

October 15, 2022

The Honorable Judge Sample
Office of Hearing Operations
123 Main Street, Suite 456
Yourtown, AQ 67890

Prehearing Memorandum on behalf of:
Olivia JONES (999-99-9999)

Dear Judge Sample,

I am scheduled to appear before you for a hearing scheduled on October 30, 2022 at 10 AM. My birthday is January 1, 1971 and I am 51 years old with a high school diploma. I allege that I became disabled on September 29, 2021 due to carpal tunnel syndrome, back pain, and depression.

Procedural History

I submitted my application for SSDI disability benefits on April 15, 2022. I was denied at the initial level on June 1, 2022, and at the reconsideration level on August 15, 2022. My date last insured is December 31, 2025.

Sequential Evaluation

Step One: I haven't engaged in substantial gainful activity since my alleged onset date of September 29, 2021.

Step Two: I have the following medically determinable severe impairments:

- Carpal tunnel syndrome (Ex. 1F)
- Lumbar disc degeneration (Ex. 2F)
- Major depressive disorder (Ex. 3F)

Step Three: I meet or equal the listing requirements of 1.15, disorders of the skeletal spine resulting in compromise of a nerve root (Ex. 8F), and listing 12.04, depressive disorders (Ex. 7F).

Step Four: I am unable to perform my past work as an electrical engineer because I can't sit, type, or concentrate long enough to complete the job duties.

Step Five: I am unable to perform any other work in the national economy because I can't perform even a simple sit-down job. Alternatively, medical-vocational grid rule 201.14 directs a finding that I am disabled.

Relevant Medical Evidence

I have seen Dr. Smith for treatment of my carpal tunnel syndrome since 2020. She conducted a nerve conduction study on November 1, 2020, which showed that I had severe carpal tunnel in my right hand, which is my dominant hand. (Exhibit 1F, page 5)

Dr. Smith prescribed cortisone injections, which I had on January 5, April 4, and July 15, 2021 (Exhibit 1F, pages 10, 20 and 30), but they didn't relieve the pain for very long. I had carpal tunnel surgery on September 29, 2021 (Exhibit 1F, page 40) and haven't returned to work since then.

I have seen Dr. Garth for treatment of my lower back pain since 2019. Dr. Garth diagnosed me with spinal stenosis on February 19, 2020 after reviewing an MRI that showed severe nerve root compression. (Exhibit 2F, page 6)

Since that date I have taken multiple medications including gabapentin and Vicodin (Exhibit 4F, page 2) that make me drowsy and confused. I tried physical therapy (Exhibit 5F) and acupuncture (Exhibit 6F), but nothing helped. Dr. Garth performed a spinal fusion on December 22, 2021, but I still have pain that can only be relieved by reclining my legs.

Since I left work I have had trouble keeping a positive attitude. My pain prevents me from doing some of my favorite activities such as bicycling and kayaking. Just reading is difficult for me now because I can't hold the book for long enough to read more than a page. Even if I could hold the book, my pain medications make it hard for me to focus after a few paragraphs.

The last time I saw Dr. Smith, she referred me to a psychologist, Dr. Danna. When I saw Dr. Danna I started to cry when he asked me questions about my daily routine. He performed a mental status evaluation (Exhibit 3F page 9) and diagnosed me with depression. I have been attending pain management counseling sessions over the phone weekly but I struggle with motivation. I let the dishes pile up and only leave the house when I am completely out of food.

Dr. Danna wrote a letter on January 18, 2022 saying that I have a lot of mental limitations. (Exhibit 7F). Dr. Garth wrote a letter on March 30, 2022 saying that I shouldn't be on my feet for longer than 1 hour during the day (Exhibit 8F). Dr. Smith didn't write a letter, but in a progress note from May 16, 2022 (Exhibit 1F, page 60), she mentioned that I had difficulty typing texts and shouldn't handle small objects.

Conclusion

I'm unable to perform my past work due to a combination of my physical and mental impairments. My past work involved a lot of typing that I can't do since my carpal tunnel surgery. Even if I could do the work physically, my depression makes it hard for me to focus on anything for longer than a few minutes. I tried looking for other jobs, but none of them would let me elevate my legs to relieve my back pain.

Thank you for your time and consideration.

Sincerely,

Olivia Jones