

IN THE CIRCUIT COURT FOR COCKE COUNTY, TENNESSEE

DOMESTIC RELATIONS DIVISION

JEREMY BLACK,

Plaintiff / Counter-Defendant,

v.

TESHIA BLACK,

Defendant / Counter-Plaintiff.

Case No.: 37,107, II

Judge: Hon. James L. Gass

Date April 2, 2026

PETITIONER'S MOTION TO IMPEACH RESPONDENT WITH PRIOR INCONSISTENT
STATEMENTS AND FOR CONSIDERATION OF CREDIBILITY IN CUSTODY
DETERMINATION

COMES NOW the Petitioner, Jeremy S. Black, pro se, and respectfully moves this Court for entry of an order permitting impeachment of Respondent, Teshia Black, with prior inconsistent statements and other admissible credibility evidence under Tenn. R. Evid. 607, 608(b), and 613, and for consideration of Respondent's credibility in the Court's best-interest analysis under Tenn. Code Ann. § 36-6-106.

In support of this Motion, Petitioner states as follows:

1. This case involves custody-related determinations in which the Court must consider the best interests of the minor children under Tenn. Code Ann. § 36-6-106.

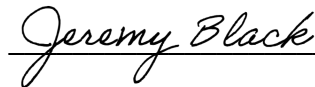
2. Respondent has made multiple statements concerning alleged incidents, parenting issues, counseling, finances, and communications with the children that are inconsistent with one another and with objective records.
3. Tennessee Rule of Evidence 607 permits a party to attack the credibility of any witness, including a witness called by that party.
4. Tennessee Rule of Evidence 613 permits impeachment by prior inconsistent statement, provided the witness is afforded an opportunity to explain or deny the statement and the opposing party has an opportunity to question the witness thereon.
5. Tennessee Rule of Evidence 608(b) permits limited inquiry on cross-examination into specific instances of conduct probative of truthfulness or untruthfulness, but does not permit proof by extrinsic evidence.[1]
6. The statements and discrepancies identified in Exhibit Z concern material issues, including the alleged conduct underlying protection-order proceedings, communications regarding the minor children, counseling history, and financial representations relevant to parenting ability and credibility.
7. These matters are relevant to the Court's evaluation of Respondent's moral, physical, mental, and emotional fitness, as well as the willingness and ability of each parent to facilitate a close and continuing parent-child relationship, under Tenn. Code Ann. § 36-6-106.
8. The information summarized in Exhibit Z is also supported by the facts set out in Petitioner's previously prepared affidavit, including the July 6, 2024 body-worn camera statements, the later changes in Respondent's account, the disputed references to

counseling and phone records, and the financial and custody-related inconsistencies reflected in the record.

WHEREFORE, Petitioner respectfully requests that the Court:

- A. Permit impeachment of Respondent with prior inconsistent statements and other admissible credibility evidence under Tenn. R. Evid. 607, 608(b), and 613;
- B. Allow Petitioner to use the statements and supporting records identified in Exhibit Z for cross-examination and impeachment, subject to the Tennessee Rules of Evidence;
- C. Consider Respondent's credibility, honesty, and consistency as relevant factors under Tenn. Code Ann. § 36-6-106; and
- D. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 2nd day of April, 2026.

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Jeremy S. Black
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motions was served upon counsel of record by Email on this 2nd day of April, 2026

Also copy of the foregoing Motions sent by US Mail to
Crystal Jessee
Jessee Law Office
P.O. Box 1537
Greeneville, TN 37744
Email: cgjlaw@jesseelawoffice.com



Date April, 2, 2026

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