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Brandy Carter

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Toyota Motor Manufacturing, Ky., Inc. v. Williams:
Americans With Disabilities Act Requires Individual to be Substantially Limited
in Completing Daily Tasks to Receive Benefits

By Brandy Carter

In a unanimous decision, the United States Supreme Court in *Toyota Motor Mfg., Ky., Inc. v. Williams*, 122 S. Ct. 681 (2002), held an individual must have an impairment that prevents or severely restricts the individual from doing activities that are of central importance to most people's lives, in order to receive benefits under the Americans with Disabilities Act of 1990. The Court so held despite its finding that the plaintiff was impaired in performing tasks that were necessary for her position working on an engine fabrication assembly line. In reaching its decision, the Court interpreted the meaning of the term "substantially limited in performing manual tasks" within the ADA.

In August of 1990, Ella Williams ("Williams") began working at Toyota's manufacturing plant in Georgetown, Kentucky ("Toyota"). *Toyota Motor Mfg., Ky. Inc. v. Williams*, 122 S. Ct. 681 (2002). Williams began her career at Toyota on an engine fabrication assembly line working with pneumatic tools. *Id.* at 686. Williams began experiencing pain in her hands, wrists, and arms and sought treatment from the company's in-house medical services. Williams was diagnosed with bilateral carpal tunnel syndrome and bilateral tendonitis. *Id.* Williams consulted a second doctor who told her to refrain from lifting more than twenty pounds,

from performing overhead work, using vibrating tools, or engaging in tasks requiring repetitive flexing or extension of her wrists or elbows. *Id.* For the next two years she was assigned to modified tasks. *Id.* Williams filed a claim under the Kentucky Workers' Compensation Act, which was settled. Williams returned to work, but became dissatisfied with Toyota's efforts to accommodate her. Williams filed suit in the United States District Court for the Eastern District of Kentucky alleging violations of the ADA. *Toyota Motor Mfg., Ky.*, 122 S.Ct. at 686. The case subsequently settled and she returned to work. *Id.* Upon her return, Williams was placed on the Quality Control Inspection team performing tasks, which only required the visual inspection of the paint job on vehicles that were on the assembly line. *Id.* at 687.

In the fall of 1996, the nature of the position changed and required all quality control workers to spread highlighter oil on cars with a sponge in order to observe imperfections in the paint job. *Id.* Williams' symptoms returned and she was ordered by her physician not to perform work of any kind. *Id.* Toyota then fired Williams citing her record of poor attendance. *Id.* Williams filed this action in the United States District Court for the Eastern District of Kentucky. *Id.* The

district court granted Toyota's motion for summary judgment. *Id.* Williams appealed to the court of appeals for the sixth circuit, which reversed the lower court's decision. *Id.* Toyota appealed to the United States Supreme Court. *Id.* at 689.

In its analysis, the Court first stated that the court of appeals was incorrect in granting partial summary judgment to Toyota on the issue of whether Williams was substantially limited in performing manual tasks at the time she requested the company to accommodate her disability. *Toyota Motor Mfg., Ky., Inc.*, 112 S. Ct. at 689. The Court then analyzed the legislative intent behind the ADA in light of previous decisions by the Court. *Id.* at 691. In *Sutton v. United Air Lines, Inc.*, 527 U.S. 471, 487 (1999), the Court stated, "because more than 100 million people need corrective lenses to see properly, had Congress intended to include all persons with corrected physical limitations among those covered by the Act, it undoubtedly would have cited a much higher number than 43 million disabled persons in the findings." *Id.* at 487. In *Albertson's Inc. v. Kirkingburg*, 527 U.S. 555, 567 (1999), the Court stated that individuals cannot prove disability status under this test merely by submitting evidence of a medical impairment. The ADA requires

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persons claiming the Act's protection to prove a disability by offering evidence that the extent of the limitation caused by their impairment is substantial. *Id.* at 567.

In response to the court of appeals' interpretation that a disability effecting only job specific tasks fell within the ADA, the Court stated that there was no foundation for such a standard in previous decisions or within the ADA itself. *Id.* at 693.

The Court next considered the record as to the Petitioner's ability to function after her condition worsened. *Toyota Motor Mfg. Ky. Inc.*, 122 S.Ct. at 694. The Supreme Court wholly rejected the court of appeals' finding that petitioner was substantially limited in performing manual tasks because she could no longer sweep, dance, garden or drive long distances, as these were not tasks central to most people's daily lives. *Id.* at 694. The Court relied, in part, on 42 U.S.C. § 12102(2)(A)(1994 ed.), which states that, "to qualify as disabled, a claimant must further show that the limitation on the major life activity is 'substantial.'" *Id.* at 690. The Court maintained that the language of the ADA should be narrowly interpreted so that frivolous disability claims will not take benefits away from those truly in need. *Id.* at 691.

The United States Supreme Court in *Toyota Mfg., Ky., Inc., v. Williams*, held that an award of disability benefits under the ADA should only be awarded to those individuals unable to tend to daily life tasks such as personal hygiene or household chores. This case is an example of the Court's current

tendency to narrowly interpret the ADA and acts of Congress to fit individual cases as opposed to broadly granting benefits to those who are mildly disabled.

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