

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Hugh M. v. Frank Bisignano, Commissioner of Social Security

Hugh M. · No. TJS-25-1270 · Decided April 8, 2026

SUMMARY

The United States District Court for the District of Maryland reviews the denial of Hugh M.'s claim for Supplemental Security Income. The court grants the Commissioner's motion for a sentence-four remand and denies the claimant's request for remand for payment of benefits, holding that further evaluation is warranted regarding vocational-expert evidence and compliance with SSR 24-3p at step five. The court reverses the Commissioner's decision in part, remands for further proceedings, and closes the case.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Timothy J. Sullivan
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 8, 2026
DOCKET	TJS-25-1270
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Hugh M. sought judicial review of the Commissioner’s denial of Supplemental Security Income. The parties filed cross-motions to remand, and the Commissioner requested a sentence-four remand for further administrative proceedings while Hugh M. sought remand for payment of benefits.
STANDARD OF REVIEW	The court must uphold the agency decision if it is supported by substantial evidence and the agency applied the proper legal standards. The court may affirm, modify, or reverse the Commissioner’s decision, with or without remanding for a rehearing, under 42 U.S.C. § 405(g).
PRECEDENTIAL VALUE	Unpublished district court letter opinion; precedential status is unknown.
PARTIES	Hugh M. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

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PRACTICE AREAS

Social Security disability

administrative law

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QUESTIONS PRESENTED

1. Whether the ALJ's step-five finding was adequately supported when the vocational expert did not identify the data sources used to estimate available jobs or explain applicable differences between those sources and the information used in the disability regulations.
2. Whether the court should remand for payment of benefits rather than for further administrative proceedings because the case had been pending for many years and Hugh M. argued that the record established disability.

HOLDINGS

1. Remand for further administrative proceedings was warranted because the vocational-expert evidence did not adequately comply with SSR 24-3p and the record lacked sufficient explanation to permit meaningful review of the finding that Hugh M. could perform a significant number of jobs in the national economy.
2. Remand for payment of benefits was not warranted merely because the claim had been pending for nearly ten years; an award without remand is appropriate only in the unusual case where the record clearly establishes entitlement to benefits or no substantial-evidence basis could support denial.

KEY QUOTATIONS

"The Court agrees that remand for further investigation and explanation at step five pursuant to SSR 24-3p is warranted."

"Although Hugh M. points out that his case has been pending for almost ten years, this is not a ground "for directing an award of benefits in the absence of a finding that a claimant is indeed disabled.""

"The case is REMANDED for further proceedings in accordance with this opinion."

FACTUAL BACKGROUND

Hugh M. applied for SSI alleging disability beginning January 1, 2011. The ALJ found severe physical and mental impairments but determined that Hugh M. retained the residual functional capacity for a restricted range of medium work and that jobs existed in significant numbers that he could perform. The vocational expert used Job Browser Pro to estimate job numbers, but the hearing record did not establish the data sources used or explain differences between those sources and the regulatory or occupational information relied upon by the ALJ.

PROCEDURAL HISTORY

Hugh M. applied for SSI in 2016, and an ALJ denied the claim in 2019. After the Appeals Council denied review, the Eastern District of New York remanded the case by stipulation. A second ALJ decision denying benefits was remanded by this Court in April 2024. After a third ALJ hearing and a February 10, 2025 denial, Hugh M. again sought judicial review. The District of Maryland granted the Commissioner's motion for a sentence-four remand for further proceedings, denied Hugh M.'s request for payment of benefits, reversed the Commissioner's decision in part for inadequate analysis, and closed the case.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand under sentence four of 42 U.S.C. § 405(g) for further administrative proceedings, including further investigation and explanation under SSR 24-3p concerning whether Hugh M. can perform a significant number of jobs in the national economy at step five.

CASES CITED

- Mascio v. Colvin, 780 F.3d 632, 634 (4th Cir. 2015)
- Melkonyan v. Sullivan, 501 U.S. 89 (1991)
- Shelley C. v. Commissioner of Social Security Administration, 61 F.4th 341, 369 (4th Cir. 2023)
- Radford v. Colvin, 734 F.3d 288, 295-96 (4th Cir. 2013)
- Arakas v. Commissioner, Social Security Administration, 983 F.3d 83, 111 (4th Cir. 2020)
- Carr v. Kijakazi, No. 20-2226, 2022 WL 301540, at *3, *5 (4th Cir. Feb. 1, 2022)
- Florida Power & Light Co. v. Lorion, 470 U.S. 729, 744 (1985)
- Bush v. Shalala, 94 F.3d 40, 46 (2d Cir. 1996)

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