

TENNESSEE COURT OF WORKERS' COMPENSATION CLAIMS

Darlene Taylor as Surviving Spouse of Darrell Taylor v. Dale's Recycling

2026 TN WC 81 · No. 2023-07-5405 · Decided March 19, 2026

SUMMARY

The Tennessee Court of Workers' Compensation Claims held that Darlene Taylor was entitled to survivor benefits after her husband, Darrell Taylor, suffered a fatal heart attack while performing work-related tasks. The court found that physical exertion, emotional stress from an unexpected traffic stop, and heat exposure primarily caused the heart attack despite preexisting medical conditions. The court awarded death benefits totaling \$504,450, burial expenses, attorney's fees, and discretionary costs.

CASE DETAILS

COURT	Tennessee Court of Workers' Compensation Claims
WRITING FOR THE COURT	Allen Phillips
JURISDICTION	Tennessee Court of Workers' Compensation Claims
DECIDED	March 19, 2026
DOCKET	2023-07-5405
DISPOSITION	other
PROCEDURAL POSTURE	Following a compensation hearing, the Tennessee Court of Workers' Compensation Claims adjudicated the surviving spouse's claim for death benefits arising from the employee's fatal heart attack.
STANDARD OF REVIEW	The claimant bears the burden of proving compensability by a preponderance of the evidence. Causation must be established to a reasonable degree of medical certainty, meaning that the employment incident was more likely than not the cause and contributed more than 50 percent to the fatal heart attack.
PRECEDENTIAL VALUE	Published compensation order

TOPICS

workers compensation

employment law

damages

remedies

PRACTICE AREAS

workers compensation

employment law

remedies

QUESTIONS PRESENTED

1. Whether Taylor's fatal heart attack arose primarily out of and in the course of his employment under Tennessee's post-Reform Act workers' compensation law.
2. Whether the claimant was entitled to stipulated death benefits, burial expenses, attorney's fees, and discretionary costs after proving compensability.

HOLDINGS

1. The claimant proved by a preponderance of the evidence and to a reasonable degree of medical certainty that Taylor's fatal heart attack arose primarily out of his employment because the work-related physical exertion, sudden emotional stress, and heat contributed more than 50 percent to the death.
2. The statute in effect on the date of injury governs the parties' workers' compensation rights; consequently, the court applied the version of Tennessee Code Annotated section 50-6-210 in effect on June 22, 2023.
3. The claimant and eligible stepson were entitled to the stipulated death-benefit award of \$504,450, burial expenses of \$8,667.81, attorney's fees of \$100,890, and discretionary costs of \$4,436.10.

KEY QUOTATIONS

"Mrs. Taylor must show to a reasonable degree of medical certainty that Mr. Taylor's death arose primarily out of his employment, meaning that the June 22 incident contributed more than 50% to his fatal heart attack when considering all causes." (at 5)

"Mr. Taylor did not die upon rising, thinking about work, or eating a Big Mac. He might have, but he didn't. Instead, Mr. Taylor died when exerting himself in the heat at work after an unexpected traffic stop." (at 7)

FACTUAL BACKGROUND

Darrell Taylor died on June 22, 2023, while driving a scrap-metal trailer for Dale's Recycling. After a sheriff's deputy stopped him because metal was falling from the trailer, Taylor climbed a roughly fourteen-foot ladder, entered the trailer, and began moving metal while exposed to heat; approximately ten minutes later, the deputy found him dead near the tailgate. The coroner attributed the death to cardiorespiratory arrest associated with chronic hypertension and diabetes. The claimant's cardiologist opined that physical exertion, emotional stress from the traffic stop, and heat caused more than 50 percent of the fatal cardiac event, while the employer's cardiologist attributed the death to preexisting risk factors.

PROCEDURAL HISTORY

Darlene Taylor filed a Petition for Benefit Determination after her husband died while performing work-related transportation and trailer-loading duties. The employer and carrier denied compensability, asserting that the death resulted from preexisting medical conditions. After depositions, admission of medical records, expert

testimony, and a March 11, 2025 compensation hearing, the court entered a Compensation Order awarding death benefits, burial expenses, attorney's fees, and discretionary costs.

DISPOSITION

other

CASES CITED

- Mitchell v. Bunge North America, 2019 TN Wrk. Comp. App. Bd. LEXIS 15 (Apr. 16, 2019)
- Nutt v. Champion Int'l Corp., 980 S.W.2d 365, 368 (Tenn. 1998)
- Sanker v. Nacarato Trucks, Inc., 2016 TN Wrk. Comp. App. Bd. LEXIS 27, at *12 (July 6, 2016)
- Lentz v. Coca-Cola Consol., Inc., 2023 TN
- Lurz v. Int'l Paper Co., 2018 TN Wrk. Comp. App. Bd. LEXIS 8, at *17 (Feb. 14, 2018)

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