

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN

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CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: / SCANNED BY:

JEFFREY RYAN FENTON,

PLAINTIFF

v.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

CASE NO. 1:23-cv-1097

**DECLARATION OF MARSHA ANN FENTON REGARDING SON
JEFFREY RYAN FENTON AND TENNESSEE LEGAL PROCEEDINGS**

I, Marsha Ann Fenton, declare under oath as follows:

1. I am a citizen of the United States of America and live in Genessee County Michigan in the same small town in which I was born.
2. Jeffrey Ryan Fenton is my only son. He is a man of integrity whose word is his promise, and he keeps his promises more than most people that I have known.
3. For privacy I'm not listing my home address here, since court records are public, and we have had so much trouble with the parties in this lawsuit, from Tennessee.
4. I am an active registered voter in Genessee County and have been for much of my life. Both the state of Michigan and the federal government have my home address on record.
5. Jeffrey has lived in the basement of my tiny home inherited from my parents with assessed value of less than \$50,000 for the past four years, since his house in Tennessee was stolen

Initials: MF

from him.

6. I loaned Jeffrey money toward his \$4,500 retainer with attorney Brittney Gates, specifically to try to save his home, but attorney Gates repeatedly put him off and ultimately failed to protect his interests.

7. Day after day, Jeffrey told me, attorney Gates promised to send him a draft of his “divorce answer and counter complaint”, for him to review and comment on. Unfortunately, Jeffrey says that he has never seen or received a single draft of any such document from Ms. Gates.

8. Jeffrey said that he provided attorney Gates¹ with a lot of evidence that the charges against him were false and fraudulent. Maybe attorney Gates was overwhelmed by the sheer volume of claims which she needed to respond to, in an attempt to regain a level playing field.

9. In an emergency, I loaned him \$5,000 more to hire attorneys Mitchell Miller and Marty Duke a mere three days² before his hearing in chancery court—not nearly enough time to fully review all the facts and evidence.

10. The law firm for which attorney Mitchell Miller worked tried to insist that I sign an open-ended personal guarantor for Jeffrey’s legal fees because he told me that his attorneys feared he would become essentially “uncollectible” if the court decided to take his home, which attorney Story had asked and which happened.

11. I’m a retired pediatric intensive care nurse and can’t afford to guarantee an open-ended debt to attorneys, billing at hundreds of dollars per hour. I didn’t feel safe with such a

¹ https://rico.jeffenton.com/evidence/2019-07-26_attorney-gates-failed-to-perform.pdf

² This counts business days only, there was one weekend.

proposal regardless.

12. Instead, Jeffrey told me that he promised them that once he ran out of money to pay them, that he would switch to representing himself *pro se*, even stating that he would “fire” them if need be so that the court couldn’t force them to “work for free,” as was their stated concern.

13. My \$5,000 retainer with attorneys Miller and Duke³ was allegedly exhausted after the first 30-minute hearing on August 1, 2019, and Jeffrey told me that the judge and attorney Story had ordered his home be taken and forced to auction “with no minimum” *before* discovery started.

14. At that point, it didn’t make sense to loan him more money to waste on legal counsel. The home was the only major thing worth saving, and that was being taken by decree of the court on day one.

15. Afterwards Jeffrey needed to—not desired to as the court “records” portray—represent himself *pro se* because I could not loan him more money to pour into the “black hole,” and he had no other means to pay an attorney.

16. I did not plan to support one of my fifty-plus-year-old children during the sunset of my life.

17. Jeffrey has never needed any help with being supported since he became an adult at the age of seventeen or eighteen.

18. Before the courts in Tennessee interfered with my son’s life, he was a whole person. But there was absolutely no reason the courts could not follow the rules and law instead of leaving

³ https://rico.jeffenton.com/evidence/2019-08-02_attorneys-miller-duke-retainer-exhausted.pdf

my son destitute.

19. The Williamson County Chancery Court judge, Michael Binkley, along with attorneys Story, Yarbrough, and the crew in the federal bankruptcy court—appear to have intentionally ignored and unconscionably circumvented the Federal Rules of Bankruptcy Procedure along with multiple significant statutes of Federal Bankruptcy Law to illegally deprive my son of the most valuable piece of property he has ever held an ownership interest in—first broke and then destroyed my son.

20. Every court to date has turned its proverbial head, refused to acknowledge clearly obvious misconduct, on a magnitude unimaginable, while discarding Jeffrey over and over again without any concern whatsoever that the system has completely rendered his life unsustainable.

21. I remember going into antique shops in Frankenmuth and Battle Alley where the owners often display a sign which plainly states, “You break it, you bought it.” That is exactly how I feel about them breaking my son, destroying his confidence and stealing everything that he built, loved, and cherished—that the system should “own” the problem it has created.....and fix it.

22. Had Jeffrey been given an equitable and ethical chance to obtain the vocational rehabilitation which he needs—to re-enter the workforce, which could have been done had the false cloud of a protective order not been hanging over him—I believe that he could have completely recovered from this divorce by now. He could have kept his beautiful home and probably bought out ex-wife’s interest, which instead she discarded, without wasting critical years of his life and hundreds of thousands of dollars which he very simply could not afford to lose.

23. This would have allowed Jeffrey's ex-wife to only pay a fraction of their calculated and previously agreed upon alimony and prevented her from needing to fear the possibility of criminal charges for her role in the unethical events organized, facilitated, and executed by her counsel and the courts, to both her tremendous detriment as well as to that of my son.

24. Jeffrey's ex-wife should always have her vocational value and ability to recover occupationally, whereas my son has no college education or formalized training.

25. I find it tremendously sad that there seems to have been financial incentives for the parties in the "sale" of Jeffrey's home, and that the courts and its players steered matters in the direction they wanted them to go.

26. Jeffrey was stripped of his self-respect and human dignity as a result, which he had built throughout his lifetime of adult independence with extremely hard work. My son was shattered, devalued, and discarded as a human being by people who preyed upon him and his ex-wife instead of acting in good faith in accordance with their oaths of office for the fair and equitable dissolution of their marriage.

27. Jeffrey's million-dollar retirement nest egg, his home, would have probably been paid off in another ten or twelve years as he had planned, if not for the unethical and nefarious conduct of others involved who failed to notify him of bankruptcy proceedings and who deliberately contravened the law.

28. Had the court fairly allowed my son to obtain a divorce as the law requires, or if the court had never interfered with my son's life at all and forced him to shell out thousands of dollars to defend himself against frivolous and defamatory false allegations—some of which resulted in a

fraudulent protective order—he would have been fine, living a life well-earned and hard fought for, but truly his own, which is every person’s right in this nation.

29. To interfere as the court did without lawful, ethical, and humane considerations first and foremost, is shamefully reprehensible.

30. The duty of care and even-handed justice was due my son from the courts and the state of Tennessee. As soon as told the Tennessee Court of Appeals that not only was that duty violated, but unconscionable misconduct took place between the parties and the judge, it had a duty to intervene, and at the absolute very least, hear his testimony without any presumption of his guilt.

31. Jeffrey has been shouting from the proverbial rooftops and providing evidence to each and every court of what he believes is obvious misconduct between attorney Story and Judge Binkley just as he is trying to still do here in this Michigan Federal court.

32. It would not at all serve justice if Jeffrey’s case is dismissed without him ever being heard, despite him working on related matters almost around the clock for four insane years. Not one person who has been involved can reasonably claim not to know about the obvious misconduct of the courts and others involved. Nobody has helped, which is appalling.

33. Jeffrey told me he has filed so many documents and so much evidence with all the courts because nobody is listening. He has never been heard regarding the malfeasance of the actors involved.

34. Rights protected by the Constitution should apply to my son; however, that has not yet happened. He has been deprived of his rights and any protection so far through the judicial

system, while I had hoped that was simply a shortcoming within Tennessee. However, with this court now proposing to dismiss his case despite the amount of work he has done and the amount of evidence of so much foul play in the courts records, I pray the court reconsiders, and instead of being another obstacle in my son's pursuit of justice, it begins to protect him from the vipers who care not about the law but operate in the courts as a way to financially and litigiously dominate and prey upon others.

35. I pray that this court rectifies the senseless and lawless deprivation of my son's life and liberty. I charge it now with that responsibility and beg the lawful intervention to protect my son's life, rights, and livelihood instead of trying to figure out how to discard this case or "pass the buck" without ever bothering to hear his testimony.

36. No matter how many people might be embarrassed from their misconduct being revealed in this lawsuit, the United States of America, including the Michigan federal court system, still owes my son a duty of justice, which I have yet to witness in the slightest capacity.

37. Outside the law, the courts have no lawful authority by which to arbitrarily deprive people of their life, liberty, and property, and the courts in Tennessee did not act lawfully.

38. The courts in Tennessee had a responsibility to return my son to a condition, where if I die tomorrow, he can survive and won't end up living on the streets. This court now has that responsibility.

39. All that I have witnessed being exercised in Jeffrey's cases in Tennessee is lawless power and people who won't even question his accusers or force the court to provide findings of real fact and law that support this absurdity and who issue "default judgments" after he is forced

out of that state and into Michigan—without lawful jurisdiction or authority.

40. Events that occurred in Tennessee have included crimes of epic proportions, and if that is not obvious, then please order a hearing for my son and I to appear before this court so that it can be the very first to hear our testimony of wrongdoing.

41. If this court refuses to help, then please at the very least do not put a cure for my son beyond his reach, costing years more of his life and keeping him in extreme poverty. Instead, if this court refuses to help, please simply transfer this case to the court that has the lawful jurisdiction to uphold justice.

42. Not only have defendants in this case failed to deliver justice, but they refused to help protect the vulnerable. They live above the law and beyond practical daily accountability and have intentionally targeted, attacked, and preyed upon my son while strategically exploiting his known and fully disclosed disabilities, which must be corrected because I cannot afford to support him for the rest of his life (or mine).⁴

43. Jeffrey desperately needs to learn a skill he can use to work from my home, due to my IgA antibody deficiency and my inability to develop an immunity with the pneumococcal vaccine and the life threatening danger of COVID-19 and other contagious illnesses to me.

44. Letters from my immunologists⁵ have been repeatedly provided to attorney Story as well as to the courts⁶, stressing that Jeffrey must work from home; however, he is unable to do

⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-38, PageID.2032-2045

⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-38, PageID.2042-2045

⁶ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.2000

so because of the ridiculous circumstances they have unreasonably created for him. I cannot afford the added expenses in my household without his help.

45. Since COVID-19, because of my immunity disorder and per the specific instructions of my immunologist, I don't go into restaurants or stores anymore, nor have I had any family get-togethers, nor have I had any visitors in my home, except for a few brief visits by two of my daughters and an afternoon outdoor visit by my cousins for lunch once when they came up from Florida.

46. Jeffrey told me that he told attorney Story and the Tennessee Court of Appeals over and over that he could not even get a job to buy the most basic necessities in life, as long as the fraudulent order of protection is in place⁷, which hurts his credibility and his employability.

47. Even amidst a global pandemic, the likes of which the planet has never before seen during my lifetime, where prisons around our country released felons from prison early due to the public health care crisis, the State of Tennessee ardently refused to remove a fraudulent order of protection against my son, which is based upon a false unsigned personal statement⁸ allegedly typed by his ex-wife, but with no date and signature on it.

48. He has repeatedly told me that the document is almost exclusively fraudulent.

49. Jeffrey has even provided evidence on a line-by-line basis to prove that the unsigned letter is almost exclusively lies.

50. I don't understand why nobody seems to care about the truth, the costs, the

⁷ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1679-1681

⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.655-656

consequences, or the collateral damage which is being repeatedly multiplied in my son's life.

51. From what I've read in several newspaper articles⁹ about some of the people involved in Jeffrey's divorce, their apparent conflicts of interest, and their known associates throughout the Tennessee court system, both present day as well as during years past,¹⁰ this I can assure you: Jeffrey does *not* stand out as the lawless criminal.

52. The fraudulent protective order must be removed so Jeffrey can obtain employment to help with expenses.

53. My son was one of the most successful people in our family. He has always been a hard worker. He had a beautiful home before he even met his ex-wife and has never been a threat of any kind to her.

54. Jeffrey has always moved to where the work was, worked multiple jobs when he was younger, and built a life for himself without any assistance from extended family or the government until 2019 when he was cut down in just a month and a half in court. He went from owning a beautiful half million-dollar home in Brentwood, Tennessee, the nicest home of any of his siblings or myself, to literally being homeless, without any income, support, or shelter.

55. Jeffrey still can't even explain to me everything that they did to him, but he has been working to put words to it day and night—typically twelve or more hours every single day of the week—for four long years.

56. I can't even remember the last time I saw Jeffrey take a day off and relax or do

⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-14, PageID.597 ~ ECF No. 1-16, PageID.640

¹⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1771-1792

anything fun or recreational.

57. Jeffrey rarely comes upstairs and doesn't even watch an hour of TV a day. Almost all that he does is research the law—a topic which he has never showed any interest—network with other victims of legal abuse, watch YouTube videos to learn about the law, and draft papers for the courts.....for four solid years now.

58. As a retired nurse, I have had a lot of experience working with children with various abilities/disabilities. I also have several years of experience as a parish nurse and helping dysfunctional families and those with other needs, including working with the community.

59. Jeffrey was wrongly accused of abusing his ex-wife¹¹ and wasn't even allowed to testify to the truth or present proof countering such false accusations. He had lots of documentation with him, which he filed in court, but court personnel either never looked at it or at least they never treated him as though they had looked at or considered a word of it.

60. I need to set the record straight about a couple of things, which are so simple to prove that I can't understand why everyone has failed or refused to intervene to date, without delivering justice to Jeffrey.

- First of all, Jeffrey never planned or wanted to move to Michigan.
- He did talk about coming to visit me for a month or two while he and his ex-wife sold their home, but that was based upon an agreement between him and her, whereby she had promised to pay him \$1,750 per month in alimony¹² for 6 years.

¹¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.655-656

¹² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-35, PageID.1933-1943

Unfortunately, later she changed her mind about that.

- Jeffrey was never willing to even consider moving out of his home except for that alimony agreement he and his ex-wife had.¹³ In the end, she backed out of the agreement, and her attorney pretended that Jeffrey just planned to render himself homeless— forfeiting all the money he had invested into their home, including his retirement account, without having a means of purchasing himself a replacement home or at the very least having the money to rent himself somewhere to live and without becoming a financial liability for someone else, like me or the government.

61. To my knowledge, nobody would give away a half-million-dollar home with nothing in return and be made homeless.

62. Jeffrey even had two roommates¹⁴ who paid him \$1,400 per month and were his only income source at that moment, due to his betrayal by his ex-wife and her attorneys. Taking away his home also forced him to lose his roommates and the income from them.

63. Because of what happened, Jeffrey has been geographically displaced by 600 miles from all his friends and support systems, to live in my basement, in a state which he hoped to never live in again. He has been forced onto food stamps and Medicaid.

64. My son has his share of challenges, but he is neither an idiot, nor is he a monster.

¹³ https://www.rico.jefffenton.com/evidence/2018-10-27_verbal-settlement-agreement.pdf

¹⁴ https://rico.jefffenton.com/evidence/2019-03-26_fenton-sunnyside-roommate-lease-merriman.pdf

https://rico.jefffenton.com/evidence/2019-04-09_fenton-sunnyside-roommate-lease-garcia.pdf

65. There is a personal testimony¹⁵ of some sort, which Jeffrey's ex-wife or someone else wrote and put with her petition for the order of protection. It is full of outrageous lies.

66. I had Jeffrey get me a copy of her statement so that I can quote her accurately, and I will attach it with this declaration so everybody knows what I'm talking about.

67. There is no date and no signature on the statement.¹⁶ It is a plain typed statement that is alleged to be written by Jeffrey's ex-wife.

68. On information and belief, it should be signed and dated to be valid in court.

69. The unsigned document states, "Jeff and I have been separated since April 22, 2018 and I have not seen him since sometime in April when we met to file our taxes. Prior to that I had not seen him since December 2018." This is a lie because Jeffrey and his ex-wife went to counseling together on January 22nd, 2019.¹⁷ I know for a fact they saw each other and his counselor that day together because I paid for their counseling session. Jeffrey told me that he also brought gifts to her apartment that day.

70. Next, the statement claims, "*I am in fear for my safety based on the repeated harassment that has continued to occur.*"¹⁸ I find it impossible to believe that Jeffrey's ex-wife, who is a highly skilled gun safety instructor,¹⁹ who has her own arsenal of custom guns, who is a lifetime

¹⁵ https://rico.jeffenton.com/evidence/2019-06-20_wifes-false-unsigned-personal-testimony-for-op.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-31, PageID.1805-1806)

¹⁶ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.661-662

¹⁷ https://rico.jeffenton.com/evidence/2019-01-22_wifes-birthday-and-counseling-together.pdf

¹⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.661

¹⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-31, PageID.1794 ~ ECF No. 1-33, PageID.1873

NRA member, and who has better training than most police officers,²⁰ is afraid of Jeffrey—who was at the time living 600 miles away in Michigan.

71. I've seen plenty of pictures of Jeffrey's ex-wife with her guns. She taught half our family how to shoot handguns. She has training with assault weapons, pepper spray, doing special exercises for clearing houses and handling hostage situations—the kind of elite skills you see portrayed in movies.

72. I have never seen Jeffrey's ex-wife “in fear for [her] safety” from anyone. If true, she wouldn't have given Jeffrey turn-by-turn directions to her apartment. And she wouldn't have frequented their house by herself and left their dog, Sarah, with Jeffrey over the Christmas break, proof of which has been posted on Facebook.

73. Unlike Jeffrey's ex-wife, I had an abusive spouse. I had three protection orders (hereinafter “PO”) against my ex-husband due to actual documented physical abuse, which was photographed by the police. He stalked me, did much more, and was a *genuine* threat.

74. Each time the PO was about to expire, I had to go to court with specific documentation of new dates and events to get an extension. Each time I saw a different judge who approved the extension.

75. Whenever issuing or extending the PO, there had to be legal service to my ex-husband, with signature of reception. There were no surreptitious issuances or extensions without the abuser being given notice or an opportunity to be heard as has repeatedly happened to Jeffrey

²⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-20, PageID.955 ~ ECF No. 1-21, PageID.994

by the Tennessee courts.

76. I cannot believe that in Tennessee one can easily take everything a person owns, suspend his life for six years without cause, notice, motion, or hearing—and destroy any chance of employment due to a fraudulent PO on his record, all the while giving him no chance to dispute it.

77. People have a right to dispute charges—to due process—and to certainly know why a PO is extended from 1 year to six without even living in the state during either issuance.....by “default” judgments.....with no apparent triggering incident.

78. I unequivocally state that there was no service of process or notice via U.S. mail or otherwise at my home that would have provided the opportunity for Jeffrey to defend himself.

79. Furthermore, I can attest to the fact that Jeffrey has never once been served with notice or allowed to take part and be heard in any legal proceeding within the State of Tennessee since he began living in my basement. This is astounding and contrary to the Constitution.

80. There was never even a notice or motion for default served, which I thought was required before you could slam someone with harsh punitive default judgments, full of fraudulent claims.

81. When I got my divorce, all I had to do to get a video of the proceeding was go to the records office and pay for it. Everything in that court is electronically documented.

82. This is not true in Tennessee where neither audio nor video is recorded in civil courts. There is no “the lawyer can write whatever they want” rule in the state of Michigan.

83. Next in the unsigned statement filed with the petition for the PO, it says, “Over the last several weeks Jeff has sent me numerous text messages and lengthy emails talking about his

intentions on ruining my life, causing me issues with my employer and clients at work, ruining my credit and financially ruining me. As a result of Jeff's continued verbal and emotional abuse and deliberate non-cooperation, I have filed for bankruptcy to preserve my finances."

84. The statement did not mention that Jeffrey did computer maintenance for his ex-wife's boss at a reduced charge, that he talked to her boss and got her a \$10,000 annual raise²¹, or that, because of Jeffrey's encouragement, she got her architect's license. But those latter three statements are true.

85. I have seen Jeffrey go to great lengths to try to protect his ex-wife from herself. Apparently, nobody has fact-checked these outrageous claims with any evidence nor tried applying some good old-fashioned common sense.

86. Jeffrey's emails, texts, and letters are always quite lengthy, which is a manifestation of his disability.

87. He wrote a 30-page letter²² to his pastor and both of their counselors to lay all his cards on the table—before they were even married. His ex-wife knew that about him before she ever said "I do," and she accepted both his strengths and weaknesses for a total of fifteen years.

88. I read the emails and texts which are filed with her PO petition,²³ which are still in the court records, and, yes, they are lengthy, but there is nothing wrong with that. Some of them are even angry, but that seems logical since Jeffrey's ex-wife literally quit paying their mortgage

²¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1435-1444

²² https://rico.jeffenton.com/evidence/2005-02-09_thirty-page-letter-before-marriage.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-31, PageID.1810-1811)

²³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.655-678

payments and secretly filed for bankruptcy²⁴ without even telling Jeffrey.²⁵

89. I have not seen any evidence regarding the claims against Jeffrey with respect to his ex-wife's employer.

90. As for "*deliberate non-cooperation*", that is another lie²⁶ and must be part of attorney Story's fairy tale that Jeffrey was willing to give his house away and go live in the woods without his ex-wife signing her promise to pay him the alimony which they had agreed upon.²⁷

91. On information and belief, it appears to me that nobody questions statements made or presented by an attorney who has a personal relationship with a judge in Tennessee. The lies which were told in Jeffrey's case were written in the court records as if matters of fact. These lies have been accepted as the truth. Despite the fact that they are actually false.

92. As for the last statement, "*I have filed for bankruptcy to preserve my finances,*" that is *wildly* ludicrous, makes no logical sense whatsoever, and is another lie.²⁸

93. It is plain to me that Jeffrey's ex-wife filed bankruptcy to force the sale of the marital residence²⁹ because the financing was in her name and she wanted Jeffrey out of it, but she had no legal right to force Jeffrey out because he was a tenancy by the entirety³⁰ co-owner.³¹

²⁴ https://rico.jeffenton.com/evidence/2019-04-26_wifes-ch13-petition-3-19-bk-02693.pdf

²⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1760-1761

²⁶ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.661

²⁷ https://rico.jeffenton.com/evidence/2019-01-28_verbal-agreement-needed-in-writing-for-closing.pdf

²⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.661

²⁹ https://rico.jeffenton.com/evidence/2018-10-09_wife-does-not-want-to-keep-marital-residence.pdf

³⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.541-542

³¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1416-1430

94. Jeffrey was in possession of the marital residence³² at the time of the proceedings in Tennessee, because his ex-wife chose to move out earlier and had rented an apartment for herself.

95. Jeffrey had his life's savings invested into the property plus about eight years of hard earned "sweat equity," whereby improvements to the marital residence³³ were Jeffrey's primary investment in life as well as his most significant contribution to their family for much of that time.

96. In contrast, Jeffrey's ex-wife's primary investment during that same time frame was in building her career in architecture, through which she almost doubled her vocational value and potential.

97. After my son's legal battles in Tennessee, he was left penniless. He received nothing from his home and lost about \$10,000 worth of personal property, his retirement, and his future earning potential—perhaps the only person in U.S. history to lose that much in a divorce, disregarding any legal expenses. Such a result could only occur if the law was not followed.

98. Jeffrey always said that his ex-wife had a 775-835 credit score throughout most of their marriage. It makes no sense that "fil[ing] for bankruptcy" would help "preserve [her] finances." My brain tells me that filing for bankruptcy *destroys* a person's finances, along with their credit score.

99. I have attached real evidence,³⁴ which hopefully someone will consider, that

³² https://rico.jeffenton.com/evidence/2019-06-11_plaintiff-transferred-utilities.pdf

³³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.507-510

³⁴ https://rico.jeffenton.com/evidence/2021-01-26_trustees-final-account-and-distribution-report.pdf

Jeffrey's ex-wife never really "needed" to file for bankruptcy. I could not believe this when I saw it.

100. Near the end of Jeffrey's ex-wife's bankruptcy, a document called the "Trustee's Final Account and Distribution Report"³⁵ was filed, which Jeffrey found as he learned about the bankruptcy laws and sifted through the court records in search of a clue. He pointed me to this part of it:

101. Claims Discharged Without Payment: \$55,593.59.³⁶

102. I didn't know that it was legal to file for bankruptcy with such a small percentage of debt compared to annual income.

103. Jeffrey's ex-wife made about a hundred thousand dollars per year.³⁷ I can't even imagine how much she has paid in legal fees. Jeffrey paid \$9,500. I know this since it was mostly my money. Jeffrey still has an outstanding bill of approximately another \$10,000 for being represented in only one hearing. Less than one month of quasi representation and Jeffrey's legal fees were upwards of \$20,000. I wouldn't be surprised if his ex-wife's legal fees were close to \$100,000.

104. Jeffrey and his ex-wife lost approximately \$250k³⁸ in cash they had invested into their marital residence as of the day that it was "sold" due to the forced auction, so that probably totals \$225,000 in her losses.....to save just \$55,600 in alleged bankruptcy relief. Such a notion is

³⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-34, PageID.1883-1890

³⁶ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-34, PageID.1883-1890

³⁷ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1444

³⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.501-506

preposterous! Does anybody fact-check any of the crazy claims in Jeffrey's ex-wife's bankruptcy? That is fraud.

105. No question should remain that Jeffrey's ex-wife used her bad choices and blamed them on Jeffrey—that it was his fault that she essentially threw away roughly \$350,000 worth of their family's money to save \$55,600.

106. Jeffrey's ex-wife clearly did not “file[] for bankruptcy to preserve [her] finances” or to protect herself from my son. Anyone with a little bit of common sense and the most rudimentary math skills can figure that out.

107. I must mention that Jeffrey's ex-wife has been very unstable throughout her menopause.³⁹ As a nurse, I know that can happen. She has an extreme sleep disorder (narcolepsy), requiring heavy sedation. She has to take her medication to be able to sleep and again in the middle of the night.

108. I believe that because of her challenging health condition, she would have made an easy victim for a team with a lawyer, a judge, and an auctioneer who were colluding.

109. It has been noted in the news that Jeffrey's ex-wife's lawyer and the judge who presided over the divorce attended parties together⁴⁰ and family vacations hosted by her attorney.⁴¹

110. It seems amazing how quickly their house was auctioned, without any apparent signs on the street.

³⁹ https://rico.jeffenton.com/evidence/2019-02-05_narcolepsy-menopause-and-stalking-not.pdf

⁴⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-14, PageID.597 ~ ECF No. 1-15, PageID.620

⁴¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-15, PageID.621-626

111. I'd never seen any advertising whatsoever.

112. Jeffrey said the auctioneers charged them an extra \$5,000 or \$6,000 for advertising, but he told me he never saw anything other than a brochure made on the computer.

113. The house miraculously sold for exactly what was owed on the mortgages, plus the auctioneer's fees and the closing costs.....and a few months later their home sold for a couple hundred thousand dollars more.⁴²

114. That seems like wrongful enrichment to me and a nefarious form of conversion.

115. The next sentence in the unsigned statement filed with the petition for the PO states, "Upon finding out about the bankruptcy petition, Jeff became enraged and his incessant texts and e-mails have been upsetting and vindictive."

116. At this point, refuting each sentence one at a time, when I haven't seen a single sentence of truth throughout, the burden of proof should be reversed, with due diligence required of Jeffrey's ex-wife and her counsel to prove with some real evidence if they want to pretend that any of this is true, honest, or written and filed with the court in good faith, for a genuine pursuit of justice.

117. Lots of "texts and e-mails" sounds like Jeffrey. But those texts and emails his ex-wife is talking about are attached to the trial courts records. I read them, and, though there are understandably a few angry messages, there is nothing where Jeffrey has ever threatened to harm his ex-wife.

⁴² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.501-506

118. Clearly, Jeffrey's ex-wife and her attorneys have lost credibility entirely and unrestrained wrongdoing has been rampant, whereas Jeffrey has been denied all due process or even being heard.

119. Because of the defendants, Jeffrey has been tortured and abused for four years, not even able to work because of the fraudulent default PO from almost 600 miles away. It is plainly apparent the sort of lies the PO was based upon.

120. The unsigned statement filed with the petition for the PO declares, "*I am fearful that he will actually show up at my work, as he has done so in the past.*" The statement conveniently leaves out the fact that Jeffrey actually used to work for his ex-wife's boss previously. However, he has never confronted her at her work or even at her apartment, so it looks as though they are trying to fraudulently insinuate he would.

121. I have never known Jeffrey to be physically confrontational. He just writes profusely with lots of strong words but nothing threatening, which is his first amendment right.

122. Jeffrey told me that his ex-wife wanted to remain friends⁴³ after the divorce, which is why I paid for their counseling session together on January 22, 2019.

123. Jeffrey's ex-wife was a totally different person before her attorneys hijacked their marriage with a fraudulent narrative.

124. The unsigned statement says, "*At this point all of his communication to me is not consensual and I have relayed this to Jeff multiple times.*" I'm going to state the obvious: just **block**

⁴³ https://rico.jeffenton.com/evidence/2019-01-22_wifes-birthday-and-counseling-together.pdf

the emails! I think Jeffrey's ex-wife may have been collecting them to use against him for the PO so she could sacrifice their home and that she was coached to get a PO in any way possible so her team could get leverage and force the bankruptcy without notifying or including him.

125. The unsigned statement says, "*Jeff is a licensed gun carrier and has many weapons, and I am in fear of what he may do to me if this continues.*" This may sound convincing for some, but it is lie stacked on top of lie, stacked on top of lie, with a long text or email to "substantiate it," particularly considering his ex-wife's credentials with firearms and self-defense training.⁴⁴

126. Jeffrey has filed the truth in court records everywhere in which the pictures alone testify as to how absolutely ridiculous this is. See ECF No. 1-31, PageID.1794 ~ ECF No. 1-33, PageID.1873 in this federal case. Please pay especially close attention to ECF No. 1-31, PageID.1814 ~ ECF No. 1-32, PageID.1836.

127. I was made aware that when Jeffrey showed those pages to Judge Binkley, expecting that attorney Story had betrayed their friendship by "gaming the court," Jeffrey expected that Judge Binkley was going to be furious at attorney Story along with his ex-wife, and honestly thought that Judge Binkley would rise to vindicate Jeffrey from the absurdly abusive and harassing "narrative" which attorney Story had fraudulently crafted and executed in his case.

128. Instead of defending Jeffrey and getting angry with Attorney Story, the reverse happened. He accepted her lies and lost patience with Jeffrey, which was a telltale moment for Jeffrey he told me.

⁴⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-31, PageID.1814 ~ ECF No. 1-32, PageID.1836

129. Shortly thereafter, Judge Binkley ordered horrifically harsh and punitive judgments, in alliance with attorney Story, based upon her same “fraudulent narrative”. Jeffrey had provided both the court and Judge Binkley 250+/- pages⁴⁵ of sworn testimony and clear evidence including photographs that every action levied against him was substantially fraudulent. Yet Judge Binkley chose to not only stand against what was true, honest, and just, but instead he lashed out to further harm Jeffrey, beyond everything already done to him. That was the moment Jeffrey admitted to me that he was forced to concede that Judge Binkley was corrupt. Judge Binkley did not get “gamed” by attorney Story as Jeffrey initially believed. Instead, Judge Binkley helped attorney Story “game the outcome.”

130. Jeffrey assured me he provided an overwhelming amount truth during his August 29, 2019, hearing in chancery court and says that he saw Judge Binkley physically exit the courtroom and walk to the Clerk and Master’s Office to retrieve Jeffrey’s exhaustive filing and carry the stack of documents back to the courtroom.

131. Yet apparently Judge Binkley has never given Jeffrey the benefit of one single word of his clear and obvious testimony, which merely required an honest and decent person to look at the pictures while granting Jeffrey the benefit of what was plainly obvious “common sense.” By all accounts, it appears that Judge Binkley simply refused despite the obvious truth.

132. Jeffrey told me that he has told attorney Story and the Tennessee Court of Appeals repeatedly that he cannot even get a job or obtain the most rudimentary “work from home” to try

⁴⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038

to support himself or help with his expenses because of how they have fraudulently assaulted his constitutional civil liberties as a U.S. citizen.

133. I do not know the true motives for keeping a PO on my son after his property had been seized and he was forced to relocate 600 miles away in Michigan, except possibly: to threaten his life, safety, and freedom; to extort his silence about their misconduct; simply as ADA interference with no logical motive other than to cruelly harm him even more; or possibly for ever attempting to challenge them and stand up for his most basic human rights, as a citizen of this nation, due no less than the same respect and rights due to both of them.

134. Jeffrey assured me he believes that Judge Binkley and attorney Story both intentionally committed “fraud on the court, by members of the court”, spanning from the chancery court throughout the fraudulent bankruptcy filing, where the Federal Rules of Bankruptcy Procedure along with multiple bankruptcy laws were intentionally ignored, violated, or fraudulently circumvented by leveraging Judge Binkley’s courtroom. Jeffrey informed me that he believes they both intentionally worked together against the interests of justice.

135. Jeffrey admits that was the moment when he could no longer deny the fact that Judge Binkley was willfully conspiring with attorney Story to fraudulently deprive Jeffrey of his rights and his property under the color of law.

136. I could have never gotten a PO against my actual physically abusive ex-husband with such unsubstantiated claims.

137. The unsigned statement filed with the petition for the PO declares, “Jeff refers to himself as a part of the ‘extraction team’ and lives a very paranoid life. He installed extensive home

monitoring at our marital residence including surveillance videos and audio recording systems.”

138. I know for a fact that Jeffrey’s ex-wife bought and installed the home alarm system and cameras with Jeffrey years earlier. The statement makes it sound like a new development and again does everything to try to sensationalize Jeffrey’s lifestyle, but at the end of the day, it is fraud stacked on top of fraud.

139. Jeffrey has told me about using their surveillance system to watch wildlife in their yard, as deer walked through the yard almost daily and often slept there as did many other animals. Their property was surrounded on both sides by hundreds of acres of protected woodlands, including Owl’s Hill Nature Sanctuary.

140. Now, for the craziest unfounded claim in the unsigned personal statement, it states, “Jeff refers to himself as a part of the ‘extraction team’.”

141. I have never heard my son say that term before he read it in his ex-wife’s court filings. Since then, I have only heard it a couple of times, when he was specifically referring to or communicating about those filings.

142. Jeffrey told me that when he first read that claim on the unsigned personal statement, it was so outrageous and out of character he burst out laughing. It sounds a lot like the *A-Team* from the 80s. But no, Jeffrey making the aforementioned reference to himself is a lie.

143. I can only assume that one of Jeffrey’s ex-wife’s attorneys thought this would be a nice flare to add some drama to the rest of her made-for-TV bologna they filed.

144. Overall, the unsigned personal statement is nothing less than absurd and contains far more lies and fraud than any possible probative value.

145. How is Jeffrey supposed to have the slightest chance correcting all of the lies, when the lies are literally the primary substance of almost each and every sentence written throughout, yet he has been blocked at every turn? There must be an atrocious number of ethical and conduct violations, but somebody needs to know, hear, and act upon the truth. This is horrifically criminal.

