

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Chanada Robinson, for herself and as next of friend/next of kin for
Anthony Thompson Jr. v. Officer Brian Baldwin, et al.

No. 3:22-cv-125-CEA-JEM (E.D. Tenn. Dec. 29, 2025) · No. No. 3:22-cv-125-CEA-JEM · Decided December
29, 2025

SUMMARY

The United States District Court for the Eastern District of Tennessee grants Defendants’ joint Daubert motion to exclude the opinions of Plaintiff’s expert, Dr. James Wilson. The court concludes that Dr. Wilson was not shown to be qualified to testify about the standard of care applicable to law enforcement officers, that his breach-of-standard-of-care opinion constituted an impermissible legal conclusion, and that portions of his opinions were unreliable because they relied on unsupported assumptions about the timing of EMS treatment.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Jill E. McCook
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	December 29, 2025
DOCKET	No. 3:22-cv-125-CEA-JEM
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Evidence 702 to exclude Plaintiff's expert, Dr. James Wilson, in the remaining denial-of-medical-care claim. The magistrate judge, acting under a referral from the district judge, granted the joint Daubert motion.
STANDARD OF REVIEW	Under Rule 702 and Daubert, the court acts as a gatekeeper to determine whether expert testimony is relevant and reliable. The proponent bears the burden of establishing admissibility by a preponderance of the proof. District-court admissibility decisions are reviewed for abuse of discretion.
PRECEDENTIAL VALUE	unpublished

TOPICS

daubert standard

expert testimony

evidence

civil rights

section 1983

PRACTICE AREAS

civil rights litigation

evidence

expert testimony

federal civil procedure

QUESTIONS PRESENTED

1. Whether Dr. Wilson was qualified under Federal Rule of Evidence 702 to offer opinions concerning the standard of care applicable to law-enforcement officers.
2. Whether Dr. Wilson's opinions that the officers breached the standard of care constituted inadmissible legal conclusions.
3. Whether Dr. Wilson's opinions concerning delayed medical care and pain and suffering were sufficiently reliable and supported by the record under Rule 702.

HOLDINGS

1. Plaintiff failed to establish that Dr. Wilson's medical and first-responder experience qualified him to opine specifically on the standard of care governing law-enforcement officers.
2. Dr. Wilson's opinions that Defendants breached the standard of care were inadmissible legal conclusions because they defined or applied the governing legal standard to the facts.
3. Dr. Wilson's opinions concerning the officers' alleged failure to provide or ensure pain medication were unreliable because they rested on factual assumptions unsupported by the record, including assumptions about the timing and presence of EMS personnel.

KEY QUOTATIONS

"Federal Rule of Evidence 702 obligates judges to ensure that any scientific testimony or evidence admitted is relevant and reliable." (Section II)

"For the reasons set forth above, the Court GRANTS Defendants' Joint Daubert Motion as to Plaintiff's Expert Dr. James Wilson, M.D. [Doc. 148]." (Section IV)

FACTUAL BACKGROUND

Anthony Thompson Jr. was shot during an encounter with Knoxville police officers at a high school and later died. Plaintiff's remaining claim concerns whether the officers failed to provide timely medical care. Plaintiff's expert, emergency physician James Wilson, opined that the officers breached a first-responder standard of care and that the delay caused Thompson unnecessary pain and suffering. The court found that Dr. Wilson lacked a demonstrated foundation concerning the standard of care applicable to law-enforcement officers, offered impermissible legal conclusions, and relied on unsupported assumptions concerning the timing of emergency medical services and Thompson's consciousness.

PROCEDURAL HISTORY

Plaintiff and a co-plaintiff brought civil-rights and related state-law claims arising from the shooting and death of Anthony Thompson Jr. The district court granted summary judgment to the defendants, and the Sixth Circuit affirmed all claims except Plaintiff Robinson's denial-of-medical-care claim against Officers Baldwin, Cash, and Clabough, which it remanded. After reopening the case, Plaintiff disclosed Dr. Wilson as an expert, and Defendants moved to exclude his opinions. The court granted the motion.

DISPOSITION

other

CASES CITED

- Robinson v. City of Knoxville, No. 24-5159, 2025 WL 621451 (6th Cir. Feb. 26, 2025)
- Kumho Tire Co. v. Carmichael, 526 U.S. 137 (1999)
- Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579 (1993)
- Rose v. Sevier County, No. 3:08-CV-25, 2012 WL 6140991, at *4 (E.D. Tenn. Dec. 11, 2012)
- Coffey v. Dowley Manufacturing, Inc., 187 F. Supp. 2d 958, 970-71 (M.D. Tenn. 2002)
- Madej v. Maiden, 951 F.3d 364, 374 (6th Cir. 2020)
- Berry v. City of Detroit, 25 F.3d 1342, 1351 (6th Cir. 1994)
- Bradley v. Ameristep, Inc., 800 F.3d 205, 209 (6th Cir. 2015)
- Pride v. BIC Corp., 218 F.3d 566, 577 (6th Cir. 2000)
- Nale v. Finley, 505 F. Supp. 3d 635, 645 (W.D. La. 2020)
- United States v. Melcher, 672 F. App'x 547, 552 (6th Cir. 2016)
- Woods v. Lecureux, 110 F.3d 1215, 1220 (6th Cir. 1997)
- Torres v. County of Oakland, 758 F.2d 147, 150 (6th Cir. 1985)
- AK v. Behavioral Health Systems, Inc., 382 F. Supp. 3d 772, 774 (M.D. Tenn. 2019)
- Jarvis v. Hamilton County Department of Education, No. 1:17-CV-00172, 2019 WL 1368618, at *9 (E.D. Tenn. Mar. 26, 2019)
- Jordan v. Town of Fairmount Heights, No. 8:22-CV-02680, 2024 WL 732011, at *4 (D. Md. Feb. 21, 2024)
- Roe v. Patterson, No. 4:19-CV-179, 2022 WL 987814, at *3 (E.D. Tex. Mar. 31, 2022)
- Davis v. Sig Sauer, Inc., 126 F.4th 1213, 1224 (6th Cir. 2025)
- In re Scrap Metal Antitrust Litigation, 527 F.3d 517, 530 (6th Cir. 2008)
- McLean v. 988011 Ontario, Ltd., 224 F.3d 797, 800-01 (6th Cir. 2000)
- Pomella v. Regency Coach Lines, Ltd., 899 F. Supp. 335, 342 (E.D. Mich. 1995)

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