

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

<b>JEFFREY RYAN FENTON,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Case No. 3:24-cv-01282</b>
<b>v.</b>	)	<b>District Judge Campbell</b>
	)	<b>Magistrate Judge Holmes</b>
<b>VIRGINIA LEE STORY, ET AL.,</b>	)	
	)	
<b>Defendants.</b>	)	

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**AFFIDAVIT OF LISA CARSON**

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The undersigned affiant, Lisa M. Carson, being first duly sworn, hereby deposes and says:

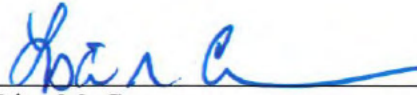
1. I am counsel of record for Defendants Williamson County, Tennessee and Williamson County Sheriff's Office in this action. I am over the age of eighteen (18) and am otherwise competent to give this affidavit.
2. This case was transferred to this court from the Western District of Michigan on October 25, 2024. These Defendants have a currently pending Motion to Dismiss the case based on jurisdiction and venue issues (Doc. 78) that has likely been rendered moot by the transfer<sup>1</sup>, but other grounds for dismissal exist.
3. Additional time is necessary to prepare a responsive pleading addressing these other grounds for dismissal of Plaintiff's allegations.

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<sup>1</sup> It is not clear to Defendants whether the currently pending Motion to Dismiss related to venue and personal jurisdiction, which is likely moot, impacts the timing of their responsive pleading upon transfer. Accordingly, they file the accompanying Motion out of an abundance of caution.

4. I am requesting that Defendants Williamson County, Tennessee and Williamson County Sheriff's office be granted an extension to November 22, 2024 in which to file an answer or other responsive pleading.
5. Because of Plaintiff's pro se status, we request that the Court excuse Defendants from the consultation requirement of the local rules related to opposition to this Motion.

FURTHER AFFIANT SAITH NOT.



\_\_\_\_\_  
Lisa M. Carson

STATE OF TENNESSEE        )  
  )  
COUNTY OF WILLIAMSON    )

Subscribed and sworn to before me this 31st day of October, 2024.



\_\_\_\_\_  
Notary Public

My Commission Expires:

7/25/2027



**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 31, 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 31, 2024 to the following:

Brian Joseph Gallagher  
Lennon Miller PLC  
151 S Rose Street, Suite 900  
Kalamzoo, MI 48152

Valerie Henning Mock  
Wilson Elser Moskowitz Edelman & Dicker LLP  
17197 N Laurel Park Drive, Suite 201  
Livonia, MI 48152

Anica Clarissa Jones  
U.S. Attorney's Office  
719 Church Street  
Suite 3300  
Nashville, TN 37203

Ryan D. Cobb  
U.S. Attorney (Grand Rapids)  
The Law Building  
330 Ionia Avenue, NW  
Grand Rapids, MI 49501

Sandra J. Densham  
Plunkett Cooney  
333 Bridge Street, NW, Suite 530  
Grand Rapids, MI 49504

Thomas Anderson  
1187 Old Hickory Boulevard, Suite 125  
Brentwood, TN 37027

Laura C. Baucus  
Dykema Gossett PLLC  
39577 Woodward Avenue, Suite 300  
Bloomfield Hills, MI 48304

Bret Channess  
Rublin Lublin, LLC  
3145 Avalon Ridge Place, Suite 100  
Peachtree Corners, GA 30071

Michael L. Gutierrez  
Tyler A. Burk  
Butzel Long PC  
300 Ottawa Avenue, NW, Suite 620  
Grand Rapids, MI 49503

Dawn Nicole Williams  
Dykema Gossett PLLC  
Capitol View Building  
201 Townsend Street, Suite 900  
Lansing, MI 48933

Peako Jenkins  
Assistant Attorney General  
P.O. Box 20207  
Nashville, TN 37202-0207

Benjamin E. Goldammer  
Danica G. Suedekum  
Kay Griffin, PLLC  
222 Second Avenue North  
Suite 340-M  
Nashville, TN 37201

/s/Lisa M. Carson