146. Finally, regarding the unsigned personal statement and the claim regarding Jeffrey “causing [his ex-wife] issues with [her] employer and clients at work,” that is nonsense, because her “bankruptcy” and the subsequent “divorce” were strategically timed for when it was known for over a year in advance that his ex-wife’s boss was planning to retire⁴⁶ when his office lease expired and he would close down their firm.⁴⁷ Obviously, there would be no “issues” with any “employer” or “clients” then. This is confirmed in a letter provided in court by attorney Story⁴⁸ on August 1, 2019, which plainly states that Jeffrey’s ex-wife’s employer is downsizing and cutting back to retire and close their firm in a couple of months.

147. So why has this charade persisted without cross examination or allowing Jeffrey to even be heard, particularly when there are so many obvious lies Jeffrey has repeatedly proved?

148. I don’t see a shred of evidence that shows Jeffrey has acted inappropriately regarding their marriage or divorce proceeding or done anything unusual other than writing long and frequent (non-threatening) emails and texts, which was all a given fifteen years prior.

149. This nonsense simply fails to pass the “smell test,” and I honestly hope that

⁴⁶ https://rico.jefffenton.com/evidence/2019-08-14_bankrupcy-planned-for-when-employer-retires.pdf

⁴⁷ https://rico.jefffenton.com/evidence/2019-08-14_bankrupcy-planned-for-when-employer-retires.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.765)

⁴⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.765

someone will look past the fraud to discover and discern the truth for once.

150. I believe I am starting to see why Jeffrey has such a tough time telling his story: because there is layer upon layer of ceaseless fraud.

151. On June 16, 2019, in one of his lengthy e-mails, Jeffrey stated, “I wish we would have had an asteroid fall on our home and kill us (or at least me), the day before I discovered your plans to divorce me.”

152. Jeffrey said that attorney Story and Judge Binkley acted as though this were some plausible “disturbing threat”—as if Jeffrey is capable of hurling asteroids at people.

153. I have not known Jeffrey to state that he would or wanted to throw any asteroids to kill people, and I would further question the sanity or the motives of anyone alleging that this was a real “threat.”

154. This was clearly a cry of desperation. Jeffrey wished he could have simply passed peacefully at home in his sleep, with his family around him before he woke-up to learn that the person he loves the most in his life chose to betray him and destroy his property, his person, and his freedom.

155. In that same email that is being cited above with Jeffrey wishing the pain would stop, the other 95 percent of it—which the court chose to ignore—was actually sweet and sorrowful, not angry or threatening; however, the most dramatic part was cherry-picked.⁴⁹

156. I have read the email. Jeffrey stated in it: “You break my heart! You absolutely

⁴⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.673-675

refuse to share anything with me,” and, “Regarding the house, I understand that you included both BCS and BOA in your list of creditors, and that they both plan to come to your hearing, but I’m unclear if you are trying to forfeit the house or retain the house through your bankruptcy? Are the first and second mortgage payments current? Is there anything which I need to be concerned about here?”

157. Jeffrey also stated in this email: “Mostly I’m not angry about this, I’m just confused...and heartbroken, that all of this could happen and you never even bothered to mention it to me. That you think that little of me. I won’t try to use any of this against you or interfere in any way. I’m just sad!”

158. I don’t know very many people who could be so clearly and severely betrayed by a gang of powerful people helping the person he loves the most betray him while handling it as gracefully as my son—who didn’t threaten anyone.

159. Why is a fraudulent portrayal about the final paragraph of a three-page letter the only part which has been acknowledged by the court instead of it having accepted, evaluated, and averaged the primary substance throughout this documented communication? Possibly because that would have failed to yield the desired results.

160. I thought that courts were prohibited from executing predetermined conclusions while only exploring or acknowledging testimonies or evidence which would support only the desired, predetermined outcome.

161. This is an obvious, obscene, miscarriage of justice, and my son has mountains of evidence documenting almost all, if not every phase, of it.

162. It is my understanding that despite the actions by the chancery court, it could no more lawfully seize and force the sale of my son's property without due process than the bankruptcy court could, yet that is exactly what happened.

163. The very minimum for either court to have satisfied the lowest threshold of due process prior to the forced deprivation of my son's critical and essential property interests, including his sole stream of income during that emergency, would have been for him to have been provided with a realistic and viable opportunity to save his property or mitigate his losses in it prior to forced deprivation.

164. However, he was specifically forbidden from doing so by the court and opposing counsel. I know this because I offered to loan Jeffrey the money to cure the defaulted mortgages and preventing them from defaulting again. Yet that was not enough to satisfy Ms. Story in court on August 1, 2019.

165. Prior to the hearing on August 1, 2019, in chancery court, Jeffrey told me that when he told his attorneys he could borrow the money from me to bring and keep his mortgages current, attorney Story overheard him and answered him directly, stating to the effect, "No, it is already too far along in the bankruptcy."

166. Jeffrey was intentionally omitted from notice⁵⁰ by both the bankruptcy court and their mortgage companies. He never had a chance. I believe that they already had plans for his home. Clearly he was provided no opportunity to save his property.

⁵⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1760-1761

167. My son constantly defends his ex-wife and does everything he can to try to protect her, even from the potential consequences of the crimes she participated in against him.

168. Jeffrey has requested immunity⁵¹ for his ex-wife from the FBI⁵² and the DOJ/USTP⁵³ while he has tried repeatedly to hold the powerful members of the court accountable for their crimes against their family.

169. I believe that Jeffrey's ex-wife and her attorneys intentionally had her default upon their mortgage payments without ever even telling my son. This set the stage for the whole bankruptcy fraud and divorce assassination levied against my son, yet attorney Story has the nerve to pretend that *my son* is the monster.

170. I've always trusted our government, the police, and the legal system. But underlying events are simply wrong on so many levels—without one good faith action to substantiate anything that has been done to harm my son.

171. I don't understand how the state of Tennessee could have gotten it so wrong for so long, while refusing to even once hear my son's testimony and consider it before his fate was determined.

172. This has been the closest thing to terrorism which I have experienced in my life.

173. I went to Tennessee with Jeffrey to help him pack and move what he could carry

⁵¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1682-1684

⁵² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1704-1707
Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1771-1775

⁵³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1758-1761

back to Michigan. Several big-ticket items in his home had been stolen⁵⁴, including a 1,200 lb. custom gun safe.

174. I'm reasonably sure that someone must know where the safe went because there are very few companies in town who are even qualified to transport such an extremely heavy object. Yet Jeffrey tells me that nobody will tell him.

175. It was both heartbreaking and terrifying to be at my son's home for the last time. We quickly tried to pack up what they had left him while being stalked and harassed almost non-stop by the attorney and one of the auctioneers that Ms. Story had spy on us.⁵⁵

176. I always enjoyed my visits to Jeffrey's home but not that time. It was like being at his funeral.

177. At one point, auctioneer Tommy Anderson snuck into Jeffrey's back yard whereupon he went onto his rear deck and beat on the glass back doors of the home, which startled me because I never anticipated anyone to be at the back door.

178. We couldn't get cell phone reception at Jeffrey's marital residence because all the internet equipment had been disconnected, and their home was nestled deep inside a little valley between two massive hills, which disrupted cell phone and TV reception.

179. We didn't learn until we left his home with the U-Haul that both Ms. Story and auctioneer Tommy Anderson had been harassing, stalking, spying on, and even threatening Jeffrey

⁵⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.559-562

⁵⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-16, PageID.630-635

repeatedly.⁵⁶

180. An email sent to Jeffrey from auctioneer Tommy Anderson on October 6th, 2019, stated⁵⁷, “Jeff my friend, I will be coming by today after my son’s bball game. I hope to see you gone by then, or other measures, not to your liking will be enforced. Time to move on. Tommy Anderson.”

181. That is clearly using threats of physical intimidation to scare us out of Jeffrey’s home, but Jeffrey tells me this was just a shadow of the types of harassment, coercion, and legal bullying he had to endure by Judge Binkley, attorney Story, the auctioneers, and others.

182. I am not aware of any legitimate need for us to be rushed and bullied so much. Jeffrey said that the sale of his property didn’t close for a few more weeks⁵⁸.

183. So, when Tommy Anderson arrived pounding on Jeffrey’s back door, we were not at all expecting him. It wasn’t until we pulled out of Jeffrey’s driveway later that evening, that Jeffrey received a volley of angry and threatening emails.⁵⁹

184. I saw several threatening messages from attorney Story and the auctioneer on Jeffrey’s cell phone after we left his house that day.

185. Honestly, I was afraid to even take a nap while at Jeffrey’s home. Attorney Story had Jeffrey evicted from his own home by four sheriff’s deputies as if he was a dangerous felon. It was *so* scary.

⁵⁶ <https://rico.jefffenton.com/evidence/2019-10-06-harassing-threatening-stalking-spying.pdf>

⁵⁷ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-16, PageID.633

⁵⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-16, PageID.635

⁵⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-16, PageID.630-635

186. Even after Jeffrey and I were back in Michigan, I kept my front drapes closed and no longer answer the door.⁶⁰ If a siren goes by, I cringe. When I do leave home, I always check my driveway upon my return for a police car before I enter. I have a plan of where to go if one is in there.

187. After four years of being my son's proofreader, this is like a never-ending nightmare that began as a crime and was transformed into abusive cruelty.

188. I don't understand how anybody can treat people this way, especially short of a criminal charge and full due process of law.

189. I certainly don't understand how a real judge could have anything to do with the crimes that I have witnessed.

190. Jeffrey paid the auctioneers a lot of money for literally discarding his home for exactly what was owed on the mortgages plus the real estate and closing fees without him ever receiving one penny from it.⁶¹

191. Not by any choice of his own either, he was forced against his will by the Chancery Court.

192. Adding insult to injury after taking my sons home, the people who made a small fortune on it were disrespectful and threatened him. I've never seen anything like it and hope that I never do again. I was terrified.

193. A few months after Jeffrey's home was discarded for roughly fifty cents on the

⁶⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1762-1765

⁶¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.557-558

dollar, it was listed back on the market for a few hundred thousand dollars above the auctioned “selling” price. It was almost like a gang deed—but done by powerful attorneys and judges.

194. To me it seems as if the truth and the law meant nothing to the court.

195. I thought that the whole purpose of courts was to hear both sides, to then determine the truth, and finally to apply the law to the truth; however, this certainly never happened with my son.

196. Jeffrey is vocationally challenged/disabled and has been left unable to earn a living due to the court.

197. My son has never been a criminal or in any trouble with the law. If anybody looked at the evidence in his case and actually allowed him to testify and be heard, they would know that.

198. On information and belief, nothing in Jeffrey’s case in Tennessee was based upon the truth and law.

199. It is ridiculous how the responsible people have and continue to leverage a PO to oppress my son for four years with two more still to go—if it doesn’t get extended once again.

200. My son would never harm his ex-wife, and I’ve never seen her afraid of anyone.

201. I’ve never seen my son be rough with his ex-wife in any way.

202. I’ve never heard Jeffrey’s ex-wife talk bad about my son and don’t understand what happened to her or who put her up to what she did. Both of their lives appear to have been destroyed as a result.

203. Incidentally, their marital residence, which the court forcefully took and liquidated

for a little over \$320,000 is now worth approximately \$900,000.⁶² Because of its location,⁶³ it has appreciated by roughly a hundred thousand dollars per year for the past four consecutive years.

204. One of Jeffrey's ex-wife's favorite sayings used to be, "that is what the FBI calls a clue!" Perhaps the motive was to acquire the home because of its location. Stealing homes is nothing new. The Countrywide fraud back in the early 2000s helped the company steal many homes, but just because it is common doesn't make it right.....or legal.

205. Jeffrey told me he wants to do whatever he can to help promote a sensible system of transparency and accountability within the Tennessee court system while helping to protect the interests of the less fortunate. Using his case as evidence, which is direly needed. Proving that the risk to the public of not making such commonsense improvements to the judiciary within the state is far beyond the tolerance of civilized society.

206. I hope that this court will finally help my son see justice and set him free from official oppression so that he can begin trying to move forward and rebuilding his life before I am gone. He truly has no means to survive on his own and provide for himself in the simplest way because of an unconscionable horde working fraudulently to execute their own form of "justice"—all under color of law.

207. I would like to take this opportunity to stress one final point in this testimony, which I don't believe is possible to overstate in this case. This declaration took me a few days to write and edit, but the facts mentioned herein are provided largely to correct the lies contained in a mere

⁶² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.485

⁶³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.494-500

1 ¼ pages of the documentation⁶⁴ filed in chancery court (docket #48419B) against my son.

208. As far as I know, this almost all ties to some lie which was told in the unsigned personal statement that was used to lay the groundwork for the almost exclusively fraudulent narrative, which was then leveraged unconscionably as the foundational basis of my son's entire case; however, both the truth and the facts have been strategically ignored.

209. In my opinion, the foregoing is the biggest reason why my son has not seen justice and why the truth is virtually unbelievable. My son is not fighting just one or two lies, but the entire acclaimed basis of his case, from what I can see, has no foundation in either fact or law. It is simply fantasy, and it portrays my son falsely as a monster.

210. I can see that Jeffrey is so incredibly overwhelmed needing to tell so much truth, but every court he has turned to so far has refused to even entertain the idea that multiple members of the court could intentionally act so reprehensibly. However, the facts are all here and have been on court record since August 29, 2019. Courts have acted as RICO organizations previously. The Operation Greylord case is a classic example.

211. Jeffrey told me that he told the Court of Appeals that he needed them to fact-check specific discrepancies⁶⁵ between his two transcripts⁶⁶ of evidence because without seeing the foul play with their own eyes, honestly, the lies are more plausible than the truth with this illusion they

⁶⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-31, PageID.1805-1806

⁶⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-35, PageID.1925 ~ ECF No. 1-36, PageID.2006

⁶⁶ https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf
https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

have fabricated.

212. So many powerful and prominent members of the court worked together in what appears to be horrible faith to commit what seems to have been multiple serious felonies⁶⁷ against my son. But nobody is willing to give my son the benefit of the doubt long enough to even hear and weigh his testimony. That is awfully unfair and unconstitutional.

213. It is bad enough that so many people working in what are considered positions of “public trust” appear to have ganged up on my son and acted so poorly, but to then put help and a cure out of reach for him, that is injustice stacked upon injustice.

214. I wrote a previous affidavit/declaration⁶⁸ on 10/13/2020, which Jeffrey filed in the Tennessee Court of Appeals and also provides valuable testimony in this case; however, I think it was completely ignored because the court never contacted me in regard to it, nor did they help my son.

215. There is one other very serious concern, which I know that Jeffrey has tried to bring to numerous parties attention throughout the Tennessee court system, including the Tennessee Court of Appeals,⁶⁹ the Tennessee Supreme Court,⁷⁰ as well as the Administrative Office of the Courts⁷¹ and the Board of Professional Responsibility,⁷² that is the clear difference between what

⁶⁷ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-34, PageID.1874-1924

⁶⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-2, PageID.49-53

⁶⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1704-1707

⁷⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1665 ~ ECF No. 1-30, PageID.1792

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1370 ~ ECF No. 1-28, PageID.1664

⁷¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1704-1707

⁷² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1698-1715

was said during Jeffrey's 8/1/2019 hearing (when he had counsel) and what was said during his 8/29/2019 *pro se* hearing in Chancery Court, when he could no longer afford counsel to protect him.⁷³

216. By comparing both the 8/1/2019⁷⁴ and the 8/29/2019⁷⁵ transcripts of evidence, while also listening to the recorded audio⁷⁶ from the 9/29/2019 hearing, which Jeffrey recorded in court with Judge Binkley's permission in advance.

217. To start, on 8/29 attorney Story demanded that Jeffrey be evicted from his home, that he be escorted out by the sheriff's office, and that he not be allowed to take any of his personal property with him. Oddly, I can't see where any of this was mentioned on his transcripts from his 8/1/2019 hearing,⁷⁷ while he still had counsel to help protect him.

218. On page 6 of the transcript⁷⁸, attorney Story stated: "So he's got to be out for them to get this place ready to go.... I would like the Order to reflect that the Williamson County sheriff's department will accompany him.... Off the property. And I don't think he needs to take any property."

219. On pages 7-8 of the transcript⁷⁹, attorney Story stated: "If he will tag the items that he wants, like my client tagged the items per your order, if he'll just put a tag on items he wants,

⁷³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-35, PageID.1925 ~ ECF No. 1-36, PageID.2006

⁷⁴ https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf

⁷⁵ https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf

⁷⁶ https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

⁷⁷ https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf

⁷⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1160

⁷⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1161-1162

we'll make sure that those get stored, and then we can use the proceeds from the sale. We're going to deposit those into the clerk's office. And we can use those to pay the next storage unit and then when he gets ready to come here and get his things, or maybe he wants to use some of his proceeds to have them shipped to him since he..."

220. On page 8 of the transcript⁸⁰, attorney went on to say: "So I'm trying my best to be as accommodating to him and considering his condition that, you know, this is going to be a simple process for him. He can take his clothes, his personal property, be out September 3rd. We will tag everything, take care of it. Mr. Anderson is not going to destroy property. That's all I'm asking for."

221. Unfortunately, as soon as Jeffrey was no longer within the State of Tennessee, I can't see where they kept any of their promises from court on 8/29/2019.

222. On September 16th, 2019 Ms. Story sent Jeffrey a letter⁸¹ demanding that he immediately send her \$2,000 for storage, while in court on 8/29 she said that they would use the proceeds from the sale of his home.

223. On September 26th, 2019, Attorney Story sent Jeffrey a letter⁸² demanding \$3,534 no later than October 2nd. In that same letter Attorney Story stated, "At this point, it is our position that moving the items to Michigan **is not financially responsible...** We will go ahead and file a Motion with the Court **to sell or otherwise get rid of** all remaining items in the home **in the event**

⁸⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1162

⁸¹ https://rico.jefffenton.com/evidence/2019-09-16_story-letter-demanding-two-grand-for-storage.pdf

⁸² https://rico.jefffenton.com/evidence/2019-09-26_story-letter-demanding-thirty-five-hundred.pdf

that you do not agree to pay the cost for packing, moving, and storing the items that you wish to retain.”

224. Again, to reiterate, on pages 7-8 of the transcript⁸³, attorney Story stated: “If he will tag the items that he wants, like my client tagged the items per your order, if he’ll just put a tag on items he wants, we’ll make sure that those get stored, and then we can use the proceeds from the sale. We’re going to deposit those into the clerk’s office. And we can use those to pay the next storage unit and then when he gets ready to come here and get his things, or maybe he wants to use some of his proceeds to have them shipped to him since he...”

225. Everything changed once Jeffrey no longer physically resided within the State of Tennessee any longer. None of this was within Jeffrey’s control.

226. They knew they had run him off without a penny to his name. While any money he could have produced for payment would have come directly out of my bank account.

227. They forced him to leave his personal property behind in court on 8/29/2019, promising to take care of it, then after he was gone (as ordered), they changed their mind(s) and claimed that it was **“not financially responsible”** to keep his personal property and move it to the State of Michigan, as he had planned and previously attempted, but was denied in court.

228. That is horribly unfair and appears to have all been done in awful faith.

229. On page 24 of that transcript⁸⁴, Ms. Story stated: “Since he probably will be moving to Michigan, I would be amenable to him attending the final hearing by telephone if he doesn’t want

⁸³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1161-1162

⁸⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1178

to drive back. And I can tell you, I will try to accommodate him in any way I can.”

230. On information and belief, shown on the transcripts of evidence from the 8/29/2019 hearing in chancery court, attorney Story demanded that Jeffrey be forcefully evicted from his home by the Williamson County Sheriff’s Office, with just a five-day notice, without allowing him to take any of his personal property, not even his bed.

231. On information and belief, it is clear by reading the transcripts that both attorney Story and Judge Binkley were well aware that once they evicted Jeffrey from his home, he had no place where he could stay in Middle Tennessee, and he would be forced to relocate to Michigan to stay with me.

232. On information and belief, Jeffrey showed me an affidavit filed by attorney Story⁸⁵ on October 21st, 2019, which apparently Judge Binkley used as the basis by which to order the default judgments against Jeffrey.

233. Here is what Attorney Story’s 10/21/2019 affidavit⁸⁶ stated:

- I am over 18 years of age and have personal knowledge of the following facts.
- At the August 29, 20 19 hearing in this matter, the Court set this matter for final hearing on October 21, 2019 in open Court with Mr. Jeffrey Fenton present in the courtroom.
- Since the August 29, 2019 hearing, Mr. Fenton relocated to Michigan.
- In his handwritten note, he stated that he does not want to contest the divorce and

⁸⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1986

⁸⁶ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1986

that he does not wish to communicate with Virginia Story or anyone from her firm, ever again. He states that he will never be in Tennessee again.

234. I believe that what this affidavit⁸⁷ failed to state, which my son wrote in his “handwritten note” left at his residence for Ms. Fenton, is at least as important as what Ms. Story disclosed in this affidavit.

235. Both parts were critical and essential for a tribunal to make a truly informed decision.

236. Jeffrey’s “handwritten note” is recorded in the Chancery Court technical records, in docket #48419B, volume 3, pages 412-415⁸⁸, while Attorney Story’s affidavit is recorded directly preceding at page 411.⁸⁹

237. I’m unsure why judge Binkley would have allowed her only to disclose the “cherry picked” parts.

238. Here are the pertinent unedited statements written by Jeffrey in his “handwritten note” left for Ms. Fenton at their marital residence⁹⁰:

➤ I am so sorry things ended this way, but I can never speak with you again. To protect my heart, not out of anger or resentment.⁹¹

⁸⁷ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1069

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1986

⁸⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1070-1073

⁸⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1069

⁹⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1070-1073

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1987-1991

⁹¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1071

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1989

- I will never communicate with Virginia Story or anyone from her firm, ever again. Regardless of the consequences.⁹²
- **IF she will drop all charges and never contact me again**, then I will likewise drop my 250 page counter motion set for October 21st.⁹³
- I will mail you the free simple divorce papers signed – and as long as no lawyers are involved, we each walk with what we have, assets + debts, and no alimony etc... due to either ever. **Only if we finish non-contested together, without a lawyer, as we promised each other.**⁹⁴
- I would and will never hurt you or those you love in any way. Despite what they cost me.⁹⁵
- I will always love you! I leave only with tremendous sadness, nothing more.⁹⁶
- If Ms. Story tries to use any of this against me, I will dedicate my life to fighting and appeal this to State Court, where the sale of our home will be found and proven to be against state laws.⁹⁷

⁹² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1071

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1989

⁹³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1071

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1989

⁹⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1071-1072

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1989-1990

⁹⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1072

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1990

⁹⁶ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1072

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1990

⁹⁷ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1072

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1990

- If I never hear from Ms. Story or her staff or court, then I'm done, and I surrender all.⁹⁸
- I will always love you!⁹⁹
- I'm so sorry!¹⁰⁰
- Please don't sell or discard any of this [pile of gifts left for Fawn], it was all worth more than money or it wouldn't be sitting here.¹⁰¹
- It is my kiss on the cheek goodbye! Please kiss and hug my puppy for me.¹⁰²
- Non-Contested, No Joint Assets or Debts, Divorce papers to be mailed to you within 2 weeks. It might take me a week to get to MI and unload this crap.¹⁰³
- I will never be in Tennessee again. You never have ANYTHING to fear from me!¹⁰⁴
- Goodbye Fawn! Love, J.F.¹⁰⁵

⁹⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1072

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1990

⁹⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1072

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1990

¹⁰⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1072

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1990

¹⁰¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1073

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1991

¹⁰² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1073

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1991

¹⁰³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1073

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1991

¹⁰⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1073

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1991

¹⁰⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1073

239. From what I can see, they took all of the benefit of Jeffrey's generous **proposal/offer** to his ex-wife, without any of his clearly stated conditions.

240. I can personally attest to the fact that it was never Jeffrey's intention to have this case continue to move forward without him being provided an opportunity to be heard or defend himself.

241. I can personally attest to the fact that this handwritten note never communicated any such offer, proposal, statement, or suggestion.

242. I can personally attest to the fact that Jeffrey was simply trying to mitigate damages for both him and Ms. Fenton, by ending the contested litigation and obtaining a final divorce decree amicably by Jeffrey and Ms. Fenton filing for an uncontested divorce, using the State of Tennessee's free divorce forms¹⁰⁶ for litigants without any children, without any joint assets or debts remaining, as they had previously promised each other.

243. I can personally attest that Jeffrey still believed that they had at least a year of litigation ahead for the contested divorce (they had not even begun discovery yet), based upon the estimate of taking between a year to a year and a half for a fully contested divorce in Williamson County, per what Jeffrey was told by Ms. Fenton during their first divorce action in docket #47426.

244. I can personally attest that Jeffrey did not at all understand that attorney Story was seeking to skip discovery for the divorce and proceed to a final hearing related to the divorce.

245. I can personally attest that Jeffrey's understanding of what the court was referring

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1991

¹⁰⁶ <https://www.tncourts.gov/help-center/court-approved-divorce-forms>

to as a “final hearing” both in this “matter” and “cause” Jeffrey believed to be in regards to the issues which the court had addressed to date, in some meaningful capacity, those being the outcome from the forced auction and the alleged violation of the “Order of Protection *Ex Parte*”, because Ms. Story asked to continue those due to Jeffrey’s late filing of his 8/29/2019 250+/- page exhaustive filing, while obviously the court repurposed Jeffrey’s 8/29/2019 hearing in Chancery Court to obtain possession of Jeffrey’s marital residence.

246. I can personally attest that Jeffrey has a recorded phone call over two hours long, from a conversation he had on 8/19/2019 with his previous counsel, attorney Mitchell Miller. During this call attorney Miller instructed Jeffrey on how to navigate the discovery process while representing himself *pro se*.

247. It is absurd to believe that he would have done this had he no plans of continuing to defend his case.

248. It is also absurd to believe that Jeffrey would have stayed awake for several days writing and compiling over 250+/- pages of sworn testimony and evidence (which he did), to rush and file it in Chancery Court on the very first day which he was “allowed” to file anything in docket #48419B *pro se*¹⁰⁷ (which he did), while Jeffrey told me that he physically saw both Judge Binkley and Attorney Story with his massive filing in their hands during court on 8/29/2019 (which he did), merely to turn his back afterwards and decline the opportunity to even have that exhaustive filing heard and used to his benefit toward his defense (which he did not do).

¹⁰⁷ https://rico.jeffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038) Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1998

249. Jeffrey was devastated after his first hearing in Chancery Court on 8/1/2019, where the court ordered the forced auction of his home with “no minimums”¹⁰⁸, while Jeffrey was denied notice by the bankruptcy court¹⁰⁹ and any chance to save his critical property interests. To make matters worse, by the end of the day on August first, Jeffrey had exhausted \$9,500 in legal fees for his defense, which he only borrowed from me in an attempt to save his home, while it was a complete waste.

250. To still make matters worse, the next day on 8/2/2019, the law firm Jeffrey hired to represent him, demanded another \$6,000¹¹⁰ be deposited into their law firms trust immediately, in order to continue having representation.

251. Due to Ms. Fenton’s bankruptcy and now the forced auction of their marital residence, there was no reasonable expectation that Jeffrey would even be able to recover his legal fees for continued litigation, so he was forced to switch to representing himself *pro se*.

252. Absolutely devastated by recent events, with days of sleep deprivation, on August 4th Jeffrey lashed-out on momentarily on Facebook with an angry post to the effect of: “My home was declared on Thursday to be auctioned as an estate sale, along with everything that I’ve worked my life to own. So much for fairness in Tennessee... After 25 years with not so much as a traffic ticket... [through] horrendous lies... The truth will come out in the end, I promise... Once I clear the state lines and all my proof of your misdeeds hits the national media...”.

¹⁰⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-35, PageID.1951-1953

¹⁰⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1760-1761

¹¹⁰ https://rico.jefffenton.com/evidence/2019-08-02_attorneys-miller-duke-retainer-exhausted.pdf

253. This post made absolutely no physical threats. It did not name or tag Ms. Fenton. The only thing which I believe could have rationally been considered a “threat” in Jeffrey’s Facebook post, was that he would **expose the truth about the crimes committed against him** by Ms. Fenton (potentially with the help of the courts and her counsel), after he safely made it over the state line, hopefully beyond the retaliatory reach of the State of Tennessee.

254. Regardless, the post was dumb, angry, distraught, an unnecessary risk considering the challenges he faced, and didn’t need to be online.

255. As soon as I saw this post on Facebook, I called Jeffrey (who had finally fallen asleep), I woke him up and told him that somebody might interpret his Facebook post as a violation of the “order of protection *ex parte*” which the court had placed against him, so he should take it down. Jeffrey agreed and immediately deleted the post, while I don’t even believe that it was online for a full day.

256. Unfortunately, it was already too late, because somebody had already captured a screenshot of his Jeffrey’s angry and distraught rant and contacted his attorneys claiming that this Facebook post constituted a violation of the *ex parte* order of protection, while setting a court date for Jeffrey to be heard on this matter for 8/29/2019.

257. Jeffrey was fully prepared to be heard on this matter on 8/29/2019, but after using this violation as a means to quickly drag Jeffrey back into court, under the threat of violating the order, with potential jail time as a possible consequence, adding panic to the rest of the burden which Jeffrey was carrying at that time, the hearing was repurposed instead to gain possession of his marital residence.

258. Here is an excerpt from the 8/29/2019 hearing in Chancery Court, from the Transcript of Evidence¹¹¹, Page 3, Lines 9-20:

9. MS. STORY: Your Honor, the motion that
10. we are here on today is a motion for violation of the
11. order of the court that was August 14th of '19. And
12. after the order was entered, there was a pretty scary
13. communication from Mr. Fenton. I am not here today to
14. argue about that motion necessarily. The more
15. pressing matter -- and that was his response, that is
16. the lengthy response we received this morning. It
17. deals more with the issues of why he made those
18. statements and those type of things.
19. **But the more pressing issue, Your Honor,**
20. **was the deadlines for getting this house sold...**

259. Here is an excerpt from the 8/29/2019 hearing in Chancery Court, from the Transcript of Evidence¹¹², Page 8 Line 18 through Page 9, Line 20:

18. THE COURT: What do you want me to do
19. with this violation of the Order?

¹¹¹ https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

¹¹² https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

20. MS. STORY: Just continue it. We can
21. just reset that portion of the motion. **He just filed**
22. **a response today.** I'm fine to -- the *ex parte* remains
23. in effect anyway under the Order of the Court, and I
24. **have not seen any further violations of that Order.**
25. The selling of the marital property is a concern to me
·1. but I can deal with that at final hearing. One of the
·2. things, too, is you might want to waive mediation in
·3. this case. I have requested in my motion that
·4. mediation be waived. There is an Order of Protection
·5. where they are not to be around each other. It would
·6. be difficult for a mediator to accommodate that. And
·7. I think that it really is just settling personal
·8. property. They don't have any -- and then whatever
·9. comes from the proceeds. They have no children.
10. THE COURT: **That's granted.**
11. Okay, sir, let me talk to you about one
12. thing. We're narrowing the issues before the Court
13. today.
14. MR. FENTON: Okay.
15. THE COURT: We're not going to be talking

16. about the violation of the Order of Protection.

17. **That's going to be reset. So all of these documents**

18. **you have don't apply to today.** [Unfortunately, it appears that the court refused to ever apply any of Jeffrey's defense¹¹³, for his benefit, despite the absolutely needless, catastrophic debilitating costs to my sons life and liberty.]

260. Jeffrey went above and beyond in every attempt to be heard and defend his case, while the Court Records in the State of Tennessee currently consist of over 500 pages on file in the Chancery Court, with over 500 more pages of filings between the Tennessee Court of Appeals and the Tennessee Supreme Court.

261. While no technicality should prevent a *pro se* litigant's testimony from being used to their benefit.

262. Yet Jeffrey's life remains destroyed by unsolicitous "default" judgements after he was wrongfully driven from both his home and the State of Tennessee, to merely survive.

263. Ms. Story stated, "At the August 29, 20 19 hearing in this matter, the Court set this matter for final hearing on October 21, 2019 in open Court with Mr. Jeffrey Fenton present in the courtroom."

264. I can personally attest that Jeffrey has repeatedly told me that he never expected that the final hearing in his divorce was scheduled for 10/21/2019.

265. The language used on the 8/29/2019 Order of the Court stated: "The Motion for

¹¹³ https://rico.jefffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf

Violation of the Order of Protection will be reset with **the Final Hearing in this cause** set for October 21, 2019 at 9:00 a.m.”

266. The “cause” which Jeffrey understood this to be in regards to, he believed was only in regards to the issues which the court had discussed in any meaningful capacity to date, those being the alleged violation of the order of protection *ex parte*, and the outcome of the forced auction of the marital residence.

267. To confirm this, by reflecting back onto the language Jeffrey used in his “handwritten note” left at his marital residence for his ex-wife, his understanding is confirmed:

268. “IF she [Ms. Story] will drop all charges and never contact me again, then I will likewise drop my 250 page counter motion set for October 21st.¹¹⁴”

269. Jeffrey was of the understanding that this October 21st hearing was finally his opportunity for all of his evidence and counter-claims (included in his “One and Done”¹¹⁵) to be heard and considered by the Chancery Court.

270. While Jeffrey also understood Ms. Story to have promised in open court on 8/29/2019 to allow Jeffrey to participate in that 10/21/2019 hearing over the phone, because Jeffrey was involuntarily displaced to the State of Michigan, to obtain emergency replacement shelter and provision at my house, where he has been stuck residing in my basement ever since. Subsequent to his forced eviction by the sheriff’s office on 9/3/2019, per attorney Story’s specific

¹¹⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-23, PageID.1071

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1989

¹¹⁵ https://rico.jeffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038)

request in Chancery Court on 8/29/2019.

271. Since all of their property was already gone, Jeffrey offered to give Fawn exactly what he said she had long been fighting for... a divorce where she wasn't required to pay any alimony.

272. I can personally attest to the fact that on 8/29/2019 Jeffrey filed over 250+/- pages of sworn testimony¹¹⁶ along with clear and convincing evidence, which I have read and Jeffrey has told me that he believes answers every complaint brought against him in docket #48419B, while he also believes that it proves every action brought against him to have been substantially fraudulent.

273. Jeffrey told me that he may not have titled this document correctly, because he didn't know how, since attorney Story had combined multiple actions for hearing in court on 8/29/2019 (his first day as a *pro se*), the title was getting long, and he was overwhelmed.

274. Attorney Story's motion that day was titled, "MOTION FOR VIOLATION OF THE *EX PARTE* ORDER OF PROTECTION AND FOR DATE CERTAIN FOR WALK THROUGH OF HOUSE AND MOTION FOR SCHEDULING ORDER".

275. Jeffrey tried to copy what he had seen done by his previous counsel, by using the title of the motion and adding "Husbands Response" or similar language to the beginning of the title.

276. On this 250+/- page filing by Jeffrey, he titled it, "HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE *EX PARTE* ORDER

¹¹⁶ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038

OF PROTECTION AND FOR DATE CERTAIN FOR WALK THROUGH OF HOUSE AND MOTION FOR SCHEDULING ORDER”.

