

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. )

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JOINT MOTION TO SUBSTITUTE COUNSEL

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Brian Gallagher of Lennon Miller, PLC and Peako Jenkins of the Tennessee Attorney General’s Office file this joint motion to substitute Peako Jenkins as counsel for Defendants Michael Binkley, Frank Clement, Jr., Andy Bennett, William Neal McBrayer, James Hivner, John Coke, Sandra Garrett, the State of Tennessee, the Tennessee Administrative Office of the Courts, the Tennessee Court of Appeals Middle Division, the Chancery Court for Williamson County, the Supreme Court of Tennessee, and the Board of Professional Responsibility. 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,

/s/Brian J. Gallagher

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/s/Peako Jenkins

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**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:

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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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