

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA, PITTSBURGH DIVISION

Robert Michael Lesko v. Commissioner, Social Security
Administration

Lesko · No. 2:24-CV-01660-CBB · Decided December 18, 2025

SUMMARY

The United States District Court for the Western District of Pennsylvania reviewed cross-motions for summary judgment in a Social Security disability benefits appeal. The court held that the ALJ failed to adequately explain how the claimant's mild mental limitations, including fatigue, brain fog, and concentration symptoms, were reflected in the residual functional capacity assessment. The claimant's motion was granted, the Commissioner's motion was denied, and the decision denying benefits was vacated and remanded under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania, Pittsburgh Division
WRITING FOR THE COURT	Christopher B. Brown
JURISDICTION	United States District Court for the Western District of Pennsylvania, Pittsburgh Division
DECIDED	December 18, 2025
DOCKET	2:24-CV-01660-CBB
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of an administrative denial of disability insurance benefits. The parties filed cross motions for summary judgment.
STANDARD OF REVIEW	The court reviewed whether the Commissioner applied the correct legal standards and whether the decision was supported by substantial evidence on the record as a whole. The court could not reweigh the evidence or substitute its judgment for that of the ALJ, but required the ALJ to provide a clear and satisfactory explanation and to explicitly consider relevant, probative evidence.

PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive value only.
PARTIES	Robert Michael Lesko v. Commissioner, Social Security Administration, Frank Bisignano, substituted as Defendant

TOPICS

summary judgment judicial review of agency action administrative law civil procedure

PRACTICE AREAS

Social Security disability benefits administrative law federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment was supported by substantial evidence when the ALJ found mild mental limitations related to fatigue, memory, concentration, and brain fog but did not explain how those limitations affected the RFC.
2. Whether remand was required because the ALJ failed to include or adequately convey the claimant's mild mental limitations in the vocational-expert hypothetical and failed to provide a detailed assessment of those limitations.
3. Whether the court should reach Lesko's additional arguments concerning the ALJ's evaluation of the medical evidence, subjective symptoms, and treating-source opinions.

HOLDINGS

1. An ALJ must consider all medically determinable impairments, including nonsevere impairments producing only mild mental limitations, when formulating the claimant's RFC.
2. An ALJ may not rely on a finding of mild mental limitations while omitting any explanation of their impact on the RFC and vocational-expert hypothetical.
3. The case must be remanded for the ALJ to consider Lesko's mild mental limitations in formulating the RFC; the court need not reach the remaining challenges because the ALJ may reach different conclusions on remand.

KEY QUOTATIONS

“In assessing RFC, the adjudicator must consider limitations and restrictions imposed by all of an individual’s impairments, even those that are not ‘severe.’” (Section V.a)

“These boilerplate statements and incorporation by reference of Lesko’s mental limitations into the RFC are not “valid explanations” or “detailed assessments” of how Lesko’s mental limitations were considered in deciding his RFC as required by the applicable regulations and jurisprudence.” (Section V.a)

“Simply put, while a finding that a claimant has a mild mental limitation does not automatically result in “a corresponding mental limitation in the RFC[,]” an ALJ must consider these findings in formulating the

FACTUAL BACKGROUND

Lesko alleged disability from myelofibrosis, chronic pain, gout, fatigue, immune-system deficiencies, brain fog, and neuropathy. The record included opinions from his treating oncologist and primary-care physician that he could perform only very limited work, as well as a functional-capacity evaluation indicating that he could perform sedentary work part time. The ALJ found myelofibrosis and obesity severe, found his mental impairments and related fatigue, memory, concentration, and brain-fog symptoms mild and nonsevere, and assessed a residual functional capacity for less than the full range of light work. The ALJ did not adequately explain how the mild mental limitations affected the RFC or include them in the vocational hypothetical relied upon to find that Lesko could perform his past work.

PROCEDURAL HISTORY

Lesko applied for disability insurance benefits on March 16, 2023, alleging disability beginning December 25, 2022. After the claim was initially denied, Lesko obtained reconsideration and an administrative hearing before an ALJ on July 18, 2024. The ALJ denied benefits on August 16, 2024, and the Appeals Council declined review. Lesko timely appealed to the district court. The court granted Lesko's motion for summary judgment, denied the Commissioner's motion, vacated the denial of benefits, and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must reconsider Lesko's mild mental impairments, including fatigue, memory and concentration limitations, and brain fog, when formulating the RFC, provide an adequate explanation of their functional impact, and conduct further proceedings consistent with the opinion.

CASES CITED

- Rutherford v. Barnhart, 399 F.3d 546, 552 (3d Cir. 2005)
- Hartranft v. Apfel, 181 F.3d 358, 360 (3d Cir. 1999)
- Plummer v. Apfel, 186 F.3d 422, 427 (3d Cir. 1999)
- Biestek v. Berryhill, 587 U.S. 97 (2019)
- Pierce v. Underwood, 487 U.S. 552, 565 (1988)
- Cotter v. Harris, 642 F.2d 700, 704-06 (3d Cir. 1981)
- King v. Califano, 615 F.2d 1018 (4th Cir. 1980)
- Podedworny v. Harris, 745 F.2d 210, 221 (3d Cir. 1984)
- Adorno v. Shalala, 40 F.3d 43, 48 (3d Cir. 1994)
- Brewster v. Heckler, 786 F.2d 581, 583 (3d Cir. 1986)
- Barnhart v. Thomas, 540 U.S. 20, 24-25 (2003)

- *Dobrowolsky v. Califano*, 606 F.2d 403, 406 (3d Cir. 1979)
- *Doak v. Heckler*, 790 F.2d 26, 28 (3d Cir. 1986)
- *Hess v. Commissioner of Social Security*, 931 F.3d 198, 209-10, 213-14 (3d Cir. 2019)
- *Ramirez v. Barnhart*, 372 F.3d 546, 555 (3d Cir. 2004)
- *Meersand v. Kijakazi*, No. CV 20-1084, 2021 WL 5003331, at *3 (E.D. Pa. Oct. 28, 2021)
- *Benedetto v. Saul*, No. CV 19-4021, 2020 WL 5763551, at *6-7 (E.D. Pa. Sept. 28, 2020)
- *Metelli v. Berryhill*, No. CV 16-6094, 2017 WL 2570913, at *1 (E.D. Pa. May 26, 2017)
- *Green v. Colvin*, 179 F. Supp. 3d 481, 486 (E.D. Pa. 2016)
- *Gunn v. Kijakazi*, 705 F. Supp. 3d 315, 332-33 (E.D. Pa. 2023)
- *Kich v. Colvin*, 218 F. Supp. 3d 342, 357 (M.D. Pa. 2016)
- *Siry v. Bisignano*, No. CV 24-1910, 2025 WL 2447786, at *5 (E.D. Pa. Aug. 25, 2025)
- *Maria A. v. Commissioner of Social Security Administration*, No. CV 23-2484 (MAS), 2024 WL 943466, at *6 (D.N.J. Mar. 5, 2024)
- *Balla v. Commissioner of Social Security*, No. CV 18-00386 (RBK), 2019 WL 2482661, at *3 (D.N.J. June 14, 2019)
- *Curry v. Commissioner of Social Security*, No. 1:15-CV-07515-NLH, 2017 WL 825196, at *5-6 (D.N.J. Mar. 2, 2017)
- *William R. v. Bisignano*, No. 24-CV-4765, 2025 WL 1738663, at *9 (June 23, 2025)
- *Steininger v. Barnhart*, No. CIV.A. 04-5383, 2005 WL 2077375, at *4 (D.N.J. Aug. 24, 2005)