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Clerk of the
Appellate Courts

IN THE COURT OF APPEALS OF TENNESSEE
AT NASHVILLE

Assigned on Briefs August 13, 2026

DEIRDRE MICHELLE WILSON v. REGIONS BANK

Appeal from the Circuit Court for Davidson County
No. 26C893 Joe Binkley, Jr., Judge

No. M2026-01213-COA-T10B-CV

Plaintiff/Appellant filed an accelerated interlocutory appeal under Tennessee Supreme Court Rule 10B seeking review of the trial court's order denying her motion to recuse. Finding no evidence of bias requiring recusal, we affirm.

Tenn. Sup. Ct. R. 10B Interlocutory Appeal as of Right; Judgment of the Circuit Court Affirmed and Remanded

VALERIE L. SMITH, J., delivered the opinion of the court, in which ANDY D. BENNETT and KRISTI M. DAVIS, JJ., joined.

Deirdre Michelle Wilson, Nashville, Tennessee, appellant, *pro se*.

Christopher J. Barrett, Nashville, Tennessee, for the appellee, Regions Bank.

OPINION

I. FACTS AND PROCEDURAL HISTORY

Appellant Deirdre Michelle Wilson filed an action against Appellee Regions Bank in the General Sessions Court for Davidson County (the "General Sessions Court"). On March 6, 2026, Ms. Wilson filed a motion to recuse the General Sessions judge (the "First Motion to Recuse"). On March 18, 2026, the General Sessions Court purportedly dismissed the action. On March 20, 2026, Ms. Wilson appealed to the Circuit Court for Davidson County (the "trial court"). On April 8, 2026, Ms. Wilson filed an accelerated interlocutory appeal with this Court, seeking review of the General Sessions Court's denial of the First Motion to Recuse.

Despite filing an appeal with this Court, Ms. Wilson simultaneously sought the trial court's review of the First Motion to Recuse. On April 8, 2026, Ms. Wilson filed with the trial court a pleading titled "Motion for De Novo Review of Denial of Recusal Pursuant to Tenn. Sup. Ct. R. 10B, section 4.01" (the "Motion for De Novo Review"). On April 20, 2026, Regions Bank filed its response opposing the Motion for De Novo Review, and on April 24, 2026, the trial court heard the motion. On April 28, 2026, Ms. Wilson filed an amended complaint. On April 30, 2026, the trial court entered an order declining to review the General Sessions Court's denial of the First Motion to Recuse (the "Order Declining Review"). Therein, the trial court stated that it would not review the General Sessions Court's actions but would hear Ms. Wilson's entire case *de novo*.

On May 7, 2026, this Court entered its opinion concerning the accelerated interlocutory appeal of the General Sessions Court's denial of the First Motion to Recuse. *See Wilson v. Regions Bank*, No. M2026-00552-COA-T10B-CV, 2026 WL 1257314 (Tenn. Ct. App. May 7, 2026) ("*Wilson I*"). In *Wilson I*, we determined that this Court lacked subject matter jurisdiction to entertain the appeal and that jurisdiction laid with the trial court. *Id.* at *2–3. Accordingly, we transferred the appeal to the trial court. *Id.* at *3.

On May 29, 2026, Ms. Wilson filed a motion for default judgment against Regions Bank for its alleged failure to respond to her amended complaint. On June 4, 2026, Regions Bank filed a motion to dismiss. On July 10, 2026, the trial court heard Ms. Wilson's motion for default judgment and several of her other motions along with Regions Bank's motion to dismiss. Relevant here, the trial court orally denied the motion for default judgment and granted the motion to dismiss.

On July 19, 2026, Ms. Wilson filed a motion to recuse the trial court judge (the "Second Motion to Recuse"). As discussed further *infra*, her alleged grounds for recusal concerned the trial court's treatment of her amended complaint, default judgment request, late filings, proposed orders, and the appeal transferred in *Wilson I*. With the Second Motion to Recuse, Ms. Wilson also purportedly filed a supporting affidavit, which recounted her recollection of the April 24, 2026, and July 10, 2026, hearings.

The trial court denied the Second Motion to Recuse by order entered July 22, 2026 (the "Recusal Order"). On July 23, 2026, the trial court entered its order disposing of the remaining motions, including Ms. Wilson's motion for default judgment, and dismissing the action (the "Dismissal Order").