277. Outside court Jeffrey referred to this exhaustive filing by himself as his “ONE and DONE”. Though he did not have the foresight to title it as such during his rush to file this massive response on the court record, during his very first pro se hearing on 8/1/2019.

278. Jeffrey later tried to get the Court of Appeals to correct the title to his massive 250+/- page filing to read: “HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE *EX PARTE* ORDER OF PROTECTION, AND IN OBJECTION TO ORDER GRANTING MOTION TO SELL THE MARITAL RESIDENCE, AND HUSBAND'S ANSWER AND COUNTER COMPLAINT TO WIFE'S COMPLAINT FOR DIVORCE, HEREAFTER REFERRED TO AS HUSBAND'S "ONE AND DONE"”.

279. But Jeffrey told me that Ms. Story objected, and the Tennessee Court of Appeals refused to correct the title or give any consideration to the fact that he never failed to plead any matter in docket #48419B.

280. Jeffrey was *pro se* in addition to his known and documented disabilities on court records. On information and belief the title being incorrectly named should not have stopped the court from considering the extensive evidence and pleadings filed on court record therein by my son. This federal *pro se* case¹¹⁷ from Nashville seems to agree.

281. Jeffrey has told me that in his research the title of a document does not dictate its

¹¹⁷ https://rico.jefffenton.com/evidence/2017-04-10_usdc-tnmd-fisher-v-gates-pro-se-report.pdf

purpose, but rather the “relief requested” indicates the purpose of a pleading.

282. The “relief requested” in Jeffrey’s “One and Done”¹¹⁸ clearly addressed his divorce, the sale of his marital residence, and the proposed “order of protection”.

283. I can’t imagine a reasonable good faith cause for excluding this critical evidence and testimony while claiming in the FINAL DECREE OF DIVORCE, “The Court finds, based upon the **undisputed** testimony of Wife...”

284. The testimony of wife **was never undisputed**. Jeffrey did everything reasonably within his power and knowledge in good faith to be heard by the court, to dispute the testimony, and to defend himself against the unreasonable deprivation which he has suffered for over four years now, based almost entirely upon “default” judgements while there are hundreds of pages on the court records proving beyond any reasonable doubt that Jeffrey has tried to be heard and defend himself, while the court has simply refused to hear him or allow his defense in any way.

285. There are so many things wrong with this again, that it is overwhelming to articulate, and seems frankly unbelievable that a court could have proceeded in such a fashion, but the evidence is all on court records, in Jeffrey’s filings.

286. First Jeffrey had an extension for filing his divorce answer and counter complaint, by an agreement between his prior counsel Marty Duke, and attorney Story, because forcing the auction of the marital residence was apparently a higher priority for those involved.

287. On August 5th 2019, Jeffrey emailed his attorney Charles (Marty) Duke, and asked,

¹¹⁸ https://rico.jeffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038)

“Can you simply inform me of any critical dates which I need to self-represent by, as I cannot afford further representation: For example, when did you get the ANSWER & COUNTER COMPLAINT extended to?”

288. To which attorney Marty Duke replied on that same day,¹¹⁹ “There is **no definite date certain** by which I agreed with Ms. Story to file an Answer & Counter-Complaint. However, until there is an Order entered relieving us as counsel in this matter, **you should not file anything *prose.***”

289. On information and belief, from my understanding of this agreement between attorneys Duke and Story, Jeffrey filed his “ad-hoc” divorce answer and counter complaint to every action to date on the very first day which he was ever “allowed” to file anything *pro se* in docket #48419B, according to his counsel.

290. Additionally, Jeffrey stated in his “One and Done” on page 43, “Husband requests that the court order a two-month moratorium on any deadlines and court filings on this docket, including all motions, petitions, etc... This time is needed with Husband’s handicaps, so that he can focus on his move... This would allow the minimum time required both to pack and prepare to move, while allowing husband to break-down his office and complete the move to Michigan, without fear of concurrent litigation being filed, forcing Husband to redirect all energies to meet the emergency legal demands... After which Husband will need to assemble office furniture, and rebuild his network, get his server up and running, etc... during which time Husband will have no

¹¹⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1998

access to any of his files and records related to this divorce. Consequentially, until this move is completed, Husband will be physically incapable of responding to court filings without Wife first winning default judgments, which is absolutely unfair.”

291. Although the court may have found Jeffrey’s request for a “two-month moratorium” excessive, surely he was due some time for such a massive forced transition at the very start of his litigation. While Jeffrey would have never requested such accommodations had he truly no plan or intent to continue to defend his case.

292. From what Jeffrey has explained to me, based on his phone call with Mitchell Miller, Jeffrey’s previous counsel, where attorney Miller instructed Jeffrey on how to navigate the “discovery” process while representing himself *pro se*, Jeffrey still believed that to be roughly another year of litigation before him and Ms. Fenton, which Jeffrey fully planned to participate in.

293. Jeffrey’s “One and Done” was not a formal answer to anything, Jeffrey still did not believe that a formal answer was even due yet, due to attorney Marty Duke’s agreed extension with attorney Story.

294. Jeffrey wrote his “One and Done” largely to protect himself, because he could sense that some foul-play was afoot, and he believed that the false narrative portraying him as a “monster” was the underlying premise of the entire case, which he was upset that his prior counsel had failed to address, despite them only having a few days to study his case prior to his 8/1/2019 hearing.

295. Since the combination of actions levied against Jeffrey in his first 8/29/2019 hearing he believed touched upon all three significant matters before the Chancery Court, the forced sale

of his home, his divorce, and the alleged order of protection, Jeffrey took that opportunity to address each and every one as quickly and completely as he could in an emergency fashion. This is why this is referred to as an “ad hoc” answer and counter-complaint to all actions by attorney Story to date.

296. Jeffrey still believed that he had time and the opportunity to file full formal responses to each and every averment, complaint, and accusation (which he planned to do), but he was unable to in such a short period of time. So, with the primary focus being to defend himself during the 8/29 hearing for the alleged “violation of the order of protection *ex parte*”, Jeffrey also set out to “set the record straight” about each and every action which he believed to have been abusively levied against him to date, to apparently destroy his name and his credibility before the court, by correcting the court record with his “One and Done”¹²⁰.

297. This was an attempt to protect himself in every way he could imagine.

298. This was an attempt to correct the record to date.

299. This was an attempt to obtain the consideration needed for him to have the slightest chance at defending his case.

300. This was an emergency answer and counter to everything to date to the best of his ability, on short notice, to protect Jeffrey from “default” judgements.

301. This was an attempt to mitigate both Jeffrey and Ms. Fenton’s damages, while asking the court to justly intervene and not require the litigation to go the full course, requiring still

¹²⁰ https://rico.jefffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038)

another year of court battles to resolve so few remaining real “merits” in their divorce.

302. This was also an attempt to formally notify the court about what Jeffrey perceived as significant harassment, bullying, and “abuse of process” by attorney Story. While asking the court to protect him from Ms. Story’s actions which he believed were in violation of the court’s rules of conduct.

- On page 30 of Jeffrey’s “One and Done”¹²¹ filed in Chancery Court on 8/29/2019: “As verified by the attached exhibits, the fraudulent narrative, and the motions and petitions filed by Wife hence far, Husband respectfully asks the court for relief, under the legislation known as “Stalking by Way of the Courts”. Wife has filed abusive motions and petitions in this divorce, designed to “harass or maliciously injure” the Husband, by exhausting his economic resources and trying to force him to make financial concessions.”
- On page 31: “This is simply a litigious form of domestic assault. Also referred to as “malicious prosecution or abuse of the legal process”. All filings by Wife under Docket No: 48419B, show some form of this oppressive harassment, stalking, and domestic abuse.”
- On page 54: “Husband prays that the court will defend him in regard to Ms. Story’s abusive treatment, and/or that she be replaced by another member of her firm in this matter, having failed to act as her office should require.”

¹²¹ https://rico.jeffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038)

- On page 54: “For the purpose or again correcting the narrative of Ms. Story’s verbal attacks by legal process, Husband wants to clarify that Wife’s desire to skip mediation has nothing to do with her fear of Husband, especially for the ridiculous benefit of being mindful of the safety of everyone else involved in the process. I’ve never been more falsely harassed by anyone, and again, I appeal to the court to please intervene.”

303. Jeffrey later reached out to the Tennessee Court of Appeals¹²² while also notifying them about what he perceived to be ADA abuse and abuse of process by attorney Story. Unfortunately, Jeffrey’s requests appear to have *fallen to deaf ears*.

304. There are many more requests by Jeffrey within his “One and Done”¹²³ filing in Chancery Court on 8/29/2019, where he genuinely sought the courts help, protection, and accountability, to provide him with an opportunity to safely be heard and defend his case, but ultimately, they refused.

305. No part of Jeffrey’s filing appears to have been considered, and certainly hasn’t ever been used in his defense.

306. Again, Jeffrey believed that much of the misconduct was happening behind Judge Binkley’s back at first, while Jeffrey gave the court the benefit of the doubt and honestly believed that upon his informing the court about all the foul play in the docket, that Judge Binkley would rise to vindicate Jeffrey and protect his pursuit of justice. Unfortunately, that never happened.

¹²² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1749-1752

¹²³ https://rico.jefffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038)

307. I don't believe that anybody can read this and reasonably conclude that Jeffrey didn't try with every fiber of his being to honor and respect the court, to participate and try to be heard, and to defend his case to the absolute best of his abilities. Certainly, regardless of any other **facts** in this case, Ms. Story and Ms. Fenton's claims were without doubt "**disputed**".

308. On information and belief, I cannot see how any good faith "default" judgments could have been ordered against Jeffrey on October 21st, 2019, especially without allowing Jeffrey to attend over the phone and he was told previously by attorney Story in open court on 8/29/2019.

309. Stated by attorney Story on page 24, lines 1-5 of the 8/29/2019 transcript of evidence¹²⁴, "MS. STORY: Since he probably will be moving to Michigan, I would be amenable to him attending the final hearing by telephone if he doesn't want to drive back. And I can tell you, I will try to accommodate him in any way I can."

310. Yet they obviously changed their minds and failed to notify Jeffrey of their decisions, to provide him any opportunity at all to correct any misunderstandings or to have any chance to be heard and to defend himself about otherwise devastating "default" orders of arbitrary and unjust deprivation.

311. This is so clear and overwhelming, I don't understand why nobody will fix it and restore Jeffrey's life, liberty and freedom to him, at the very least.

312. On information and belief, the Tennessee courts have unconstitutionally deprived my son of his life, his rights, his property, and his freedom, without equal and due process of law.

¹²⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1993

313. The FINAL DECREE OF DIVORCE¹²⁵ dated 10/21/2019 declares the “Husband has not filed an Answer and has had two attorneys both of whom have withdrawn.” But I know that Jeffrey’s first attorney negligently failed to perform,¹²⁶ and his second counsel used up all his funds and part of mine during the first hearing.¹²⁷ So, it is clearly not Jeffrey’s fault he did not have counsel. See paragraph 6 herein.

314. On information and belief, my son never failed to plead, or to mount a defense, which I understand are essential for “default” judgments to have been issued in good faith and to stand.

315. Contrary to the FINAL DECREE OF DIVORCE¹²⁸ indicating Jeffrey “has not filed an Answer,” I know that my son filed an extensive ad-hoc answer and counter claim on August 29, 2019¹²⁹, to every claim brought against him as of that date, which he brought to the court and attempted to address that day as shown in #48419B and was his very first *pro se* hearing. I know this because I listened to the audio recording of the proceeding and read the transcript.

316. According to what attorney Duke told Jeffrey in an email that I saw, Jeffrey was not to file anything *pro se* until his counsel was released by the court,¹³⁰ which also took place on the morning of August 29, 2019. Hence, that morning was the very first opportunity Jeffrey had, as far as I know, when he was ever “allowed” to file anything *pro se* in the chancery court.

¹²⁵ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1994-1997

¹²⁶ https://rico.jefffenton.com/evidence/2019-07-26_attorney-gates-failed-to-perform.pdf

¹²⁷ https://rico.jefffenton.com/evidence/2019-08-02_attorneys-miller-duke-retainer-exhausted.pdf

¹²⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1994-1997

¹²⁹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038

¹³⁰ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1998

317. Jeffrey told me that he frantically emailed attorneys Duke and Miller hundreds of pages of clear evidence that most, if not all, of the claims brought against him by attorney Story were substantially fraudulent.

318. Also, the FINAL DECREE OF DIVORCE¹³¹ declares, “The Court finds, based upon the undisputed testimony of Wife, a witness for Wife as to the grounds for the divorce, the exhibits introduced in this cause, and the record as a whole, that the following shall be the Order of this Court.” I cannot believe that it uses the phrase “undisputed testimony” when my son filed hundreds of pages countering¹³² much of what attorney Story has said and provided to the court— because it was false and/or fraudulent.

319. My son tells me that he has repeatedly asked who the “witness for Wife as to the grounds for the divorce” is, but nobody will tell him this.....nor tell him why he was never noticed in the bankruptcy¹³³.....nor provide him with a final fully executed HUD-1¹³⁴ after the home was “auctioned,” showing what his home sold for along with exactly where the proceeds of that sale went. All which he has repeatedly asked for, from the attorneys, the closing company, the auctioneers, the court, but nobody will provide him with the information.

320. In “Husband’s Response to Wife’s Motion to Sell Marital Residence¹³⁵” filed by

¹³¹ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1994-1997

¹³² Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038

¹³³ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-30, PageID.1760-1761

¹³⁴ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-36, PageID.1992

Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.559-562

¹³⁵ https://rico.jeffenton.com/evidence/2019-07-29_response-to-wifes-motion-to-sell-residence.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.692-702)

attorney Duke on 7/29/2019, Mr. Duke stated: “COMES NOW the Defendant/Husband, Jeffrey Ryan Fenton, by and through his attorneys of record, Charles M. Duke and Mitchell Miller, and for Response to Wife’s motion to Sell the Marital Residence, would respectfully request that the hearing on the motion be continued for a short period of time, due to the fact that undersigned counsel only has been retained to represent the Defendant/Husband as of the filing date required of this response, the same being July 29, 2019, and an Agreed Order of Substitution of Counsel is being filed concurrently herewith regarding the same. Therefore, counsel for the Defendant would respectfully submit that additional time is necessary for undersigned counsel to review the matter fully and meet with their client, so as to fully and completely respond to a motion that will have such enormous bearing on the parties moving forward in this matter.”

321. Jeffrey told me that both attorney Story and Judge Binkley refused to grant Jeffrey and his counsel an extension of time so they could adequately prepare to defend Jeffrey before the court forced the sale of his real property.

322. In the transcript I read for the proceedings in chancery court on August 1, 2019, Attorney Mitchell stated,¹³⁶ “...we do think that because the main asset in this divorce is this home, which we are essentially disposing of before there’s been any discovery and any further analysis on this, that we need to proceed in a way that absolutely maximizes the total take on this.”

323. I believe the response by Judge Binkley¹³⁷, “Under the circumstances,” proves that he was already biased against my son. There is no impartiality with such a statement. Justice did

¹³⁶ https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1202)

¹³⁷ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1202

not flow from judgments in chancery court, nor has there been any justice in subsequent judgments in other courts.

324. On information and belief, anyone trained in the law might ask what business the chancery court had in disposing of real property, which was part of an estate under *exclusive* jurisdiction¹³⁸ of federal court in a bankruptcy filed 39-days prior to any state action in the chancery court.

325. On information and belief, my son was portrayed as a monster and still is to this day—in what appears to be fraudulently derived “default” judgments by an out of state court, whose personnel refused to follow the court’s rules of professional and judicial conduct or obey state and federal laws.

326. I find it disturbing that there was never a hearing to determine if any of the outrageous claims against my son were supported by fact, before they were presumed by the court to be both fact and true, while my sons counsel was denied time to prepare such an expansive defense, and his home was ordered taken during his very first hearing, before discovery had even begun.

327. Considering the extraordinary impact of the loss of the greatest asset in both Jeffrey and his wife’s lives—the marital home—the court should not have refused the necessary time to adequately prepare Jeffrey’s defense and prevented him from being heard, nor should it have begun the disposal of the marital home during the very first hearing in what Jeffrey said he expected to be

¹³⁸ Case 1:23-cv-01097-PLM-RSK, ECF No. 1-34, PageID.1882, 1891-1892

a yearlong litigation process for obtaining a contested divorce in Williamson County Tennessee.

328. I believe that the unfounded, unsubstantiated, and substantially false claims made by Jeffrey's ex-wife and her counsel throughout three separate motions were done to strategically overwhelm Jeffrey and exploit the symptoms of his known and fully disclosed disabilities¹³⁹, thereby preventing him from being able to effectively multi-task and defend himself against multiple legal attacks simultaneously.

329. In court on August 1, 2019, attorneys Duke and Miller told the court they had only been retained by Jeffrey a few days prior, in an emergency effort to replace Ms. Gates. They requested a few more days to become familiar with the case and go through hundreds of pages of evidence Jeffrey sent to them so they could organize the evidence and prepare to present the truth to the court—all before the court ordered the unrecoverable loss of the greatest asset in their marriage, the home, during the very first hearing in the case; however, both attorney Story and Judge Binkley refused to allow them any more time to study the case and prepare a more suitable defense for Jeffrey.

330. The court set a final hearing date in the order entered on August 29, 2019, which Jeffrey showed me. He told me he thought the "hearing" would be for the violation of the PO and "sale" of house, not a final hearing on the case since discovery had not even begun and all contested civil cases end in a "trial"!

331. I've never heard of someone who doesn't want to be heard and defend their case,

¹³⁹ https://rico.jefffenton.com/evidence/2019-01-23_riding-an-exercise-bicycle-peddling-furiously.pdf
https://rico.jefffenton.com/evidence/2019-02-09_wife-hates-that-plaintiff-can-not-multi-task.pdf

fighting day and night for four-long years, trying to get anyone to apply their own sworn testimony and evidence filed on the court records in their defense.

332. I believe the reason the court record in this federal case is so verbose is that the state courts in Tennessee refused to hear my son's testimony or consider his evidence. Time after time Jeffrey has done everything known within his power to be heard, while each and every court has denied his most basic constitutional rights to due process. Therefore, as he moves through the immovable courts, the record and evidence gets longer and longer.

333. It is not Jeffrey's fault that it takes an obscene amount of documentation to prove that the primary substance which took place in his case was no more than fraud imagined and executed. That wasn't Jeffrey's choice. That was the choice of counsel and government personnel involved. Jeffrey's ex-wife's attorneys could have just as easily argued their case based upon its real merits, but that would not have yielded the favorable outcome they wanted.

334. I pray that this court will deliver justice and restore life, liberty, freedom, and wholeness to my son without requiring more torturous years of his life. Please cease to intentionally harm, threaten, and silence him, and stop pressuring him not to expose or share the truth.

335. The odds could not be more sharply stacked against my son, but he needs *and is due* relief. There is no other way forward for him.

336. The courts have a responsibility here if they want the people to trust them with the most critical life-altering decisions they face. There must be accountability and liability for the unconscionable losses and damages incurred.

337. Justice delayed is justice denied. Justice denied is also justice denied. People can

only survive and sustain so much, before it physically, financially, and psychologically destroys them. I'm lucky that my son has survived so far.

338. This is the fourth court to see this ridiculousness. It is time for justice; please deliver it!

339. There is so much more... it's simply overwhelming. The court doesn't want to read it and Jeffrey hasn't had time to even write it all yet.

340. Unless a court invest the time and care to fact check the evidence in this case **or vacate every previous void order** for bias, misconduct, lack of jurisdiction, lack of lawful authority, violating state and federal laws, criminal conduct, etc...

341. Tenn. R. Sup. Ct. 2.11 - Disqualification(a)(1) The judge has a **personal bias** or **prejudice** concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding.

342. Tenn. R. Sup. Ct. 2.11 - Disqualification(a)(1) The judge has a **personal bias** or **prejudice** concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding.

343. Frankly, I don't believe that automatic "disqualification" for bias could be more clear in this case. From what I can see, "bias" appears to be the least seditious charge by which a fraction of the foul play on record in this case could attempt to be justified and honestly addressed.

344. It still requires a court to do the right thing in the honest pursuit of justice. There is no honor in continuing to enable and hide gross misconduct, in stark violation of the constitutional rights of litigants. **Especially** regarding vulnerable litigants such as those who are *pro se* or disabled.

Especially when they have proceeded honorably in good faith with the court, filing true, honest, and fair responses, without playing games or trying to manipulate the court or “*game*” the outcome in any manner. **Especially** when despite their sincere efforts, previous courts have obviously treated them disparagingly.

345. We are better than that in the United States of America. We need to demand that we remain better than that in the United States of America. Or “law” becomes a farse, “courts” become irrelevant, and “justice” loses all meaning.

346. Personally, I believe in a United States of America which is better than that. Which if nothing else, holds TRUTH higher than lawless deprivation of that which is good, lawful, just, righteous, and peaceful.

347. Jeffrey was *broken* by a court, while his *rights* and his *freedoms* continue to be held *hostage* under the color of law, by the State of Tennessee.

348. It is beyond Jeffrey’s power, will, deeds, and reach to fix this debilitating miscarriage of justice. It requires the agreement of an honorable and brave defender of justice, who cares more about the honest execution of justice for the benefit of our nation than about the clamor of peer pressure by their colleagues.

349. Who refuses to extend “professional courtesy” to other judges when such a “courtesy” requires violating their oath of office, the judicial canons, and/or covering up serious felony crimes by members of the court against litigants who sincerely operated in good faith.

350. “An independent and honorable judiciary is indispensable to justice in our society. A judge should maintain and enforce high standards of conduct and should personally observe

those standards, so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.”

351. “A judge should respect and comply with the law and should act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.”

352. “A judge should not allow family, social, political, financial, or other relationships to influence judicial conduct or judgment. A judge should neither lend the prestige of the judicial office to advance the private interests of the judge or others nor convey or permit others to convey the impression that they are in a special position to influence the judge. A judge should not testify voluntarily as a character witness.”

353. “The duties of judicial office take precedence over all other activities. The judge should perform those duties with respect for others, and should not engage in behavior that is harassing, abusive, prejudiced, or biased.”

354. “A judge should be faithful to, and maintain professional competence in, the law and should not be swayed by partisan interests, public clamor, or fear of criticism.”

355. “A judge should take appropriate action upon receipt of reliable information **indicating the likelihood that a judge’s conduct contravened this Code**, that a judicial employee’s conduct contravened the Code of Conduct for Judicial Employees, **or that a lawyer violated applicable rules of professional conduct.**”

356. I pray that the canons above mean as much to this court and anyone reading this, as they do to our family in this hour.

357. **My son needs your help... will this court please help him?**

358. Thank you for your time and consideration.

DECLARATION

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct, except as to matters herein stated to be on information and belief, and as to such matters, I certify as aforesaid that I verily believe the same to be true.

Executed on January 16, 2024

Marsha Ann Fenton

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1

My name is Fawn Fenton and I have been married to Jeff Fenton for 13 years. Jeff and I have been separated since April 22, 2018 and I have not seen him since sometime in April when we met to file our taxes. Prior to that I had not seen him since December 2018. I filed for divorce on June 4, 2019.

I am in fear for my safety based on the repeated harassment that has continued to occur. Over the last several weeks Jeff has sent me numerous text messages and lengthy e-mails talking about his intentions on ruining my life, causing me issues with my employer and clients at work, ruining my credit and financially ruining me. As a result of Jeff's continued verbal and emotional abuse and deliberate non-cooperation, I have filed for bankruptcy to preserve my finances. Upon finding out about the bankruptcy petition, Jeff became enraged and his incessant texts and e-mails have been upsetting and vindictive. Just as an example, from June 12 through June 16, Jeff sent me 12 e-mails all of substantial length, describing how he plans on ruining my life. I am attaching just a snapshot of my email account showing the number of e-mails sent from June 12-16. The length of the emails would be too long to attach; however, I have saved them all. In addition, Jeff continues to send me numerous text messages, some very lengthy. In some of the texts he uses derogatory language, calling me a "bitch." On June 14, 2019 he sent me 8 text messages within in less than 40 minutes. The next day, June 15, 2019 he sent me 16 text messages over the course of 4 hours, several of which were extremely lengthy. I have asked Jeff on several occasions to stop e-mailing and texting me, however, he continues to repeatedly harass me. At this point all of his communication to me is not consensual and I have relayed this to Jeff multiple times. On June 15, 2019 Jeff left me a voicemail on my cell phone stating that if I did not call him back or respond to his emails or text messages that he was going to "show up at my work or apartment to try to get some information out of me." I am fearful that he will actually show up at my work, as he has done so in the past and has sabotaged my work e-mails. Jeff has been employed in IT and is very tech savvy. In the past he was able to remotely log into my work computer and delete all e-mails that had his name in them. My company has already spent a considerable amount of money hiring a new IT support team to try and close loopholes and delete Jeff's access to our system, but we are still finding settings that reference Jeff's settings or route to his e-mails. Jeff has also threatened to post derogatory comments anonymously on the internet about both myself and my company. This cyber stalking could potentially cost me my job and career. I am fearful for what he may try to do now that I have filed for divorce and am not responding to his threats.

On June 16, 2019 in one of his lengthy e-mails he stated, "I wish we would have had an asteroid fall on our home and kill us (or at least me)", the day before I discovered your plans to divorce me." Jeff is a licensed gun carrier and has many weapons, and I am in fear of what he may to do me if this continues. Jeff refers to himself as a part of the "extraction team" and lives a very paranoid life. He installed extensive home monitoring at our marital residence including surveillance videos and audio recording systems.

The harassment has caused me undue emotional stress and anxiety. I am unable to sleep well, and his harassment is causing trouble in my day to day life. The continued texting and e-mailing are interfering with my ability to perform my job and I fear that if these things continue that I will reach a point of an emotional breakdown.

2

I've been married three times. **First Wife:** 18-20. **Second Wife:** mid-twenties, lasted 4-years. **Third & Last Wife:** 2005-2019 (WILCO Docket #48419B). For the sake of protecting their anonymity (within this document), I will call my most recent wife by a very fond, private pet name, "**Tootie**". (It might not sound flattering, but it originated from the greatest fondness, and was never used derogatorily!) I will refer to my second wife here, as "**Previous Wife**" or "**Prior Wife**".

Pastors Jon & Kitty Sterns (Franklin Vineyard), Pastors Jerry & Cindy Bryant (Nashville Vineyard), Dr. Roy Hamley (Woodmont Hills Counseling Center), and [REDACTED] Tootie (Girlfriend Extraordinaire):

Greetings!

This started off as an introduction letter to the Sterns, as they've succeeded in learning very little about me thus far (which I'll credit to my avoidance) but I've come to a point where I want to move forward, and to be **unknown** has never been my desire. (Did I hear the Bryant's say "AHMEN"? LOL) It requires a certain fondness, or at least a willingness to read, in order to grow very close to me.

The biggest emotional/spiritual problem that I have struggled with this past year, is the **absolute inability to "balance accounts"** from my past. My past relationships with God, the Vineyard (Nashville), and my [REDACTED] **Previous Wife**. For that reason I've decided to also use this letter to try to put language to some of those issues, and am hoping that this will be an instrument that will help bring about closure. Jerry & Cindy – I think that there were a lot of things that were unsaid, but understood, yet I feel that I owe you a direct explanation of why I left the church, the nature of my hurts & resentments prior to leaving, the reason that now in coming back to church I have chosen the Franklin Vineyard over Nashville, and to tell you both once again that **I love you very much and truly appreciate the investment that you made into my life.**

I've decided to do this in an open format, copied to all those mentioned above, hoping **not** to cause anyone shame, or expose anyone's nakedness, but rather because I think it is important for all those addressed to understand **My Journey**, what has brought me to this point, decisions I've made and why, and how this all has impacted me thus far. Further I don't wish to speak behind anyone's back (except [REDACTED] **Prior Wife** for reasons that shall become obvious later on). I've included Dr. Roy Hamley in the addressing of this letter as he is a Christian Counselor who is currently working with [REDACTED] **Tootie** and myself, both individually and as a couple, to help aid us in moving forward. I've also copied this letter to [REDACTED] **Tootie**, though much of it may be hard for her to read as it pertains to my ex-wife [REDACTED] **Prior Wife**. I think that it is important that as we move forward together, we both are knowledgeable about what has brought us each to this point, and the struggles that we still face (individually and together) even if those struggles do not directly involve the other.

First off, in regards to the Pastoral oversight, Counseling, and Care, I give you all complete permission to speak freely with each other about me. I am largely an open book. If you have something to say, or a burden on your heart, please don't tip-toe with me, **just say it**. I seem to possess an anointing that at some point causes even the most conservative pastor to swear, in an attempt to get through to me. So I expect this. Please feel free to cuss as you must. LOL

Please honor my request that you treat this letter with the absolute of confidentiality. It is intended for those who are named at top and absolutely no one else.

The only REAL "evidence" in #48419B are **MY OWN WORDS**. While they refuse to even allow me to provide the CONTEXT within which they were spoken, the background and history behind them. WHY I said what I said, WHEN I said it. Or what my words were even MEANT to communicate & convey! I'm just accused of texting/emailing **TOO MUCH** (try the "block" button), labeling me an "abusive stalker". **WORDS MEAN SOMETHING!** **I'm NO MORE of a "STALKER", than anyone reading this is a "PEDOPHILE"!** To assassinate my character while REFUSING to HEAR my TESTIMONY & DEFENSE, is an unconscionable ABUSE OF POWER, causing me to suffer "OFFICIAL OPPRESSION" for well over 2 years now!

Contents:

(It's a bad sign when a letter has a "Table of Contents".)

- 1 Intro
- 2 Contents
- 3 Father – Adolescents – Vegas
- 4 Meet the Vineyard (Nashville)
- 5 The Sweat Shop
- 6 **Met Prior Wife**
- 7 Marriage [REDACTED]
- 8 [REDACTED]
- 9 True Love
- 10 [REDACTED]
- 11 Father vs. Husband
- 12 Different Journeys
- 13 [REDACTED]
- 14 Love / Hate Relationship
- 15 [REDACTED]
- 16 Dear Jeff
- 17 [REDACTED]
- 18 Purging the **Prior Wife** Files
- 19 [REDACTED]
- 20 Divorced **Previous Wife**
- 21 [REDACTED]
- 22 I'm never going to know! – Seeking Counsel
- 23 The Prophecy
- 24 Why did I leave the Vineyard (Nashville)?
- 25 Hurts and Resentments
- 26 Vineyard Mass Exodus
- 27 In Steps **Tootie**
- 28 **Tootie** Meets God
- 29 Walking Through Doors - Conclusion

It may be **UNUSUAL** to be so **verbose**, but everyone is different, there is **certainly no crime in that!** I have been a **WRITER** who best communicates through writing since my **TEENS!** That is my **FIRST AMENDMENT RIGHT!** It is how I'm wired! How I personally **process life** and **communicate** most effectively. "**Tootie**" **knew that when we met, long before we ever got married.**

*My writing has by far attracted more women in my life than any other quality about me. Many women find my intense honesty, vulnerability, and sincerity, combined with my ability to articulate it, to be rare and something which they are attracted to, and/or can deeply **RELATE** with!*

Most of my life writing has been my most applauded strength and "gift". I've helped change policies throughout the State of Tennessee, before with this "gift". I've been thanked by governors, senators, mayors, given a special award... Often (if not **USUALLY**), Tootie **EDITED** my writing for grammar, punctuation, spelling, and overall content. Tootie showed little dislike for my writing, until she **LEFT** me, and it reminded her of the **TRUTH**, which we had both experienced together. Our promises to each other, **while I tried to persuade her onto a healthier path for herself.**

NEVER ONCE, in 15-YEARS, had I heard the word "ABUSE" or "Emotional Abuse" from "Tootie", until she secretly met with her first DIVORCE ATTORNEY! We walked very closely with numerous counselors, mentors, pastors, leaders in our lives, we have worked through several of our **OWN** issues and relational challenges. Yet **NEVER ONCE** was I remotely accused of "abusing" my beloved "Tootie" in **ANY WAY, SHAPE or FORM!** (**Such claims are no less than litigious terrorism!**)

The point of me sharing this document with the Court is not the **CONTENT**, it is the **VERBOSITY**, the **BULK OF WRITTEN CONTENT**, a **THIRTY-PAGE** written letter **PRIOR** to marriage - where there were no secrets, all the cards were **ALWAYS** on the table (at least from my end)! This also shows the level of **AUTHENTICITY, HONESTY, OPENNESS, TRANSPARENCY, VULNERABILITY,** and the level of **ACCOUNTABILITY** that I've walked in for **DECADES!** **This is WHO I AM!** Regardless of what those with an agenda pretend or claim!

I have a LIFETIME of EVIDENCE proving MY IDENTITY! I belonged to writers groups at church. I founded **NashvilleChristian.com**, as I met with church leaders throughout the mid-state. Twice I was a guest on local radio programs. While I designed, administered and managed the website and fax service prior, for over a decade. I also served as Tootie's **SOUND BOARD**. She shared and bounced everything off of me, **DAILY**, while I helped her and her company in any way that I could! I communicated with Tootie probably **5-25 times per day** on average, via texts, emails and phone calls. **We were connected at the hip, and together a force to be reckoned with!** (This was as much by HER will as it was by MINE!) **We were a TEAM!**

Unfortunately, our greatest strengths are often our greatest weakness, when our lives enter into a state of trauma. (Hence, I do regret some things that I've said and done.) **Yet REALITY is NOTHING as has been fraudulently claimed, to bind and discard me, without cost or consequence.**

3

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

In re:	§	Case No. 3:19-BK-02693
	§	
FAWN ██████████ FENTON	§	
	§	
Debtor(s)	§	

**CHAPTER 7 TRUSTEE’S FINAL ACCOUNT AND DISTRIBUTION REPORT
CERTIFICATION THAT THE ESTATE HAS BEEN FULLY ADMINISTERED
AND APPLICATION TO BE DISCHARGED (TDR)**

John C. McLemore, chapter 7 trustee, submits this Final Account, Certification that the Estate has been Fully Administered and Application to be Discharged.

1) All funds on hand have been distributed in accordance with the Trustee’s Final Report and, if applicable, any order of the Court modifying the Final Report. The case is fully administered and all assets and funds which have come under the trustee’s control in this case have been properly accounted for as provided by law. The trustee hereby requests to be discharged from further duties as a trustee.

