

TENNESSEE COURT OF WORKERS' COMPENSATION CLAIMS

Eason, Adrienne v. Federal Express Corporation

2026 TN WC 18 · No. 2025-60-2340 · Decided March 9, 2026

SUMMARY

The Tennessee Court of Workers’ Compensation Claims denied Adrienne Eason’s request for medical benefits related to a left-knee mass arising after a 2023 workplace injury. The court held that her petition was untimely under Tennessee Code Annotated § 50-6-203 because it was filed more than one year after the employer’s last voluntary benefit payment and that no applicable exception had been shown.

CASE DETAILS

COURT	Tennessee Court of Workers' Compensation Claims
WRITING FOR THE COURT	Joshua D. Baker
JURISDICTION	Tennessee Court of Workers’ Compensation Claims
DECIDED	March 9, 2026
DOCKET	2025-60-2340
DISPOSITION	other
PROCEDURAL POSTURE	Expedited workers' compensation benefits proceeding concerning a statute-of-limitations defense.
STANDARD OF REVIEW	At an expedited hearing, the court determines whether the employee is likely to prevail at a final hearing.
PRECEDENTIAL VALUE	Published expedited order; the court applied the statutory limitations rule to determine that the employee was unlikely to prevail at a final hearing.
PARTIES	Adrienne Eason v. Federal Express Corporation, Indemnity Insurance Company of North America

TOPICS

- workers compensation
- statute of limitations
- statutory interpretation
- civil procedure

PRACTICE AREAS

- workers compensation
- employment law

QUESTIONS PRESENTED

1. Whether Eason's petition was barred by Tennessee Code Annotated section 50-6-203(b)(2) because it was filed more than one year after the later of the last authorized treatment date or the date the employer ceased paying compensation.
2. Whether the limitations period runs from the date the employer issued its last payment or from the date the payment was received or cleared.
3. Whether any applicable exception to the statute of limitations prevented dismissal or denial of benefits.

HOLDINGS

1. The petition was untimely because it was filed more than one year after the later of the last authorized treatment date and the date Federal Express ceased making compensation payments.
2. The relevant date is the date the employer issued the last payment of compensation, not the date the employee or provider received or cleared it.
3. Eason's date of requesting medical treatment was immaterial because the statute requires the filing of a petition, and she did not present an applicable exception to the limitations defense.

KEY QUOTATIONS

“the right to compensation is forever barred, unless a petition for benefit determination is filed . . . within one (1) year from the latter of the date of the last authorized treatment or the time the employer ceased to make payments of compensation to or on behalf of the employee.” (at 2)

“issuing date of the last payment of compensation by the employer, not the date of its receipt shall constitute the time the employer ceased to make payments of compensation.” (at 2)

FACTUAL BACKGROUND

Eason sustained a work injury on August 2, 2023, and received authorized treatment until August 21, 2023. The claim's last benefits payment was issued on March 8, 2024. After noticing a left-knee mass in October 2024, Eason requested treatment on March 18, 2025, and filed her petition on April 10, 2025.

PROCEDURAL HISTORY

After Federal Express refused to authorize treatment for a left-knee mass, Eason filed a petition for benefit determination on April 10, 2025. Following an expedited hearing on March 4, 2026, the Court of Workers' Compensation Claims denied benefits at that time because Eason was unlikely to prevail at a final hearing.

DISPOSITION

other

CASES CITED

- *Carpenter v. Am. Water Heater Co.*, 2024 TN Wrk. Comp. App. Bd. LEXIS 26, at *6-7 (July 12, 2024)

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