On August 11, 2026, Ms. Wilson filed a timely petition for recusal appeal with this Court. On August 25, 2026, this Court entered an order directing Ms. Wilson to submit file-stamped versions of the supporting documents attached to her recusal petition. On

September 4, 2026, Ms. Wilson submitted file-stamped copies of the trial court's orders only.¹

II. ISSUE PRESENTED

In a Tennessee Supreme Court Rule 10B appeal, “the only order we may review is the trial court’s order that denies a motion to recuse.” *Duke v. Duke*, 398 S.W.3d 665, 668 (Tenn. Ct. App. 2012). We do not review the correctness or merits of the trial court’s other rulings, but we consider the circumstances surrounding those rulings insofar as they bear on the preserved grounds for recusal. *See id.*; *Krohn v. Krohn*, No. M2015-01280-COA-T10B-CV, 2015 WL 5772549, at *7–8 (Tenn. Ct. App. Sept. 22, 2015). Accordingly, the sole issue on appeal is whether the trial court erred in denying Ms. Wilson’s Second Motion to Recuse.

III. DISCUSSION

First, we recognize that Ms. Wilson is proceeding *pro se*. Self-represented litigants are entitled to fair and equal treatment by the courts. *Hodges v. Tenn. Att’y Gen.*, 43 S.W.3d 918, 920 (Tenn. Ct. App. 2000) (citing *Paehler v. Union Planters Nat’l Bank, Inc.*, 971 S.W.2d 393, 396 (Tenn. Ct. App. 1997)). Nevertheless, “courts must not excuse *pro se* litigants from complying with the same substantive and procedural rules that represented parties are expected to observe.” *Young v. Barrow*, 130 S.W.3d 59, 63 (Tenn. Ct. App. 2003) (citing *Edmundson v. Pratt*, 945 S.W.2d 754, 755 (Tenn. Ct. App. 1996); *Kaylor v. Bradley*, 912 S.W.2d 728, 733 n.4 (Tenn. Ct. App. 1995)); *see also Hessmer v. Hessmer*, 138 S.W.3d 901, 903–04 (Tenn. Ct. App. 2003); *Sukapurath v. Raghavan*, No. W2026-00450-COA-T10B-CV, 2026 WL 1078505, at *3 (Tenn. Ct. App. Apr. 21, 2026).

We review the denial of a recusal motion *de novo*, without a presumption of correctness. Tenn. Sup. Ct. R. 10B, § 2.01. The recusal inquiry is objective: whether a person of ordinary prudence in the judge’s position, knowing all facts known to the judge, would reasonably question the judge’s impartiality. *Adams v. Dunavant*, 674 S.W.3d 871, 878 (Tenn. 2023). The party seeking recusal bears the burden of establishing a factual basis for disqualification. *Id.* at 878–79.

Our review is based on the materials Ms. Wilson supplied with her petition and supplemental submission. Tennessee Supreme Court Rule 10B requires a petitioner to provide the recusal motion, supporting documents filed below, the order on the recusal motion, and other portions of the record necessary to determine the appeal. Tenn. Sup. Ct. R. 10B, § 2.03. As mentioned above, although Ms. Wilson provided file-stamped copies

¹ Having reviewed the petition and supporting materials, we conclude that an answer, additional briefing, and oral argument are unnecessary and elect to act summarily pursuant to Tennessee Supreme Court Rule 10B, sections 2.05 and 2.06. Tenn. Sup. Ct. R. 10B, § 2.05, 2.06.

of the relevant orders, the copies of her recusal motion and supporting affidavit remain unstamped. Without the trial court clerk's stamp, we cannot be certain that these documents were included in the record. *See Sukapurath*, 2026 WL 1078505, at *3. However, for purposes of this decision, we treat these documents as copies of the materials presented to the trial court. *See Smith v. Daniel*, No. M2019-02083-COA-T10B-CV, 2019 WL 6825976, at *1 n.1 (Tenn. Ct. App. Dec. 13, 2019). Nevertheless, we caution litigants to include file-stamped copies of all supporting documents with any petition for recusal, and our decision to overlook the missing file-stamps here does not dispense with the requirement that the motion and its supporting materials be presented below. *Id.*

On appeal, Ms. Wilson identifies six actions from the trial court as grounds for recusal: (1) clearing the courtroom before the July 10, 2026 hearing; (2) entering the Dismissal Order while the Second Motion to Recuse was pending; (3) strictly enforcing procedural rules against Ms. Wilson but not against Regions Bank; (4) adverse rulings concerning Ms. Wilson's amended complaint and request for default judgment; (4) accepting Regions Bank's proposed order and declining Ms. Wilson's objections and competing order; and (6) declining to review the First Motion to Recuse following the transfer in *Wilson I*.

