

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PRECEDENTIAL VALUE	unpublished district-court memorandum opinion; nonprecedential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)