2) A summary of assets abandoned, assets exempt, total distributions to claimants, claims discharged without payment, and expenses of administration is provided below:

Assets Abandoned: <i>(without deducting any secured claims)</i>	\$1,250.00	Assets Exempt:	\$11,000.00
Total Distributions to Claimants:	\$3,028.98	Claims Discharged Without Payment:	\$55,593.59
Total Expenses of Administration:	\$1,371.02	ATTORNEY STORY: —	<u>\$11,514.50</u>
		(SEE PAGE-4)	\$44,079.09

3) Total gross receipts of \$4,400.00 (see **Exhibit 1**), minus funds paid to the debtor(s) and third parties of \$0.00 (see **Exhibit 2**), yielded net receipts of \$4,400.00 from the liquidation of the property of the estate, which was distributed as follows:

	CLAIMS SCHEDULED	CLAIMS ASSERTED	CLAIMS ALLOWED	CLAIMS PAID
Secured Claims (from Exhibit 3)	\$11,672.82	\$308,190.92	\$0.00	\$0.00
Priority Claims:				
Chapter 7 Admin. Fees and Charges (from Exhibit 4)	NA	\$1,371.02	\$1,371.02	\$1,371.02
Prior Chapter Admin. Fees and Charges (from Exhibit 5)	NA	\$0.00	\$0.00	\$0.00
Priority Unsecured Claims (From Exhibit 6)	\$0.00	\$0.00	\$0.00	\$0.00
General Unsecured Claims (from Exhibit 7)	\$59,845.46	\$37,324.85	\$35,314.85	\$3,028.98
Total Disbursements	\$71,518.28	\$346,886.79	\$36,685.87	\$4,400.00

4). This case was originally filed under chapter 0 on 04/26/2019. The case was converted to one under Chapter 7 on 12/06/2019. The case was pending for 13 months.

5). All estate bank statements, deposit slips, and canceled checks have been submitted to the United States Trustee.

6). An individual estate property record and report showing the final accounting of the assets of the estate is attached as **Exhibit 8**. The cash receipts and disbursements records for each estate bank account, showing the final accounting of the receipts and disbursements of estate funds is attached as **Exhibit 9**.

Pursuant to Fed R Bank P 5009, I hereby certify, under penalty of perjury, that the foregoing report is true and correct.

Dated: 01/09/2021

By: /s/ John C. McLemore
Trustee

STATEMENT: This Uniform Form is associated with an open bankruptcy case, therefore, Paperwork Reduction Act exemption 5 C.F.R. § 1320.4(a)(2) applies.

**EXHIBITS TO
FINAL ACCOUNT**

EXHIBIT 1 – GROSS RECEIPTS

DESCRIPTION	UNIFORM TRAN. CODE	AMOUNT RECEIVED
2017 Toyota Prius Mileage: 30,000 Other Information: VIN: [REDACTED]	1129-000	\$4,400.00
TOTAL GROSS RECEIPTS		\$4,400.00

The Uniform Transaction Code is an accounting code assigned by the trustee for statistical reporting purposes.

EXHIBIT 2 – FUNDS PAID TO DEBTOR & THIRD PARTIES

NONE

EXHIBIT 3 – SECURED CLAIMS

NONE

CLAIM NUMBER	CLAIMANT	UNIFORM TRAN. CODE	CLAIMS SCHEDULED	CLAIMS ASSERTED	CLAIMS ALLOWED	CLAIMS PAID
6	BancorpSouth Bank	4110-000	\$0.00	\$54,863.54	\$0.00	\$0.00
7	Toyota Motor Credit Corporation	4210-000	\$11,672.82	\$12,600.00	\$0.00	\$0.00
8	Specialized Loan Servicing LLC	4110-000	\$0.00	\$240,727.38	\$0.00	\$0.00
TOTAL SECURED CLAIMS			\$11,672.82	\$308,190.92	\$0.00	\$0.00

EXHIBIT 4 – CHAPTER 7 ADMINISTRATIVE FEES and CHARGES

PAYEE	UNIFORM TRAN. CODE	CLAIMS SCHEDULED	CLAIMS ASSERTED	CLAIMS ALLOWED	CLAIMS PAID
John C. McLemore, Trustee	2100-000	NA	\$1,100.00	\$1,100.00	\$1,100.00
John C. McLemore, Trustee	2200-000	NA	\$83.69	\$83.69	\$83.69
Pinnacle Bank	2600-000	NA	\$6.33	\$6.33	\$6.33
U.S. Bankruptcy Court Clerk	2700-000	NA	\$181.00	\$181.00	\$181.00
TOTAL CHAPTER 7 ADMIN. FEES AND CHARGES		NA	\$1,371.02	\$1,371.02	\$1,371.02

EXHIBIT 5 – PRIOR CHAPTER ADMINISTRATIVE FEES and CHARGES

NONE

EXHIBIT 6 – PRIORITY UNSECURED CLAIMS

CLAIM	CLAIMANT	UNIFORM	CLAIMS	CLAIMS	CLAIMS	CLAIMS
-------	----------	---------	--------	--------	--------	--------

NUMBER	TRAN. CODE	SCHEDULED	ASSERTED	ALLOWED	PAID	
1	IRS Insolvency	5800-000	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL PRIORITY UNSECURED CLAIMS			\$0.00	\$0.00	\$0.00	\$0.00

EXHIBIT 7 – GENERAL UNSECURED CLAIMS

CLAIM NUMBER	CLAIMANT	UNIFORM TRAN. CODE	CLAIMS SCHEDULED	CLAIMS ASSERTED	CLAIMS ALLOWED	CLAIMS PAID
2	Ascend Federal Credit Union	7100-000	\$12,900.65	\$12,900.65	\$12,900.65	\$1,106.50
3	Ascend Federal Credit Union	7100-000	\$4,212.89	\$5,000.00	\$2,990.00	\$256.45
4	American Express National Bank	7100-000	\$9,518.02	\$9,518.02	\$9,518.02	\$816.37
5	Capital One Bank (USA), N.A.	7100-000	\$9,906.18	\$9,906.18	\$9,906.18	\$849.66
	BanCorp South	7100-000	\$0.00	\$0.00	\$0.00	\$0.00
	Bank of America	7100-000	\$11,793.22	\$0.00	\$0.00	\$0.00
	Chase Card	7100-000	\$0.00	\$0.00	\$0.00	\$0.00
	Specialized Loan Servicing, LLC	7100-000	\$0.00	\$0.00	\$0.00	\$0.00
	Virginia Lee Story	7100-000	\$11,514.50	\$0.00	\$0.00	\$0.00
TOTAL GENERAL UNSECURED CLAIMS			\$59,845.46	\$37,324.85	\$35,314.85	\$3,028.98

**FORM 1
INDIVIDUAL ESTATE PROPERTY RECORD AND REPORT
ASSET CASES**

Page No: 1

Exhibit 8

Case No.: 19-02693-CW3-7
Case Name: FENTON, FAWN [REDACTED]
For the Period Ending: 1/9/2021

Trustee Name: John C. McLemore
Date Filed (f) or Converted (c): 12/06/2019 (c)
§341(a) Meeting Date: 01/06/2020
Claims Bar Date: 05/04/2020

1	2	3	4	5	6
Asset Description (Scheduled and Unscheduled (u) Property)	Petition/ Unscheduled Value	Estimated Net Value (Value Determined by Trustee, Less Liens, Exemptions, and Other Costs)	Property Abandoned OA =§ 554(a) abandon.	Sales/Funds Received by the Estate	Asset Fully Administered (FA)/ Gross Value of Remaining Assets
Ref. #					
1	2017 Toyota Prius Mileage: 30,000 Other Information: VIN: [REDACTED]	\$14,500.00	\$6,188.16	\$4,400.00	FA
2	Sofa, Rugs, End Table, Coffee Table, Bedroom Suite, Bookshelves, Gun Safe, Table & Chairs, Toaster, Pots & Pans, Misc. Household items	\$1,420.00	\$0.00	\$0.00	FA
3	TV, Tablet	\$575.00	\$0.00	\$0.00	FA
4	Breyer Horses	\$450.00	\$0.00	\$0.00	FA
5	AR15, FN-FAL, Glock 23, Rugger SP101	\$2,750.00	\$50.00	\$0.00	FA
6	Clothing/Shoes/Purse	\$500.00	\$0.00	\$0.00	FA
7	Wedding Ring \$1500 and Costume jewelry	\$1,200.00	\$300.00	\$0.00	FA
Asset Notes: Jeweler said worth \$300. Burdensome Asset.					
8	Dog, 2 Bunnies, Fish	\$0.00	\$0.00	\$0.00	FA
9	Items in storage Books, Luggage, Pet Supplies, Christmas Decorations	\$435.00	\$0.00	\$0.00	FA
10	2 Aquarium located at 102 Plum Nelly Circle	\$425.00	\$0.00	\$0.00	FA
11	Cash	\$200.00	\$0.00	\$0.00	FA
12	Checking First Farmers & Merchants	\$1,349.36	\$0.00	\$0.00	FA
13	Checking Ascend Federal CU	\$0.00	\$0.00	\$0.00	FA
14	Savings First Farmers & Merchants	\$1,350.65	\$0.00	\$0.00	FA
15	Savings Ascend Federal CU	\$272.60	\$0.00	\$0.00	FA
16	Checking MIT FCU (u)	\$255.00	\$0.00	\$0.00	FA
17	Savings MIT FCU (u)	\$200.55	\$0.00	\$0.00	FA
18	Cellphone, Laptop (u)	\$550.00	\$0.00	\$0.00	FA

TOTALS (Excluding unknown value)

\$26,433.16

\$6,538.16

\$4,400.00

Gross Value of Remaining Assets

\$0.00

**FORM 1
INDIVIDUAL ESTATE PROPERTY RECORD AND REPORT
ASSET CASES**

Page No: 2

Exhibit 8

Case No.: 19-02693-CW3-7
 Case Name: FENTON, FAWN [REDACTED]
 For the Period Ending: 1/9/2021

Trustee Name: John C. McLemore
 Date Filed (f) or Converted (c): 12/06/2019 (c)
 §341(a) Meeting Date: 01/06/2020
 Claims Bar Date: 05/04/2020

1	2	3	4	5	6
Asset Description (Scheduled and Unscheduled (u) Property)	Petition/ Unscheduled Value	Estimated Net Value (Value Determined by Trustee, Less Liens, Exemptions, and Other Costs)	Property Abandoned OA =§ 554(a) abandon.	Sales/Funds Received by the Estate	Asset Fully Administered (FA)/ Gross Value of Remaining Assets

07/07/2020 PC with Virginia Story 615-790-1778 who represents the Debtor in her Williamson County Divorce (Judge Binkley)

07/02/2020 PC from Jeff Fenton?? Debtor's former husband talked with him for more than 30 minutes.

05/27/2020 Filed Mt to Allow/Disallow Claims.

05/13/2020 Email to Jodie Thresher re: claims.

04/15/2020 Fawn Fenton picked up her ring.

04/01/2020 Email to Jody Thresher and Mary Beth Ausbrooks about Debtor's ring

03/19/2020 Filed Report of Sale.

03/19/2020 Jeweler said diamond ring and wedding band was worth \$300. Burdensome asset. Will return ring to Debtor.

02/19/2020 Gave diamond ring and wedding band to Bobby Colson who will get a valuation.

02/10/2020 Filed Mt to Sell Equity in Vehicle to Debtor for \$4,400.

02/03/2020 Claims bar 5/4/2020.

01/30/2020 Debtor wants to buy equity in vehicle

01/30/2020 Email to Jodie Thresher about wedding ring.

01/28/2020 Calculation of value of equity in 2017 Toyota Prius

01/20/2020 PC with Paul Spina counsel for Toyota Motor Credit.

01/08/2020 Email from Jodie Thresher, Debtor's attorney - Just wanted to give you a heads up that we will be filing an Amended Schedule A/B and C on this case.

01/07/2020 Email to Mary Beth - John told Ms. Fenton yesterday that he would like an independent valuation of her 2017 Toyota Prius. See attached instructions to forward to your client.

Initial Projected Date Of Final Report (TFR):

Current Projected Date Of Final Report (TFR):

/s/ JOHN C. MCLEMORE

JOHN C. MCLEMORE

FORM 2

CASH RECEIPTS AND DISBURSEMENTS RECORD

Case No. 19-02693-CW3-7
 Case Name: FENTON, FAWN [REDACTED]
 Primary Taxpayer ID #: **_***41 [REDACTED]
 Co-Debtor Taxpayer ID #:
 For Period Beginning: 4/26/2019
 For Period Ending: 1/9/2021

Trustee Name: John C. McLemore
 Bank Name: Pinnacle Bank
 Checking Acct #: *****0194
 Account Title:
 Blanket bond (per case limit): \$720,000.00
 Separate bond (if applicable):

1	2	3	4	5	6	7	
Transaction Date	Check / Ref. #	Paid to/ Received From	Description of Transaction	Uniform Tran Code	Deposit \$	Disbursement \$	Balance
02/05/2020	(1)	Diane D. [REDACTED] EX-WIFE'S MOM PAID TO KEEP NEW PRIUS!	Equity in 2017 Toyota Prius per 2-10-2020 Motion to Sell [Dkt. No. 99]	1129-000	\$4,400.00		\$4,400.00
07/31/2020		Pinnacle Bank	Service Charge	2600-000		\$77.00	\$4,323.00
08/03/2020		Pinnacle Bank	Service Charge	2600-000		(\$77.00)	\$4,400.00
08/03/2020		Pinnacle Bank	Service Charge	2600-000		\$6.33	\$4,393.67
09/03/2020	3001	U.S. Bankruptcy Court Clerk	Motion to Sell Filing Fee (Docket No. 99)	2700-000		\$181.00	\$4,212.67
12/12/2020	3002	John C. McLemore	Trustee Compensation	2100-000		\$1,100.00	\$3,112.67
12/12/2020	3003	John C. McLemore	Trustee Expenses	2200-000		\$83.69	\$3,028.98
12/12/2020	3004	Ascend Federal Credit Union	Final Distribution	7100-000		\$1,106.50	\$1,922.48
12/12/2020	3005	Ascend Federal Credit Union	Final Distribution	7100-000		\$256.45	\$1,666.03
12/12/2020	3006	American Express National Bank	Final Distribution	7100-000		\$816.37	\$849.66
12/12/2020	3007	Capital One Bank (USA), N.A.	Final Distribution	7100-000		\$849.66	\$0.00

TOTALS:	\$4,400.00	\$4,400.00	\$0.00
Less: Bank transfers/CDs	\$0.00	\$0.00	
Subtotal	<u>\$4,400.00</u>	<u>\$4,400.00</u>	
Less: Payments to debtors	\$0.00	\$0.00	
Net	<u>\$4,400.00</u>	<u>\$4,400.00</u>	

For the period of 4/26/2019 to 1/9/2021

Total Compensable Receipts: \$4,400.00
 Total Non-Compensable Receipts: \$0.00
 Total Comp/Non Comp Receipts: \$4,400.00
 Total Internal/Transfer Receipts: \$0.00

Total Compensable Disbursements: \$4,400.00
 Total Non-Compensable Disbursements: \$0.00
 Total Comp/Non Comp Disbursements: \$4,400.00
 Total Internal/Transfer Disbursements: \$0.00

For the entire history of the account between 02/03/2020 to 1/9/2021

Total Compensable Receipts: \$4,400.00
 Total Non-Compensable Receipts: \$0.00
 Total Comp/Non Comp Receipts: \$4,400.00
 Total Internal/Transfer Receipts: \$0.00

Total Compensable Disbursements: \$4,400.00
 Total Non-Compensable Disbursements: \$0.00
 Total Comp/Non Comp Disbursements: \$4,400.00
 Total Internal/Transfer Disbursements: \$0.00

FORM 2

CASH RECEIPTS AND DISBURSEMENTS RECORD

Case No. 19-02693-CW3-7
 Case Name: FENTON, FAWN ██████████
 Primary Taxpayer ID #: **_***41 ████
 Co-Debtor Taxpayer ID #:
 For Period Beginning: 4/26/2019
 For Period Ending: 1/9/2021

Trustee Name: John C. McLemore
 Bank Name: Pinnacle Bank
 Checking Acct #: *****0194
 Account Title:
 Blanket bond (per case limit): \$720,000.00
 Separate bond (if applicable):

1	2	3	4	5	6	7	
Transaction Date	Check / Ref. #	Paid to/ Received From	Description of Transaction	Uniform Tran Code	Deposit \$	Disbursement \$	Balance

TOTAL - ALL ACCOUNTS

NET DEPOSITS

NET DISBURSE

ACCOUNT BALANCES

\$4,400.00

\$4,400.00

\$0.00

For the period of 4/26/2019 to 1/9/2021

Total Compensable Receipts: \$4,400.00
 Total Non-Compensable Receipts: \$0.00
 Total Comp/Non Comp Receipts: \$4,400.00
 Total Internal/Transfer Receipts: \$0.00

 Total Compensable Disbursements: \$4,400.00
 Total Non-Compensable Disbursements: \$0.00
 Total Comp/Non Comp Disbursements: \$4,400.00
 Total Internal/Transfer Disbursements: \$0.00

For the entire history of the case between 12/06/2019 to 1/9/2021

Total Compensable Receipts: \$4,400.00
 Total Non-Compensable Receipts: \$0.00
 Total Comp/Non Comp Receipts: \$4,400.00
 Total Internal/Transfer Receipts: \$0.00

 Total Compensable Disbursements: \$4,400.00
 Total Non-Compensable Disbursements: \$0.00
 Total Comp/Non Comp Disbursements: \$4,400.00
 Total Internal/Transfer Disbursements: \$0.00

/s/ JOHN C. MCLEMORE

JOHN C. MCLEMORE

4

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
AT FRANKLIN

CLERK & MASTER

2019 OCT 21 PM 3:58

FAWN ██████████ FENTON,)
Plaintiff/Wife,)
)
vs.)
)
JEFFREY RYAN FENTON,)
Defendant/Husband.)

No. 48419B

FILED FOR ENTRY _____

AFFIDAVIT OF VIRGINIA LEE STORY

RECEIVED BY
Judges' Chambers
Date: 10-22-19 *dlw*

STATE OF TENNESSEE)
COUNTY OF WILLIAMSON)

Comes now, Virginia Lee Story, attorney of record for the Petitioner, and after being first duly sworn, states as follows:

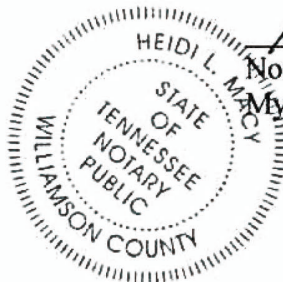
1. I am over 18 years of age and have personal knowledge of the following facts.
2. At the August 29, 2019 hearing in this matter, the Court set this matter for final hearing on October 21, 2019 in open Court with Mr. Jeffrey Fenton present in the courtroom.
3. Since the August 29, 2019 hearing, Mr. Fenton relocated to Michigan.
4. In his handwritten note, he stated that he does not want to contest the divorce and that he does not wish to communicate with Virginia Story or anyone from her firm, ever again. He states that he will never be in Tennessee again. See attached Exhibit 1.

FURTHER AFFIANT SAITH NOT.

[Handwritten Signature]

VIRGINIA LEE STORY

SWORN to and subscribed before me this 21st day of October, 2019.



Heidi L. Macy

Notary Public
My Commission Expires: 6-19-22

MY LOVE!!!

Fawn,

FILED
WILLIAMSON COUNTY
CLERK & MASTER
2019 OCT 21 PM 3:58
FILED FOR ENTRY

I treasure it more
(But must be
than anything)

MY REGRET!

Thank you so much for leaving
the picture here for me (your painting).
It is out of no anger or resentment that
I leave it behind, I just can't keep it.
out of intense sadness of losing you!

MY PRAYER!

I hope you will keep it, and find that
part of yourself again. That happy, simple
playful place.

I also can't keep my wedding ring, so
you are no longer bound to that part. I just can't.
It would kill me. I buried mine back where our
little friends used to live. Not one came to visit
during my stay here, which broke my heart.

ELECTRONICS
TOYS & GIFTS

The blue ray was from Mack, the gas mask
has your name on it and was sized for you, the
monopod you asked for.

EXHIBIT
1

I am so sorry things ended this way,
but I can never speak with you again. To
protect my heart, not out of anger or resentment

MY HOPE!

BECAUSE MS. STORY
LITERALLY TERRORIZED
AND ABUSED ME BEYOND
BENEFIT TO ANYONE!

I will never communicate with Virginia
Story or anyone from her firm, ever again,
Regardless of the consequences.

MY OFFER:

IF, and ONLY IF THE
TERMS OF MY OFFER ARE
ACCEPTED. BUT MS. STORY
STEALS EVERYTHING, WHILE
SECRETLY DENYING MY TERMS!

If she will drop all charges and never
contact me again, then I will likewise
drop my 250 page counter motion set
for October 21ST.

MY TERMS:

REQUIRED CONDITIONS.
A VERY GENEROUS OFFER,
BUT THEY ALWAYS WANT
TO TAKE MORE BY FORCE!

I will mail you the free simple
divorce papers signed - and as long as
no lawyers are involved, we each walk with
what we have, assets + debts, and no
alimony etc... due either ever. only if we
finish non-contested together without a lawyer

WIFE HAS ALWAYS KNOWN THIS! THE "DANGER GAME" IS JUST LEVERAGE, TO GET THE POLICE TO HELP, AS THEY COMMIT A CRIME!

as we promised each other,

I would and will never hurt you or those you love in any way. Despite what they cost me.

I will always love you! I leave only with tremendous sadness, nothing more.

I OFFERED: TO LET HER GET AWAY WITH EVERYTHING! BUT HER OWN GREEDY LAWYER PUTS HER AT RISK SIMPLY FOR THE THRILL OF DOMINATING AND ABUSING ME MORE! WHEN IS ENOUGH, ENOUGH???

If Ms. Story tries to use any of this against me, I will dedicate my life to fighting and appeal this to state court where the sale of our home will be found and proven to be against state laws. If I never hear from Ms Story or her staff or court, then I'm done, and I surrender all. I will always love you!
I'm so sorry! JM

Please don't sell or discard any of this
(except gas mask + flower vase if you want.)

It was all worth MORE THAN MONEY.

or it wouldn't be sitting here

It is my kiss, on the
cheek goodbye! ~~Flower~~

kiss and hug pet
puppy for me

Non-Contested, No Joint Assets or Debts,

Divorce papers to be mailed to you
within 2 weeks. It might take
me a week to get to MI and
ordered this crap.

MY TERMS REPEATED:
TO MAKE ABSOLUTELY SURE
THERE WERE NO MISUNDERSTANDINGS,
QUESTIONS, OR CONFUSION, WHICH COULD FORCE
US BOTH THROUGH MORE TOTALLY UNNECESSARY PAIN!
WITHOUT BENEFIT TO ANYONE, EXCEPT FOR TO A SADIST!

MORE
TOTALLY UNNECESSARY
PEACEFUL REASSURANCE,
TO REMOVE ANY POSSIBLE
LINGERING THOUGHT, EVEN IF
FROM HER OWN FAKE STORY!

I will never be in Tennessee
again. You never have ANYTHING
TO FEAR FROM ME!

Goodbye FAWN!
Love,


FAWN ██████████ FENTON vs JEFFREY RYAN FENTON
08/29/2019

DESPITE MS. STORY'S PROMISE IN COURT ON 8/29/2019, TO HOLD COURT OVER THE PHONE - THEY REFUSED WITHOUT NOTICE!

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MS. STORY: Since he probably will be moving to Michigan, I would be amenable to him attending the final hearing by telephone if he doesn't want to drive back. And I can tell you, I will try to accommodate him in any way I can.

THE COURT: ~~I know you will. You already have.~~

MS. STORY: And, also, the order probably needs to say that Ms. Fenton can execute any other documents that need to be executed because he might not be here to sign anything, that Mr. Anderson might need signed. So I would like to be able to put that in the Order.

THE COURT: All right. Then if you'll prepare the Order, that'll take care of us. That's what we're doing. That's the Order of the Court. Thank you very much.

(Proceedings were adjourned at 11:44 a.m.)

2019-10-07 GIFTS LEFT AT OUR HOME FOR MS. FENTON WITH NOTE



2019-10-09 EMAIL FROM AUCTIONEER CONFIRMING MS. FENTON RECEIVED THE GIFTS, RATHER THAN SOMEONE ELSE TAKING, AUCTIONEER PROMISED ME A HUD-1 "SETTLEMENT STATEMENT" WHICH I NEVER GOT

[REDACTED]

From: Tommy Anderson <tom@tommyanderson.us>
Sent: Wednesday, October 9, 2019 6:42 PM
To: Jeff Fenton
Subject: Re: Closing | Utilities | Fully-Executed Settlement Statement
Attachments: image001.gif

Yes Fawn received all electronics and got them in her possession. I will have title company send you everything upon closing completion.

Sincerely,
Tommy Anderson

On Wed, Oct 9, 2019, 5:38 PM Jeff Fenton <jeff.fenton@live.com> wrote:

Hello Tommy,

Please let me know once the closing is completed, so that I can disconnect the utilities. They are all currently being billed to me, on my credit, and I need to minimize accruing debt, especially with zero proceeds from the sale, with which to pay any of my debts or expenses, while remaining unemployed.

Also, did you inform Fawn about the TV and Camera equipment at the house for her? Do you know if she has obtained that yet, or what her plan is? (I just want to ensure that Fawn gets the equipment, rather than the new buyer... he already got a good enough deal!)

Finally, I would like a scan of the fully executed HUD-1, emailed to me please, upon closing.

Thank you, sir.

Jeff Fenton
1986 Sunnyside Drive
Brentwood, TN 37027

Tenn. R. Sup. Ct. 1.0

Rule 1.0 - TERMINOLOGY

- (a) "Belief" or "believes" denotes that the person involved actually supposed the fact in question to be true. A person's belief may be inferred from circumstances.
- (b) "Confirmed in writing," when used in reference to the informed consent of a person, denotes informed consent that is given in writing by the person or a writing that a lawyer promptly transmits to the person confirming an oral informed consent. See paragraph (e) for the definition of "informed consent." If it is not feasible to obtain or transmit the writing at the time the person gives informed consent, then the lawyer must obtain or transmit it within a reasonable time thereafter.
- (c) "Firm" or "law firm" denotes a lawyer or lawyers in a law partnership, professional corporation, sole proprietorship or other association authorized to practice law; or lawyers employed in a legal services organization or the legal department of a corporation, government agency, or other organization.
- (d) "Fraud" or "fraudulent" denotes an intentionally false or misleading statement of material fact, an intentional omission from a statement of fact of such additional information as would be necessary to make the statements made not materially misleading, and such other conduct by a person intended to deceive a person or tribunal with respect to a material issue in a proceeding or other matter.
- (e) "Informed consent" denotes the agreement by a person to a proposed course of conduct after the lawyer has communicated adequate information and explanation about the material risks of and reasonably available alternatives to the proposed course of conduct.
- (f) "Knowingly," "known," or "knows" denotes actual awareness of the fact in question. A person's knowledge may be inferred from circumstances.
- (g) "Partner" denotes a partner in a law firm organized as a partnership or professional limited liability partnership, a shareholder in a law firm organized as a professional corporation, a member in a law firm organized as a professional limited liability company, or a sole practitioner who employs other lawyers or nonlawyers in connection with his or her practice.
- (h) "Reasonable" or "reasonably," when used in relation to conduct by a lawyer, denotes the conduct of a reasonably prudent and competent lawyer.
- (i) "Reasonable belief" or "reasonably believes" when used in reference to a lawyer, denotes that the lawyer believes the matter in question and that the circumstances are such that the belief is reasonable.
- (j) "Reasonably should know," when used in reference to a lawyer, denotes that a lawyer of reasonable prudence and competence would ascertain the matter in question.
- (k) "Screening" and "screened" denote the isolation of a lawyer from any participation in a matter through the timely imposition of procedures within a firm that are reasonably adequate under the circumstances to protect information that the isolated lawyer is obligated to protect under these Rules or other law.
- (l) "Substantial" or "substantially," when used in reference to degree or extent, denotes a material matter of clear and weighty importance.

Tenn. R. Sup. Ct. 3.3

Rule 3.3 - Candor Toward the Tribunal

BY LAW, any STATEMENTS or AFFIDAVITS written by a Lawyer, especially in an EX PARTE HEARING against a PRO SE LITIGANT, which FAILS to include ALL the MATERIAL FACTS KNOWN TO THE LAWYER, that will enable the tribunal to make an informed decision, whether or not the facts are adverse, constitute "FRAUD UPON THE COURT, BY OFFICER(S) OF THE COURT!"

(a) A lawyer shall not knowingly:

(1) make a false statement of fact or law to a tribunal; or

(2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or

(3) in an ex parte proceeding, fail to inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision, whether or not the facts are adverse.



(b) A lawyer shall not offer evidence the lawyer knows to be false, except that a lawyer who represents a defendant in a criminal proceeding, and who has been denied permission to withdraw from the defendant's representation after compliance with paragraph (f), may allow the client to testify by way of an undirected narrative or take such other action as is necessary to honor the defendant's constitutional rights in connection with the proceeding.

(c) A lawyer shall not affirm the validity of, or otherwise use, any evidence the lawyer knows to be false.

(d) A lawyer may refuse to offer or use evidence, other than the testimony of a client who is a defendant in a criminal matter, that the lawyer reasonably believes is false, misleading, fraudulent or illegally obtained.

(e) If a lawyer knows that the lawyer's client intends to perpetrate a fraud upon the tribunal or otherwise commit an offense against the administration of justice in connection with the proceeding, including improper conduct toward a juror or a member of the jury pool, or comes to know, prior to the conclusion of the proceeding, that the client has, during the course of the lawyer's representation, perpetrated such a crime or fraud, the lawyer shall advise the client to refrain from, or to disclose or otherwise rectify, the crime or fraud and shall discuss with the client the consequences of the client's failure to do so.

(f) If a lawyer, after discussion with the client as required by paragraph (e), knows that the client still intends to perpetrate the crime or fraud, or refuses or is unable to disclose or otherwise rectify the crime or fraud, the lawyer shall seek permission of the tribunal to withdraw from the representation of the client and shall inform the tribunal, without further disclosure of information protected by RPC 1.6, that the lawyer's request to withdraw is required by the Rules of Professional Conduct.

(g) A lawyer who, prior to conclusion of the proceeding, comes to know that the lawyer has offered false tangible or documentary evidence shall withdraw or disaffirm such evidence without further disclosure of information protected by RPC 1.6.

(h) A lawyer who, prior to the conclusion of the proceeding, comes to know that a person other than the client has perpetrated a fraud upon the tribunal or otherwise committed an offense against the administration of justice in connection with the proceeding, and in which the lawyer's client was not implicated, shall promptly report the improper conduct to the

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IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
AT FRANKLIN

CLERK OF COURT

2019 OCT 21 PH 3:56

FAWN [REDACTED] FENTON,)
Plaintiff/Wife,)
vs.)
JEFFREY RYAN FENTON,)
Defendant/Husband.)

No. 48419B

FILED FOR ENTRY 10/23/19

RECEIVED BY
Judges' Chambers
Date: 10-22-19 [Signature]

FINAL DECREE OF DIVORCE

THIS CAUSE came on to be heard on the 21st day of October, 2019 before the Honorable Michael W. Binkley, Judge, holding Court for the Chancery Court for Williamson County, Tennessee, upon the Complaint for Divorce filed by Wife on June 4, 2019 of which Husband was served on June 20, 2019. Husband has not filed an Answer and has had two attorneys both of whom have withdrawn. The last attorneys, Marty Duke and Mitchell Miller, withdrew on August 29, 2019 while Mr. Fenton was in open Court and Mr. Fenton stated that he wished to proceed *Pro Se*. The Court informed Mr. Fenton of self-representation and Mr. Fenton confirmed that this is how he wished to proceed. The Court set a Final Hearing date in the Order entered on August 29, 2019. The Court finds, based upon the undisputed testimony of Wife, a witness for Wife as to the grounds for the divorce, the exhibits introduced in this cause, and the record as a whole, that the following shall be the Order of this Court.

It is therefore **ORDERED, ADJUDGED and DECREED** that the Wife, FAWN [REDACTED] FENTON, shall be granted an absolute divorce on the grounds of inappropriate conduct. The parties' real property located at 1986 Sunnyside Drive, Brentwood, TN 37027 has a contract pending for sale. Attached is the closing statement and print out from the Bankruptcy Court as to the outstanding debt (**Exhibit 1**). There are no proceeds remaining to disburse. If for any reason the property does not close under the current contract, then Wife shall be granted all

WE HAD NOT EVEN BEGUN DISCOVERY YET! MS. STORY HAD GRANTED EXTENSIONS BY AGREEMENT BETWEEN ATTORNEYS FOR DIVORCE ANSWER & COUNTER COMPLAINT TO BE DUE - WHILE SHE PRIORITIZED THE FORCED DEPRIVATION OF MY HOME, AUCTIONING MY BEAUTIFUL \$500k BRENTWOOD HOME FOR \$0! RENDERING ME HOMELESS! FORCED TO RELOCATE TO SURVIVE!

right, title and interest in and to said real property and shall take all necessary steps to ensure that Husband's name is not associated with the property or the debt. Wife may sign any and all documents to close the property if a subsequent buyer is obtained and any proceeds shall be awarded to Wife free and clear of claims of Husband. The parties have divided all personal property. Each party is awarded all personal property in their respective possession. Wife is in Bankruptcy which addresses her debt allocation and she will be responsible for all her indebtedness holding Husband harmless for the same.

It is further **ORDERED, ADJUDGED and DECREED** that Wife shall be solely responsible for all indebtedness in her name or incurred by her including her Bankruptcy. Husband shall be solely responsible for any and all debts in his name or that he has incurred holding Wife harmless for same. If Husband does not pay the creditors and they seek payments from Wife and she is forced to pay the same, then Wife shall be awarded a Judgment for any amounts she has to pay for which execution may issue.

Additionally, neither party shall contract any indebtedness on the credit of the other from and after the date of execution of this Agreement.

It is further **ORDERED, ADJUDGED and DECREED** that each party shall be awarded any banking, investment or retirement accounts in their respective names free and clear from the other party. All joint accounts have been closed. All right, title and interest of either party in and to any account or account balance awarded to the other party shall be, and is hereby, divested out of that party and vested absolutely in the other party.

It is further **ORDERED, ADJUDGED and DECREED** that the parties will file 2016 and 2019 taxes separately. Each party shall assume sole and separate responsibility for paying any taxes, penalties and/or interest which may hereafter be finally determined to be due as a result of

income earned and/or received by that party or losses or deductions taken with respect to that party's income during any year for which the parties file, or have filed, joint income tax returns. Further, each party shall hold the other party harmless from any liability for such incomes taxes, penalties and/or interest as may hereinafter be finally determined to be due as a result of that party's misreporting of previous income.

It is further **ORDERED, ADJUDGED and DECREED** that Wife shall be awarded the 2017 Toyota Prius (VIN: [REDACTED]) titled in Wife's name free and clear of any claim by Husband. All right, title, and interest of Husband in and to said vehicle shall be, and is hereby, divested out of him and vested absolutely in Wife. Wife shall be, and is hereby, solely and separately responsible for any debt or liability associated with this vehicle as of the date of execution of this Agreement and shall indemnify and hold Husband harmless therefor. Each party shall be responsible for their own car expenses and insurance.


Husband shall be awarded the 2003 Buick LeSabre (VIN: [REDACTED]) titled in Husband's name free and clear of any claim by Wife. All right, title and interest of Wife in and to said vehicle shall be, and is hereby, divested out of her and vested absolutely in Husband. Husband shall be, and is hereby, solely and separately responsible for any debt or liability associated with this vehicle as of the date of execution of this Agreement and shall indemnify and hold Wife harmless therefor. Husband shall be responsible for liability insurance on the 2003 Buick LeSabre and further agrees to remove Wife's name from any insurance policy regarding the same.

