

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Charisse Robinson v. Chancler Prescott and Graybar Electric
Company, Inc.

Robinson · No. 1:24-cv-145 · Decided May 22, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee ruled on Defendants’ motions in limine in a motor-vehicle-accident case. The court denied the motion insofar as it sought to preclude Plaintiff from testifying about missed workdays, lost wages, and the cause of certain immediately occurring pain, but granted the motion to exclude testimony about the value of medical bills absent expert proof of their reasonableness and necessity.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Charles E. Atchley, Jr.
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	May 22, 2026
DOCKET	1:24-cv-145
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved in limine to exclude Plaintiff's anticipated testimony concerning missed workdays and lost wages, the cause of her alleged injuries, and the value of her medical bills. The court ruled on the evidentiary motion before trial.
STANDARD OF REVIEW	Motions in limine are preliminary evidentiary rulings designed to narrow evidentiary issues and avoid unnecessary trial interruptions. Such rulings may be changed as the trial unfolds.
PRECEDENTIAL VALUE	unpublished district-court memorandum opinion; nonprecedential
PARTIES	Charisse Robinson v. Chancler Prescott, Graybar Electric Company, Inc.

TOPICS

motion in limine

expert testimony

evidence

personal injury

damages

PRACTICE AREAS

evidence

civil procedure

personal injury

damages

QUESTIONS PRESENTED

1. Whether Plaintiff could testify about missed workdays and lost wages without additional expert proof connecting the claimed injuries to her inability to work.
2. Whether Plaintiff could testify as a lay witness about the cause of her head, neck, shoulder, and back pain immediately following the vehicle accident and continuing for a limited period.
3. Whether Plaintiff could testify about the value of her medical bills when she lacked expert proof establishing their reasonableness and necessity.

HOLDINGS

1. Plaintiff may testify about her missed workdays and lost wages because her testimony may provide competent proof of those losses and whether her injuries caused an inability to work depends on the evidence presented at trial.
2. Plaintiff may testify about the pain she experienced immediately following the vehicle accident and continuing for a limited period afterward, including testimony that may establish causation of her head, neck, shoulder, and back pain.
3. Plaintiff is precluded from testifying about the value of her medical bills because she cannot recover medical-bill damages without expert proof establishing the reasonableness and necessity of the medical services and charges.

KEY QUOTATIONS

“Motions in limine are “designed to narrow the evidentiary issues for trial and to eliminate unnecessary trial interruptions.”” (Section I)

“A ruling on a motion in limine is preliminary in nature and may change depending on how the trial unfolds.” (Section I)

“Plaintiff’s head, neck, shoulder, and back pain immediately following the Accident and persisting for a limited period of time, are sufficiently ‘simple’ to prove through lay person testimony.” (Section II.B)

“It is GRANTED to the extent that Plaintiff is precluded from testifying about her medical bills. It is DENIED in all other respects.” (Section III)

FACTUAL BACKGROUND

Plaintiff alleges that she sustained head, neck, shoulder, and back pain in a vehicle accident and missed work or lost wages as a result. She also sought damages related to medical bills and expenses and allegedly had some

headaches and back pain before the collision. The court addressed the admissibility of her anticipated testimony concerning lost work, injury causation, and medical-bill value.

PROCEDURAL HISTORY

The action is a personal-injury suit arising from a vehicle accident. In a prior summary-judgment order, the court held that Plaintiff could testify about certain pain and discomfort and about missed workdays and lost wages, but could not recover medical-bill damages absent expert proof of reasonableness and necessity. Defendants then filed motions in limine seeking to preclude the testimony.

DISPOSITION

other

CASES CITED

- Louzon v. Ford Motor Co., 718 F.3d 556, 561 (6th Cir. 2013)
- Luce v. United States, 469 U.S. 38, 41 n.2 (1984)
- United States v. Yannott, 42 F.3d 999, 1007 (6th Cir. 1994)
- United States v. Luce, 713 F.2d 1236, 1239 (3d Cir. 1983)
- King v. Chase, No. 2:22-cv-02030-JPM-atc, 2022 U.S. Dist. LEXIS 113944, at *22-23 (W.D. Tenn. June 28, 2022)
- King v. Chase, No. 2:22-cv-02030-JPM-atc, 2022 U.S. Dist. LEXIS 113944, at *17-18 (W.D. Tenn. June 28, 2022)
- Seaton v. Black & Decker (U.S.) Inc., No. 2:20-CV-124, 2021 U.S. Dist. LEXIS 70649, at *18 (E.D. Tenn. Apr. 13, 2021)
- Stricklan v. Patterson, No. E2008-00203-COA-R3-CV, 2008 Tenn. App. LEXIS 647, at *4 (Tenn. Ct. App. Nov. 4, 2008)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA CHARISSE ROBINSON,)) Plaintiff,) Case No. 1:24-cv-145) v.) Judge Atchley) CHANCLER PRESCOTT and GRAYBAR) Magistrate Judge Steger ELECTRIC COMPANY, INC.,)) Defendants.)) MEMORANDUM OPINION AND ORDER Before the Court is Defendants' Motions in Limine. [Doc. 68].

For the reasons that follow, the Motion [Doc. 68] will be GRANTED IN PART and DENIED IN PART. I. STANDARD OF REVIEW Motions in limine are “designed to narrow the evidentiary issues for trial and to eliminate unnecessary trial interruptions.” Louzon v. Ford Motor Co., 718 F.3d 556, 561 (6th Cir. 2013) (citation and internal quotation marks omitted). They are often asserted “to exclude anticipated prejudicial evidence before the evidence is actually offered.” Luce v. United States, 469 U.S. 38, 41 n.2 (1984).

