

TENNESSEE COURT OF WORKERS' COMPENSATION CLAIMS

Barnes v. Electrolux

Barnes, 2025 TN WC 94 (Tennessee Court of Workers' Compensation Claims 2025) · No. 2025-60-5786 ·
Decided December 23, 2025

SUMMARY

The Tennessee Court of Workers’ Compensation Claims ordered Electrolux to provide Edwin Barnes with recommended left-shoulder surgery after finding that he was likely to prevail at a final hearing on the compensability of his workplace injury. The court held that the authorized treating physician’s causal opinion and surgical recommendation established the likely entitlement to medical benefits, despite Barnes’s prior shoulder history. The court denied Barnes’s request for attorney’s fees at that time and set a status hearing.

CASE DETAILS

COURT	Tennessee Court of Workers' Compensation Claims
WRITING FOR THE COURT	Joshua Davis Baker
JURISDICTION	Tennessee Court of Workers’ Compensation Claims
DECIDED	December 23, 2025
DOCKET	2025-60-5786
DISPOSITION	other
PROCEDURAL POSTURE	Expedited workers' compensation hearing on the employee's requests for shoulder surgery and an attorney's fee. The employer disputed compensability and refused to provide the recommended surgery without formally denying the claim.
STANDARD OF REVIEW	At an expedited hearing, the employee must prove that he or she is likely to prevail at a final hearing.
PRECEDENTIAL VALUE	Published
PARTIES	Edwin Barnes v. Electrolux

TOPICS

- workers compensation
- remedies
- interlocutory appeal
- appellate procedure
- employment law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Barnes established that he was likely to prevail at a final hearing and was therefore entitled to the recommended shoulder surgery at an expedited hearing.
2. Whether Barnes was entitled to an attorney's fee for Electrolux's alleged unreasonable failure to initiate medical benefits.

HOLDINGS

1. Barnes met his burden of showing that he was likely to prevail at a final hearing, and Electrolux was required to provide the shoulder surgery recommended by the authorized treating physician, Dr. Moore.
2. Barnes was not entitled to an attorney's fee at that time because the limited circumstances warranting an interlocutory fee award were not present.

KEY QUOTATIONS

“These facts alone, however, do not give Electrolux license to deny reasonable and necessary medical care.”
(3)

“[P]arties and their lawyers cannot rely solely on their own medical interpretations of the evidence to successfully support their arguments.” (4)

FACTUAL BACKGROUND

Barnes had longstanding left-shoulder complaints and had recently completed physical therapy and been referred for an MRI before the workplace incident. On April 24, 2025, he testified that he felt a significant pop in his left shoulder while trying to move stacked parts bins at Electrolux. Authorized physicians diagnosed a traumatic rotator-cuff tear and biceps-tendon rupture, causally related the condition to the work accident, and recommended surgery. Electrolux questioned whether the accident occurred, relied on Barnes's prior shoulder history and alleged lack of candor, and declined to provide the surgery without formally denying the claim.

PROCEDURAL HISTORY

Barnes sustained or alleged a left-shoulder injury while working for Electrolux on April 24, 2025. After authorized physicians related his shoulder condition to the work accident and recommended surgery, Electrolux declined to provide the surgery, prompting Barnes to request an expedited hearing. The Court ordered Electrolux to provide the surgery but denied attorney's fees at that time.

DISPOSITION

other

CASES CITED

- *McCord v. Advantage Human Resourcing*, 2015 TN Wrk. Comp. App. Bd. LEXIS 6, at *7-8 (Mar. 27, 2015)

- Lurz v. Int'l Paper Co., 2018 TN Wrk. Comp. App. Bd. LEXIS 8, at *17 (Feb. 14, 2018)
- Thompson v. Comcast Corp., 2018 TN Wrk. Comp. App. Bd. LEXIS 1, at *29 (Jan. 30, 2018)

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