

COURT OF APPEALS OF TENNESSEE

Camille Webb Steward v. Orson Eric Steward

No. M2026-00546-COA-T10B-CV (Tenn. Ct. App. Apr. 30, 2026) · No. M2026-00546-COA-T10B-CV ·
Decided April 30, 2026

SUMMARY

The Tennessee Court of Appeals dismissed Orson Eric Steward’s accelerated interlocutory appeal from the denial of his motion to recuse the trial judge. The court held that the recusal motion failed to comply with Tennessee Supreme Court Rule 10B § 1.01 because it lacked a supporting affidavit or declaration and did not affirmatively state that it was not presented for an improper purpose.

CASE DETAILS

COURT	Court of Appeals of Tennessee
WRITING FOR THE COURT	Steven W. Maroney; John W. McClarty, P.J., E.S.; Jeffrey Usman
JURISDICTION	Tennessee Court of Appeals
DECIDED	April 30, 2026
DOCKET	M2026-00546-COA-T10B-CV
DISPOSITION	dismissed
PROCEDURAL POSTURE	Accelerated interlocutory appeal as of right under Tennessee Supreme Court Rule 10B from an order denying a motion to recuse.
STANDARD OF REVIEW	De novo review applies to a Tennessee Supreme Court Rule 10B appeal. The appellate court may act summarily without an answer, additional briefing, or oral argument when appropriate.
PRECEDENTIAL VALUE	Published Tennessee Court of Appeals opinion
PARTIES	Orson Eric Steward v. Camille Webb Steward

TOPICS

- interlocutory appeal
- appellate procedure
- family law procedure
- standard of review
- civil procedure

PRACTICE AREAS

- family law
- judicial disqualification and recusal
- appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court erred in denying Steward's motion for recusal.
2. Whether Steward's failure to support the recusal motion with an affidavit or declaration and to include the required statement regarding improper purpose required dismissal of the Rule 10B appeal.
3. What issues may be reviewed in an accelerated interlocutory appeal under Tennessee Supreme Court Rule 10B.

HOLDINGS

1. In a Rule 10B recusal appeal, the Court of Appeals may review only the trial court's order denying the motion to recuse and may not review the correctness or merits of the trial court's other rulings.
2. A party seeking recusal must strictly comply with Tennessee Supreme Court Rule 10B § 1.01 by filing a written motion supported by an affidavit under oath or declaration under penalty of perjury based on personal knowledge, stating with specificity all factual and legal grounds for disqualification, and affirmatively stating that the motion is not presented for an improper purpose.
3. A pro se litigant is entitled to fair and equal treatment but must comply with the same substantive and procedural rules applicable to represented parties.

KEY QUOTATIONS

“Interlocutory recusal appeals require “meticulous compliance with the provisions of Rule 10B.”” (at 3)

“We reach the same result here; Appellant’s failure to strictly comply with the requirements of Tennessee Supreme Court Rule 10B § 1.01 is fatal to his appeal.” (at 4)

FACTUAL BACKGROUND

Orson E. Steward sought recusal of Chancellor Deana C. Hood during divorce proceedings, alleging that she acted outside her authority, demonstrated unethical bias, and improperly handled an order of protection. His motion was not supported by an affidavit or declaration under penalty of perjury and did not affirmatively state that it was not presented for an improper purpose. The trial court denied the motion, and Steward filed an accelerated Rule 10B recusal appeal.

PROCEDURAL HISTORY

During divorce proceedings, Orson E. Steward filed a motion seeking recusal of Chancellor Deana C. Hood. The Chancery Court for Williamson County denied the motion, finding that it lacked specific facts supported by competent evidence, relied on unsupported assertions and subjective suspicions, identified no extrajudicial source of bias, and was untimely. Steward then filed a Rule 10B petition for recusal appeal. The Court of Appeals dismissed the appeal because the motion failed to comply strictly with Rule 10B § 1.01.

DISPOSITION

dismissed

CASES CITED

- Duke v. Duke, 398 S.W.3d 665, 668, 671 (Tenn. Ct. App. 2012)
- Williams by & through Rezba v. HealthSouth Rehab. Hosp. N., No. W2015-00639-COA-T10B-CV, 2015 WL 2258172, at *5 (Tenn. Ct. App. May 8, 2015)
- Brown v. Christian Bros. Univ., 428 S.W.3d 38, 46 (Tenn. Ct. App. 2013)
- Hodges v. Tenn. Att'y Gen., 43 S.W.3d 918, 920 (Tenn. Ct. App. 2000)
- Paehler v. Union Planters Nat'l Bank, Inc., 971 S.W.2d 393, 396 (Tenn. Ct. App. 1997)
- Young v. Barrow, 130 S.W.3d 59, 63 (Tenn. Ct. App. 2003)
- Edmundson v. Pratt, 945 S.W.2d 754, 755 (Tenn. Ct. App. 1996)
- Kaylor v. Bradley, 912 S.W.2d 728, 733 n.4 (Tenn. Ct. App. 1995)
- In re Samuel P., No. W2016-01592-COA-T10B-CV, 2016 WL 4547543, at *2 (Tenn. Ct. App. Aug. 31, 2016)
- Cotham v. Cotham, No. W2015-00521-COA-T10B-CV, 2015 WL 1517785, at *2 (Tenn. Ct. App. Mar. 30, 2015)
- Simms Elec., Inc. v. Roberson Assocs., Inc., No. 01-A-01-9011-CV-00407, 1991 WL 44279, at *2 (Tenn. Ct. App. Apr. 3, 1991)
- Johnston v. Johnston, No. E2015-00213-COA-T10B-CV, 2015 WL 739606, at *2 (Tenn. Ct. App. Feb. 20, 2015)
- Moncier v. Wheeler, No. E2020-00943-COA-T10B-CV, 2020 WL 4343336, at *3 (Tenn. Ct. App. July 28, 2020)
- Hobbs Purnell Oil Co., Inc. v. Butler, No. M2016-00289-COA-R3-CV, 2017 WL 121537, at *14 (Tenn. Ct. App. Jan. 12, 2017)
- Jordan v. Jordan, No. E2024-01731-COA-T10B-CV, 2024 WL 5135834, at *3 (Tenn. Ct. App. Dec. 17, 2024)