It is further **ORDERED, ADJUDGED and DECREED** that Wife is awarded a Judgment against Husband for all court costs incurred for which execution may issue. Attorney for Wife shall file her Affidavit for the Court of the communication from Husband that he did not wish to


IT IS COMPLETELY UNREASONABLE TO VIEW MY NOTE LEFT WIFE AND CONCLUDE I FORFEIT CASE - WITHOUT ACTIONS BEING DROPPED, AS IS CLEARLY STATED! ALSO THAT I WOULD FILE A 250-PAGE RESPONSE TO BE HEARD! 18 U.S.C. § 242 - Deprivation of Rights Under Color of Law, 18 U.S.C. § 241 - Conspiracy Against Rights, 18 U.S.C. Chapter 96—Racketeer Influenced and Corrupt Organizations, 42 U.S.C. § 3631 - Criminal Interference with Right to Fair Housing, 42 U.S.C. § 14141 - Pattern and Practice

contest the divorce and that he was present in Court on August 29, 2019 when the Final Hearing was set to be heard.

ENTERED this 24th day of October, 2019.


MICHAEL W. BINKLEY, JUDGE
Michael W. Binkley
Circuit Court Judge/Chancellor
21st Judicial District, Division III

APPROVED FOR ENTRY:


VIRGINIA LEE STORY; BPR #11700
Attorney for Wife
136 Fourth Avenue South
Franklin, TN 37064
(615) 790-1778
virginia@tnlaw.org

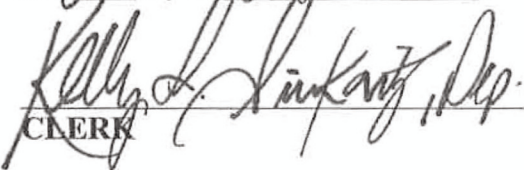
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded via U.S. mail to **Jeffrey Ryan Fenton**, Husband *Pro Se*, at 17195 Silver Parkway, #150, Fenton, MI 48430 this 21st day of October, 2019.


VIRGINIA LEE STORY

CLERK'S CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded to **Virginia Lee Story**, Attorney for Wife, at the above address, and to **Jeffrey Ryan Fenton**, Husband *Pro Se*, at 17195 Silver Parkway, #150, Fenton, MI 48430 this 30th day of Oct, 2019.


CLERK

TAKING MY HOME without DUE PROCESS! Chasing me out with the WCSO! Leaving me without food or shelter! Denying my 250-PAGES of TESTIMONY with CLEAR PROOF the CHARGES were ALL FRAUDULENT! WHILE \$10k of my PERSONAL PROPERTY WAS STOLEN! As they Ordered a FRAUDULENT "OP" Against ME! BREAKING EVERY SINGLE OATH OF OFFICE - I've NEVER even been ARRESTED! NO NOTICE or WARNING! NO "MOTION FOR DEFAULT JUDGMENT"! OUTRAGEOUS!

Jeff Fenton

From: Charles M. Duke <marty@mdukelaw.com>
Sent: Monday, August 5, 2019 6:39 PM
To: Jeff Fenton
Cc: Mitchell Miller
Subject: RE: Fenton v. Fenton

Categories: 4-Email: Important Information

Jeff:

There is no definite date certain by which I agreed with Ms. Story to file an Answer & Counter-Complaint. However, until there is an Order entered relieving us as counsel in this matter, you should not file anything pro se.

Thanks. have a good evening.
Marty

From: Jeff Fenton
Sent: Monday, August 05, 2019 5:36 PM
To: Charles M. Duke
Cc: Mitchell Miller
Subject: RE: Fenton v. Fenton

Thanks Marty.

Can you simply inform me of any critical dates which I need to self-represent by, as I can not afford further representation:

For example, when did you get the ANSWER & COUNTER COMPLAINT extended to?

Any other time critical dates would be greatly appreciated.

Thanks.

JEFF FENTON
METICULOUS.TECH

(615) 837-1300 OFFICE
(615) 837-1301 MOBILE
(615) 837-1302 FAX

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*Licensed in Kentucky

September 16, 2019

Via Email

Mr. Jeffrey Fenton

Email: [REDACTED]

Via First Class Mail

[REDACTED]

Re: Fawn [REDACTED] Fenton vs. Jeffrey Ryan Fenton
Williamson County Chancery Court No. 48419B

Dear Mr. Fenton:

Once Ms. Story obtained possession of my home, she reneged upon every commitment made during the 8/29/2019 hearing in Chancery Court.

My client was at the house over the weekend ~~and has indicated that you left the house in a mess despite you having known since August 1, 2019 that the property would be auctioned.~~ The costs for cleaning out the house and moving the items that you have tagged per the Court Order to storage will be in excess of \$2,000. Please send a check payable to Fawn Fenton noted for moving and clean up to my office address. I will provide you with each invoice so you have an accounting of actual costs.

Attorney Story said in Court on 8/29 that all expenses would be paid out of the proceeds from the auction (which hadn't even taken place yet).

If I do not receive a check from you in the amount of \$2,000 by Friday, September 20, 2019, we will have to sell the remaining items in the house and then dispose of the items that cannot be sold. Any proceeds from items sold will be deposited into the Clerk's office for distribution after payment of the costs.

This letter was dated and postmarked on 9/16/2019, while she is DEMANDING these funds by 9/20/2019, the day it reached Michigan.

As for the items you have tagged and for which you will send the \$2,000 advance by Friday, September 20, 2019, for the movers and clean up, please make the arrangements for a storage unit. This will need to be done by Thursday, September 26, 2019. Send me the name of the storage location and unit number with verification that the amount has been paid in advance so that when the movers arrive there are no snags.

Per Ms. Story's own fraudulent Ex Parte "Order of Protection", if I still had possession of my firearms, I would have GONE TO JAIL!

Finally, we did not locate any guns in the house. Please advise where they are located with the contact information or whether you have taken them with you to Michigan. If you have any guns in your possession, please provide an itemized list of all types, manufacturers, and models.

I see this being for absolutely NO reason other than BLOOD LUST! Wanting to forcefully TAKE and LIQUIDATE every single thing I owned!

Sincerely,

Virginia Lee Story
Attorney at Law

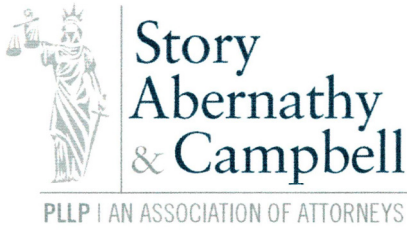
cc: Ms. Fawn Fenton

This is how abusive, heavy-handed, and bullying Attorney Virginia Lee Story treated me throughout every action in this mass deprivation of rights and property, without so much as HEARING my DEFENSE, while Judge Michael W. Binkley enabled and empowered her every cruel, savage, inhumane, and criminal actions. While neither showed any care for the Rule of Law, their Oaths of Office, either State or Federal Constitutions, the Judicial Canons, or the Rules of Professional Conduct! Ms. Story's actions are even in violation of BASIC INTERNATIONAL HUMANITARIAN LAWS!

williamsoncountyattorneys.com

* Rule 31 Family Law Mediator

In Court on 8/29/2019 (transcripts hidden in R.v4 (pages 495-523), Ms. Story INSISTED that I leave my Personal Property, at the residence for FALSE, fraudulent, and unsubstantiated reasons. Now, under false claims, having only had FIVE-DAYS NOTICE of a wrongful eviction, that SHE INSISTED upon in Court on 8/29, as I tried to meet her OUTRAGEOUS DEMANDS that I TAG every item I wanted to KEEP (nearly EVERYTHING I OWNED, which is WHY I OWNED IT). As I tried to assist my elderly disabled roommate/tenant, who ended-up HOMELESS as a result of her demands during my 8/1/2019 hearing, illegally ignoring his leasehold RIGHTS! Now Ms. Story is insatiably trying to EXTORT thousands of Dollars from my meager elderly mother, knowing that Ms. Story already TOOK my INCOME, my SHELTER, my SAVINGS, leaving me BROKE, HOMELESS, and DESTITUTE!



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virginia@tnlaw.org

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*Licensed in Kentucky

September 26, 2019

Via First Class Mail and E-Mail

Mr. Jeffrey Fenton
17195 Silver Parkway, #150
Fenton, MI 48430
[REDACTED]

Re: Fawn [REDACTED] Fenton vs. Jeffrey Ryan Fenton
Williamson County Chancery Court No. 48419B

Dear Mr. Fenton:

OH WOW!!! This just doesn't STOP! Judge Michael W. Binkley refused to perform his JUDICIAL DUTY to equality, impartiality, fairness, due process, mitigating loss, and stopping CRUEL MISCONDUCT by a FRIEND! (This was a DIVORCE, can I possibly LIVE through this?)

To follow up on correspondence sent to you on September 16, 2019, we never received any information on a storage unit you would like to use to store the extensive list of items you wish to retain from the Sunnyside residence. Therefore, Ms. Fenton took it upon herself to obtain a quote from Fox Moving and Storing to have these items packed, moved and stored. **The quote is attached hereto.** As you can see, the cost for packing only your personal items (i.e. remaining clothing, photos, etc.) is \$639.00. The cost for moving the larger items and your personal items is \$2,895.00. This would include moving the items to Fox's storage facility in Nashville. The cost to store these items in their storage facility would be approximately \$495.00 per month. Finally, to have all of these items packed and moved to Michigan, the cost would be over **\$6,000.00.**

At this point, it is our position that moving the items to Michigan is not financially responsible but that is up to you if you want to use any proceeds you received to have your items shipped. It is our position and that of Mr. Anderson's that the entire value of the remaining contents of the home is only approximately \$3,000.00, therefore the cost to move and store these items far outweighs their worth. However, if you would like for the items to be packed and stored in the Fox storage facility in Nashville then you will need to send a check to my office in the amount of \$3,534.00 no later than next Wednesday, October 2, 2019, made payable to Fawn Fenton and she will schedule the movers and the storage facility for one month until you decide if you want to have the items moved to Michigan. The only other option is to have the remaining property sold and any proceeds will be placed in the Clerk & Masters office for distribution at a later date. We will go ahead and file a Motion with the Court to sell or otherwise get rid of all remaining items in the home in the event that you do not agree to pay the cost for packing, moving and storing the items that you wish to retain.

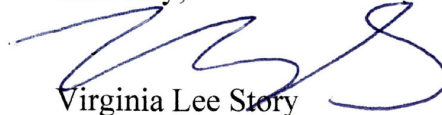
Then it doesn't SOUND like you FORCED me to LEAVE my Personal Property behind so that you can SELL it for any quasi-legitimate reason, but rather just to CRUELY HARM the disabled and financially disadvantaged party, EVEN MORE! PURELY for the DOMINATING POWER-TRIP, and FUN! That's WORSE than being GREEDY! That is SICK and SADISTIC! (Yet there's more still to come...) Is there any INTEGRITY at all within the Williamson County Chancery Court??? I can't see HOW on EARTH this is remotely JUSTIFIABLE!

Jeffrey Fenton
September 26, 2019
Page 2

Finally, you still have not disclosed where all of your guns are located. Please advise where they are located with the contact information or whether you have taken them with you to Michigan. If you have any guns in your possession, please provide an itemized list of all guns that you removed, manufacturers, and models.

I thank you in advance for your prompt response to these time sensitive matters.

Sincerely,



Virginia Lee Story
Attorney at Law

Enclosure
cc: Ms. Fawn Fenton

The most LAWLESS person I have ever met, on EITHER side of the LAW! Attorney Virginia Lee Story believes that I'll endlessly allow her to BULLY, ABUSE, ROB, RAPE, and TERRORIZE me and my family "under color of law"! SORRY! NO COURT OF LAW has the AUTHORITY or JURISDICTION for what you have DONE! EVERYTHING IS VOID IN #48419B and I'm pressing CRIMINAL CHARGES for at least a HALF-DOZEN State, Federal, and CONSTITUTIONAL FELONIES, which YOU committed along with the "help" of SEVERAL of your "FRIENDS"! You and Judge Michael W. Binkley can KILL me if you want, while the WHOLE WORLD WATCHES! I've already had extensive communications with the DOJ. I tracked down the same Nashville FBI "Special Agent" who Arrested Corrupt Nashville Judge Casey Moreland, after getting tired of being rejected by their call centers. You have MISJUDGED my courage! I will EXPOSE your crimes to every member of State and Federal Law Enforcement, local government, and Courts throughout the Country, until somebody cuts this CANCER out of the Williamson County Chancery Court! I know that I'm risking my own LIFE, but I'd rather die as a FREE man than live as your SLAVE! (Peaceful Protests!) I just hope the FBI/DOJ catches you in any further harm you try to cause me and my family, because I KNOW you will!

JUDGE MICHAEL W. BINKLEY & ATTORNEY VIRGINIA LEE STORY vs JEFFREY RYAN FENTON
WILLIAMSON COUNTY CHANCERY COURT | 08/29/2019 | #48419B | M2019-02059 | R.v4 (502:20 - 503:9)

20 MS. STORY: If he will tag the items that
21 he wants, like my client tagged the items per your
22 order, if he'll just put a tag on items he wants,
23 we'll make sure that those get stored, and then we can
24 use the proceeds from the sale. We're going to
25 deposit those into the clerk's office. And we can use
1 those to pay the next storage unit and then when he
2 gets ready to come here and get his things, or maybe
3 he wants to use some of his proceeds to have them
4 shipped to him...

6 So I'm trying my best to be as
7 accommodating to him...
8 this is going to be a simple process for him.

7

MISTITLED (AS FILED)

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
AT FRANKLIN

FILED
WILLIAMSON COUNTY
CLERK OF COURT
2019 AUG 29 AM 9:17

FAWN ██████████ FENTON,)
Plaintiff/Wife,)
v.)
JEFFREY RYAN FENTON,)
Defendant/Husband.)

FILED FOR ENTRY
Docket No: 48419B

HUSBAND’S RESPONSE AND COUNTERMOTION
TO WIFE’S MOTION FOR VIOLATION OF THE
EX PARTE ORDER OF PROTECTION AND FOR DATE CERTAIN FOR
WALK THROUGH OF HOUSE AND MOTION FOR SCHEDULING
ORDER

COMES NOW the Defendant/Husband, Jeffrey Ryan Fenton, for his response to the Wife’s Motion, along with Husband’s Countermotion, stating as follows:

First Husband would like to bring to the court’s attention, the disabilities with which he has been diagnosed, and continues ongoing treatment for. If not properly understood, one could easily draw incorrect conclusions, specifically about Husband’s communications, in how he speaks and even more so, his excessive use of words when writing. Please see Exhibit-A for a thorough explanation regarding this, from both Terry M. Huff (LCSW), Husband’s Psychotherapist, and Dr. Richard E. Rochester (M.D.), Husband’s Psychiatrist.

Husband suffers from the following handicaps:

Obsessive-Compulsive Personality Disorder (OCPD) DSM-5 301.4 (F60.5)

Generalized Anxiety Disorder (GAD) DSM-5 300.02 (F41.1)

Attention-Deficit Hyperactivity Disorder (ADHD) DSM-5 314.01 (F90.2)

There was also an agreed extension between counsel (Duke/Story) for me to file a formal divorce answer/counter later, which I still planned to do. I have a long recorded phone call with Attorney Mitchell Miller, where he instructed me on how to navigate discovery on my own. I filed this ad-hoc "One and Done" as a temporary emergency back-up, to protect myself from exactly the sort of "defaults" Story and Binkley still levied against me. I knew they were violating my rights and could not be trusted. **This was my insurance plan, which they still completely ignored.** The Judicial Canons, State, Federal, and Constitutional Laws, the Federal Rules of Civil and Bankruptcy Procedure, the State of Tennessee’s Rules of Judicial and Professional Conduct, all meant nothing. (Racketeering Under Color of Law!)

Circadian Rhythm Sleep Disorder (CRSD) Non-24-Hour Sleep-Wake Disorder (Non-24)
DSM-5 307.45 (G47.24)

Special Note: Although “OCPD” (Obsessive-Compulsive Personality Disorder) sounds very similar to “OCD”, a disorder and acronym which are much more common, “OCPD” is an entirely different disorder, with very little, if anything, in common with “OCD”. Please take a moment to discover the differences, as is well described, in Exhibit-A.

1. The Facebook post is deeply regretted and was deleted as soon as Husband was informed that it could be interpreted as a violation of the Temporary Order of Protection (within a matter of hours). Wife was not named in the post, furthermore the post was only to be found by searching the Husband’s “Stories”, not in the regular user “Feed”. Wife continued to search Husband’s “Stories” even after requesting the Temporary Order of Protection, based almost entirely upon fraudulent claims.

Still, Husband was wrong for venting on Facebook. Not only was the platform wrong, but the words which Husband angrily spewed were also very wrong. Not just because of the Temporary Order of Protection, but because they depicted God as Husband’s little “underling”, who “blesses” and “curses” people upon his command. That’s not who God is. God is Love. Likewise, I shouldn’t try to leverage any knowledge or belief in God, to harm, hurt, distress, curse, anyone, ever! For that Mrs. Fenton, I am sincerely sorry, and I ask that you please forgive me. I also ask for you to please remember, that despite what all I may think that I know, or see, or find true, that your Father God loves you, and he is NEVER going to curse the work of your hands or your heart. God will always love you through the most warm, expectant, grateful, compassionate eyes, which you’ve ever

imagined. Though we may both do great wrongs within our lifetimes, God will never see that when he looks at you!

As for those who are shaken, scared, or concerned about Husband's extreme verbosity, grandiose language, searching, frustrated, angry, and at times even hostile WORDS, that is ALL that they are. They are not words which lead to something worse. There is no need to "read between the lines". Husband has no (or very, very little) "internal filter". If there is something on Husband's mind, then he says it, probably five times. So, if anyone is "adding to" Husband's words, fearing some greater storm ahead, they are fictitiously making-up a false narrative, as the words are the entire payload. They are the only thing that Husband has ever "threatened" anybody with.

In nearly 50 years, Husband has never been arrested for anything, ever. Husband hasn't even been cited with a traffic ticket, during his 25 years living in Tennessee. Prior to Wife's secretly planned divorce, which Husband was the last to learn about, "words" had usually been Husband's friend, and were often held in high-esteem by others, though you would never know it by looking at the wreckage of the past year and a half of Husband's life. There has been too much loss, too quickly, during too vulnerable of a season. With Husband's words, he is literally "fighting for his life". He has not a dollar, a home, a job, or a vocation to leverage in defense of himself. "Words" are all that Husband has (along with proof when there is time), and they just haven't been enough to survive this unforeseen, dedicated, non-relenting, course of mammoth unrecoverable loss.

Husband has never been physically aggressive. Husband can't remember getting into a "fist fight", in his entire life. To accuse Husband of physical violence, is not only inaccurate and unsubstantiated, but it is also harassing, abusive, and violent to Husband's character, which he takes very seriously.

Though you may be able to read Husband's words, with the intensity and ferocity which they sometimes bring, and interpret them to be suggesting or threatening any type of "physical violence", that is never what Husband is threatening or even suggesting. Husband's greatest threat, to anyone, is to lock himself inside his office for a week, while publishing painfully clear evidence online (if you can touch it, if you can feel it, if you can smell it) of the wrongs which someone else has leveraged to harm Husband. Regardless of what sort of "package" Husband comes "wrapped-in", the truth is on his side. For Husband cares not enough about what someone else thinks of him, to be pretentious. To be fake. To be egotistical. To be proud. Husband's top-two values in life are truth and authenticity. Citing, "To thine own self be true!"

To add context to the following two sentences, Husband is talking about a family of 8-racoons and a few opossums which he feeds at the marital residence's back door every night, with water kept outside for them year around. "Yet it will be too late to save my family of friends. They will be confused and distraught, with some probably even perishing, waiting for me to come home and care for them, yet never will I be allowed."

Husband and Wife are both critter lovers and gotten many hours of enjoyment from all the wildlife here at Sunnyside. We first had a groundhog who lived under our deck for four

years, with two or three litters of pups, who would wrestle and play on our rear deck daily. (The last groundhog left from those litters, died on the same day which I was served the Divorce Complaint and the Ex Parte Order of Protection, from Wife's counsel.) We had a really cute skunk for a while, along with probably a dozen different opossums, who have become what we call our "Yard Pets". Now three generations of raccoons are Husband's daily guests.

Every night, Husband and Wife (now just Husband), puts out a bowl of food (size depending upon the number of guests), calling the critters in for dinner, after which they typically arrive to eat within a matter of minutes. (One of the things which Husband will miss the most.) With the marital residence backed-up to a massive hill, where Husband and Wife own to the very top, with hundreds of acres of undeveloped woods behind it, Husband and Wife purposely built a 3-sided fence around their backyard, so to keep neighbors and their pets out (to protect our wildlife), while leaving the back of the property unfenced, so that wildlife can freely come and go. Furthermore, over the past decade, Husband has hauled all the brush and branches from tree trimming and clearing, up into the woods, creating two massive brush piles, for the critters to live in, find shelter, and thrive. This area is full of life and was one of the truly unique attributes of this property, which Husband and Wife shall never be able to replace.

The marital residence is located in a deep and narrow valley. Across the street, the homes all backup to "Owl's Hill Nature Sanctuary", so that our valley is surrounded on all sides by hundreds of acres of protected woodlands, while being centrally located between downtown Franklin, downtown Brentwood, Green Hills, Belle Meade, and Bellevue, with

a direct path into the West side of Nashville via Hillsboro Road, where some of the most highly paid vocations exists. The neighborhood has the peaceful atmosphere of a campground or park, yet it is as close to the city as you can get, while living in such serene surrounds, for anywhere near the price-point of the marital residence. Husband and Wife expect that as Nashville continues to develop, that this property will double and maybe triple in value within their lifetimes. This home was their retirement plan, in addition to eventually starting a small architecture business from home, in another 15 years, once they are at retirement age, with Wife being the Architect, and Husband handling all the marketing, bookkeeping, and learning to draft, to assist Wife. This was their entire “retirement plan”, being as all their “retirement savings”, was entirely invested into the purchase and improvements of this property. Complimented by the home being scheduled to be fully paid-off within those 15 years, so that part-time employment from home would comfortably support them both, while living in paradise, the nicest residence and neighborhood which Husband and Wife had ever lived, and likely ever will.

Regretfully with this divorce, plus the massive added loss from selling the marital residence, home, before it appreciates beyond all which they’ve invested in it, Husband will never be able to realistically “retire”. In addition to having no savings, while having a large pile of debt in his name, with no technical skills qualified to employ husband with even a mediocre income, and not enough “working years” remaining for Husband to ever advance enough in any professional field, or to accrue any meaningful savings, with which to fund any sort of “retirement”. Additionally, since Husband has not held a W-2 job paying Social Security in over a decade, Husband will have extremely little Social Security

to even look forward to, a massively disadvantaged future from any which Wife shall be privileged to enjoy. Some of Wife's family is also very wealthy, so Wife stands to inherit enough money to independently fund her retirement, while Husband has no such fortune to look forward to.

So the marital residence, rich in value to both Husband and Wife, for not only the fantastic location and expected appreciation, but also because of being land-locked by huge protected lands, in the most wealthy and vocationally prosperous county, as well as arguably the best section of that county, intended to vocationally and economically benefit Husband and Wife for the remainder of their lives.

The loss of the marital residence, is not only the loss of a couple hundred-thousand dollars, to a family who can't sustain such a massive loss without pushing them both into bankruptcy, but it is also the loss of over half a million dollars of future value and opportunities, the loss of the only chance which Husband will ever have at "retirement", while currently almost 50 years old, and the loss of a standard of living which Husband will never be able to obtain half of again, within his lifetime.

If you wonder why Husband has been reluctant to sell his Home, it is not only the totality of all that he has worked for and accomplished in life, but it is also the only vehicle by which Husband could have leveraged to obtain anywhere near the same standard of living, to that which the Husband and Wife were privileged to enjoy together.

This divorce, along with the loss of the marital residence, considering Husband's disabilities and the vocational challenges which he will face for the rest of his life, is

essentially the loss of Husband's life as he has known it, and worked all his life to obtain and sustain. Husband has deeply grieved the loss of Wife and their family of furry "children" (a dog, two bunnies, multiple aquariums). Husband has also deeply grieved the loss of their marital residence, along with the tremendous value which it represented. Most of all, Husband has grieved the loss of his life, as ever he has known it, with this mammoth and catastrophic economic loss, which there is no plausible way for Husband to fully recover from, within the remainder of his lifetime. Now Husband will need to live in the basement of his mother's small two-bedroom, one bath, home, for a season. Located in a small town in Michigan (near "Flint), over an hour away from industries and vocational opportunities, equal to probably a quarter of the vocational opportunities, currently within 10 miles of Husband's home. In taking away his residence, Wife and the courts which Wife "gamed" and leveraged to oust Husband, have doomed Husband to a lifestyle ¼ of that which he has enjoyed over the past decade, and less than half that which Husband had 15 years ago, prior to meeting Wife.

While the court may deem Husbands rigidity in selling his home and his future to be unreasonable, Husband was literally "fighting for his life", with ultimately no say or control over the fate which Wife unilaterally forced upon him. Wife admitted knowing that this would realistically be a loss which Husband would never be able to recover from (even crying and apologizing), but regretfully Wife justified that Husband was an "acceptable loss" to regain her "independence". Demanding her "freedom" to enjoy the fruits of her vocational achievements, which have only been accessible to Wife and obtained because of the significant contributions (not mentioned herein) which Husband truly made to

Wife's licensing as an Architect, and the advancement of her career. While Wife will now temporarily seek to become "under-employed", at 50% - 75% of her current earning potential, helping to justify her bankruptcy, while alleviating much of the obligation to pay Husband alimony, under the guise of mental trauma and physical illness, which she erroneously attributes to Husband.

Really, Wife has managed narcolepsy successfully for well over a decade, and while early and extreme menopause has certainly taxed Wife physically for the past five years or so (which Husband largely blames for Wife's shift in allegiances to her family, ultimately pressuring Wife to divorce Husband), along with the mental stress of choosing to gamble so much money/debt/retirement, to oust Husband, while Wife has seriously compromised her integrity, committing fraudulent, unethical, and criminal acts, which she persists in, including perjury at both the State and Federal levels. This brings with it the risks of not only incarceration for Wife but could potentially result in the loss of her license as an Architect, for such blatant ethics violations. Husband believes that by Wife adamantly refusing any sort of "fair" divorce settlement, preferring rather to physically, mentally, and financially sabotage and destroy herself, forcing the loss of all their marital assets, that Wife is essentially giving herself "Chronic Fatigue Syndrome" in the process, by her absolute unwillingness to compromise at ALL costs.

Husband believes, based upon conversations with Wife, both oral and in writing, that Wife has been planning this since the end of 2018, knowing that her boss was soon planning to retire, while anticipating her Federal Income Taxes to increase to \$31k per year post-divorce, under the new tax laws which went into effect at the start of 2019. Filing signally,

living in an apartment, while refusing all tax-wise options which Husband has fervently presented to Wife, as both an incentive and reward, to encourage Wife to continue to grow her career. Which is why Husband believes that Wife refused to sign any agreement with Husband, committing to the 50/50 equity split from selling the marital residence, combined with the \$1,750 per month in “transitional” alimony, which the couple had verbally agreed to, for a duration of 6 years. This verbal agreement (also communicated via email) was a condition to the “Non-Suit”, which they filed to sell their home outside the oversight of the courts, with Husband temporarily moving to Michigan. Since Wife repeatedly refused to “put her own words into writing”, to secure Husband’s equity split and their alimony agreement, Husband refused to relinquish possession of the marital residence, which had been his only “leverage” since wife abandoned him, because both mortgages were in Wife’s name.

As shown in a text message from Wife, on December 22nd, 2018 (Exhibit-B), Wife stated to Husband as follows:

“Correct, my tax situation is going to suck for a very long time... 90k gross – 31k taxes – 21k alimony = 38k net. Plus or minus.”

Wife went on to say:

“Someday when alimony is done, I **can** get a job making only \$43k gross and have the same net of +/- \$38k.” (Emphasis added to point out that apparently the lower income is Wife’s preference.)

Husband already had concerns, but as a result of this conversation via SMS, Husband became convinced that Wife planned to down-size her career, to reduce both her alimony and her income taxes, once her boss retired within the following year. Husband further became convinced, that this was Wife's compelling reason for refusing to sign the previously agreed upon terms of their verbal settlement agreement, to Non-Suit and sell the marital residence outside the courts. Husband was rightfully concerned, that had he gone to Michigan without a written agreement signed, that wife would have "stiffed" him, once the marital residence sold, knowing that Husband could not afford to pursue an out-of-state lawsuit against Wife, for alimony, nor could Husband afford to move back to Nashville, without alimony, after Husband surrendered possession of his home.

Several months later, in a face to face conversation with Wife, Wife admitted that she didn't sign the agreement, because she wasn't sure that she could afford the agreed alimony, speaking of seriously downsizing her occupation after her firm closed, stating that she is even considering seeking part-time employment, instead of her fulltime job.

This was when Husband knew that he could not rely on alimony to help rebuild his life, so Husband decided that his best chance at not losing literally everything, was by trying to keep the marital residence. First Husband planned to obtain roommates, to leverage the wasted space currently in the 2,500 square foot home, while also meeting both Husband and Wife's negative monthly cashflow (Wife claimed to have a negative cashflow of \$400 - \$500 monthly). After obtaining roommates, with Husband's total rents equaling \$1,400 per month, Husband gave Wife the financial benefit of approximately \$900 of those rents, per month. Which should have lifted Wife out of the red, with a positive monthly cashflow

of \$400 - \$500. This is why Husband believes that Wife needed to accept a voluntary pay cut with her employer, to prepare Wife to meet the financial qualifications for filing Chapter-13 bankruptcy.

Shortly after Husband discovered that Wife had filed bankruptcy, Husband was served with both the Ex Parte Order of Protection, and Divorce papers once again, after Wife had assured Husband, that she was done “wasting” her money on lawyers for a “contested divorce”. Husband had been emailing Wife extensively, to ensure that she was keeping up the mortgage payments on their home, which Wife simply refused to answer or reply to. Since the home has Husband’s life invested into it, keeping the mortgages current was critical to Husband, but he no longer had access to the mortgage information, being in Wife’s name, since she had changed the account credentials to lock Husband out.

Despite how many times Husband asked Wife about the status of the mortgages, and even if Wife choose to “keep” the home in her bankruptcy (elected by one checkbox on the bankruptcy forms), both which Wife refused to answer. Then to make matters worse, the frequency of those very emails, in comparison with how frequently Wife chose to reply, was used by Wife and her counsel, as substantiation for requesting an Order of Protection for Wife. Although those emails contained urgent concerns regarding the possibility (and now a forced reality) of Husband losing literally everything, those emails did not contain anything malicious, and certainly not anything threatening, by any means. Yet Husband’s counsel chose not to take the matter to trial, but rather to settle for maintaining the Ex Parte Order of Protection, throughout the duration of the divorce.

Husband understood that the Ex Parte Order of Protection prevented Husband from pursuing Wife, entering her world, or interfering with her life in any way. What Husband absolutely did not understand, was that this Ex Parte Order of Protection still allowed for Wife to enter Husbands world, interrupting the sanctity, privacy, and enjoyment of his home, legally forcing Husband and his roommates to vacate their home for hours at a time, under the threat of incarceration, should Husband refuse to comply.

This, combined by the instant loss of his home, per court order, absolutely pushed Husband over the edge, leading to Husband lashing out inappropriately on Facebook, after days of physical and emotional exhaustion, compounded by the stress of accruing a massive financial debt to his mother for legal fees, without even reaching the stating gate for his divorce. At that point, accruing more debt to maintain legal counsel, no longer made fiscal sense for Husband, especially in light of the fact that his home, which was the Husband's only meaningful asset, had already been ordered by the court to be auctioned in 45-days, with no minimum.

Since wife has preemptively filed for bankruptcy, substantially less financial relief is expected to be obtainable from her. Despite Wife's role as the family's primary breadwinner for over a decade, [REDACTED]

[REDACTED] and the breadth of financial and legal bullying" which Wife had engaged in against Husband, while using both illegal and unethical tactics to undermine the equity in their home without Husband even knowing. Both by accruing "marital debt" on her credit cards, to support two residences, after Wife abandoned Husband, with a poorly planned

budget, which could never cash-flow, as Husband immediately pointed out to Wife. Unfortunately, Wife insisted that she was smarter than Husband and “would figure it out”.

Having managed the couple’s finances for over 13 years, Husband knew beyond any doubt that the couple could not afford two Brentwood residences. They simply didn’t have enough income to support or justify such a brash and irresponsible decision. The evidence of which now is Wife having been substantially fined by the IRS, after her first-time filing taxes for the family, while again aggressively refusing Husband’s assistance.

Wife even fraudulently filed the couples 2018 joint tax return, without Husband’s knowledge or consent. While she changed the marital address from the family’s home to her apartment, changing the phone on file to her own, and scheduling the automatic refund to be deposited directly into her personal and now private bank account, without so much as notifying Husband. This demonstrates the extent to which Wife has been on a power-trip beyond anything that Husband had previously seen in her, as she continued to financially and legally “bully”, dominate, and oppress Husband, throughout Wife’s crusade to “cut-off every limb” to simply discard Husband, without offering Husband any post-divorce support or assistance of any sort.

At one-point Husband asked Wife:

“Is there anything that I can do to help you, besides die?”

To which wife honestly answered:

“No.”

Later on, in a text message, Wife told Husband:

“You won’t do anything for me, you won’t let me be free.”

As bad as Husband felt, still he was trapped inside a home which he could neither afford to keep nor to leave, as wife constantly “ripped the carpet out from under his feet”. While denying Husband any opportunity to establish some basis of stability, without needing to rely upon Wife. That was one of the primary objectives for Husband obtaining roommates. Since most of the money went to benefit Wife anyways, Husband did not obtain roommates, choosing to share his living space with random strangers, simply for the immediate benefit.

Rather Husband was attempting to build a foundation which would be sustainable as Husband tried to obtain the vocational training and future job which would allow him to finally “free” Wife without the exorbitant need for alimony.

Husband’s goal was simply to provide Wife with as much financial relief as he possibly could afford, putting off other financial commitments such as repaying his mother, and continuing to increase that relief as rapidly and substantially as possible. Hoping to gain back his financial independence, prior to Wife self-destructing, setting Husband back more than he could ever realistically recover from. Having shared that strategy with Wife (thinking it would appeal to her), Wife intentionally filed bankruptcy, before and to deny Husband of the opportunity to succeed in his declared agenda; to help save them both from financial ruins.

