Scott v. Barnhart, 297 F.3d 589, 595
- Craft v. Astrue, 539 F.3d 668, 673
- Moore v. Colvin, 743 F.3d 1118, 1123
- Indoranto v. Barnhart, 374 F.3d 470, 474
- Briscoe ex rel. Taylor v. Barnhart, 425 F.3d 345, 355
- Campbell v. Shalala, 988 F.2d 741, 744
- Michelle D. v. Kijakazi, No. 21 C 1561, 2022 WL 972280, at *4 (N.D. Ill. Mar. 31, 2022)
- Willis v. Acting Comm'r of Soc. Sec., No. 3:21-cv-178 JD, 2022 WL 2384031, at *3 (N.D. Ind. July 1, 2022)
- Tammy M., 2021 WL 2451907, at *7
- Taylor v. Kijakazi, No. 2:22-cv-32-PPS-JPK, 2023 WL 334601, at *3 (N.D. Ind. Jan. 20, 2023)
- Crowell v. Kijakazi, 72 F.4th 810, 816 (7th Cir. 2023)

- Karr v. Saul, 989 F.3d 508, 513
- Grotts v. Kijakazi, 27 F.4th 1273, 1278
- Tiffany B. v. Kijakazi, No. 1:20-cv-02696, 2022 WL 224817, at *6 (S.D. Ind. Jan. 26, 2022)

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