

A DIALOGUE ON A CONTEMPORARY ISSUE
***TOYOTA V. WILLIAMS* [1]**

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Editor

EDITOR'S NOTE

This entry is a continuation of a series designed to stimulate discussion of significant, contemporary issues with our readers. The issue here is a January 2002 Supreme Court decision under the Americans with Disabilities Act. The case involves whether a person who suffers from carpal tunnel syndrome (CTS) can be considered disabled under the ADA. The Sixth Circuit Court of Appeals looked at job-performance data to determine that this individual was disabled under the ADA. The Supreme Court looked instead to the individual's ability to perform "central life activities" and reversed the decision.

This case was decided under the Americans with Disabilities Act of 1990 (ADA) [2]. The plaintiff, Ella Williams, was first employed by the company on an assembly line job that required her to use pneumatic tools. After some time on this job, she developed carpal tunnel syndrome and tendinitis in her hands and arms. She asked for a transfer and was placed in a position where she inspected cars on the assembly line for defective paint and wiped down each newly painted car as it passed on the conveyor.

Williams performed this job successfully for about three years, and then her duties were expanded to include another job that required her to grip a block of wood with a sponge attached to the end and wipe down the passing cars with a highlight oil. This new work also required her to keep her hands and arms at shoulder height repetitively over several hours. Her ligament and muscle problems reappeared in a more severe form, with tendinitis now in her shoulders and neck as well. Because of these symptoms, Williams asked her employer to assign her to

her former job. Williams claimed that employer refused (although the employer disputes this fact). The central question, according to the court, was whether the employer violated the ADA by refusing to accommodate Williams by allowing her to return to her former, less strenuous work.

THE MAJORITY OPINION OF THE SIXTH CIRCUIT

The district court had granted summary judgment against Williams because it did not think her impairment met the requirements of a disability under the ADA. The Sixth Circuit addressed this issue, asking whether the physical difficulties caused by her new job constituted a “disability,” thereby bringing her within the coverage of the ADA.

The court of appeals began by reviewing the interpretation of the ADA that the Supreme Court had put forward in *Sutton v. United Airlines* [3]. In that case, the Supreme Court: 1) held that the word “disability” means a physical or mental impairment that substantially limits one or more of the person’s major life activities; a record of such impairment; or being regarded as having such an impairment; 2) when applied to the major life activity of working, the Court held that the impairment must render the person unable to perform a class or broad range of jobs; and 3) the Court also expressed a reluctance to consider working as a major life activity and suggested that it be viewed as a residual life activity to be considered as a last resort, only if the individual is not substantially limited with respect to any other major life activity.

Turning to this case, the court of appeals essentially concluded that Williams’ impairments to her arms, shoulders, and neck were sufficiently disabling to allow her to cross the threshold into the protected class of individuals under the ADA who must be accorded reasonable accommodation. Her ailments were analogous to having missing, damaged, or deformed limbs that prevented her from performing the tasks associated with a wide variety of jobs and that limited her ability to perform repetitive work with hands and arms outspread and lifted for extended periods of time. The fact that she could perform isolated, nonrepetitive manual tasks over a short period of time, such as tending to her personal hygiene or carrying out household chores, did not change the situation. She was disabled under the act because she was substantially limited in her ability to perform the range of manual tasks associated with assembly line work.

THE DISSENT

Circuit Judge Boggs dissented partially because he believed that the court’s attempt to deal with work as a major life activity was flawed. According to Boggs, this court’s decision was incorrect on the facts because the record showed that Williams could perform many manual tasks adequately, including those associated with personal care, housekeeping, and with the wiping tasks she had

performed prior to her newest job assignment. The decision was also incorrect on the law because her difficulty lay almost exclusively with the inability to perform tasks that require gripping tools or working with arms extended and lifted over long periods of time. Yet there is no regulation or case that indicates that such a specific and partial limitation is considered a disability with regard to the major life activity of “performing manual tasks,” Boggs wrote.

Moreover, Boggs added, the majority opinion took a subset of abilities relating to working (i.e., the ability to perform manual tasks) and erroneously treated a partial limitation there as substantially limiting a major life activity. Williams did not show a substantial limitation because her impairment almost entirely affects her ability to perform a particular job or a subset of job-specific tasks. She did not demonstrate that there is a broader class of jobs from which her impairment disqualifies her, Boggs concluded.

THE DECISION OF THE SUPREME COURT

The case was appealed to the Supreme Court, *certiorari* was granted, and the court announced its decision on January 8, 2002 [4]. In a unanimous decision written by Justice Sandra Day O’Connor, the Court reversed and remanded the appellate court’s decision because the Sixth Circuit did not apply the proper standard in determining that Williams was disabled under the ADA.

The Court criticized the decision of the Sixth Circuit because that court analyzed only a limited set of manual tasks and 2) failed to ask whether her impairments prevented or restricted her from performing tasks of central importance in people’s daily lives. The Sixth Circuit erred in suggesting that a substantial limitation in a major life activity could be proved by showing that a disability involves a class of manual activities that affect the ability to perform tasks at work.

The appellate court, furthermore, circumvented the ruling of the Supreme Court in *Sutton* by focusing on Williams’ inability to perform manual tasks associated only with her job. The court made its determination about whether an impairment constitutes a disability only by analyzing the impairment’s effect at the workplace. *The central inquiry must be whether the claimant is unable to perform the variety of tasks central to most people’s daily lives.* [Emphasis added.] The definition of disability found in the ADA deals not only with employment, but with public transportation and public accommodation, demonstrating that the definition is intended to cover individuals with disabling impairments regardless of their connection to a workplace. Moreover, the manual tasks associated with a particular job are not necessarily important parts of most people’s lives, as would be household chores, bathing, and brushing one’s teeth. The Sixth Circuit should not have disregarded Williams’ ability to perform these activities.

The editor welcomes your analysis of this court decision. Please send me your ideas on no more than three double-spaced, typewritten pages, focusing on

whatever questions come to your mind after reading this synopsis of the *Toyota* case. You might want to discuss the managerial implications of *Toyota* or the implications on the ability of any individual to win a case based on working as a major life activity.

ENDNOTES

1. *Ella Williams v. Toyota Motor, Kentucky, Inc.*, 224 F.3d 840 (6th Cir. 2000).
2. 42 U.S.C. § 12101.
3. *Sutton v. United Airlines*, 119 S. Ct. 2139 (1999), discussed in Charles J. Coleman, The Sutton Trilogy: Changing the Landscape of the ADA, *Journal of Individual Employment Rights*, Vol. 9 (1), pp. 55-69 (2000-2001).
4. *Toyota Motor Mfg., Ky., Inc. v. Williams*, 534 U.S. 184 (2002), No. 00-1089, Reversed and remanded.

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