IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

| JEFFREY RYAN FENTON, |) |
|-----------------------------|------------------------------------|
| Plaintiff, |))) Case No. 3:24-cv-01282 |
| v. |) District Judge William Campbell |
| VIRGINIA LEE STORY, ET AL., |)) |
| Defendants. |) |

JOINT MOTION TO SUBSTITUTE COUNSEL

Come now Brian Gallagher of Lennon Miller, PLC and Lisa Carson of Buerger, Moseley & Carson, PLC and file this joint motion to substitute Lisa Carson as counsel for Defendants, Elaine Beaty Beeler, Williamson County, Tennessee and Williamson County Sheriff's Office in this case. This Joint Motion is not intended to constitute a waiver by these Defendants of any objection to personal jurisdiction, inadequate service of process, improper joinder or any other defense or objection in this matter, which defenses and objections are expressly reserved.

Respectfully submitted,

<u>/s/Brian J. Gallagher</u> Brian J. Gallagher (P72712) LENNON MILLER PLC 151 South Rose Street, Suite 900 Kalamazoo, MI 49007 Telephone: (269) 488-3027 Email: bgallagher@lennonmiller.com /s/Lisa M. Carson

Lisa M. Carson, BPR# 14782 BUERGER, MOSELEY & CARSON, PLC Attorney for Defendants Elaine Beaty Beeler, Williamson County, Tennessee and Williamson County Sheriff's Office 4068 Rural Plains Circle, Suite 100 Franklin, TN 37064 Telephone: (615) 794-8850 Facsimile: (615) 790-8861 Email: lcarson@buergerlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been filed and delivered via U.S. mail on October 30, 2024 to the following:

Jeffrey Ryan Fenton 17198 Silver Parkway, #150 Fenton, MI 48430-3426

I certify that a true and exact copy of the foregoing has been forwarded via the Court's electronic filing system on October 30, 2024 to the following:

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