

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Tiffany S. W. v. Frank Bisignano, Acting Commissioner of Social Security

Tiffany S. W. · No. 2:24-cv-10656 (BRM) · Decided January 12, 2026

SUMMARY

The United States District Court for the District of New Jersey reviewed Tiffany S. W.’s appeal from the Commissioner of Social Security’s denial of Disability Insurance Benefits. The court held that the Administrative Law Judge adequately evaluated the evidence, developed the record, assessed the claimant’s past relevant work and impairments, and supported the decision with substantial evidence. The court denied the appeal and affirmed the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Brian R. Martinotti
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 12, 2026
DOCKET	2:24-cv-10656 (BRM)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying her application for Disability Insurance Benefits.
STANDARD OF REVIEW	The court reviews legal issues plenary and reviews factual findings to determine whether they are supported by substantial evidence. The court may not reweigh the evidence or substitute its own factual determinations for those of the ALJ.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Tiffany S. W. v. Frank Bisignano, Acting Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security

administrative law

disability benefits

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to evaluate a chiropractor's treatment plan as a medical opinion.
2. Whether the ALJ's categorization of Plaintiff's past work and finding that she could perform past relevant work were supported by substantial evidence.
3. Whether the ALJ adequately developed and considered the record concerning Plaintiff's obesity, hypertension, anxiety, and depression.
4. Whether the ALJ erred by declining to fully credit Plaintiff's testimony concerning her functional limitations.

HOLDINGS

1. The ALJ did not err by declining to evaluate the chiropractor's prognosis and treatment plan as a medical opinion because a chiropractor is not an acceptable medical source and the submission did not assess what Plaintiff could still do despite her impairments.
2. The ALJ's categorization of Plaintiff's prior work and determination that she could perform past relevant work were supported by substantial evidence.
3. The ALJ adequately developed and considered the record concerning Plaintiff's obesity, hypertension, anxiety, and depression and was not required to obtain an outside expert opinion regarding each fact incorporated into the RFC determination.
4. The ALJ did not err by declining to fully credit Plaintiff's testimony because the ALJ considered the testimony and explained that it was not entirely consistent with the medical and other evidence.

KEY QUOTATIONS

"Courts are not permitted to re-weigh the evidence or impose their own factual determinations." (Section II)

"The ALJ can only assess impairments the claimant testifies they have, and only to the extent the claimant actually provides evidence of their nature and severity." (Section IV.C)

"An ALJ "is entitled to reject a claimant's testimony if he finds they lack credibility," so long as their decision on that front "contain[s] a thorough discussion and analysis of the objective medical and the other evidence."" (Section IV.D)

FACTUAL BACKGROUND

Plaintiff alleged disability based on spinal, shoulder, pain, neurological, obesity, anxiety, and depressive conditions. The ALJ found several physical impairments severe, but found obesity, hypertension, anxiety, and depression nonsevere or minimally limiting. The ALJ determined Plaintiff retained the residual functional capacity for light work with postural and manipulative limitations and could perform several past relevant jobs.

The district court found the ALJ adequately considered the chiropractor's treatment plan, Plaintiff's work history, obesity and mental-health evidence, and testimony regarding functional limitations.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits on October 29, 2021, alleging disability beginning May 1, 2021. After a hearing, the administrative law judge found her not disabled on January 29, 2024. The Appeals Council denied review on September 23, 2024. The district court denied Plaintiff's appeal and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- *Matthews v. Apfel*, 239 F.3d 589, 592 (3d Cir. 2001)
- *Knepp v. Apfel*, 204 F.3d 78, 83 (3d Cir. 2000)
- *Richardson v. Perales*, 402 U.S. 389, 401 (1971)
- *Newhouse v. Heckler*, 753 F.2d 283, 285 (3d Cir. 1985)
- *Newell v. Commissioner of Social Security*, 347 F.3d 541, 545 (3d Cir. 2003)
- *Biestek v. Berryhill*, 587 U.S. 97, 102-03 (2019)
- *Daring v. Heckler*, 727 F.2d 64, 70 (3d Cir. 1984)
- *Chandler v. Commissioner of Social Security*, 667 F.3d 356, 359, 362 (3d Cir. 2011)
- *Hartranft v. Apfel*, 181 F.3d 358, 360-61 (3d Cir. 1999)
- *Bowen v. Yuckert*, 482 U.S. 137, 140-41 (1987)
- *Plummer v. Apfel*, 186 F.3d 422, 428 (3d Cir. 1999)
- *Williams v. Sullivan*, 970 F.2d 1178, 1186 (3d Cir. 1992)
- *Burnett v. Commissioner of Social Security*, 220 F.3d 112, 120 (3d Cir. 2000)
- *Holloman v. Commissioner of Social Security*, 639 F. App'x 810, 814 (3d Cir. 2016)
- *Lippincott v. Commissioner of Social Security*, 982 F. Supp. 2d 358, 380-81 (D.N.J. 2013)
- *Powers v. Commissioner of Social Security*, Civ. A. No. 19-21970, 2021 WL 1207793, at *7 (D.N.J. Mar. 31, 2021)
- *Schaudeck v. Commissioner of Social Security*, 181 F.3d 429, 431 (3d Cir. 1999)
- *Sykes v. Apfel*, 228 F.3d 259, 262 (3d Cir. 2000)
- *Jones v. Barnhart*, 364 F.3d 501, 503-05 (3d Cir. 2004)
- *Gilliand v. Heckler*, 786 F.2d 178, 183 (3d Cir. 1986)
- *Crawford v. Commissioner of Social Security*, 363 F.3d 1155, 1160 (11th Cir. 2004)
- *Siravo v. Commissioner of Social Security*, Civ. A. No. 15-2836, 2017 WL 1246347, at *10 n.3 (D.N.J. Apr. 4, 2017)

- Caradine v. Kijakazi, Civ. A. No. 21-0014, 2022 WL 20054867, at *14 (M.D. Pa. May 26, 2022), report and recommendation adopted, 2023 WL 3851974 (M.D. Pa. June 6, 2023)
- Jones v. Dudek, 134 F.4th 991, 995, 997 (7th Cir. 2025)
- Staheli v. Commissioner, 84 F.4th 901, 907 (10th Cir. 2023)
- Cotter v. Harris, 642 F.2d 700, 703 (3d Cir. 1981)
- Sims v. Apfel, 530 U.S. 103, 111 (2000)
- Alejandra D. v. Commissioner of Social Security, Civ. A. No. 22-175, 2023 WL 2609134, at *8 (D.N.J. Mar. 22, 2023)
- Titterington v. Barnhart, 174 F. App'x 6, 11 (3d Cir. 2006)
- Keith v. Commissioner of Social Security, Civ. A. No. 12-4172, 2013 WL 6904070, at *6 (D.N.J. Dec. 31, 2013)
- Gibson v. Astrue, Civ. A. No. 12-cv-1219, 2013 WL 1163366, at *13 (D.N.J. Mar. 19, 2013)