A ruling on a motion in limine is preliminary in nature and may change depending on how the trial unfolds. *United States v. Yannott*, 42 F.3d 999, 1007 (6th Cir. 1994) (citing *United States v. Luce*, 713 F.2d 1236, 1239 (6th Cir. 1983)). II. ANALYSIS Defendants have requested that Plaintiff be precluded from testifying regarding three categories of evidence: (1) any alleged missed workdays and/or lost wages; (2) the cause of her alleged injuries; and (3) her medical bills.

[Doc. 68]. The Court will analyze each in turn. A. Missed Workdays and/or Lost Wages Defendants first argue that Plaintiff should be precluded from testifying about days she missed work or lost wages because such testimony is irrelevant absent competent proof that her claimed injuries caused any inability to work. [Doc. 68 at 1].

In response, Plaintiff cites the Court's Summary Judgment Order [Doc. 72], which determined that she may testify about her missed workdays and lost wages. As Plaintiff pointed out, the Court has already held that she may testify about her lost wages and missed workdays. [Doc. 72 at 9–10]; see also *King v. Chase*, No. 2:22-cv-02030-JPM-atc, 2022 U.S. Dist. LEXIS 113944, at *22–23 (W.D.

Tenn. June 28, 2022) (finding that Plaintiff's lay testimony regarding her lost wages and pay records as enough to establish a claim for lost wages). Moreover, whether or not Plaintiff ultimately proves whether her claimed injuries caused any inability to work depends on the testimony and evidence submitted at trial.

In its Summary Judgment Order, the Court found that Plaintiff's testimony, without expert proof, may be sufficient to prove injury and causation regarding the pain and discomfort temporally associated¹ with the vehicle accident and the immediate impact it had on her daily life,² which necessarily includes her inability to work. [Doc. 72 at 6–8].

Accordingly, Defendants' Motion [Doc. 68] is DENIED as to 1 As the Court previously explained in its Summary Judgment Order, it need not determine at this stage the precise duration of Plaintiff's permissible testimony regarding her injuries immediately following the vehicle accident. [Doc. 70 at 8 n.1]. That issue will depend on the testimony and foundation presented at trial, including any evidence that creates that causal link between Plaintiff's alleged injuries and her inability to work.

Plaintiff will, of course, be subject to cross-examination, and the jury will assess her credibility. In addition, Defendants may raise appropriate objections at trial should they believe Plaintiff is exceeding the scope of her permissible testimony. ² Importantly, the Court's ruling only included Plaintiff's alleged head, neck, shoulder, and back pain immediately following the vehicle accident and persisting for a limited period afterwards.

[Doc. 70 at 6–8]. Plaintiff may not testify about any medical diagnosis, including her alleged diagnosis of "post-concussion syndrome," or further injuries that may have arisen from the vehicle

accident. Plaintiff's ability to testify about her lost wages. B. The Cause of Her Alleged Injuries Next, Defendants assert that Plaintiff should be precluded from testifying about the cause of the injuries she allegedly incurred in the vehicle accident because they must be established with expert testimony.

[Doc. 68 at 2]. Again, the Court, in its Summary Judgment Order, has already held that "Plaintiff's head, neck, shoulder, and back pain immediately following the Accident and persisting for a limited period of time, are sufficiently 'simple' to prove through lay person testimony." [Doc. 72 at 6]. It is well within a lay person's ability to testify about the pain she felt immediately following a traumatic event, such as a vehicle accident.

See King, 2022 U.S. Dist. LEXIS 113944, at *17–18. That testimony, presented at trial, may be enough to prove that Defendants are the cause of her alleged injuries. Furthermore, other possible causes of Plaintiff's injuries that may have existed before the collision, such as reported headaches and back pain before the accident, boils down to a credibility issue that the jury will weigh in reaching its decision.

Accordingly, Defendants' Motion [Doc. 68] is DENIED as to Plaintiff's ability to testify about that cause of her alleged head, neck, shoulder, and back pain immediately following the vehicle accident and persisting for a limited period of time afterwards. C. Medical Bills Finally, Defendants contend that Plaintiff should be precluded from testifying about the value of her medical bills because expert testimony is required to establish the reasonableness and necessity of medical bills.

[Doc. 68 at 2–3]. In its Summary Judgment Order, the Court held that, without any expert proof establishing the reasonableness of her medical bills, Plaintiff is precluded from recovering any damages relating to her medical bills and expenses. [Doc. 72 at 8–9]. See *Seaton v. Black & Decker (U.S.) Inc.*, No. 2:20-CV-124, 2021 U.S. Dist. LEXIS 70649, at *18 (E.D.

Tenn. Apr. 13, 2021) ("'[T]o recover for [medical] expenses, expert opinion must be offered regarding the reasonableness and necessity of the physician's services and charges.'" (citing *Stricklan v. Patterson*, No. E2008- 00203-COA-R3-CV, 2008 Tenn. App. LEXIS 647, at *4 (Tenn. Ct. App. Nov. 4, 2008))). Since Plaintiff is unable to recover any damages relating to her medical bills, she is precluded from offering testimony about them.

Accordingly, Defendants' Motion [Doc. 68] is GRANTED, and Plaintiff is therefore precluded from testifying about the value of her medical bills. III. CONCLUSION For the reasons set forth above, Defendants' Motions in Limine. [Doc. 68] is GRANTED IN PART and DENIED IN PART. It is GRANTED to the extent that Plaintiff is precluded from testifying about her medical bills.

It is DENIED in all other respects. SO ORDERED. /s/ Charles E. Atchley, Jr. c CHARLES E. ATCHLEY, JR. UNITED STATES DISTRICT JUDGE

