

TENNESSEE WORKERS' COMPENSATION APPEALS BOARD

Erica Lee v. Amazon

Lee, 2026 TN WC App. 19 (Tennessee Workers' Compensation Appeals Board 2026) · No. 2025-80-1847 ·  
Decided March 30, 2026

SUMMARY

The Tennessee Workers’ Compensation Appeals Board affirmed an interlocutory order denying Erica Lee additional medical and temporary disability benefits arising from a shoulder injury allegedly sustained while working for Amazon. The Board concluded that the authorized treating physician’s causation and medical-necessity opinions retained a presumption of correctness and were not rebutted by an unauthorized physician’s opinion based on a later MRI. The Board also declined to find the appeal frivolous and remanded the case.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Tennessee Workers' Compensation Appeals Board                                                                                                                                                                                                                                                                                                                  |
| WRITING FOR THE COURT | Meredith B. Weaver; Timothy W. Conner; Pele I. Godkin                                                                                                                                                                                                                                                                                                          |
| JURISDICTION          | Tennessee Workers’ Compensation Appeals Board                                                                                                                                                                                                                                                                                                                  |
| DECIDED               | March 30, 2026                                                                                                                                                                                                                                                                                                                                                 |
| DOCKET                | 2025-80-1847                                                                                                                                                                                                                                                                                                                                                   |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | Interlocutory appeal from the Court of Workers' Compensation Claims' denial of additional medical treatment and temporary total disability benefits after an expedited hearing.                                                                                                                                                                                |
| STANDARD OF REVIEW    | For medical records and questionnaires, the Appeals Board is in the same position as the trial court to make credibility determinations and may draw its own conclusions regarding the weight and credibility of expert testimony. The Board reviewed the trial court's interlocutory benefits determination under the preponderance-of-the-evidence standard. |
| PRECEDENTIAL VALUE    | Published memorandum opinion of the Tennessee Workers' Compensation Appeals Board.                                                                                                                                                                                                                                                                             |
| PARTIES               | Erica Lee v. Amazon                                                                                                                                                                                                                                                                                                                                            |

TOPICS

workers compensation

appellate procedure

standard of review

remedies

evidence

## PRACTICE AREAS

workers' compensation

employment law

## QUESTIONS PRESENTED

1. Whether the trial court properly denied additional medical benefits because the authorized treating physician's opinion on causation and medical necessity was presumed correct and was not rebutted by the unauthorized physician's opinion.
2. Whether Lee established entitlement to temporary total disability benefits, including causation and the duration of the claimed disability period.
3. Whether the appeal was frivolous.

## HOLDINGS

1. The trial court properly denied additional medical benefits because the authorized treating physician's opinions regarding causation and medical necessity were presumed correct, and the conflicting opinion from the unauthorized physician was insufficient to rebut that presumption.
2. Lee was not entitled to temporary total disability benefits at this stage because she failed to establish that the work injury primarily caused her current condition and failed to establish the duration of the period of disability.
3. The appeal was not frivolous because it was not devoid of merit or brought solely for delay, particularly given the conflicting medical opinions regarding the primary cause of Lee's shoulder condition.

## KEY QUOTATIONS

*“Thus, “the reviewing court may draw its own conclusions about the weight and credibility of the expert testimony.”” (at 3)*

*“Dr. Jones’s opinions given in response to the questionnaire have a presumption of correctness, and Dr. Buechner’s opinion, based in part on his review of an MRI completed nearly two years after the work accident and with no comparison to the prior MRI completed in October 2023, does not rebut that presumption.” (at 3)*

*“As there are two conflicting medical opinions regarding the primary cause of Employee’s shoulder condition, we decline to determine that this appeal is frivolous.” (at 4)*

## FACTUAL BACKGROUND

Lee alleged that a July 11, 2023 incident while pulling a loaded cart at Amazon injured her right shoulder. Amazon's authorized treating physician initially treated her, later placed her at maximum medical improvement, and, after learning of subsequent employment and an altercation, opined that her condition was primarily degenerative and that further treatment was not medically necessary because of the Amazon incident. An unauthorized physician later attributed the shoulder condition to the work accident, but his opinion relied on a

later MRI without comparison to the earlier MRI. The trial court found that Lee had not shown a likelihood of prevailing on primary causation or established the period of disability for temporary total disability benefits.

### PROCEDURAL HISTORY

After a work-related shoulder incident, Lee sought additional medical and temporary disability benefits based on a physician's opinion that her condition was caused by the accident. The trial court found that the authorized treating physician's causation and medical-necessity opinion was presumed correct, determined that Lee had not shown she was likely to prevail at trial, and denied benefits. Lee appealed but did not timely file a supporting brief; the Appeals Board affirmed the interlocutory order and remanded the case.

### DISPOSITION

affirmed

### REMAND INSTRUCTIONS

The case was remanded after affirmance of the interlocutory order denying benefits; the opinion states no more specific remand instructions.

### CASES CITED

- Sneed v. Bd. of Prof'l Resp. of the Sup. Ct. of Tenn., 301 S.W.3d 603, 615 (Tenn. 2010)
- Cosey v. Jarden Corp., No. 2017-01-0053, 2019 TN Wrk. Comp. App. Bd. LEXIS 3, at \*8 (Tenn. Workers' Comp. App. Bd. Jan. 15, 2019)
- Edwards v. Peoplelease, LLC, No. W2024-01034-SC-R3-WC, 2025 Tenn. LEXIS 514, at \*18 (Tenn. Dec. 22, 2025)
- Jones v. Crenco Leasing and Sales, No. 2015-06-0332, 2015 TN Wrk. Comp. App. Bd. LEXIS 48, at \*7 (Tenn. Workers' Comp. App. Bd. Dec. 11, 2015)
- Yarbrough v. Protective Servs. Co., Inc., No. 2015-08-0574, 2016 TN Wrk. Comp. App. Bd. LEXIS 3, at \*11 (Tenn. Workers' Comp. App. Bd. Jan. 25, 2016)
- Burnette v. WestRock, No. 2016-01-0670, 2017 TN Wrk. Comp. App. Bd. LEXIS 66, at \*15 (Tenn. Workers' Comp. App. Bd. Oct. 31, 2017)