

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

<b>JEFFREY RYAN FENTON,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>Case No. 3:24-cv-01282</b>
	)	<b>JUDGE WILLIAM L. CAMPBELL, JR.</b>
<b>VIRGINIA LEE STORY, et al.,</b>	)	<b>Magistrate Judge Barbara D. Holmes</b>
	)	
<b>Defendants.</b>	)	<b>JURY DEMAND</b>
	)	
	)	
	)	
	)	

**MOTION FOR SUBSTITUTION OF COUNSEL  
FOR DEFENDANT CADENCE BANK**

Defendant Cadence Bank, through undersigned counsel, hereby move this Court to substitute George H. Cate, III and Kimberly M. Ingram-Hogan of Bradley Arant Boult Cummings LLP (collectively “Bradley”) as counsel for Defendant in place of Michael L. Gutierrez and Tyler A. Burk of Butzel Long PC (hereinafter “Butzel”). As grounds for this Motion, Defendant Cadence Bank states that Butzel was retained as Cadence Bank’s counsel when this case was pending in the United States District Court for the Western District of Michigan. By Order entered October 25, 2024 (Dkt. #127), this case was transferred to this Court pursuant to 28 U.S.C. § 1406(a). Now that this case has been transferred to the Middle District of Tennessee, Cadence Bank has retained Bradley to serve as its counsel, as reflected by Notices of Appearance filed on November 4, 2024. The purpose of this Motion is to substitute Bradley as counsel for Defendant in place of Butzel and to allow Butzel to withdraw.

Accordingly, Defendant requests that this Motion be granted. A proposed Order has been submitted.

Respectfully submitted,

*/s/ George H. Cate, III*

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George H. Cate, III (BPR #12595)

Kimberly M. Ingram-Hogan (BPR #35191)

BRADLEY ARANT BOULT CUMMINGS LLP

1221 Broadway

Suite 2400

Nashville, TN 37203

Telephone: (615) 244-2582

Facsimile: (615) 252-6380

gcate@bradley.com

kingram@bradley.com

*Attorneys for Defendant Cadence Bank*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Motion for Substitution of Counsel for Defendant Cadence Bank was served on the following via the Court's CM/ECF system on November 4, 2024:

Jeffrey Ryan Fenton  
17195 Silver Parkway #150  
Fenton, MI 48430

*Pro Se Plaintiff*

Valerie Henning Mock (P55572)  
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP  
17197 N Laurel Park Dr., Ste. 201  
Livonia, MI 48152  
valerie.mock@wilsonelser.com

*Counsel for Defendants Story, Story and Abernathy, PLLC*

Brian J. Gallagher (P72712)  
LENNON MILLER PLC  
151 South Rose Street, Suite 900  
Kalamazoo, MI 49007  
bgallagher@lennonmiller.com

*Counsel for Defendants Beeler; Bennett; Binkley; Board of Professional Responsibility of the Supreme Court of TN; Chancery Court for Williamson County, TN; Clement; Coke; Garrett; Hivner; McBrayer; State of TN; Supreme Court of the State of TN; TN Admin Office of the Courts; TN Court of Appeals Middle Division; Williamson County; Williamson County Sheriff's Office ("The Tennessee Defendants")*

Sandra J. Densham (P69397)  
PLUNKETT COONEY  
333 Bridge St., NW, Ste. 530  
Grand Rapids, MI 49504  
sdensham@plunkettcooney.com

*Counsel for Defendants Marlin, McCarthur Sanders Real Estate*

Bret J. Channess (720572)  
RUBIN LUBLIN, LLC  
3145 Avalon Ridge Place, Suite 100  
Peachtree Corners, GA 30071  
bchanness@rlselaw.com

*Counsel for Rubin Lublin TN, PLLC*

Thomas E. Anderson  
1187 Old Hickory Blvd., Ste. 125  
Brentwood, TN 37027

*Pro Se Defendant*

*/s/ George H. Cate, III*

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George H. Cate, III