

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

JEFFREY RYAN FENTON

Plaintiff,

CASE NO. 1:23-cv-01097  
HON. PAUL L. MALONEY

vs.

VIRGINIA LEE STORY,  
MICHAEL WEIMAR BINKLEY,  
KATHRYN LYNN YARBROUGH,  
ELAINE BEATY BEELER,  
MARY ELIZABETH MANEY  
AUSBROOKS,  
ALEXANDER SERGEY KOVAL,  
HENRY EDWARD HILDEBRAND III,  
CHARLES M. WALKER,  
THOMAS EARL EUGENE ANDERSON,  
ROY PATRICK MARLIN,  
SAMUEL FORREST ANDERSON,  
JAMES MICHAEL HIVNER,  
JOHN BRANDON COKE,  
SANDRA JANE LEACH GARRETT,  
FRANK GOAD CLEMENT JR.,  
ANDY DWANE BENNETT,  
WILLIAM NEAL MCBRAYER,  
STORY AND ABERNATHY, PLLP,  
ROTHSCHILD & AUSBROOKS, PLLC,  
BANKERS TITLE & ESCROW  
CORPORATION,  
HOSTETTLER, NEUHOFF & DAVIS,  
LLC,  
MCARTHUR SANDERS REAL ESTATE,  
SPRAGINS, BARNETT, & COBB, PLC,  
RUBIN LUBLIN TN, PLLC,  
BANK OF AMERICA CORPORATION,  
CADENCE BANK,  
STATE OF TENNESSEE,  
COUNTY OF WILLIAMSON  
TENNESSEE,  
WILLIAMSON COUNTY SHERIFF'S  
OFFICE,  
CHANCERY COURT FOR WILLIAMSON  
COUNTY TENNESSEE,

TENNESSEE COURT OF APPEALS  
MIDDLE DIVISION,  
SUPREME COURT OF THE STATE OF  
TENNESSEE,  
BOARD OF PROFESSIONAL  
RESPONSIBILITY OF THE SUPREME  
COURT OF TN,  
TENNESSEE ADMINISTRATIVE  
OFFICE OF THE COURTS,

Defendants,

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**AFFIDAVIT OF VIRGINIA LEE STORY**

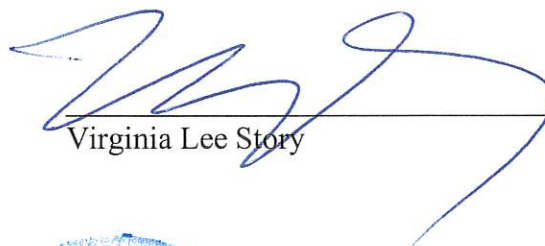
STATE OF TENNESSEE                     )  
   ) ss:  
COUNTY OF WILLIAMSON            )

Virginia Lee Story, being duly sworn deposes and states:

1. My name is Virginia Lee Story.
2. I am over 18 years of age, of sound mind, and am otherwise capable of executing this Affidavit.
3. My home address is in Franklin, Tennessee.
4. I am a resident of the State of Tennessee.
5. I am a partner at the law firm, Story and Abernathy, PLLP, which is located in Franklin, Tennessee.

6. I am a licensed attorney in the State of Tennessee.
7. I have never lived in the State of Michigan.
8. I am not a licensed attorney in the State of Michigan.
9. I have never practiced law in the State of Michigan *pro hac vice*, or otherwise.
10. None of the attorneys at my law firm, Story and Abernathy, PLLP, are licensed in the State of Michigan, nor have any practiced law in the State of Michigan *pro hac vice*, or otherwise.
11. I have never conducted any activity in Michigan related to Plaintiff.
12. Story and Abernathy, PLLP has never conducted any activity in Michigan related to Plaintiff.
13. I represented Plaintiff's ex-wife in a 2019 divorce proceeding that was adjudicated in the State of Tennessee.
14. Accordingly, the substantial part of the events giving rise to the Complaint did not occur in Michigan.

Further affiant sayeth not.

  
Virginia Lee Story

Sworn to and subscribed before me  
this 16<sup>th</sup> day of September, 2024.



Notary Public

My Commission Expires: 12/21/24