Briefly, we note that Ms. Wilson did not present the first grievance, *i.e.*, that the trial court allegedly cleared the courtroom, as a ground for recusal in the Second Motion to Recuse. "It is well settled that issues not raised at the trial level are considered waived on appeal." *PNC Multifamily Cap. Institutional Fund XXVI Ltd. P'ship v. Mabry*, 402 S.W.3d 654, 660 (Tenn. Ct. App. 2012) (citing *Waters v. Farr*, 291 S.W.3d 873, 918 (Tenn. 2009)). Accordingly, she has waived this issue.

Concerning the timing of the entry of the Recusal Order and the Dismissal Order, the file-stamped orders resolve any alleged issue. Tennessee Supreme Court Rule 10B, section 1.02, generally prohibits further orders or action while a recusal motion is pending, subject to its stated good-cause exception. Tenn. Sup. Ct. R. 10B, § 1.02. "The purpose of section 1.02 is to ensure that a trial court makes no substantive decisions while the motion to recuse is pending." *Guo v. Rogers*, No. M2020-01321-COA-T10B-CV, 2020 WL 6781244, at *4 (Tenn. Ct. App. Nov. 18, 2020) (citing *In re Estate of Abbott*, No. W2017-02086-COA-T10B-CV, 2017 WL 4864816, at *2 (Tenn. Ct. App. Oct. 27, 2017)). We recall that the trial court heard and orally granted the motion to dismiss on July 10, 2026. The Second Motion to Recuse was filed on July 19, 2026. Accordingly, when Ms. Wilson filed the Second Motion to Recuse, the trial court had already made its substantive decision concerning the case, *i.e.*, dismissal. On July 22, 2026, the trial court entered the Recusal Order, and the Dismissal Order was entered the following day. Thus, Ms. Wilson's second alleged ground for recusal is not supported by the record. Assuming, *arguendo*, that the Dismissal Order was filed before the Recusal Order, it nevertheless appears that the trial court made its substantive decision nine days before the Second Motion to Recuse was

filed. As such, even if the Dismissal Order was filed before the Recusal Order, this would not demonstrate evidence of bias requiring recusal. *See Guo*, 2020 WL 6781244, at *4.

Concerning the next several of Ms. Wilson's arguments, we note that she fails to provide any argument or legal authority in her appellate brief to show how the trial court's enforcement of procedural rules, substantive rulings, or declining to accept her draft of an order demonstrates the trial court's bias against her. Although her petition cites general recusal principles and procedural rules, she does not develop these authorities to explain how the challenged conduct demonstrates disqualifying bias. Tennessee Supreme Court Rule 10B, section 2.03(c), requires an appellant to provide an argument explaining his or her contentions, the reasons for them, and why appellate relief is warranted, with citations to appropriate authorities. Tenn. Sup. Ct. R. 10B, § 2.03(c); *see also Alvoid v. Larson Enters.*, No. M2026-01108-COA-T10B-CV, 2026 WL 2198627, at *3–5 (Tenn. Ct. App. July 30, 2026), *perm. app. denied* (Tenn. Aug. 17, 2026) (discussing the requirements of section 2.03 and dismissing a recusal appeal for multiple deficiencies, including inadequate factual information, an omitted recusal motion, and a lack of authority). An undeveloped or merely skeletal argument may result in waiver. *Sneed v. Bd. of Prof'l Responsibility of Sup. Ct.*, 301 S.W.3d 603, 615 (Tenn. 2010). Despite this waiver, to promote faith and confidence in the judiciary, we address what we perceive are Ms. Wilson's issues. *See Tarver v. Tarver*, No. W2022-00343-COA-T10B-CV, 2022 WL 1115016, at *3 (Tenn. Ct. App. Apr. 14, 2022) (electing to consider recusal grounds in the interest of public confidence despite a failure to comply with Rule 10B).

Ms. Wilson argues that the trial court was biased when it allegedly instructed her to amend her complaint and later rejected the amendment because she did not obtain consent or leave. She also argues that the trial court excused Regions Bank's failure to answer the amended complaint while strictly enforcing rules against Ms. Wilson and declining to consider her untimely objections. Additionally, Ms. Wilson characterizes the trial court's acceptance of an order drafted by Regions Bank's counsel as improper. She maintains that she lacked an adequate opportunity to review or object to the proposed order.