Utilizing a highly-strategic, extensively planned, fraudulent, focused, devoted, and relentless attempt to “discard” Husband without paying the alimony which Husband was legally due, as well as realistically needs, to have any chance at independently sustaining himself again, with even a fraction of the standard of living which he possessed 15-20 years ago. Husband believes that paying alimony is Wife’s greatest fear, both due to her economic loss while doing so, without the beneficial tax advantages it included prior to 2019, compounded and exceeded by Wife’s fear of her “losing face” with her elite, over-achieving, prosperous, snobbish, condescending, and judgmental family. (EXHIBIT-Z)

Husband believes that Wife’s current philosophy is, that she can destroy herself, be burned to ashes, and still recover quicker, than she could if she agreed to pay Husband alimony fairly. Alimony could last for 6 or 7 years, while only providing Wife with enough income remaining to sustain the rest of her debt, after which she would still need to slowly pay it down. By self-sabotaging her career for a season, Wife has chosen to file bankruptcy, which will have all her debts legally satisfied in 3-5 years, while avoiding the expense of ever needing to pay Husband any substantial alimony. Although a complete betrayal of Husband (again), while further harming his chances at recovery, self-sabotaging and filing for Chapter-13 bankruptcy, as Wife has done, is literally the quickest path for Wife to financially recover. It will literally lead to at least a 50% quicker financial recovery time for Wife, than meeting her financial obligations to Husband and her creditors.

Meanwhile Husband is without, unqualified for, and possibly incapable of obtaining and maintaining gainful employment, a home again where he can both feel safe from storms (a serious phobia associated with Husband’s GAD (Generalized Anxiety Disorder), where

Husband previously built a 40,000 pound, highly sophisticated storm-shelter in the basement of his Duplex, prior to meeting Wife. While Husband also feels safe in their current marital residence, since the home has a massive South-West facing hill, the direction which most severe weather comes from, following the jet-stream (this was a serious consideration in originally purchasing the home). Nestled within a tiny valley, which effectively makes the entire home, the safest place in which Husband has ever lived, which he has enjoyed without concerns about the weather, since it rarely impacts the home. Due to the natural shelter provided by the home's precise geographic location. (Previously, weather was a daily fear for Husband, affecting every facet of his life.)

To punctuate how critical this was, Husband and Wife would not have literally purchased a house on the opposite side of their street, since the South-West facing hill was so critical to Husband, in order to willingly forfeit the security and peaceful assurance, provided by his comfortable, customized, extremely robust storm shelter, which Husband had built inside his Duplex, prior to meeting Wife.

Now in addition to Husband losing the value of his home, Husband also lacks anywhere affordable to live, without Husband being physically forced to liquidate or discard the majority of his personal property, which is bulky, not of much value to others, but extremely important to Husband. So, Husband shall loose on every level, walking away from this marriage with less than he had 20 years ago. Crippled financially, materialistically, vocationally, and credit wise. Along with the increased physical and mental challenges, which typically increase with age, pushing the goal of recovery with a

fraction of the standard of living previously enjoyed (both prior to meeting Wife, and since) further out of Husband's reach.

Husband is repentant for that which he has done wrong, more than most people will ever understand. Husband understands that without his complicity and misplaced trust, he could have never found himself in such a dire state. Yet there is something much greater being done "wrong" here to Husband, than by Husband. As Wife leverages the law, along with her violent character assassinations of Husband, with a fraudulent narrative, the uncommon minority stereotypes, media hype, and social anxieties. While gaining sympathy playing the victim, exploiting common misperceptions about the "weaker" more "fragile", "innocent" and "needy" gender. That is certainly the story which Husband believes that Wife would like the court to believe; however, that's not what Husband believes that the evidence here shows.

a Husband was sleep deprived, distraught, and overwhelmed after court on August 1st, when Husband learned that he is losing his home, which holds his entire life's savings, all his retirement, and nearly a decade of work, by the aggressive, unfair, harassing, demeaning, strategically planned, multi-faceted legal assault by Wife and her counsel. Wife's main objective is to not pay Husband alimony, at ALL costs. Even at the expense of destroying herself; her career, her health, and her life. (Claim will be backed with significant documentation.) Especially after the 2019 tax reform laws, where alimony is no longer tax deductible for the advantaged

party. Even though Wife has been the primary breadwinner for the past 12 years of their marriage.

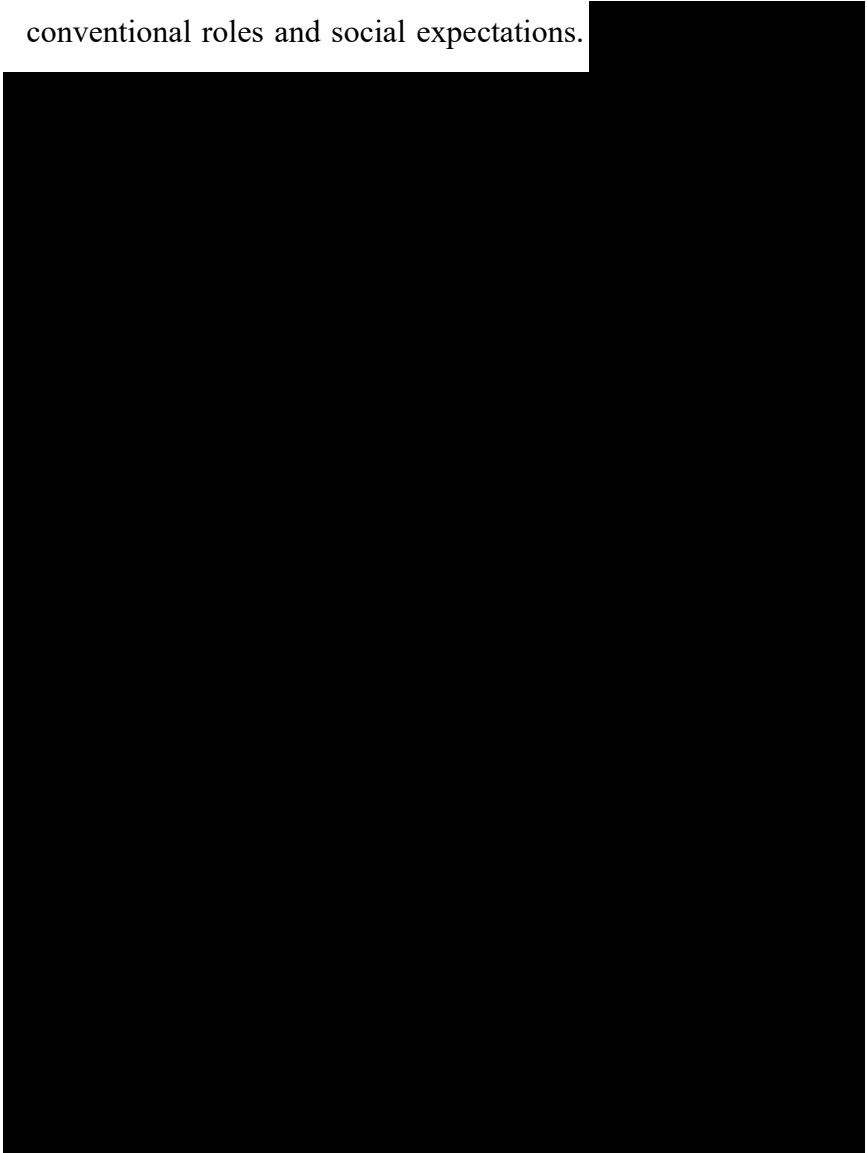
b Wife has been “bullying” Husband, both financially and legally, with false claims. Wife’s first divorce complaint stated that Husband is crazy, but highly skilled and employable, a complete contradiction of claims. Now Wife’s narrative is that Husband is dangerous, while being highly employable since he is a “genius” with computers.

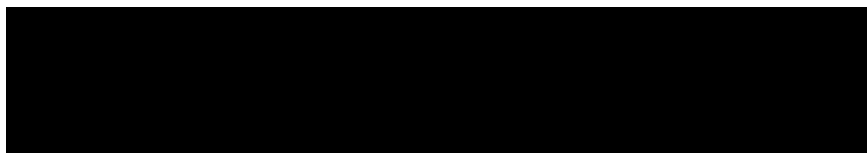
i Husband has been tested to have an IQ of 100, which is as perfectly “average” as they come.

ii Husband is not a “genius” at anything, especially related to any specific vocation, as he has spent his lifetime diluting his vocational value to any one discipline, by migrating from trade to trade, primarily determined by supply and demand, rather than passions, interests, and aptitude, which has been Wife’s privileged vocational history. Prior to marriage, without any higher education, Husband has always been a blue-collar worker, often working two and sometimes three jobs simultaneously, simply to support himself with a comfortable but much, much lower standard of living, than the couple had together.

c Wife claims that Husband refuses to work.

i That claim couldn't be more of a lie. Husband works constantly to try to meet every need of the family, to contribute "his share", and to (impossibly) please Wife. Husband has never been lazy, nor even accused of such. Wife complains now, accusing Husband of refusing to have a job outside their home, because it adds leverage to her divorce complaint, based upon conventional roles and social expectations.





iii Wife repeatedly assured Husband, that as long as the two could live on her income, without accruing a negative cash-flow, increasing their debt, that Wife was absolutely content in living their entire lives on primarily Wife's income, in order to have Husband manage and take care of every other major need for the family, and to be at her beckon call. Wife affectionately called Husband her "House Husband", both publicly and in private.

iv Wife also liked having Husband constantly at home, to care for, meet any emergency needs for, and provide company to the family's pets. Wife is a very abnormal pet lover, beyond any common conventional belief structure, and would sacrifice anything to ensure the happiness of the family's pets.

d Wife claims that Husband refused to sell their marital residence, despite the dire financial condition which Wife was in. That Husband was a constant obstructionist regarding the sale of their home.

i Though the home is a once in a lifetime opportunity for Husband and Wife, originally cherished by both, holding almost their entire net worth, which Husband had not only invested all

of his wealth into, but also his daily labor maintaining and improving the property for nearly a decade.

ii Recognizing the realistic alternatives while trying to determine how to rebuild his life, there were many times, frequently for several months, within the past year and a half, when Husband was not only willing to sell the marital residence, but Husband even offered to freely surrender his equity to Wife twice, with the sole condition that Wife live in the home and enjoy it for five years, before selling it, simply to profit from cashing-out and keeping both of their equity.

iii In all the above-mentioned instances, for one reason or another, often without Wife even providing an explanation or a response why, Wife chose not to perform, hence keeping our joint ownership in our home.

iv The urgent financial need has been fabricated by Wife, and Wife has refused to put the primary terms of her own verbal settlement agreement with Husband, on paper. Resulting in at least as much delay in selling the home as Husband has caused.

e With Wife possessing a degree from MIT, and being a licensed architect, with a \$94k per year gross income, which is actually an income of \$116.5k per year with her employer provided benefits included (while

Husband was a high-school drop-out and has never made over \$50k per annum), neither of which would have been possible without Husband's support, it was jointly determined, very early in the marriage, that Wife's time is best leveraged earning income, while Husband's time is best leveraged making said income work hard and efficiently for our family, while filling every other crack in our lives. Husband managed, customized, and cared for our homes and their properties. Husband managed our finances, managed our taxes, managed a rental property for most of the marriage (Duplex), which Husband previously owned. Husband also ran several small businesses, from being a Residential Real Estate Agent, to opening a small marketing firm, building websites, performing IT work both locally and remotely, while managing and maintaining most of the Tech needs of Wife's architectural firm, for many years.

f Husband is completely self-taught in the area of computers and technology, without any licensing or certification, and having never worked for any company in that capacity, except for his own tiny start-up, which almost completely serviced Wife's employer. Similarly, Husband's "jack of all trades and master of none" career path, has diluted his value in any one specific discipline.

g Prior to the marriage, Husband worked blue-collar jobs all his life. The most recent of which was running multi-million-dollar printing presses, for Atlantic Envelope Company, with the global FedEx contract for

manufacturing their Tyvek envelopes. Husband was one of the top-three “Lead Pressmen”, in both skill and wages, within his manufacturing plant. This was a good job, with good benefits, including an hourly rate of \$24 per hour at its best, but there was a hard ceiling at that point with no room to grow, advance, explore, or excel.

h Husband’s employment with Atlantic Envelope Company ended shortly after the marriage, after Wife obtained her Architect’s License with Husband’s help. Wife encouraged Husband to pursue a career in Real Estate, which excited us both for a while, as we explored the intersection between Architecture and Real Estate, taking on a “flip”, rehabbing it literally from the ground-up, and selling it, while we studied other investment models and properties. In the end, both Husband and Wife found Real Estate to be stressful, unreliable, and generally disappointing. Through an aptitude test in counseling, both learned that Husband is “wired” more toward the technical professions, instead of what are primarily “people centric” occupations.

i Husband regretted leaving Atlantic Envelope Company for several years, since it was the best money and “fit” which he had found so far. Husband only feels good about a job, when he is seasoned, proven, and can out-perform most of his co-workers. Husband has always found his security in his skills, never before in his relationships.

j Within a few years, Atlantic Envelope Company was sold a couple of times, then they went bankrupt. The Nashville plant was closed, and finally the entire company went out of business. The same has been the case for CPS in Franklin, where Husband previously worked as an “Assistant Pressman”. Along with nearly every manufacturing printing company in town. Printing, once the second largest industry by volume, in the Greater Nashville Area, probably isn’t within the top 100 today. The industry is simply gone, largely due to home computers and overseas manufacturing.

k Husband needs vocational rehabilitation, in order to focus training on a specific tech discipline, to grow his skills, value, and to earn a certificate or license in an area which has the capacity to earn what Husband made prior to the marriage, over twelve years ago. Husband’s only IT “reference” currently, would be Wife and Wife’s employer. Neither of which are willing to lend their endorsement, despite Husband’s excellent performance in serving their firm, in different roles for over a decade. While simultaneously saving them a small fortune, compared to industry-standard rates.

[REDACTED]

Wife has manipulated and taken advantage of Husband, as well as the legal system, while extorting every bit of value from Husband’s life, finally to discard him as a piece of trash without any responsibility or care. Wife blatantly lied to this court, to pretend to feel “physically

threatened”, when Wife knows clearly that “words” are Husband’s “weapon of choice”. Actually, words are really what Wife fears the most from Husband, not in the toxic or abusive sense like she is portraying and you would expect (we rarely even communicate anymore), rather Wife fears Husband publishing evidence online, showing Wife’s unethical, senseless, careless, and even criminal activities. Some of which Husband must now share here today, in order to have any chance at a fair trial, after the exhaustive amount of false and fraudulent narrative which Wife and her counsel have repeatedly attacked Husband with now (4x), before Husband even had the opportunity to file an “Answer and Counter Complaint for Divorce”. Despite the false narrative presented by Wife and counsel to date, Husband continually wrestled with his first Attorney to file the “Answer and Counter”, ultimately bringing about his “change in counsel”, at Husband’s choice.

a Wife’s real reason for wanting an Order of Protection, was to use as a GAG order, preventing Husband from notifying the public online, or through local media, the scam which Wife is getting away with, legally and financially dominating Husband and then dumping him here, while self-sabotaging and lying about assets to qualify for bankruptcy, simply to exhaust any financial relief Husband is due, both during the interim, as well as after the divorce, by way of alimony.

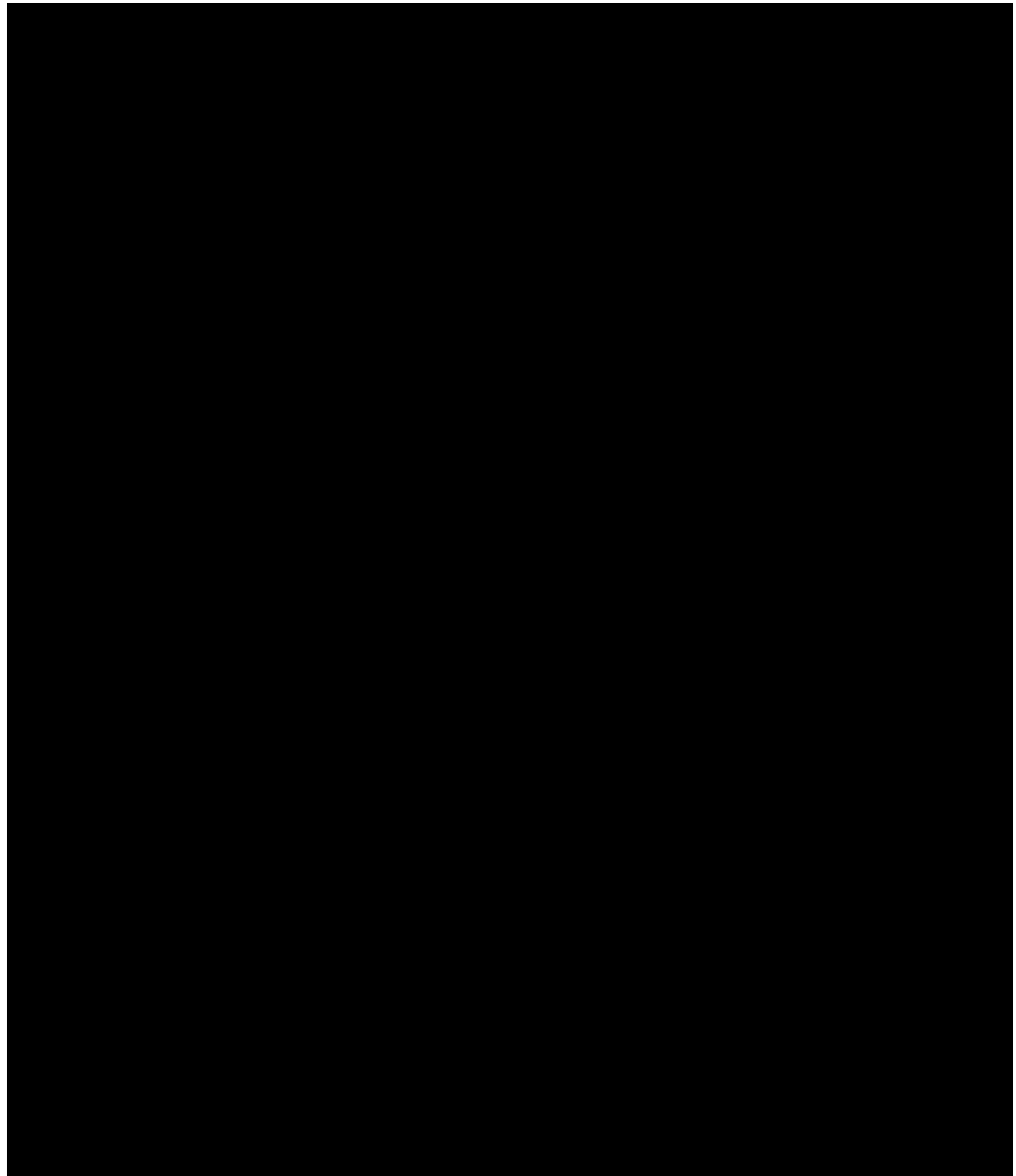
b Through “Collaborative Divorce” with Sandy Arons, Husband and Wife learned that husband should be legally due between 22% - 24% of Wife’s gross income, for approximately half the term of our marriage, which is about 6.5 years.

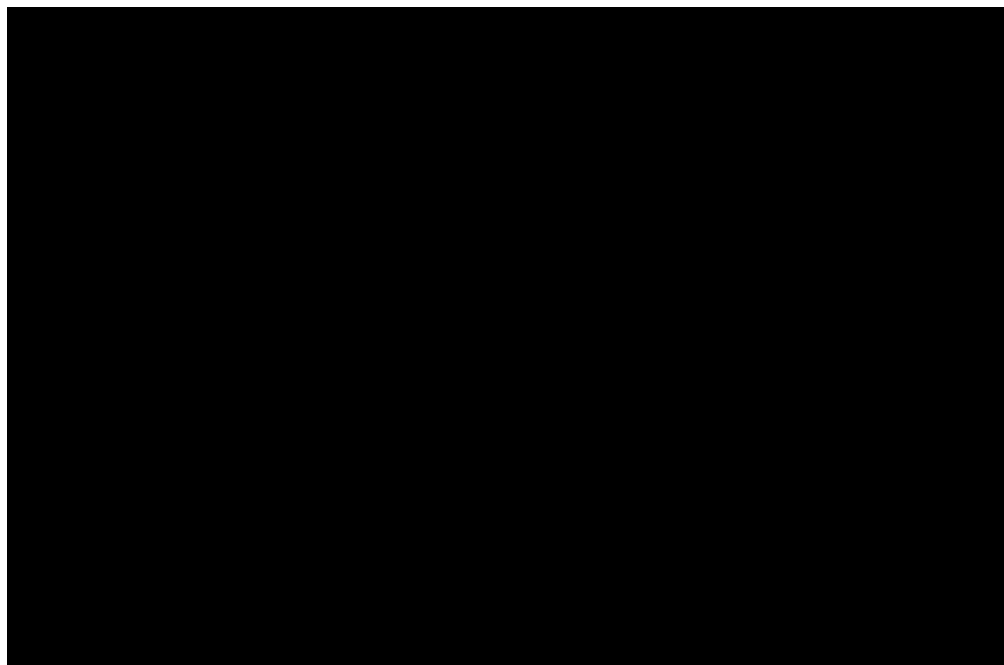
c In real numbers, during negotiations, that worked out to be between \$2k - \$2.2k in alimony, per month, for a period of 6 years (at that time). Even after Husband and Wife decided to do a “Non-Suit” to sell our home outside court, it was with the verbal agreement for the parties to split the proceeds from the sale 50/50, less only the first and second mortgages. Followed by Wife paying Husband transitional alimony, in the amount of \$1,750 per month, for a duration of 6 years.

d The agreement was that after the marital residence was sold outside of court, each party would be responsible for the debts in their own name (hence the reason for doing this outside of court), each taking our 50% of the net sale proceeds, to do whatever we choose with it. Then, claiming to no longer have any “marital property” or “marital debt”, we would file a FREE divorce using the forms provided online by the State of Tennessee. After which Husband would continue to receive the \$1,750 per month (as transitional alimony, which can’t be modified), for 6 years, as he sought vocational training, and began his whole life over at 50 years old.

e The only reason why Husband and Wife never proceeded with the plan to sell our home as agreed, is because Wife absolutely refused to put our agreement into writing. Though confirmed via email, Wife knew that her employer was planning to retire within the next year, so she expected the firm to close, and Wife wants to get a “fun” job now, or to only work “part-time”, as she has since finally admitted.

f The Chapter-13 bankruptcy forced husband out of the house, with no prior warning about the default. Wife refused Husband's questions about their mortgage status, as he saw most of this coming, except for Wife's own bankruptcy, that was a surprise, but brilliantly cruel! While husband suspects those mortgage payments were funneled to pay for Wife's legal fees, both for her bankruptcy and the divorce, with Wife's current counsel.





i Husband and Wife had promised each other that we were going to live in this home, on Sunnyside, for the rest of our lives. Everyday that's what Husband worked for... Forever! 60% of everything Husband did, wasn't for the benefit of that day, week, month, or even year... but to make a nice home for us forever! Without which, neither of us could have ever afforded to purchase a comparable home in this zip code. Husband would get to continue to work from home or be a "House Husband" as Wife affectionately called him (almost daily). Anything which Husband asked about around the House, Wife would make a snappy comeback with, "that's your job!" Husband's job never ended, and it was eventually discovered that once menopause started early (about 5 years ago), that Wife was absolutely impossible to please!

j Keep in mind, that Husband contributed about 60% of our start-up capital, toward the down payment, and nearly \$100k in renovations the first

year we purchased our home. Both Husband and Wife cashed out all Roth IRA retirement funds, to invest into the down payment, as soon as the funds recovered 75% of their value prior to the 2008 housing market crash. So, with a purchase price of \$350k in 2011, plus around \$100k in renovations that first year alone, we were at around \$450k during the start of 2012, then Husband sowed seven more years of work into improving our home, forever!

k During this time, Wife invested her life/time into increasing her professional value as an Architect. (Something which no-one can ever take away from her.) Meanwhile, Husband invested his life/time into customizing and maintaining our home forever, to enjoy and benefit from (he believed), for the rest of our lives. Which was abruptly taken away by Wife's scams, financial and legal coercion, and the court ruling an absolute auction with no minimums, including all of Husband's personal property, if he can't move it out quickly enough. As Husband simultaneously needs to spend days and weeks endlessly trying to learn how to legally survive Wife's constant legal harassment.

l As verified by the attached exhibits, the fraudulent narrative, and the motions and petitions filed by Wife hence far, Husband respectfully asks the court for relief, under the legislation known as "Stalking by Way of the Courts". Wife has filed abusive motions and petitions in this divorce, designed to "harass or maliciously injure" the Husband, by exhausting his economic resources and trying to force him to make financial concessions.

This is simply a litigious form of domestic assault. Also referred to as “malicious prosecution or abuse of the legal process”.

i All filings by Wife under Docket No: 48419B, show some form of this oppressive harassment, stalking, and domestic abuse.

ii Additionally, the “MOTION TO DEEM HUSBAND SERVED”, and all the attached ugliness, including our custom “No Trespassing” signs, at the entry, designed collaboratively by Husband and Wife together. Yet falsely portrayed by Wife, as an irrational act by Husband, further used as justification for the Ex Parte Order of Protection, filed by Wife against Husband, to further harass, control, stifle, dominate, and injure Husband’s first and second amendment constitutional rights, knowing exactly how crucial those freedoms are to both Husband and Wife.

1 Wife’s counsel filed this motion on 6/20/2019, the day after Husband’s counsel (then), Attorney Brittany Gates, communicated with Ms. Story on 6/19/2019, informing her that Ms. Gates was representing Husband, that Husband had already received service, and that Ms. Gates was Husband’s Counsel of Record. None the less, Wife’s counsel filed this motion with the court, though totally unnecessary, purely for the opportunity to further

smear the Husband's name, with their false and fraudulent narrative, solely for more litigious leverage over Husband. (They weren't going to let all that good ugliness go to waste.) Furthermore, someone from Ms. Story's office directly emailed the documents to Husband, though they had already received notice that Ms. Gates was Husband's Counsel of Record. Such created an ex parte communication, which was wholly abusive and unnecessary (Exhibit-C).

2 The marital residence was purchased on 4/29/2011 (Exhibit-D).

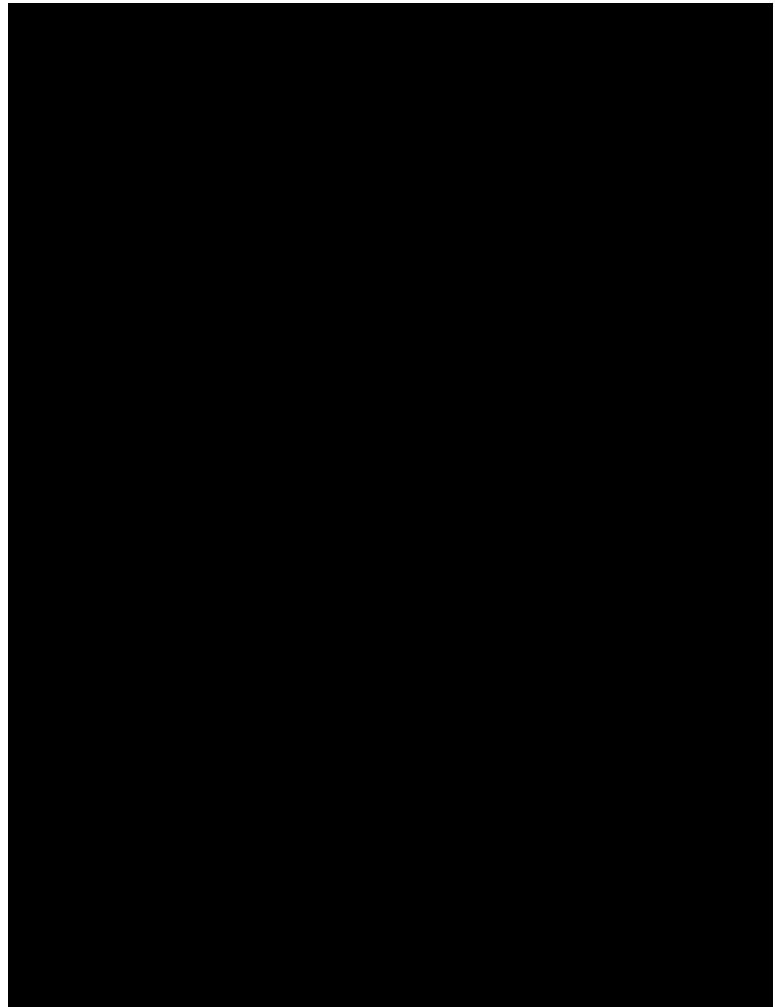
3 Honeywell Vista alarm system, was purchased on 6/13/2011 (Exhibit-E).

4 Zavio IP Dome surveillance camera was purchased on 3/15/2013 (Exhibit-F).

5 No Trespassing signs purchased Nov/Dec 2015 (Exhibit-G) shows communications between Husband and Wife will selecting sign styles, along with purchase receipts.

6 Hikvision IP network surveillance cameras (10x) were purchased on 1/20/2016. Floorplan design by Wife, allocation by Husband and Wife (Exhibit-H). Installation by Husband. The floorplan provided is file

dated 9/5/2016, with Wife's handwriting visible on the bottom-right, with the following dimensions "outerhole: 3 1/2" from each inside edge of fascia..." Wife drew other plans and elevations, to help Husband determine roof/soffit/facia relationships and dimensions to install throughout.

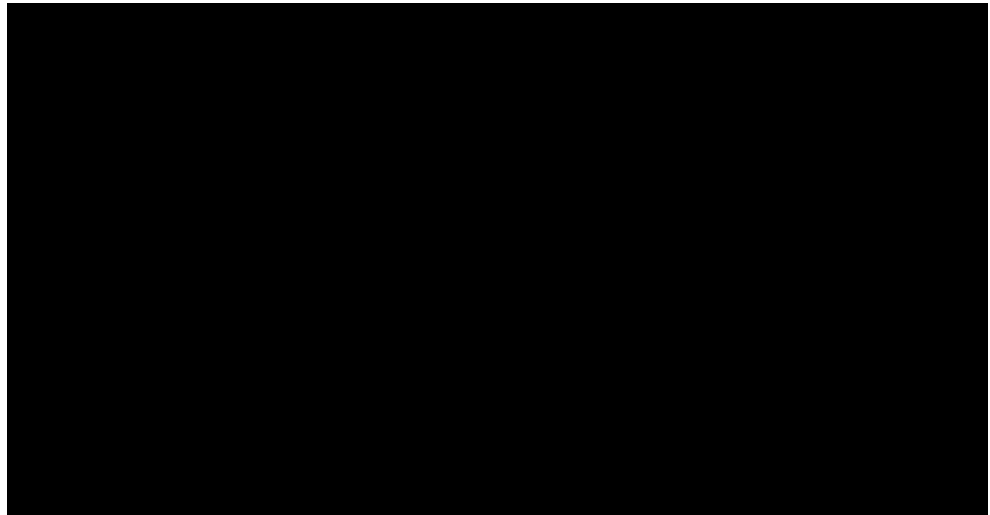


8 Alarms are normal for everyone, Husband and Wife had those at their previous home. Husband and Wife also had "No Trespassing" Signs at their previous home,


though that was primarily due to the transient rental neighborhood that the Duplex was zoned in, near Nipper's Corner.

9 The signage was for setting "boundaries". The alarm was really the only thing for "security". The surveillance cameras (which weren't monitored), were only for "accountability", after damage or intrusion was detected and researched for proof.


10 All of the electronics had something to do with the fact that both Husband and Wife like electronics, Husband more so than Wife, yet both are geeks at heart. Additionally, Husband's small business from home was in the tech industry, and Husband enjoyed learning about new technologies while installing them in his home first, to see if there might be any viability to adding that to the services he offered. Most took way too much time for Husband to ever be able to reasonably offer installation services to others. At the same time, both Husband and Wife got to enjoy a home (forever) which had built-in technologies, which neither of the parties could have ever afforded to pay third-party companies to install, administer, manage, and host. (At least not concurrently.)



n Husband believes that with the assistance of Wife's father, Wife undermined Husband's equity, by redirecting months of missed mortgage payments to the destination of Wife's choice. Hence benefitting Wife toward another financial need, while forcing the home toward foreclosure, and simultaneously leaving the court with no choice but to eject husband and tenants, followed by auctioning the home.

o Husband refused to render himself "homeless", without having in writing (even without lawyers), some assurance about how Husband could again afford to have a place to live. Now because of Wife's games, her deep dark strategy 



 allows Wife's income to decrease (as she plans), and the bankruptcy court will modify her "bankruptcy plan" to accommodate her reduced income.

p Husband insists that Wife had no legitimate need for an OP, but rather that she simply wanted the protections of a "GAG" order, along with

the opportunity to assassinate Husband's character and continue with her fraudulent narrative. **Wife was** armed at all times, with both her Glock .40 caliber handgun, which she keeps inside her purse (it is under the seat of her car, while in court) and a large law-enforcement quality, pepper spray cylinder, attached to her keychain. Husband requests that the OP Ex Parte be abolished, as it was fraudulently requested, under **false** pretenses, for purposes other than which it was designed, as a sweeping order to provide physical safety to those in jeopardy of physical harm.

q One of the realities which Husband understands in life, is if someone calls the police and says (with panic), "Help! I'm scared that my Husband (brother or friend) might publicly expose the TRUTH about me online, along with the substantiating proof." That the police don't usually rush over to arrest, restrict, or confine the perpetrator.

r However, if you simply change a couple of words to say (with panic), "Help! I'm scared that my Husband (brother or friend) might physically harm me." In that event the police will probably rush right over, intervene, arrest, warn, restrict, or confine the perpetrator.

i At which point, if you can obtain an Order of Protection, or a Temporary Order, you're not only protected from physical harm (which was never really a concern).

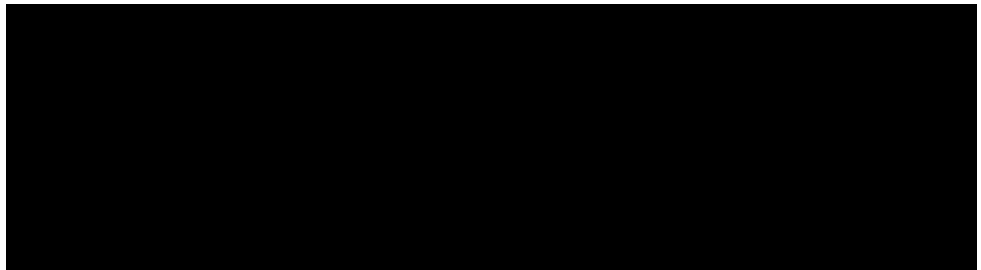
ii You also are protected from a host of other concerns, since the "perpetrator" has had some of his basic constitutional rights revoked, as a result of the tiny lie which you told the police.

