

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Matthew Phillips v. Robert McCraw and Moving Depot LLC

Phillips · No. 3:24-cv-00441 · Decided March 24, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee holds that an employer's admission of vicarious liability and acceptance of 100% fault for compensatory damages forecloses separate direct-negligence claims against the employer. The court distinguishes Tennessee Supreme Court precedent permitting direct negligence claims where fault remains to be allocated. Moving Depot LLC's partial motion for summary judgment is granted, leaving damages as the sole issue for trial.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Waverly D. Crenshaw, Jr.
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	March 24, 2026
DOCKET	3:24-cv-00441
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a motor-vehicle negligence action seeking compensatory damages. After defendants admitted that the employee was negligent, acted within the scope of employment, and that defendants accepted 100% fault for compensatory damages, Moving Depot moved for partial summary judgment on plaintiff's direct negligence claims.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court views evidence and reasonable inferences in the light most favorable to the nonmoving party, does not weigh evidence or determine credibility, and asks whether a reasonable jury could find for the nonmoving party.

PRECEDENTIAL VALUE

Unpublished federal district court memorandum opinion; persuasive authority only.

TOPICS

summary judgment

vicarious liability

negligence

negligent hiring

negligent supervision

PRACTICE AREAS

torts

civil procedure

motor vehicle negligence

summary judgment

vicarious liability

QUESTIONS PRESENTED

1. Whether an employer's acceptance of vicarious liability and 100% fault for compensatory damages forecloses the plaintiff's separate direct-negligence claims against the employer.
2. Whether summary judgment should be granted on the direct-negligence claims when no fault remains to be allocated and damages are the only issue remaining for trial.

HOLDINGS

1. When an employer accepts vicarious liability for its employee's conduct and accepts 100% fault for the plaintiff's compensatory damages, separate direct-negligence claims against the employer are redundant and cannot proceed because no fault remains to be allocated.
2. Partial summary judgment was proper on the direct-negligence claims, judgment would be entered on liability, and the only remaining issue for trial was the amount of damages.

KEY QUOTATIONS

"When all liability has been conceded or accepted by the employer, the only issue that remains is the amount of damages." (Introduction)

"The Court concludes that the rationale in Binns leading to rejection of the preemption rule—that the rule is inconsistent with Tennessee's comparative fault system—is inapplicable here for two reasons. First, no fault remains to be allocated. Second, all of the fault for damages is allocated to and accepted by Moving Depot." (Section III.A)

FACTUAL BACKGROUND

On August 18, 2022, Robert McCraw was driving Moving Depot's box truck on Interstate 65 in Millersville, Tennessee, within the scope of his employment. The truck struck the rear of Matthew Phillips's vehicle, and Phillips sought compensatory damages. Moving Depot and McCraw admitted that McCraw was negligent and acting within the scope of employment and accepted 100% fault for Phillips's compensatory damages, subject to proof of causation and the reasonableness and necessity of the claimed damages.

PROCEDURAL HISTORY

Phillips initially sued Robert McCraw and Moving Depot LLC. Defendants asserted comparative fault against additional parties, who were later named in an amended complaint and then voluntarily dismissed. After discovery, McCraw and Moving Depot admitted McCraw's negligence, scope of employment, and 100% responsibility for Phillips's compensatory damages, subject to proof that the damages were causally, reasonably, and necessarily related to the accident. The district court granted Moving Depot's partial motion for summary judgment, entered judgment on liability, and left damages as the sole issue for trial.

DISPOSITION

other

CASES CITED

- *Binns v. Trader Joe's E., Inc.*, 690 S.W.3d 241 (Tenn. 2024)
- *Rodgers v. Banks*, 344 F.3d 587, 595 (6th Cir. 2003)
- *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574, 587 (1986)
- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 249 (1986)
- *Weaver v. Cox Transp. Servs., Inc.*, 2025 WL 368569, at *5 (W.D. Tenn. Jan. 29, 2025)
- *Davis v. Sunrise Transp. Express, Inc.*, 2024 WL 2750943, at *2 (M.D. Tenn. May 29, 2024)
- *Easley v. City of Memphis*, 2025 WL 18632, at *10 (Tenn. Ct. App. Jan. 2, 2025)
- *Bolivar v. HMD Trucking, Inc.*, 2026 WL 445785, at *4 (E.D. Tenn. Feb. 17, 2026)
- *Kotova v. True*, 2026 WL 380312, at *3 (Tenn. Ct. App. Feb. 11, 2026)