

TENNESSEE COURT OF WORKERS' COMPENSATION CLAIMS

Gockenbach, Taylor v. University Health Systems, Inc.

2026 TN WC 22 · No. 2025-20-4054 · Decided March 17, 2026

SUMMARY

In this expedited workers’ compensation order, the Tennessee Court of Workers’ Compensation Claims held that the employee timely reported a cumulative trauma injury after receiving a diagnosis of a labral tear. The court awarded ongoing medical benefits and \$3,122.78 in temporary total disability benefits for May 16 through August 8, 2025, but denied temporary disability benefits thereafter because suitable work was available. The court designated Dr. Michael Kern as the authorized physician and set a status hearing.

CASE DETAILS

COURT	Tennessee Court of Workers' Compensation Claims
WRITING FOR THE COURT	Brian K. Addington
JURISDICTION	Tennessee Court of Workers’ Compensation Claims
DECIDED	March 17, 2026
DOCKET	2025-20-4054
DISPOSITION	other
PROCEDURAL POSTURE	Employee sought medical and temporary disability benefits at an expedited workers' compensation hearing. The Court issued an expedited order determining that she was likely to prevail on medical benefits and past temporary total disability benefits, while denying temporary disability benefits after August 8, 2025.
STANDARD OF REVIEW	At an expedited hearing, the employee must show that she would likely prevail at a final hearing on the merits. Tenn. Code Ann. § 50-6-239(d)(1).
PRECEDENTIAL VALUE	Published

TOPICS

- workers compensation
- remedies
- appellate procedure
- standard of review

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Gockenbach timely notified University of a cumulative trauma injury under Tennessee's workers' compensation notice statute.
2. Whether Dr. Kern should be designated as Gockenbach's authorized treating physician.
3. Whether Gockenbach was likely to prevail on her claim for temporary total disability benefits from May 16 through August 8, 2025.
4. Whether Gockenbach was likely to prevail on temporary partial disability benefits after August 8, 2025, despite University's ability to accommodate her restrictions.
5. Whether the C-32 signed medical record was admissible over University's objection.

HOLDINGS

1. An employee with a cumulative trauma injury satisfies Tennessee's fifteen-day notice requirement when she gives notice within fifteen days after she knows or reasonably should know that she suffered an injury causing permanent physical impairment or inability to perform normal work activities. Gockenbach's April 29 notice, given four days after Dr. Kern diagnosed her labral tear, was timely.
2. Dr. Kern remained the authorized treating physician because the authorized provider referred Gockenbach to him and University did not object within three days.
3. Gockenbach was likely to prevail on temporary total disability benefits for the period from May 16 through August 8, 2025, and was entitled to \$3,122.78 for that period.
4. Gockenbach was not likely to prevail on temporary partial disability benefits after August 8, 2025, because University had work available within her restrictions and she had not looked for work.
5. The Court overruled University's objection and admitted the signed C-32 medical record.

KEY QUOTATIONS

“Because Ms. Gockenbach reported a cumulative trauma injury within 15 days after she knew or reasonably should have known she suffered a work injury, the Court finds she is likely to succeed on medical benefits at a final hearing.” (Expedited Order)

“Based on Dr. Kern’s opinion, which is the only expert opinion, the Court finds that Ms. Gockenbach should have known she suffered an injury causing impairment when Dr. Kern diagnosed the tear on April 25.”
(Findings of Fact and Conclusions of Law)

FACTUAL BACKGROUND

Gockenbach worked as a nurse technician performing repetitive lifting and turning of patients. She developed progressively worsening right-sided shoulder, neck, and back pain that was worse at work, and an MRI revealed a large labral tear. Dr. Kern diagnosed a repetitive work injury, recommended surgery, and imposed work

restrictions; Gockenbach notified University four days after the diagnosis. Dr. Kern took her off work from May 16 through August 8, 2025, and University had work available that could accommodate her later restrictions.

PROCEDURAL HISTORY

Taylor Gockenbach filed a workers' compensation claim arising from a cumulative trauma injury to her shoulder, neck, and back. After an expedited hearing on February 27, 2026, the Court determined that she timely notified her employer and was likely to succeed on medical benefits, awarded \$3,122.78 in temporary total disability benefits for May 16 through August 8, 2025, denied benefits after August 8, and set the matter for a status hearing.

DISPOSITION

other

CASES CITED

- Yeoman v. Transwood Logistics, Inc., 2025 TN Wrk. Comp. App. Bd. LEXIS 57 (Nov. 13, 2025)
- Jones v. Crencor Leasing and Sales, 2015 TN Wrk. Comp. App. Bd. LEXIS 48, at *7 (Dec. 11, 2015)
- Mosley v. HG Staffing, LLC, 2021 TN Wrk. Comp.

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