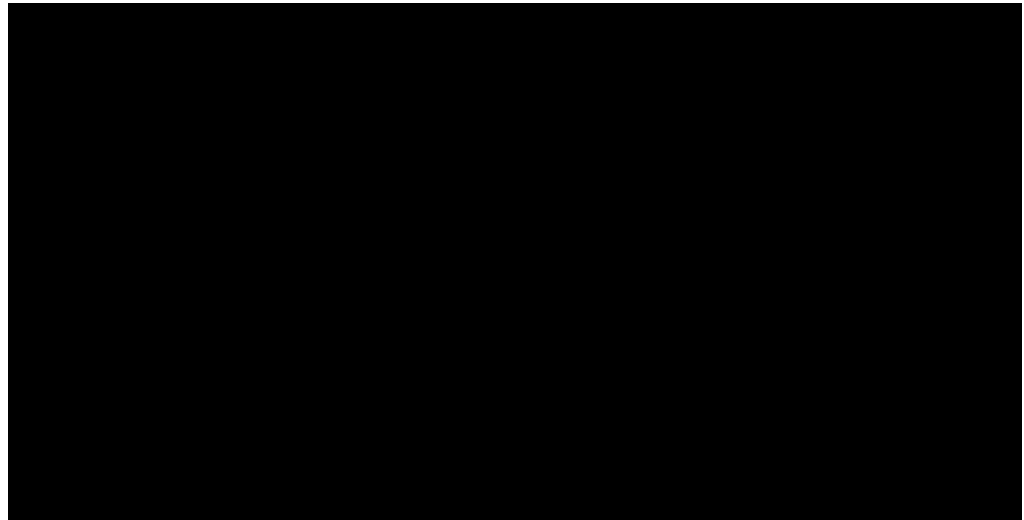
iii Husband has seen this abused more than once, and so has Wife, and people know the power which this one tiny lie can yield over others.

iv It is for this reason, that during Husband's research, that an Order of Protection is commonly referred to as "the second most oppressive and abused piece of legislation" used against the American people. It is also commonly referred to as "the nuclear bomb of divorces." Husband can personally attest to the accuracy of both of those descriptors.

s Even though Wife has convinced herself (and everyone within her circle of influence), that she is the victim here, really many of her "actions" (as opposed to Husband's "words") have been extremely aggressive, even violent, in a non-physically threatening way. Wife's unilateral choices, without a moment's notice, warning, or any opportunity to course correct, have financially devastated the family, and rendered all their property virtually worthless.

t Husband accepts his share of blame in all matters. Husband knows that he is neither a victim nor an abuser, he is something rather broken, in between.





w Throughout marriage, Husband felt as though he could never “catch-up”. Between Husbands ADHD (challenge with focus) and OCPD (a need to do tasks excellently, or not at all), Husband never seemed to be able to “catch-up” to Wife (Exhibit-A). Wife appears to be counting upon that, with her divorce tactics now. To keep running, and running, and running. If Husband ever has the time and resources, he can disprove every false claim of Wife, which is why she is intentionally hitting him as hard and repeatedly as she can.

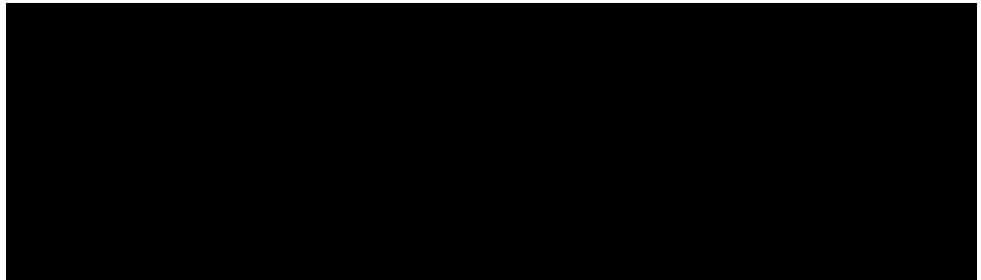
x The simple thing which Wife apparently doesn’t see, is if she worked “with” Husband a little bit, to help him reach some level of financial, vocational, or residential stability, Husband would make his way on his own. Never as quickly as Wife. Never nearly as fruitful or prosperous as Wife. But that is life. Husband wants to be “free” as badly as Wife does. He just hasn’t had the time to fight these litigious battles while trying to reinvent himself at 50 years old. Husband can handle one major project or challenge at a time, If Husband is to move, then Husband needs 2-3 weeks

with nothing else in the World to focus on besides moving. Likewise when he gets moved, he will need a couple of months to get sorted in his new environment, adjust to massive social and economic losses, and try to find some job to help buy food until he can improve his vocational training, to where he could be functionally independent again.

y Husband doesn't want to "use" Wife as she and her family believes. Husband made more money and had significantly more property than Wife when they met. Husband was never attracted to Wife because of her MIT degree or her professional future, she didn't have a dime when Husband met her, and was actually \$15k in debt to her mother from her previous divorce.

z Husband's foundational belief is that both Husband and Wife reached this state of brokenness together, so they should work their way out of it together also, rather than poaching off of Husband's poor elderly mother, at the age of 50 years old. Husband's mother was primarily a single parent "nurse", with five children. Every penny Husband's mother has, is because she denies herself basic luxuries which Husband still enjoys daily, even though Husband is penniless, unemployed, largely unemployable (due to speed and specificity, along with outdated vocational skills and experience), and soon to be homeless. Please see the letter left to Husband and his mother's best friend and husband, regarding what she had saved her money for, since both of her parents got dementia as they aged (Exhibit-J).

aa After October of 2018, when the Court schedule was mostly full, through the end the year, Wife refused to “settle”, saying that since she missed-out on the tax write-off, which was grandfathered for all who finalized their divorces prior to 2019. Wife has refused to work with an independent third-party by any means since. The reality is that \$120k in alimony over the next six years, is a lot scarier to Wife than throwing away our equity in our home, than paying a lawyer \$20k-\$40k to fight a “contested divorce”, or even than filing bankruptcy herself, in the end. Earning slightly less than a six-figure income and filing bankruptcy over \$50k in debt. Husband is the opposite, has never had over a \$50k per-annum job. [REDACTED] While Husband’s last retirement investment in his home, is being essentially forced-out by fraud...



3. Husband has a sleeping disorder, which Wife believes to be “Non-24”, that she learned about during one of the narcolepsy conferences which she attended. Husband never saw any confirmation regarding Wife’s walk-through confirming any time or date for the walk-trough, since it was so short notice (Husband has told his counsel, that he requires at least twelve hours’ notice prior to any commitments or meetings, because Husband is often awake all night, and sleeps all day. Such was the case in this instance.

Husband awoke around 3am to find information in his email about the appointment, after the scheduled date and time had already concluded, twelve hours prior. (Husband is often awake for 24 hours, then sleeps for 12 or 16. Husband must always know before going to bed, when he has any appointments or obligations the following day. , until after the time scheduled by Wife's counsel, while falsely claiming that I had confirmed the appointment time and date.

a Despite the complaints from Wife's counsel about Husband trying to delay or obstruct the walk-through or the auction in any way, that is completely false. The court order never mentioned anything about the Auctioneer accompanying Wife and her counsel during this walk-through. This walk-through per court order, was supposed to be completed much earlier, with a subsequent list of items which Wife wants to keep (determined during the walk-through, which was the purpose of the walk-through, as well as for Wife to ensure the condition of the property). Wife's counsel sent a list prior to the walk-through in an attempt to comply with the court order, but completely failing to meet the 10-day deadline for the walk-through, plus to provide to husband the subsequent list. Nobody informed Husband about the accompaniment of the Auctioneer, or any other parties beyond Wife and her counsel. Any other arrangements were at the fault, and outside the control, of Husband. To this day (8/27) Husband has been told that Wife is still compiling a more comprehensive list of personal property, which she established during the walk-through, yet even

though it was legally due by court order on August 11th, Husband has still never received any such document since the inspection.

b Husband made every attempt to communicate quickly and accurately with Wife's counsel to help schedule this, even going so far as copying her directly in Husband's emails to his counsel to ensure that his messages were getting relayed to Wife's counsel in the quickest possible fashion (for which Husband was reprimanded both by his counsel and wife's), but Wife's counsel still totally dropped the ball on this, while again aggressively blaming Husband and filing a complaint with the court.

i This is simply another example of litigious "bullying", which is completely inappropriate, harassing, abusive, unacceptable, and illegal.

ii Husband respectfully requests that the court order Wife and her counsel, to be less litigious, to work cooperatively with Husband toward solutions benefitting both parties, rather than filing inaccurate, twisted, false, and condescending motions, to hijack, oppress, and injure Husband, both in respect to the financial injury which he has suffered to date, of nearly \$13k in legal fees, without even beginning his divorce, as well as injuring husband's physical and emotional, needing to figure out how to reply to these often fraudulent motions, under the threat of incarceration should he fail. Meanwhile, if Wife and her

counsel really want to sell the marital residence, then Husband both needs and deserves enough time to pack his possessions (all 3,000 SqFt of them) and move to Michigan. This will take an absolute minimum of two weeks to simply be ready to vacate the property, which Husband wants to do prior to the auction.

1 As such, Husband requests an extension for the sale date, as well as for the dates for Wife to remove her personal property, so that Husband will not again be forced to vacate his residence, when he needs every available moment for packing.

2 Husband requests that the court order a two-month moratorium on any deadlines and court filings on this docket, including all motions, petitions, etc... with the only exception being if Husband fails to vacate the property by September 15th.

3 This time is needed with Husband's handicaps, so that he can focus on his move, and have any chance at completely evacuating the property by September 15th. (Provided the court approves.)

4 This would allow the minimum time required both to pack and prepare to move, while allowing husband to break-down his office and complete the move to

Michigan, without fear of concurrent litigation being filed, forcing Husband to redirect all energies to meet the emergency legal demands.

5 The move will require Husband to obtain significant storage space, and will require a lot of physical assistance, for weeks, to just begin to get settled, while moving into Husband's mother's small basement in Michigan.

6 After which Husband will need to assemble office furniture, and rebuild his network, get his server up and running, etc... during which time Husband will have no access to any of his files and records related to this divorce.

7 Consequentially, until this move is completed, Husband will be physically incapable of responding to court filings without Wife first winning default judgments, which is absolutely unfair.

8 Should the court not find this two-week auction deadline extension agreeable, or the two-month moratorium on all court filings so that Husband will have the time needed to move, then Husband will be forced to remain in Tennessee throughout the Auction,

and require additional financial assistance to do so, now that Husband's tenants have been evicted by the court.

a As per court order, there are no more rents coming in, plus Husband was forced to return tenant deposits, which he had used to merely survive, Husband is now behind on all the utilities for the property, and requires some emergency financial assistance from Wife, immediately, if the court will allow. Otherwise Husband will be forced to turn-off all utilities upon vacating the property, to not run up more debts in Husband's name than necessary.

b The utilities run approximately \$400 per month, plus with the loss of \$1,400 in rental income, which just barely allowed Husband enough money for food, gas, meds, and to pay the utilities, Husband requests some immediate emergency financial relief from Wife, in the amount of \$1,000 now, to bring the utilities current and to provide Husband with enough money to purchase food and his basic essentials, from now until September 15th, when Husband vacates the property to head to Michigan.

c Husband is temporarily borrowing the money for the move from his mother, expecting that cost to be around \$3,000, plus the cost of monthly storage. Husband requests the court to reimburse this expense to Husband's mother, immediately upon the sale of the home, from the Husband's portion of the remaining equity.

d Husband also requests the court to order Wife to transfer all the utilities back into her name immediately, or if the court and the Wife prefer, to order Wife to pay Husband an additional \$500 prior to 9/5/2019. to leave the utilities on in the Husband's name, through the auction, up until closing, provided that all takes place within our current timelines.

e After the move, Husband respectfully requests that the court order Wife to begin paying Husband \$500 per month again, adjusting her bankruptcy plan as needed, as temporary support, to help cover the cost of Husband's food, so not to further burden Husband's mother financially.

f Of these monies listed above, Husband respectfully requests that only the costs of moving and storage, be deducted from Husband's share of the sale proceeds, as the rest is believed by Husband to be the minimum due Husband from Wife, under Tennessee law, to help partially support Husband, until a full and final divorce decree can be reached, along with hopefully a corresponding alimony agreement, which Husband sincerely hopes the court will grant him, so that Husband will have an opportunity to obtain vocational rehabilitation and one day become financially independent again.

9 Should the court be agreeable to extend the deadline of the auction for two-weeks, and to the two-month moratorium on all court filings, provided that Husband vacate the property by September 15th as proposed, then Husband requests that the court all the Wife to handle all communications and interactions with the Auctioneer, after September 15th, once Husband has vacated the property.

10 In such event, not out of any disrespect for the court, obstinance, or belligerence on the part of Husband, nor due to any resentment toward the court, Wife, or this process, Husband respectfully requests that by court order, (not a POA or Quit Claim Deed, which Husband must sign), the court executively provide the Wife with the authority to completely sell the property, without the need for any signatures or participation by Husband.

a To frankly explain the reason this is so important to Husband, again, it is out of no act of disrespect, rebellion or defiance, it is simply a matter of beliefs. Husband believes that by providing his signature, that he is approving of the transaction which he is signing for.

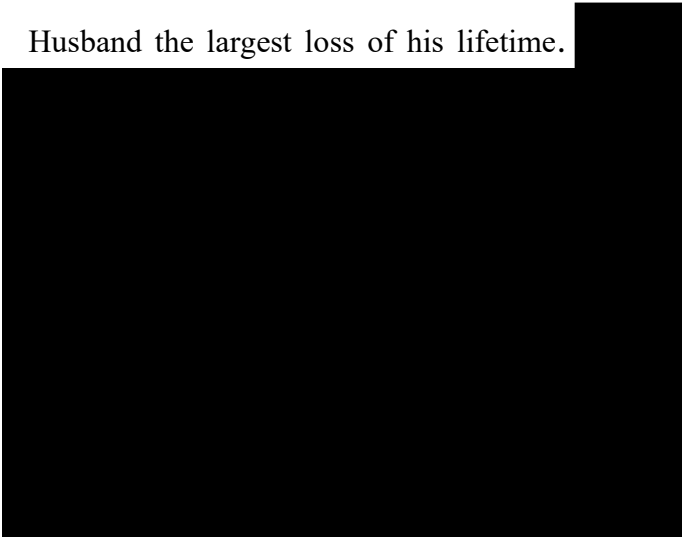
b While Husband believes that he is being robbed of his home, and any opportunity to take over payments and try to keep it, by Wife's fraudulent default on the mortgages performed months ago by Wife, without providing Husband with any notice, while refusing to even reply to Husbands questions on the matter.

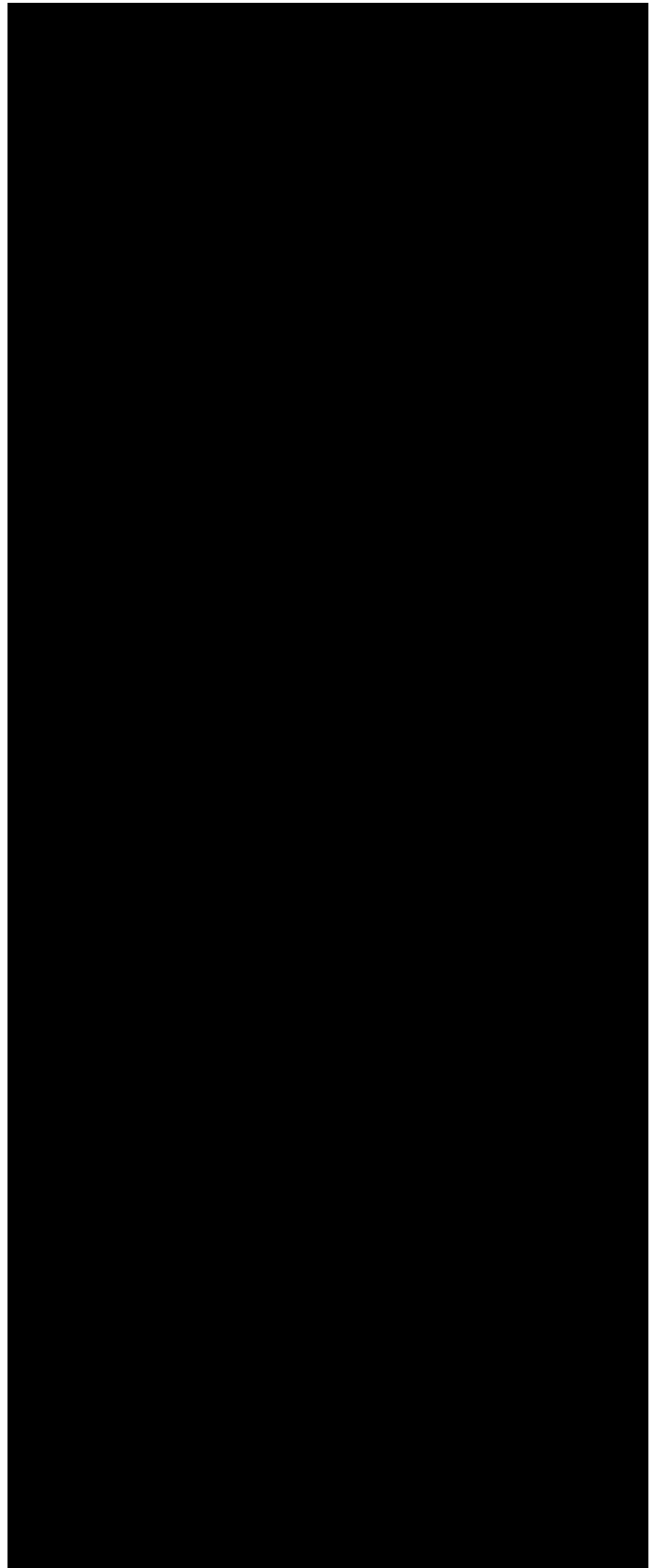
c Husband does not blame court for this, but Husband absolutely feels as though he is being robbed of most of what he has worked for in his life. Regardless of the auction sales price, or the amount of final alimony Wife is ordered to pay Husband (should alimony be awarded), Husband will never, in his lifetime, have the opportunity to enjoy this standard of living again. With all the unique characteristics which this property naturally possesses, as well as those which Husband spent nearly a decade building and constructing on the property, for the family's home forever. Husband recognizes this as a once in a lifetime chance for both the Husband and Wife, which now they have foolishly forfeited.

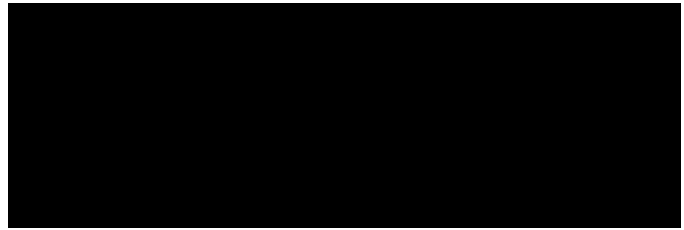
d Husband tried with every ounce of his being to prevent Wife from forcing this outcome, but with the mortgages in Wife's name, Husband ultimately was powerless over monitoring their status. At the same time, without some serious training, followed by a full-time job, and a few years of advancement, there is no way that Husband could have proactively paid the

mortgages, just “in case” wife wasn’t continuing to pay those bills, as she had been. Without absolutely any notice to Husband that her financial situation had changed, even if legitimate, which Husband highly doubts. Regardless, with timely notice from Wife to Husband, that their jointly owned asset was at risk, Husband could have worked towards finding a solution to help cure that financial shortfall, prior to reaching the point of default.

e Yet Wife stole that opportunity from Husband, and as such, suffering a loss of a lifetime, without so much as a hint in advance, Husband wishes to play no part in the final moves of Wife’s schemes, to abandon and financially undermine Husband, costing Husband the largest loss of his lifetime.



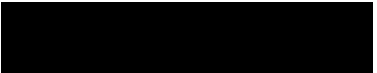
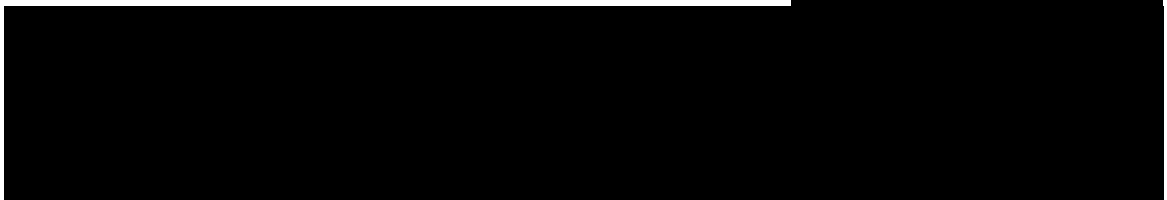




4. Per court order, both the Wife's walkthrough and thereafter her list of personal property which she requested from the marital residence, were supposed to both be completed within 10 days of the August 1st hearing date. That means that per the order of the court, the deadline for both of those tasks to be completed was on 8/11/2019. Ms. Story never even contacted Husband's counsel to begin scheduling the walk-through until 8/12/2019, already missing the deadline, requesting the walkthrough on the on the 13th or 14th, days later after the court ordered deadline. Yet Wife's counsel still finds it necessary and appropriate to legally blame, bash, and harass me with her litigious accusations, twisting information to make me sound as if I'm the party who failed to adhere to the timelines ordered by the court. Again, Husband respectfully requests that the court take action to discipline Ms. Story, to correct her actions, and change her future narratives to much less frequent and less hostile, and to work on improving her accuracy some, while reducing her slander of Husband's name and his character, both which Husband finds highly offensive, and which is harmful to Husband's mental and emotional health.

a Husband respectfully asks the court to please not allow Wife back on or inside the marital property, unless the court should choose to first terminate the Order of Protection Ex Parte, obtained by Wife's completely fraudulent testimony, so not to interfere with Husband's packing, by forcing Husband to vacate his home again, prior to either his move by September 15th, if approved by the court, or until after

the auction is finalized and the court provides Husband with the funds from the sales proceeds, necessary for Husband to move and obtain lodging here locally

5. Husband respectfully requests that he be awarded all his attorney's fees hence far, totaling around \$13k, most of which Husband borrowed from his elderly mother, as Husband has not even reached responding to the divorce complaint yet, but all \$13k in legal costs have been exhausted simply to protect Husband from the harassing, abusive, false, and fraudulent claims of both Wife and her counsel. 


6. To date, absolutely no delays of process have been due to the fault of the Husband, despite the deceitful claims of Wife and her counsel. Husband's first counsel failed to perform, though Husband was promised a draft to his Answer & Counter Complaint, which Husband has still never seen to this day. Absolutely no documents were filed, except for an extension to the temporary OP, so that Husband could gather a shocking amount of evidence, to hopefully dissolve the matter, but the continued failures to perform by Ms. Gates, forced Husband to borrow another \$5k from his mother to hire Husband's second set of counsel, with only two work days remaining to respond to both the fraudulent OP claims, as well as the order to sell my home. The two largest decisions in my life to date, with only two days to respond, while Ms. Story absolutely refused ^{to} agree to an extension for my incoming counsel, in either of the monumental and immediate matters. As such I see not why she is carrying-on about any delays or failure to perform on my part, except again to assassinate my character and to litigiously harass and abuse me.

a I respectfully request that the court order Ms. Story to attend a legal ethics class, to encourage her to be more honest, sincere, and kind in her legal motions. Such abuse by legal process is absolutely barbaric and intolerable.

b Husband prays that the court will defend him in regard to Ms. Story's abusive treatment, and/or that she be replaced by another member of her firm in this matter, having failed to act as her office should require.

c Husband has no objection to waiving the Mediation, as Wife has made it clear to Husband that she is in no way wanting to participate in any collaboration, mediation, or any other fair, neutral third-party assisted solution, or we would be divorced by now. Wife is only interested in a judgment, and refuses to settle by any other means, despite having filed bankruptcy, and the dire financial condition of both parties.

i For the purpose of again correcting the narrative of Ms. Story's verbal attacks by legal process, Husband wants to clarify that Wife's desire to skip mediation has nothing to do with her fear of Husband, especially for the ridiculous benefit of being mindful of the safety of everyone else involved in the process. I've never been more falsely harassed by anyone, and again, I appeal to the court to please intervene.

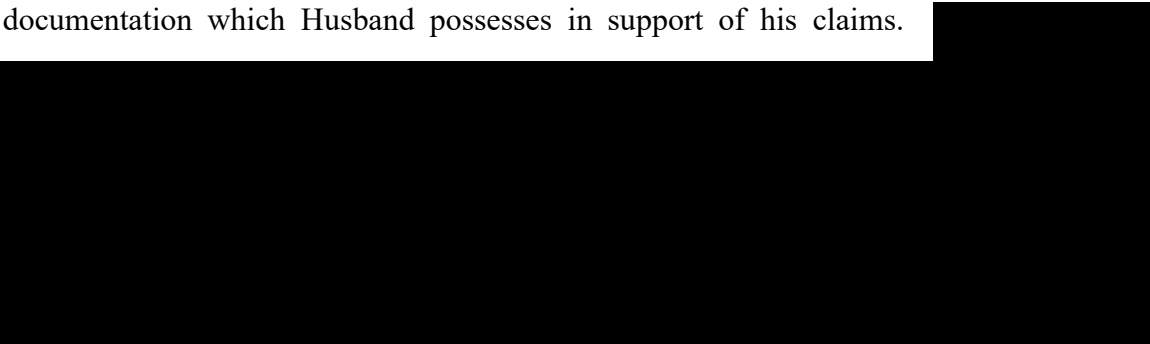
ii The real reason why Wife has refused every attempt to sit down at the same table with Husband and work towards a fair solution, has absolutely nothing to do with Husband's words,

the intensity of his presence, or any pressure which Husband could emotionally inflict upon Wife.

iii The reason is because Husband is the one person in the entire World, which Wife really struggles looking in the eyes and lying to, about her fraudulent, victimized narrative, since Husband was THERE with Wife, and remembers vividly what really happened and what did not. In contrast, most other people take Wife at face value, seeing her obviously distraught, disheveled, and injured impressions, not realizing that the majority of what they are being told, is either a really twisted version of the truth, or an absolute lie. While the signs of abuse which she portrays, some of which are real, but are self-inflicted, and never ceasing, by Wife's relentless desire to discard Husband without a penny of alimony, vocational rehabilitation, a roof over his head, or food for his belly. Wife is absolutely destroying herself, fighting to be what she calls "free" or "independent", unwilling to recognize or accept any financial obligation, responsibility, or reparations for the impact which she has had upon the Husband's life, as it lies all in ruins now, and in two months another family will be living in the home which Husband invested the proceeds of his entire life, both financially, and in labor.

7. Husband can't apply for any insurance, until Husband has either obtained vocational rehabilitation and subsequently found gainful employment, or until Wife starts paying adequate alimony to pay for said insurance, as well as meeting some of Husband's other real financial needs, such as purchasing food, paying for meds counseling, etc... Should the court be willing to order such support for Husband, then providing the sum is adequate, Husband will be happy to apply for such independent health insurance.

8. The reality is, that contrary to Wife, Husband can definitively prove each and every word written in this response and counter motion. Husband has put forth an absolutely exhaustive effort to provide the court with some of the information which Husband feels may be pertinent to helping the court discern whether Husband or Wife is presenting the truth to the court. At the same time, this is probably 1/100th of the documentation which Husband possesses in support of his claims.



As we are both completely broke, as recovery is realistically not even plausible for Husband, though his financial independence hopefully is, with some structured support and vocational training, leading to a technical certification or license in a progressive field, with vocational opportunities in the area which Husband resides. Continuing with this matter in the court is harmful to all parties, despite Wife's inability to stop injuring herself, and consequentially Husband, since Husband will never be able to focus, with his

handicaps (ADHD, OCPD, GAD, Sleep Disorder) as long as Husband's life is on trial, and due to Husband's financial shortcomings, and Wife's refusal to pay, Husband shall have no choice moving forward except to represent himself.

So at the end of the day, we can either continue as we have here today, for likely the next three years, forcing Husband to put recovery, rehabilitation, and all progress to rebuild his life on hold, until Husband no longer needs to "play lawyer", so that he can focus upon rebuilding some semblance of his life. Husband has serious concerns, about the proceeds from the sale being parked with the court for very long, since Wife's abusive and litigious counsel works right across the street from the courthouse, while Husband will not be in state or able to adequately defend himself.

Furthermore, Husband is absolutely terrified to drive over the Cincinnati bridge, as wife can well testify. Husband has not driven over that bridge in a decade, and the last time Husband had a serious panic attack, and nearly passed out while driving a U-Haul with Wife.

So Husband's only options are either to take enough Xanax that he can probably drive over the bridge safely, to then need to shortly thereafter find a place to park and sleep it off, or to have someone else who can drive Husband over the bridge, of which Husband knows of no volunteers (mother is now too old for that drive). Therefore, due to these exceptionally complex and harmful consequences for both parties, to continue in court any longer, Husband asks that the court make an exceptional modification to protocol, and provide to Husband and Wife a full and final divorce, here today, upon the grounds of

irreconcilable differences, and determine as fair of a financial settlement between the parties as the court is realistically equipped with the information it has, including the exhibits provided herein. Should the court be willing to grant us a final divorce today, but require more time to review the abundance of documentation provided, which is honestly completely unbiased, and to issue said settlement in the near future, without requiring another court appearance, Husband would be very welcoming to such an outcome as well.

Despite Husband's real need for support in this matter, Husband needs even more to never need to drive back over the Cincinnati bridge, to continue this violent process against each other and our own persons. For reason of mental and physical health, I beg the court to end this once and for all today, to save us all the next three years of our lives, wrestling over breadcrumbs. Husband's requests for a settlement approximately half of what the parties previously discussed, planned, and verbally agreed upon, is outlined below, which Husband respectfully asks the court to consider granting. Should the court decide to grant less to Husband, then Husband shall find no need to object or file further motions, Husband shall gratefully accept whatever the court finds fair. Husband does request that the court not decide upon any judgment which can be modified, altered, or which leaves the door open for future litigation, by either party. Else Husband fears that this case shall perpetually carry on forever, costing both parties more than either party can financially, emotionally, and mentally afford.

Although settlements are typically reached between opposing counsel; due to the abusive manner in which Ms. Story has presented herself throughout her filings in this case,

Husband respectfully requests that the court make an exception here to help protect Husband from needing to sit with Ms. Story and endure her condescending narrative and tone. Instead Husband simply requests that the court make a full and final determination, without any further negotiations or litigation between the parties.

Therefore, should the court not find Husband's request to be in the best interest of both parties, as well as of that of the court, Husband is reasonably certain that he'll never realistically see or benefit from any of the proceeds from the sale of his home. As Wife's counsel and other demands nibble away at it, beyond the practical reach of Husband. Whereby losing his retirement savings, and everything which Husband has earned during his lifetime, which would be one final travesty to end this absolutely toxic divorce.

Yet whatever it must be, so be it. Husband just asks the court for fair and reasonable consideration, and to end this nightmare once and for all. So, Husband can focus on what lies ahead, returning from where he once came, but has been fortunate not to need to leave since reaching adulthood.

Should the court have any questions or need any information, please feel free to ask. Husband can be emailed directly at [REDACTED] A mountain of documentation pertaining to the marriage is available upon your request.

Thank you for accepting this late filing, and earnestly considering the plethora of complex findings contained herein.

WHEREFORE, Husband would respectfully request that:

1. The court order a full and final divorce to Husband and Wife, on the grounds of Irreconcilable Differences. ~~The Order of Protection be made permanent and that Husband be required to pay her attorney's fees for having to bring this Motion.~~

2. That the Temporary Order of Protection be terminated. Husband is willing to sign a “Hold Harmless” with Wife, which can be styled to include both of our families, our employers, etc... so to protect both parties from either defaming them or publishing anything online about them, for the rest of our lives. Not requiring yearly renewal as with an Order of Protection, and also not injuring Husband’s vocational potential, like an Order of Protection.

3. If for any reason the court is not willing to terminate the Temporary Order of Protection, Husband respectfully requests that it only apply to Davidson and Williamson Counties, and that it not be converted into a full order, so not to affect Husbands employment potential. (Husband’s firearms are located in a friend’s gun vault in Goodlettsville. Husband needs to be able to legally pick them up in the U-Haul, while driving North toward Michigan, as Husband moves there for the foreseeable future.)

4. That the court divide any proceeds remaining from the sale of the home 50/50, while ordering both parties to continue assuming responsibility for the debts in their respective names. [REDACTED] Husband requests that his half of the split be paid directly to his mother, “Marsha A. Fenton” [REDACTED] [REDACTED] to help setup a trust for the future needs of Husband, educationally or otherwise. (Provided there is enough money to justify doing so.)

5. That in addition to the 50/50 split requested above, that the court repay Husband’s mother, “Marsha A. Fenton” [REDACTED] \$10,000 directly out of Wife’s

share of the sale proceeds, prior to paying any other debts, obligations, or creditors, except for the two mortgages. This is to reimburse Husband's mother for the expense of defending Husband against these totally unnecessary litigious claims, without even addressing the divorce yet in a conventional manner. Wife had previously assured Husband that she was finished with her litigious assaults, yet Wife still elected to execute her largest, most unfair, brilliant, but absolutely devastating legal assault upon Husband to date, again, without a moments warning. Husband therefore request the court to order Wife to repay Marsha A. Fenton for her resulting losses.

6. That at least a sum of \$21,000 be paid to Husband's mother, Marsha A. Fenton, to repay Husbands debts to her, prior to paying off any other debts, obligations or creditors, except as stated herein.

7. That the court payoff the outstanding balances to Husband's legal counsel \$8,600 to Marty Duke and \$2,579.39 to Schaffer Law Firm, directly out of Wife's share of the sale proceeds, immediately following the repayment of Husband's mother, prior to paying off any other debts, obligations or creditors, except as stated herein.

8. That the court award Husband transitional alimony, which the court automatically deducts from wife's paycheck, in the amount of \$1,000 per month, for a period of four years, and wife be ordered to have her bankruptcy plan modified to compensate for this.

9. If there are any emergencies where Wife cannot legally pay alimony for any reason, that all missed payments be added onto the end of the four years, so that the overall benefit to Husband is not diminished in the end. (With the proposed alimony of \$1,000 per

month for a period of 4 years, that would equal a total alimony to be paid by Wife to Husband, of \$48,000.)

10. That after the full four year term of alimony is paid, by Wife to Husband, after having made up for any months missed throughout, that Wife should owe Husband, no more alimony or support of any kind, ever again, regardless of Husband's health, need or any other circumstances, conditions, or factors.

11. That Wife's employer keep Husband insured, as Mr. Ken Adkisson previously promised until the end of this year, or until Wife is no longer employed with that firm, whichever comes first.

12. That afterwards, Husband be responsible for his own insurance needs, without demand or oversight by this court.

13. That the court would order that neither the Wife, nor her counsel, can further litigate, sue, or harass husband, by means of legal actions or otherwise.

14. That the court order a "do not contact" on both parties for a period of one year, regarding the other.

15. That both parties execute mutual lifetime "hold harmless" agreements, to include protection both to and from their families, employers, and friends, in addition to themselves.

16. The court order the auction date to be extended by a period of three-weeks after the final litigation is entered/heard in this matter, or after a 2-month moratorium is ordered by the court, forbidding anymore legal filings, until Husband has had an opportunity to complete his move to Michigan and get settled. During which time Husband

is not to be disturbed by any of the parties in this matter, so that he can focus on packing and realistically have a chance to complete it, on such a short deadline.

17. An Order be entered allowing Wife to sign any necessary listing contracts or agreements to sell the home including closing documents on behalf of she and Husband.

