

TENNESSEE COURT OF WORKERS' COMPENSATION CLAIMS AT
CHATTANOOGA

Martin Blades v. Volkswagen of America, Inc. and Arch Indemnity
Insurance Co.

Blades, 2026 TN WC 77 (Tennessee Court of Workers' Compensation Claims at Chattanooga 2026) · No. 2025-10-6938 · Decided June 3, 2026

SUMMARY

The Tennessee Court of Workers’ Compensation Claims held that Martin Blades would likely prevail in establishing that a workplace fall aggravated preexisting but asymptomatic left-hip arthritis and caused the need for hip-replacement surgery and ongoing treatment. The court ordered Volkswagen of America, Inc. to authorize reasonable and necessary treatment with Dr. Timothy Ballard and set a status hearing.

CASE DETAILS

COURT	Tennessee Court of Workers' Compensation Claims at Chattanooga
WRITING FOR THE COURT	Thomas L. Wyatt
JURISDICTION	Tennessee Court of Workers’ Compensation Claims, Chattanooga
DECIDED	June 3, 2026
DOCKET	2025-10-6938
DISPOSITION	other
PROCEDURAL POSTURE	Employee sought an expedited hearing for medical benefits for treatment of a left-hip injury and hip-replacement surgery allegedly arising from a workplace fall. The Court of Workers' Compensation Claims determined that the employee would likely prevail at a compensation hearing and issued an expedited hearing order awarding ongoing medical treatment.
STANDARD OF REVIEW	At an expedited hearing, the employee must show that he or she will likely prevail at a compensation hearing in establishing entitlement to benefits. Tenn. Code Ann. § 50-6-239(d)(1).
PRECEDENTIAL VALUE	Published Tennessee Court of Workers' Compensation Claims expedited hearing order

PARTIES

Martin Blades v. Volkswagen of America, Inc., Arch Indemnity Insurance Co.

TOPICS

workers compensation

insurance

employment law

PRACTICE AREAS

workers compensation

employment law

insurance

QUESTIONS PRESENTED

1. Whether Blades was likely to prevail in proving that his need for left-hip replacement surgery and related treatment arose primarily out of and in the course and scope of his employment.
2. Whether the aggravation of Blades's preexisting, asymptomatic left-hip arthritis was compensable under Tennessee workers' compensation law.
3. Whether Volkswagen must authorize ongoing reasonable and necessary treatment by Dr. Ballard after denying authorized treatment and after Blades underwent surgery at his own expense.

HOLDINGS

1. Blades showed that he would likely prevail at a compensation hearing in proving that his need for left-hip replacement surgery and ongoing treatment arose primarily out of and in the course and scope of employment.
2. Aggravation of Blades's preexisting but asymptomatic left-hip arthritis was compensable because the workplace fall contributed primarily to the resulting need for treatment and surgery.
3. Volkswagen must authorize ongoing reasonable and necessary treatment of Blades's left-hip replacement with Dr. Ballard.

KEY QUOTATIONS

“In other words, the employee must show “that the employment contributed more than fifty percent (50%) in causing the . . . need for treatment, considering all causes.”” (at 79)

“For the above reasons, Dr. Ballard’s opinion is the best explanation on causation of Mr. Blades’s need for hip-replacement surgery.” (at 80)

“Thus, Mr. Blades will likely prevail at a compensation hearing in showing that his need for left-hip surgery and ongoing treatment arises out of and in the course of employment.” (at 81)

“Requiring Mr. Blades to change physicians at this point would unfairly force him to face the uncertainty of whether another physician would accept treatment of a patient operated on by another surgeon.” (at 82)

FACTUAL BACKGROUND

Martin Blades fell three to four feet at Volkswagen's plant after stepping onto plastic that covered an open floor pit, striking his left knee, shin, and face. Although imaging showed severe preexisting arthritis in his left hip, he had no prior left-hip pain, diagnosis, or treatment, and he developed severe left-hip pain after the fall. Dr. Ricky Hutcheson considered the arthritis itself non-work-related, while Dr. Timothy Ballard concluded that the fall aggravated asymptomatic arthritis, caused Blades to seek treatment sooner, and contributed more than 50 percent to the need for hip-replacement surgery. Volkswagen denied coverage, and Blades underwent surgery with Dr. Ballard.

PROCEDURAL HISTORY

Blades fell at Volkswagen's plant on July 6, 2025, and Volkswagen accepted some injuries but denied compensability of treatment for his left-hip arthritis and replacement surgery. After Volkswagen denied coverage, Blades obtained hip-replacement surgery from Dr. Timothy Ballard and sought medical benefits through an expedited hearing held or requested on May 20, 2026. The court relied primarily on Dr. Ballard's causation opinion and ordered Volkswagen to authorize ongoing reasonable and necessary treatment.

DISPOSITION

other

CASES CITED

- Ledford v. Mid Georgia Courier, Inc., 2018 TN Wrk. Comp. App. Bd. LEXIS 28, at *7-8 (June 4, 2018)
- Smith v. TrustPoint Hosp., LLC, 2021 TN. Wrk. Comp. App. Bd. LEXIS 1, at *21 (Jan. 6, 2021)
- Thompson v. Comcast Corporation, 2018 TN Wrk. Comp. App. Bd. LEXIS 1, at *13-21 (Jan. 30, 2018)
- Barrett v. Lithko Contracting, Inc., 2016 TN Wrk. Comp. App. Bd. LEXIS 93 (Dec. 8, 2016)
- Young v. Young Electric Co., 2016 TN Wrk. Comp. App. Bd. LEXIS 24 (May 25, 2016)