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

JEFFREY RYAN FENTON,	
Plaintiff,)
V.) CASE NO.: 3:24-cv-01282
) JUDGE CAMPBELL
VIRGINIA LEE STORY, et al.,) MAGISTRATE JUDGE HOLMES
)
Defendants.	

EMERGENCY MOTION TO REDACT OR SEAL PORTIONS OF FILED DOCUMENTS

Pursuant to Local Rule 5.03, Defendant Honorable Charles Walker (Judge Walker) requests that portions of filed documents be redacted or sealed, stating as follows:

- 1. Judge Walker is a federal bankruptcy judge. He has expressed privacy and safety concerns relating to his private address being publicly disclosed in filings in this action.
- 2. There is good cause to remove judge Walker's address from the filings in this action. Judge Walker's privacy and security interests outweigh the public's interest in this private information, and the details of his address are not relevant to the merits in this action. *See In re Knoxville News-Sentinel Co., Inc.*, 723 F.2d 470, 474 (6th Cir. 1983); *Malhan v. Grewal*, Civil Action No. 16-8495 (CCC), 2020 WL 6689753, at *2 (D. N.J. Nov. 13, 2020); *Scheffler v. City of New Hope*, Case No. 18-cv-1690 (SRN/LIB) 2018 WL 6012181, at *2 (D. Minn. Nov. 16, 2018) (recognizing that "Judges, in particular, have a critical need to maintain their privacy because of the possible threat posed by dissatisfied litigants. . . ."); *Concerned Pastors for Social Action v. Khouri*, Case No. 16-10277, 2016 WL 8261002, at *1 (E.D. Mich. Oct. 25, 2016) (finding that witnesses' home addresses were irrelevant to the merits of the action and ordering redactions).

- 3. Accordingly, Defendant asks that the Clerk of Court redact from the ECF in this case any filings that include Judge Walker's private address or, alternatively, seal the specific pages containing the information. These filings include ECF No. 16-1, PageID.2293; ECF No.
- 66, PageID.4874; and ECF No. 95-1, PageID.5252, 5254.
- 4. Defendant further asks the Court to order Plaintiff to refrain from including Judge Walker's unredacted address in any future filings in this action.
- 5. Pursuant to Local Rule 7.01, Defendant's counsel made attempts to consult with Plaintiff regarding this motion. Defendant's counsel left Plaintiff a voicemail on October 31. Emails were exchanged between Plaintiff and Defendant's counsel on November 1, 4, and 5. Defendant's counsel left Plaintiff another voicemail on November 5. At the time of this filing, Defendant's counsel has not secured Plaintiff's assent to filing this motion jointly.

For the reasons discussed above, Defendant's motion should be granted.

Respectfully submitted,

anica.jones@usdoj.gov

THOMAS J. JAWORSKI Acting United States Attorney Middle District of Tennessee

s/ Anica C. Jones ANICA C. JONES, B.P.R. #025325 Assistant United States Attorney United States Attorney's Office 719 Church Street, Suite 3300 Nashville, TN 37203 Telephone: (615) 736-5151

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following, if registered, by operation of the Court's electronic filing system. If not registered, notice was sent by First Class, United States mail, postage prepaid, to the following:

Jeffrey Ryan Fenton	Valerie Henning Mock
17195 Silver Parkway #150	Wilson Elser Moskowitz Edelman & Dicker
Fenton, MI 48430	LLP (Livonia)
·	17197 N Laurel Park Drive, Ste. 201
	Livonia, MI 48152
Brian Joseph Gallagher	Peako Andrea Jenkins
Lennon Miller PLC	Tennessee Attorney General's Office
151 S Rose Street, Ste. 900	P.O. Box 20207
Kalamazoo, MI 49007	Nashville, TN 37202-0207
Sandra J. Densham	Thomas E. Anderson
Plunkett Cooney (Grand Rapids)	1187 Old Hickory Blvd., Ste. 125
333 Bridge Street, NW, Ste. 530	Brentwood, TN 37027
Grand Rapids, MI 49504	
Laura C. Baucus	Bret Chaness
Dykema Gossett PLLC (Bloomfield Hills)	Rubin Lublin, LLC
39577 Woodward Avenue, Ste. 300	3145 Avalon Ridge Place, Ste 100
Bloomfield Hills, MI 48304	Peachtree Corners, GA 30071
Benjamin E. Goldammer	Michael L. Gutierrez
Danica G Suedekum	Tyler A. Burk
Kay Griffin, PLLC	Butzel Long PC (GR)
222 Second Avenue North, Suite 340-M	300 Ottawa Avenue, NW, Ste. 620
Nashville, TN 37201	Grand Rapids, MI 49503
Dawn Nicole Williams	
Dykema Gossett PLLC (Lansing)	
Capitol View Bldg.	
201 Townsend Street, Ste. 900	
Lansing, MI 48933	

s/ Anica C. Jones ANICA C. JONES Assistant United States Attorney