



## Pittston Coal Group v. Sebben, 488 U.S. 105, 134 n.7 (1988)

The United States Supreme Court held that the interim Labor regulations applicable to claims seeking black lung benefits were impermissibly restrictive. The Court found that the Labor criteria were unduly restrictive because a miner would need to obtain a presumption of entitlement by establishing pneumoconiosis and either 10 years of coal mining experience or proof that the pneumoconiosis was caused by mining employment, criteria which the Court found too restrictive.

### **Because the Case Revolved Around a Medical Condition, the Court Looked to AMA Definitions to Facilitate Its Reasoning**

It is also interesting to note that the definition of the word "criterion" in Webster's Third New International Dictionary 538 (1966) is in three parts, the first two of which contain medical references. Thus, the first definition uses as an example "a special constitutional criterion of that person," drawn from the Journal of the American Medical Association, and the second makes reference to "the accepted criteria of adequate diet." None of the definitions makes any reference to legal procedures, presumptions, or burdens of proof.