Turning to the Recusal Order, the trial court stated that it treated Regions Bank's April 20, 2026, response to the Motion for De Novo Review as a responsive pleading under Tennessee Rule of Civil Procedure 15.01. In relevant part, Rule 15.01 permits amendment "once as a matter of course at any time before a responsive pleading is served" and otherwise permits amendment "*only by written consent of the adverse party or by leave of court.*" Tenn. R. Civ. P. 15.01 (emphasis added). Given its finding that Regions Bank filed a responsive pleading, the trial court concluded that Ms. Wilson was required to obtain consent or leave to file her April 28, 2026, amended complaint, which she did not do. From that premise, the trial court concluded that Regions Bank had no obligation to answer the amended complaint and that default judgment was improper. The trial court also explained that Ms. Wilson's objections to the proposed order were untimely under Davidson County Circuit Court Local Rule 33.02.

We recall that the only issue we may review in this appeal is whether the trial court erred when it denied the Second Motion to Recuse. *Duke*, 398 S.W.3d at 668. As such, our review does not question the merits of the trial court's rulings concerning: (1) Ms. Wilson's amended complaint or the trial court's interpretation of Rule 15.01; (2) Ms. Wilson's motion for default judgment or Regions Bank's motion to dismiss; or (3) Ms. Wilson's objections to the proposed order. Our role here is to consider whether the circumstances demonstrate an objective basis to question the trial judge's impartiality. Even accepting Ms. Wilson's account of the trial court's earlier instruction to amend, the alleged inconsistency concerns the trial court's ruling on a procedural question but does not demonstrate bias against Ms. Wilson or for Regions Bank. Similarly, the trial court's decisions to deny default judgment, grant the motion to dismiss, and reject Ms. Wilson's late objections also fail to demonstrate any improper bias.

Lastly, Ms. Wilson argues that the trial court's disregard of this Court's directive in *Wilson I* demonstrated bias that warranted recusal of the trial court judge. We recall that *Wilson I* concerned the First Motion to Recuse, *i.e.*, Ms. Wilson's request to recuse the General Sessions Court judge. The present appeal concerns the Second Motion to Recuse, *i.e.*, her subsequent request to recuse the trial court judge. In *Wilson I*, we determined that jurisdiction to review the denial of the First Motion to Recuse laid in circuit court, and we transferred the appeal to that court. 2026 WL 1257314, at *2–3. In doing so, we made no determination concerning whether the allegations in the First Motion to Recuse warranted recusal. We note that the trial court's Order Declining Review preceded *Wilson I*. However, the July 10, 2026, hearing occurred after *Wilson I* and both the Recusal and Dismissal Orders were entered after *Wilson I*. We deduce from the record that Ms. Wilson raised in the July 10, 2026, hearing this Court's transfer of review of the First Motion to Recuse. Although Ms. Wilson expressly raised the trial court's declining such review as a ground for recusal in the Second Motion to Recuse, the trial court did not address it in the Recusal Order. However, the Dismissal Order acknowledged our transfer of the case and granted consolidation but again declined to review the denial of the First Motion to Recuse on the trial court's understanding of the scope of a general sessions appeal.²

Tennessee Supreme Court Rule 10B section 1.03 requires a judge denying recusal to state the grounds in writing. Tenn. Sup. Ct. R. 10B, § 1.03. An inadequate explanation can require vacatur and remand. *See Dougherty v. Dougherty*, No. W2020-00284-COA-T10B-CV, 2020 WL 1189096, at *2–3 (Tenn. Ct. App. Mar. 12, 2020); *In re Maddex B.*, No. M2026-01001-COA-T10B-CV, 2026 WL 2168749, at *3 (Tenn. Ct. App. July 28, 2026), *perm. app. denied* (Tenn. Aug. 18, 2026). Nevertheless, this Court has affirmed a

² Tennessee Code Annotated section 16-15-729 provides that the trial of a civil case appealed from general sessions court shall be *de novo*. Tenn. Code Ann. § 16-15-729. We cite this provision to identify the general principle on which the trial court relied, not to opine on whether it justified declining review of the transferred recusal appeal.

trial court despite an inadequate recusal order where the asserted grounds could be evaluated and did not warrant disqualification. *See Prewitt v. Brown*, No. M2017-01420-COA-R3-CV, 2018 WL 2025212, at *9 (Tenn. Ct. App. Apr. 30, 2018). Although the trial court should have expressly addressed this ground, we can deduce its reasoning for declining review from the Dismissal Order. Accordingly, we are able to conduct a meaningful appellate review and a remand to the trial court for further explanation is unnecessary.

