

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

JEFFREY RYAN FENTON,

Plaintiff,

vs.

VIRGINIA LEE STORY, et al.,

Defendants.

Case No. 1:23-CV-1097

HON: PAUL L. MALONEY

MAG: RAY KENT

Jeffrey Ryan Fenton
17195 Silver Parkway #150
Fenton, MI 48430
(615) 837-1300
Plaintiff
PRO SE

Brian J. Gallagher (P72712)
LENNON MILLER PLC
Attorneys 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")
151 South Rose Street, Suite 900
Kalamazoo, MI 49007
(269) 488-5188 / (269) 381-8822 – Fax
bgallagher@lennonmiller.com

Valerie Henning Mock (P55572)
Wilson Elser Moskowitz Edelman & Dicker
LLP (Livonia)
Attorneys for Defendants Story and Story and
Abernathy, PLLC
17197 N Laurel Park Dr., Ste. 201
Livonia, MI 48152
(313) 327-3100
valerie.mock@wilsonelser.com

Sandra J. Densham (P69397)
Plunkett Cooney (Grand Rapids)
Attorneys for Defendants Marlin and McCarthur
Sanders Real Estate
333 Bridge St., NW, Ste. 530
Grand Rapids, MI 49504
(616) 752-4627
sdensham@plunkettcooney.com

CERTIFICATION OF CONCURRENCE PURSUANT TO L. CIV. R. 7.1(d).

NOW COME Elaine Beaty Beeler; Andy Dwane Bennett; Michael Weimar Binkley;
Board of Professional Responsibility of the Supreme Court of Tennessee; Chancery Court for

Williamson County Tennessee; Frank Goad Clement, Jr.; John Brandon Coke; Sandra Jane Leach Garrett; James Michael Hivner; William Neal McBrayer; Supreme Court of the State of Tennessee; Tennessee Administrative Office of the Courts; Tennessee Court of Appeals Middle Division; State of Tennessee; Williamson County; Williamson County Sheriff's Office (hereinafter known as "the Tennessee Defendants") by and through their attorneys, Lennon Miller, PLC, and for their Certification of Compliance state that:

1. Pursuant to W.D. Mich. Local Civil Rule 7.1(d), the Tennessee Defendants sought to ascertain whether Plaintiff will oppose their Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(3).

2. Defense Counsel left a voicemail message for Plaintiff and did not receive a response.

WHEREFORE, the Tennessee Defendants state that they have complied with W.D. Mich. Local Civil Rule 7.1(d) insofar as they have sought concurrence from the party opposing their Motion.

Dated: September 20, 2024

/s/ Brian J. Gallagher

Brian J. Gallagher (P72712)
Attorneys 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
151 South Rose Street, Suite 900
Kalamazoo, MI 49007
(269) 488-3027
bgallagher@lennonmiller.com

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2024 I electronically filed the foregoing papers with the Clerk of the Court using the ECF/CM, which will send the instant filing and notification of same to all counsel electronically and served the Plaintiff the same document by mail.

Dated: September 20, 2024

/s/ Brian J. Gallagher

Brian J. Gallagher (P72712)
Attorneys 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
151 South Rose Street, Suite 900
Kalamazoo, MI 49007
(269) 488-3027
bgallagher@lennonmiller.com