The trial court's declining to review the denial of the First Motion to Recuse does not establish the partiality Ms. Wilson claims. Although Ms. Wilson disagrees with the trial court's conclusion and characterizes its decision as defiance of this Court, her characterization supplies no additional facts to establish bias. Rather, the trial court's determination that it would not address the First Motion to Recuse was a substantive ruling, which, as discussed above, we do not address on its merits in a recusal appeal.

Adverse rulings of a trial court against a litigant, standing alone, are not grounds for recusal. *Adams*, 674 S.W.3d at 879. Indeed, "[r]ulings of a trial judge, even if erroneous, numerous and continuous, do not, without more, justify disqualification." *Id.* (quoting *Alley v. State*, 882 S.W.2d 810, 821 (Tenn. Crim. App. 1994)). When the alleged bias arises during the litigation, the party seeking recusal must demonstrate bias "so pervasive that it is sufficient to deny the litigant a fair trial." *Cooper v. Cooper*, 704 S.W.3d 784, 799 (Tenn. Ct. App. 2024) (quoting *Boren v. Hill Boren, PC*, 557 S.W.3d 542, 552 (Tenn. Ct. App. 2017)). Our inquiry considers the nature and context of the conduct, rather than the number of adverse decisions. *See Krohn*, 2015 WL 5772549, at *7–8 (Tenn. Ct. App. Sept. 22, 2015). We have reviewed Ms. Wilson's allegations concerning amendment, default, late filings, and the transferred appeal, including Ms. Wilson's contention that she relied on instructions that the trial court later contradicted. We have also reviewed the comments and sequence of proceedings recounted in her affidavit, recognizing that Ms. Wilson's affidavit reflects her recollection and is not an official transcript. Even considering her account, the alleged comments concern the trial court's understanding of procedural requirements. The fact that her case was heard last, or that the trial court acknowledged that Ms. Wilson was not wrong to seek recovery of her money, does not establish bias requiring recusal. Moreover, Ms. Wilson identifies no separate communication between Regions Bank and the trial court to support her characterization of the process as collusion. Her allegations concern the preparation and acceptance of a proposed order and the rejection of her objections. If Ms. Wilson disagreed with any of the trial court's substantive decisions, she could have challenged them through a Rule 3 appeal after final disposition. *See Tenn. R. App. P. 3*. On our review, none of the trial court's decisions demonstrate that it prejudged Regions Bank's liability or resolved the merits of the case based on its bias against Ms. Wilson. In short, Ms. Wilson's allegations simply do not establish an objectively reasonable basis for questioning the trial court's impartiality. Accordingly, we affirm the trial court's denial of the Second Motion to Recuse.

For completeness, we note that Ms. Wilson filed a second 10B petition with this Court on September 21, 2026. We did not request additional briefing from Ms. Wilson. *See* Tenn. Sup. Ct. R. 10B, § 2.05. The four-page pleading reiterates her arguments concerning the trial court’s alleged entry of the Dismissal Order while the Second Motion to Recuse was pending and its declining to follow this Court’s instructions in *Wilson I*, discussed *supra*. Ms. Wilson also appears to argue that the trial court “dual-stamped” the Order Declining Review, *i.e.*, the trial court’s initial order declining to review the denial of the First Motion to Recuse. Briefly, the Order Declining Review was e-filed on April 30, 2026, as evidenced by the following mark on the top of each page of the order: “EFILED 04/30/26 08:04 AM CASE NO. 26C893 Joseph P. Day, Clerk.” The Dismissal Order was e-filed on July 23, 2026, as evidenced by the following mark on the top of each page of that order: “EFILED 07/23/26 02:20 PM CASE NO. 26C893 Joseph P. Day, Clerk.” In the Dismissal Order, the trial court explicitly referenced the Order Declining Review, explaining in parenthesis that a copy of that order was attached to the Dismissal Order. Accordingly, because the Order Declining Review was filed as an attachment to the Dismissal Order, both above-referenced e-file markings from April 30th and July 23rd appear on the top of the copy of that order. Thus, the trial court did not “dual-stamp” the order. Rather, the appearance of a “dual-stamp” was the result of one e-filed order being attached to another.

IV. CONCLUSION

The order denying the Second Motion to Recuse is affirmed, and this matter is remanded to the trial court for further proceedings consistent with this opinion. Costs of the appeal are assessed to the Appellant, Deirdre Michelle Wilson. Because Ms. Wilson is proceeding *in forma pauperis* in this appeal, execution for costs may issue if necessary.

s/ Valerie L. Smith

VALERIE L. SMITH, JUDGE