Tenn. Code § 39-16-507(a)(3) Coercion or Persuasion of Witness:

(a) A person commits an offense who, by means of coercion, influences or attempts to influence a witness or prospective witness in an official proceeding with intent to influence the witness to:

(3) ...be absent from an official proceeding to which the witness has been legally summoned.

(b) A violation of this section is a Class D felony.

Respectfully submitted,

Jeffrey Ryan Fenton (Pro Se)
1986 Sunnyside Drive
Brentwood, TN 37027
jeff.fenton@live.com
(615) 837-1300

This Motion is expected to be heard on the 29th day of August, 2019 at 9:00 a.m. If no written Response to this Motion is filed and served in a time set by Local Rules of Practice, the Motion may be granted without a hearing.

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was forwarded via email, hand-delivered, and/or first-class mail to Virginia Lee Story, Attorney for Wife, at 136 4th Avenue South, Franklin, TN 37064, on this the 29 day of August, 2019.

Tenn. R. Sup. Ct. 3.4 - Fairness to Opposing Party and Counsel:
A lawyer shall not:

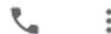
(g) request or assist any person to take action that will render the person unavailable to appear as a witness by way of deposition or at trial;

Jeffrey Ryan Fenton (Pro Se)

The COA refused to consider this, instead they demanded that I write an "appellant brief" before they would consider anything further, or relief of any kind. I told the COA that I was unable (didn't know how) to write an "appellant brief" due to the overwhelming amount of fraud which took place by Story and Binkley. I provided sworn testimony to the COA that Binkley was bias, refused to hear me, and collusive with Story, making everything in #48419B VOID. I also provided sworn testimony to the COA that Story was excessively abusive, violated the rules of conduct almost non-stop, and that Binkley and Story cast harsh, punitive, "default" judgments against me, after they had wrongfully evicted me from my home and driven me out of the State of Tennessee. By the illegal actions of Binkley and Story I was prohibited from physically being present in Tennessee to participate in court in person. Knowing that they had told me during court on 8/29/2019, that I could participate in the next hearing over the telephone, but once I was over the state line, they reneged on everything they said during court on 8/29/2019, which could benefit me. Per 455(a) both Binkley & Story were "disqualified" repeatedly, by their criminal misconduct. Chancery Court lost all lawful jurisdiction & authority.

8

Fawn Fenton
(615) [REDACTED]-7377 • mobile



Can I pickup Taco Salads and come have dinner with you?



Jan 21, 2019

F

Hello, thank you for the offer, but no, I am too tired and I have a headache. I'll see you tomorrow.

Fawn Fenton (mobile) • Jan 21, 2019

Ok... see you in the morning.



Jan 21, 2019

F

Terry is at 215 Centerview, suite 208, right?
(I am on potty with belly-ache right now... Going to try to get out the door soon...)

Fawn Fenton (mobile) • Jan 22, 2019

No, he is in Maryland Farms now:

5115 Maryland Way, Suite #134, Brentwood, TN 37027

Inside the Chapple Building



Jan 22, 2019

Oh ok!

F

I might be a few minutes late... Pooper not cooperating... Cramps.... Ungh....

Fawn Fenton (mobile) • Jan 22, 2019

I always park in the back of the building, and enter from the back. I'm heading there now. When you get there I can come out and show you the way from the first floor lobby.

It would probably be quickest for you to take the back way, up Church Street, onto Maryland Way.

Careful I just hit a bad to ice

A patch of ice



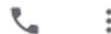
Jan 22, 2019

F

Having terrible cramps... Can't get out of bathroom right now... This sucks, sorry!

Fawn Fenton (mobile) • Jan 22, 2019

Fawn Fenton
(615) [REDACTED]-7377 • mobile



If you're still on the body it's time to abort Mission and head to Terry's



Jan 22, 2019

F

Doubled over in pain... Can't walk yet... The enemy is attacking me with cramps...

Fawn Fenton (mobile) • Jan 22, 2019

Dang... we're here waiting.



Jan 22, 2019

F

This really sucks, I don't think I'm going to make it... Curled up on floor in fetal position in pain with terrible cramps....

Fawn Fenton (mobile) • Jan 22, 2019

I'm sorry.



Jan 22, 2019

F

Does Terry have another appointment at 9? I will pay him for another hour if he's available... (Cramps starting to subside a little....)

Fawn Fenton (mobile) • Jan 22, 2019

Tuesday 11, 4, 5
Thursday wide open except for 2. (Probably 9am, or??)



Jan 22, 2019

F

Do you mean Tuesday today? (Could do 11:am today)...

Fawn Fenton (mobile) • Jan 22, 2019

Terry could do noon or 3 today.



Jan 22, 2019

F

Ok noon!

Fawn Fenton (mobile) • Jan 22, 2019

Ok, see you at noon today.



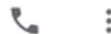
Jan 22, 2019

F

Ok thank you!

Fawn Fenton (mobile) • Jan 22, 2019

Fawn Fenton
(615) [REDACTED]-7377 • mobile



See you then!

I'm back in my car, about to hit Kroger's quickly for Ice Cream and Kiwi Veggies, is there anything that I can pickup and bring you, to help you feel better? Drugs, over the counter meds, breakfast?

I'd seriously be glad to bring you anything that will help make your morning a little better.

Do you need me to take you to the doctor or hospital?

I could pickup your fetal position body, wrap you up in a sheet or blanket, lay you in your hatchback or my trunk, and drive you to the ER or the clinic of your choice?

Still at Krogers... ?



Jan 22, 2019

F

Oh hello, I was sleeping. I am mostly ok now. Definitely have a cold, though.

Fawn Fenton (mobile) • Jan 22, 2019

Need anything from store?



Jan 22, 2019

F

No that's ok. Thank you very much for offering, though.

Fawn Fenton (mobile) • Jan 22, 2019

I'm in the lobby on the first floor waiting on Terry and you.



Jan 22, 2019

F

Thank you again for the balloon and flowers and donuts, I really do love them and that was so thoughtful of you.

Fawn Fenton (mobile) • Jan 22, 2019

Thank you for answering your phone when I called.



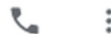
Jan 22, 2019

F

You're welcome. Thank you again for the balloon and flowers, they're brightening my kitchen.

Fawn Fenton (mobile) • Jan 22, 2019

Fawn Fenton
(615) [REDACTED]-7377 • mobile



F 😞 my heart is broken for you too. I'm so, so sorry for your pain. I know you're a good person, which is why I'd hope someday we can still be friends.

Fawn Fenton (mobile) • Jan 23, 2019

Hopefully we can!



Jan 23, 2019

F A part of my heart will always love you too.

Fawn Fenton (mobile) • Jan 23, 2019

Goodnight Tootie! Please forgive me someday if/when you can!



Jan 23, 2019

F I am definitely working on forgiving you. You deserve forgiveness , and I hope you can heal from this huge loss. I am so sorry I was unable to communicate with you and I'm sorry for all the times I made things worse.

Fawn Fenton (mobile) • Jan 23, 2019

Here is what I would say about myself in hinddight, "I've never know someone who worked harder, while getting nothing meaningful done."



Jan 23, 2019

F Hello, I pray for some peace for you today. (Regarding your text right above, I used to always think of you like you were riding a stationary exercise bicycle; peddling furiously, working so hard, but going nowhere. Sorry, not that that helps.) Anyway, my cold is much much much worse today. At least I have donuts, those sure are good and cheer me up. 🍩 🍰 🥞 🥤 🍷 🍩

Fawn Fenton (mobile) • Jan 23, 2019

F Thanks again for the donuts and flowers! I just ate last donut yesterday; flowers are still doing good!

Fawn Fenton (mobile) • Jan 26, 2019

F Understandable that your mom wants to sympathize with you. Situation is definitely heart- breaking.

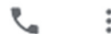
Fawn Fenton (mobile) • Jan 27, 2019

Yeah, but not really helpful.



Jan 27, 2019

Fawn Fenton
(615) [REDACTED]-7377 • mobile



Phone is falling on my face... Nightie night...
Thank you for being kind.

Fawn Fenton (mobile) • Jan 27, 2019

Nightie night. Likewise Tootie!

Never in my life did I want it to be me against you! That was my worse
nightmare!



Jan 27, 2019

9

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

DONALD W. FISHER,)	
Plaintiff,)	
)	
v.)	No. 3-15-cv-127
)	Judge Crenshaw
CHRISTOPHER GATES AND GATES)	Magistrate Judge Frensley
CONSTRUCTION AND DESIGN, LLC,)	
Defendants.)	

REPORT AND RECOMMENDATION

Pending before the Court is Defendants’ Motion to Vacate Entry of Default (Docket No. 55) and Plaintiff’s First Motion for Default Judgment (Docket No. 61). For the reasons stated herein, the undersigned recommends that Defendants’ Motion to Vacate Entry of Default (Docket No. 55) be Granted in part and Denied in part; and Plaintiff’s First Motion for Default Judgment (Docket No. 61) be Granted in part and Denied in part. Specifically, the undersigned recommends the entry of default as to the individual Defendant, Christopher Gates, be vacated but that the entry of default as to the corporate defendant, Gates Construction and Design, LLC, remain and that the Motion for Default Judgment be Granted as to Gates Construction and Design, LLC only.

Standard of Review

Federal Rule of Civil Procedure 55 (a) requires the clerk of court to enter a party’s default when the party “against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend” and “that failure is shown by affidavit or otherwise.” Fed. R. Civ. P. 55 (a). Upon entry of default a party may proceed to seek default judgment under Rule 55 (b), either from the clerk of court or the district court. The Sixth Circuit has held that entry of default is a



prerequisite to a default judgment. *Devlin v. Kalm*, 493 F. App'x 678, 685-686 (6th Cir. 2012). “Once a default is entered against a defendant, that party is deemed to have admitted all the well pleaded allegations in the complaint except those relating to damages.” *Microsoft Corp. v. McGee*, 490 F. Supp. 2d 874, 878 (S. D. Ohio 2007)(citations omitted). Rule 55 (c) of the Fed. Rules of Civil Procedure allows the district court to set aside an entry of default for good cause. Fed. R. Civ. P. Rule 55 (c).

DISCUSSION

Defendants’ Request to Set Aside Default

Following the entry of default in this case Defendant filed an Answer to the complaint (Docket No. 54) and Motion to Vacate Entry of Default (Docket No. 55). Plaintiff has not filed a response to Defendant’s motion to vacate.

The Court acknowledges that Defendants are acting pro se in this matter, and their pro se status is a factor for the court to consider in its good cause determination in setting aside a Defendant’s default. *Dessault Systemes S. A. v. Childress*, 663 F. 3d 832, 844 (6th Cir. 2011)(Citing *Shepard Claims Serv., Inc. v. William Darrah and Associates*, 796 F. 2d 190, 194 (6th Cir. 1986). Nevertheless, pro se litigants are not exempt from the requirements of the Federal Rules of Civil Procedure. *McNeill v. United States*, 508 U. S. 106, 133 (1980). The Court also notes that “mere negligence or failure to act reasonably is not enough to sustain a default.” *United States v. \$22,050.00 in United States Currency*, 595 F. 3d 318, 327 (6th Cir. 2010).

While the failure of the individually named defendant to answer the complaint is clearly negligent, nothing before the court suggests that defendant acted to thwart the judicial proceedings or with reckless disregard for the effect of his conduct on the proceedings. *See, Childress*, 663 F. 3d at 841. It is clear from the pleadings that the defendant wishes to defend

against this action. Therefore, the Court recommends that the default against the individually named defendant be set aside.

With respect to the corporate defendant, the Court has been clear that the defendant corporation must retain an attorney to represent its interest in the case. Docket No. 57. Despite being repeatedly advised of this requirement and its consequences, defendant corporation has not obtained counsel therefore the court recommends that the default as to the defendant corporation remain and not be vacated.

Plaintiff's Motion for Default Judgment

Plaintiff has filed a Motion For Default Judgment (Docket No. 61) based upon the previously issued default (Docket No. 51). Defendants have not responded to the Motion for Default Judgment. Plaintiff contends that default judgment is appropriate based upon the corporate defendant's failure to comply with the Court's previous orders requiring that any pleadings be filed by an attorney admitted to practice before this court and that the Answer filed on behalf of the individually named defendant fails to comply with the pleading requirements of Rule 8 (b) and (c) Fed. R. Civ. P.. Docket No. 61, pp. 1-2.

As noted above, the corporate defendant's failure to comply with the rules supports the entry of default under Rule 55 (a) Fed. R. Civ. P. and likewise the entry of default judgment under Rule 55(b). Therefore, the undersigned recommends that the motion for default judgment be GRANTED as to the corporate defendant, Gates Construction and Design, LLC.

With respect to the individually named defendant, the Answer to the complaint states as follows:

[t]he Plaintiff and only after refusing to perform additional repairs for free on the pool on areas due to damages caused by the mishandling namely freezing of the pool as maintained by the Plaintiff and his pool man who is a disgruntled former employee of the Defendants who was released from Defendants employ

for incompetents (sic) and undesirable conduct, did this action get filed so that the Plaintiff could claim dishonesty on the Defendants part and avoiding the 4 year limitation on his ability to claim.

Defense 1 Failure to State a Claim

Defendant answering the complaint herein, alleges all allegations and counts brought forth therein fails to state a claim for which relief can be granted.

WHEREFORE, Defendant prays that the Plaintiff take nothing and that the Defendant have judgement against the Plaintiff and recover the costs of suit herein, and such other relief that the court may deem proper.

Docket No. 54.

Federal Rules Civil Procedure Rule 8(e) provides that “pleadings must be construed so as to do justice,” and the Sixth Circuit has noted that “[t]he drafting of a formal pleading presupposes some degree of legal training or, at least, familiarity with applicable legal principles, and pro se litigants should not be precluded from resorting to the courts merely for want of sophistication.” *West v. Adecco Employment Agency*, 124 F. App’x 991, 992-93 (6th Cir. 2005)(quoting *Jourdan v. Jabe*, 951 F. 2d 108, 110 (6th Cir. 1991)).

While it is certainly true that the answer does not respond to each and every specific averment in the complaint, viewing the Defendant’s pleadings liberally, as it must for all documents filed by pro se litigants, and mindful of the requirement to do justice, it is clear that the individually named defendant has not failed to plead or otherwise defend against this action and therefore the undersigned recommends that the Motion for Default Judgment for the individually named Defendant, Christopher Gates, be DENIED.

RECOMMENDATION

For the reasons discussed above, the undersigned recommends that the Defendants’ Motion to Vacate Entry of Default be Granted as to the individually named defendant, Christopher Gates and be Denied as to the corporate defendant, Gates Construction and Design,

LLC, and that the Plaintiff's First Motion for Default Judgment be Granted as to the corporate defendant, Gates Construction and Design, LLC, and Denied as to the individual defendant, Christopher Gates.

Under Rule 72(b) of the Federal Rules of Civil Procedure, any party has fourteen (14) days after service of this Report and Recommendation in which to file any written objections to this Recommendation with the District Court. Any party opposing said objections shall have fourteen (14) days after service of any objections filed to this Report in which to file any response to said objections. Failure to file specific objections within fourteen (14) days of service of this Report and Recommendation can constitute a waiver of further appeal of this Recommendation. *See Thomas v. Arn*, 474 U.S. 140, 106 S. Ct. 466, 88 L. Ed. 2d 435 (1985), *reh'g denied*, 474 U.S. 1111 (1986); 28 U. S. C. § 636(b)(1); Fed. R. Civ. P. 72.



JEFFERY S. FRENSLEY
U. S. Magistrate Judge

10

APPENDIX - 19

REQUEST FOR MODIFICATION

Applicant requests accommodation under Tennessee Judicial Branch Policy 2.07

Applicant Information

Applicant is: ___ Witness ___ Juror ___ Attorney X Party ___ Other (Specify Nature of Interest): ___

Name: JEFFREY RYAN FENTON
Telephone: (615) 837-1300
Address: 17195 Silver Parkway, #150
Fenton, MI 48430-3426

Court: COURT OF APPEALS OF TENNESSEE
MIDDLE DIVISION (AT NASHVILLE)
Judge: _____
Case No.: M2019-02059-COA-R3-CV

1. Type of proceeding. ___ Criminal X Civil
2. Proceedings to be covered (e.g., bail hearing, preliminary hearing, particular witnesses at trial, sentencing hearing, motion hearing, trial): Appeal of Forced Sale of Home, Divorce Judgment, Stalking Charge, and Order of Protection

3. Dates modification needed (specify): Currently – Throughout Appeal

4. Disability necessitating modification (specify): Obsessive-Compulsive Personality Disorder (OCPD) DSM-5 301.4 (F60.5), Attention-Deficit Hyperactivity Disorder (ADHD) DSM-5 314.01 (F90.2), Generalized Anxiety Disorder (GAD) DSM-5 300.02 (F41.1), Circadian Rhythm Sleep Disorder (CRSD) Non-24-Hour Sleep-Wake Disorder (Non-24) DSM-5 307.45 (G47.24), Poverty, Forced Geographic Distance from Court

5. Type of modification requested (specify): Procedural and Technical Flexibility, Additional TIME for Deadlines to Self-Represent by Necessity, Communication Modifications due to COVID-19 and Excessive Mailing Times to Michigan, Judgment Based Upon the LAWS – not just the Technical Codes which I am Knowledgeable about, or able to Research and Cite (ignorance about the law is no excuse for breaking it, hence it shouldn't be for being protected by the law either). Please Judge based upon the SPIRIT of the Law, not just the Technical Manipulation of Words used to Express, Define, and Communicate it. Thank you!

6. Special requests or anticipated problems (specify): Additional TIME and Patience please. By disorder I'm a Perfectionist who has a nearly impossible time Focusing and Remaining On Task, especially when of Significant Consequence. Yet I can't afford to hire anyone to help Represent me. I also request that all Court Communications please be sent to me Electronically, via Email or Fax (I setup a dedicated fax number for the court), because it often takes a WEEK to receive Mail here in Michigan, plus in-house handling times. My Email is jeff.fenton@live.com, and my dedicated fax number for the court is (810) 255-4438.

7. Significant problem and request for Court Oversight, Accountability, Advocacy, and Assistance: I strongly believe that the narrative driving the basis for ALL the actions levied against me so far by the opposing counsel (Ms. Story) has been largely FALSE, Intentionally Deceptive, Bombarding me from every angle simultaneously, specifically to Exploit my Known Disabilities, to Strategically Devastate me, using HARRASSMENT BY LEGAL PROCESS (malicious litigation). Combined with Ms. Story's Reputation, Resources, and Relationships, I don't believe that I ever had a chance at a Fair Trial. Ms. Story BOUND me

PLEASE USE MY TN ADA, UNTIL I HAVE TIME TO FILE.
Thanks!

with an OP obtained under False Testimony, then TOOK and DESTROYED everything of substance, which I have ever owned, in just two months.

8. To substantiate my claims about legal inequality and unfairness: During my trial on August 29th, 2019, at “The Old Courthouse” in Franklin, as is recorded in VOLUME-4 of my Technical Record, Page-516, Line-6, the Judge told me, “Fair is something you do in the fall.”

Despite my many requests that the Court Differentiate this as a “Transcript of Evidence”, it remains buried in my Technical Record, even though the Judge procured the Court Reporter himself. The remainder of that same transcript clearly reveals how open, objective, and impartial, the Court remained, amidst my Testimony versus Ms. Story’s. I beg you look and see for yourself! Your intervention is requested and seriously needed!

Documentation provided by my Psychiatrist and my Psychotherapist is included to prove that I have the disabilities listed, as well as a real need for the modifications sought herein.

My request for a 60-Day extension, for filing my Brief, will follow; but for the sake of TIME, since I am so SLOW at this, I am sending this Request for Modification separately. Thank you!

I hereby certify that the above information is true and correct to the best of my knowledge.

Date: 7/8/2020


(Signature of Applicant)

G The request for modification is **GRANTED**.

G OFFER OF REASONABLE ALTERNATE MODIFICATION _____

G The request for modification is **DENIED** because:

- the applicant is not a qualified individual with a disability
- the requested modification would fundamentally alter the nature of the judicial program, service or activity
- the requested modification would create an undue financial or administrative burden
- the applicant refused to comply with the Policy
- the applicant’s failure to comply with the Policy makes impossible or impracticable the ability to provide the requested Modification

(Specify) _____

DATE: _____

Local Judicial Program ADA Coordinator

APPEALS

G Presiding Judge Review requested. (Specify reason and the remedy you want): _____

DATE: _____

(Signature of Person Requesting Review)

PRESIDING JUDGE REVIEW

I have reviewed the original request for modification, the offer of alternate modification OR the denial of modification and the reason for the denial, and the reason that this review has been requested and find as follows:

DATE: _____

PRESIDING JUDGE

G Administrative Office of the Courts Review requested. (Specify reason and the remedy you want): _____

DATE: _____

(Signature of Person Requesting Review)

ADMINISTRATIVE OFFICE OF THE COURTS REVIEW

I have reviewed the original request for modification, the offer of alternate modification OR the denial of modification and the reason for the denial, and the reason that this review has been requested and find as follows:

DATE: _____

AOC DIRECTOR

Radnor Psychiatric Group, PLC

5123 VIRGINIA WAY
SUITE C-11
BRENTWOOD, TENNESSEE 37027

Telephone: (615) 373-5205
Fax: (615) 373-5165

July 19, 2019

To Whom It May Concern:

RE: Jeffrey Fenton, DOB: [REDACTED]

Jeff Fenton has been a patient under my care since February 2012. He has been diagnosed with a Generalized Anxiety Disorder, Attention Deficit Disorder, and some Obsessive Compulsive Personality traits. He has been complaint with both his psychiatric medications prescribed and his individual psychotherapy with Terry Huff, LCSW.

The symptoms of his illnesses have interfered with his ability to maintain employment, despite compliance with our treatment recommendations. His condition does not predispose him to any violent behavior and, to my knowledge, he has not been involved in any violent behavior since being a patient under my care.

If you have any further questions regarding his diagnosis, treatment, or prognosis, please contact me with his permission.

Sincerely,



Richard E. Rochester, M.D.

Terry M. Huff, LCSW
Suite 134
5115 Maryland Way
Brentwood, TN 37027
615-627-4191
terrymhuff.com

August 28, 2019

To Whom it May Concern:

I'm writing at the request of my client, Mr. Jeff Fenton, to explain his mental health challenges and their effects on his general functioning. I am licensed as a clinical social worker in Tennessee, and I have a private psychotherapy practice in Brentwood. I have been providing psychotherapy services for thirty years. My specialty is in helping adults with attention deficit hyperactivity disorder (ADHD).

I began seeing Mr. Fenton May 3, 2018. His primary concerns for which he sought my help were marital problems and effects of his ADHD. He has a history of particular difficulties with occupational functioning due to extraordinary perfectionism and getting lost in details, which contribute to inefficiency and missed deadlines. This particular challenge, along with certain other features, are consistent with symptoms of obsessive compulsive personality disorder. ADHD and OCPD have been the focus of Mr. Fenton's psychotherapy. He also has specific phobias and social anxiety, which have not been the primary focus in therapy.

ADHD is a neurological condition that makes it difficult to manage one's attention and inhibit impulses. It is often misperceived as an inability to focus rather than difficulty managing and shifting the focus of one's attention. Adults with ADHD often have difficulty returning to open awareness when locked into a focused state of awareness. They often have trouble activating and sustaining effort on monotonous tasks, organizing and prioritizing tasks, keeping track of items needed for tasks, estimating and tracking time, managing emotions skillfully, inhibiting speech and action (tending to talk excessively and interrupt others), and inhibiting impulses.

Obsessive Compulsive Personality Disorder is characterized by "preoccupation with orderliness, perfectionism, and mental and interpersonal control, at the expense of flexibility, openness, and efficiency," according to the DSM-5 (Diagnostic and Statistical of Mental Disorders - 5th edition). Individuals with this disorder try "to maintain a sense of control through painstaking attention to rules, trivial details, procedures, lists, schedules, or form to the extent that the major point of the activity is lost." They may get so caught up in the details of a project that they don't complete it, or they miss deadlines. It can take them a long time to complete a task due to this excessive preoccupation with details. They are often "inflexible about matters of morality, ethics, or values and may force themselves and others to follow rigid moral principles and very strict standards of performance." They often have trouble delegating tasks to others, as others must conform to their way of doing things. Those tasks must be done "correctly." They tend to "plan ahead in meticulous detail and are unwilling to consider changes." Their ability to compromise may be compromised by the inflexibility. They are uncomfortable with relationships and situations in which they are not in control or where they must rely on others. They are uncomfortable with the unpredictable.

One effect of the OCPD is Mr. Fenton's communication when dealing with conflict. His excesses in speech and writing can appear imposing or hostile. He acknowledges his compulsion to communicate excessively. The compulsion is driven by an undercurrent of unsettled feelings that persist until he is certain there is no possibility of being misunderstood. This pattern is consistent with the disorder (OCPD). His effect on others—i.e., anyone receiving the excess of communication—is often lost on him, as his attention is locked into the effort to be understood. Consequently, those efforts are experienced by others as intense and sometimes hostile.

Mr. Fenton is aware that he has more work to do on this problem. He recently requested that we focus less on the present crisis and more on managing the challenge of coping effectively with the symptoms ADHD and OCPD, and decreasing self-defeating behavior. Due to both conditions, Mr. Fenton's excessive attention to what he wants to communicate obstructs him from being aware, in a given moment, of effects of his efforts (e.g., the impact of the volume of his voice when speaking, or the volume of information when writing).

Mr. Fenton has been forthcoming in psychotherapy sessions and has been open and willing to be challenged with respect to his symptoms and their effects. He acknowledges mistakes when they are pointed out and is working to understand how his best intentions sometimes go awry, and his persistent efforts can be self-defeating.

Mr. Fenton has never expressed any intention of harming himself or others during the sixteen months that I have known him. I have never had reason to suspect any intention to harm himself or others. He has participated frequently in a support group for adults with ADHD. He has participated actively and has offered help to others in the group.

Thank you for consideration of the role that mental health and disability have played out in Mr. Fenton's life and relationships. His participation in psychotherapy and related services will continue.

Respectfully,


Terry M. Huff, LCSW

Obsessive-Compulsive Personality Disorder (OCPD) DSM-5 301.4 (F60.5)

Generalized Anxiety Disorder (GAD) DSM-5 300.02 (F41.1)

Attention-Deficit Hyperactivity Disorder (ADHD) DSM-5 314.01 (F90.2)

*Circadian Rhythm Sleep Disorder (CRSD) Non-24-Hour Sleep-Wake Disorder (Non-24)
DSM-5 307.45 (G47.24)*

Radnor Psychiatric Group, PLC

5123 VIRGINIA WAY
SUITE C-11
BRENTWOOD, TENNESSEE 37027

Telephone: (615) 373-5205
Fax: (615) 373-5165

November 1, 2018

RE: Jeffrey Fenton, DOB: [REDACTED]

To Whom It May Concern:

Jeffrey Fenton has been a patient under my care since 2012. He is treated for a severe Generalized Anxiety Disorder, Attention Deficit Disorder, and suffers from an Obsessive Compulsive Personality Disorder. He also has specific phobias regarding weather, driving across bridges, and flying, along with obsessive concerns over his health.

His symptoms of severe anxiety, obsessive worry, preoccupation with details and rules, perfectionism, inflexibility, and problems with rigidity have all interfered with his ability to hold a job and have a healthy relationship.

I have prescribed medication including Lexapro 40 mg a day, Vyvanse 70 mg a day, Xanax 1 mg every six hours as needed, and Restoril 30 mg at night for chronic insomnia. He also has continued to see Terry Huff, LCSW, in psychotherapy. Despite his compliance with his medication and therapy, his symptoms continue to be disabling.

Please consider Mr. Fenton's severe psychiatric condition in any judgments being made about his ability to work and his ongoing divorce. If you have any questions regarding his treatment or prognosis, please contact me with his permission.

Sincerely,



Richard E. Rochester, M.D.
RER/sde



Obsessive-Compulsive Personality Disorder (OCPD)

By [Mark Zimmerman](#), MD, Rhode Island Hospital

Last full review/revision May 2021 | Content last modified May 2021

Obsessive-compulsive personality disorder is characterized by a pervasive preoccupation with orderliness, perfectionism, and control (with no room for flexibility) that ultimately slows or interferes with completing a task. Diagnosis is by clinical criteria. Treatment is with psychodynamic psychotherapy, cognitive-behavioral therapy, and selective serotonin reuptake inhibitors (SSRIs).

(See also [Overview of Personality Disorders](#).)

Because patients with obsessive-compulsive personality disorder need to be in control, they tend to be solitary in their endeavors and to mistrust the help of others.

About 2.1 to 7.9% of the general population are estimated to have obsessive-compulsive personality disorder; it is more common among men.

Familial traits of compulsivity, restricted range of emotion, and perfectionism are thought to contribute to this disorder. **Comorbidities** may be present. Patients often also have a [depressive disorder](#) (major depressive disorder or persistent depressive disorder) or an [alcohol use disorder](#).

Symptoms and Signs of OCPD

Symptoms of obsessive-compulsive personality disorder may lessen even over a time period as short as 1 year, but their persistence (ie, remission and relapse rates) during the long term are less clear.

In patients with obsessive-compulsive personality disorder, preoccupation with order, perfectionism, and control of themselves and situations interferes with flexibility, effectiveness, and openness. Rigid and stubborn in their activities, these patients insist that everything be done in specific ways.

To maintain a sense of control, patients focus on rules, minute details, procedures, schedules, and lists. As a result, the main point of a project or activity is lost. These patients repeatedly check for mistakes and pay extraordinary attention to detail. They do not make good use of their time, often leaving the most important tasks until the end. Their preoccupation with the details and making sure everything is perfect can endlessly delay completion. They are unaware of how their behavior affects their coworkers. When focused on one task, these patients may neglect all other aspects of their life.

Because these patients want everything done in a specific way, they have difficulty delegating tasks and working with others. When working with others, they may make detailed lists about how a task should be done and become upset if a coworker suggests an alternative way. They may reject help even when they are behind schedule.

Patients with obsessive-compulsive personality disorder are excessively dedicated to work and productivity; their dedication is not motivated by financial necessity. As a result, leisure activities and relationships are neglected. They may think they have no time to relax or go out with friends; they may postpone a vacation so long that it does not happen, or they may feel they must take work with them so that they do not waste time. Time spent with friends, when it occurs, tends to be in a formally organized activity (eg, a sport). Hobbies and recreational activities are considered important tasks requiring organization and hard work to master; the goal is perfection.

These patients plan ahead in great detail and do not wish to consider changes. Their relentless rigidity may frustrate coworkers and friends.

Expression of affection is also tightly controlled. These patients may relate to others in a formal, stiff, or serious way. Often, they speak only after they think of the perfect thing to say. They may focus on logic and intellect and be intolerant of emotional or expressive behavior.

These patients may be overzealous, picky, and rigid about issues of morality, ethics, and values. They apply rigid moral principles to themselves and to others and are harshly self-critical. ~~They are rigidly deferential to authorities and insist on exact compliance to rules, with no exceptions for extenuating circumstances.~~

Diagnosis of OCPD

- Clinical criteria (Diagnostic and Statistical Manual of Mental Disorders, *Fifth Edition* [DSM-5])

For a diagnosis of obsessive-compulsive personality disorder, patients must have

- A persistent pattern of preoccupation with order; perfectionism; and control of self, others, and situations

This pattern is shown by the presence of ≥ 4 of the following:

- Preoccupation with details, rules, schedules, organization, and lists
- A striving to do something perfectly that interferes with completion of the task
- Excessive devotion to work and productivity (not due to financial necessity), resulting in neglect of leisure activities and friends
- Excessive conscientiousness, fastidiousness, and inflexibility regarding ethical and moral issues and values
- Unwillingness to throw out worn-out or worthless objects, even those with no sentimental value
- Reluctance to delegate or work with other people unless those people agree to do things exactly as the patients want
- ~~A miserly approach to spending for themselves and others because they see money as something to be saved for future disasters~~
- Rigidity and stubbornness

Also, symptoms must have begun by early adulthood.

Differential diagnosis

Obsessive-compulsive personality disorder should be distinguished from the following disorders:

- **Obsessive-compulsive disorder (OCD):** Patients with OCD have true obsessions (repetitive, unwanted, intrusive thoughts that cause marked anxiety) and compulsions (ritualistic behaviors that they feel they must do to reduce their anxiety-related obsessions). Patients with OCD are often distressed by their lack of control over compulsive drives; in patients with obsessive-compulsive personality disorder, the need for control is driven by their preoccupation with order so their behavior, values, and feelings are acceptable and consistent with their sense of self.
- **Avoidant personality disorder:** Both avoidant and obsessive-compulsive personality disorders are characterized by social isolation; however, in patients with obsessive-compulsive personality disorder, isolation results from giving priority to work and productivity rather than relationships, and these patients mistrust others only because of their potential to intrude on the patients' perfectionism.
- **Schizoid personality disorder:** Both schizoid and obsessive-compulsive personality disorders are characterized by a seeming formality in interpersonal relationships and by detachment. However, the motives are different: a basic incapability for intimacy in patients with schizoid personality disorder vs discomfort with emotions and dedication to work in patients with obsessive-compulsive personality disorder.

Treatment of OCPD

- Psychodynamic psychotherapy
- Cognitive-behavioral therapy
- Selective serotonin reuptake inhibitors (SSRIs)

General treatment of obsessive-compulsive personality disorder is similar to that for all personality disorders.

Information about treatment for obsessive-compulsive personality disorder is sparse. Also, treatment is complicated by the patient's rigidity, obstinacy, and need for control, which can be frustrating for therapists.

Psychodynamic therapy and cognitive-behavioral therapy can help patients with obsessive-compulsive personality disorder. Sometimes during therapy, the patient's interesting, detailed, intellectualized conversation may seem psychologically oriented, but it is void of affect and does not lead to change.

SSRIs may be useful.

June 30, 2020

Re: IGA deficiency

In October, 2014, I was referred by my Internal Medicine Dr. Peddireddy to consult with Dr. Suresh Anne at the Asthma, Allergy, and Immunology Center in Flint MI. I was diagnosed with a primary immune deficiency. I have no detectable immunoglobulin A (IgA).

Dr. Anne told me I could no longer visit hospital patients or work in any part of the hospital. As a retired pediatric intensive care nurse, I had wanted to volunteer to work with children. I had to retire from my voluntary parish nurse position. I could no longer visit ill church members at home due to the danger of contracting an infection.

This was over 5 years before the dangerous covid-19. I have not gone to a store, church, hair salon, etc. since, due to the danger to my health. All food and supplies are delivered. None of my family is allowed to visit.....only my son who helps me maintain my health. If he gets exposed, I could easily have a disastrous outcome.

Thank you,



Marsha A. Fenton

Name: Marsha A Fenton | DOB: [REDACTED] | MRN: 027467957 | PCP: RAVIKUMAR R PEDDIREDDY, MD

Letter Details



MICHIGAN MEDICINE
UNIVERSITY OF MICHIGAN

Michigan Medicine Allergy Clinic | Brighton Center for
Specialty Care
Entrance 1, Level 2
7500 Challis Rd
Brighton MI 48116-9416
Telephone: 734-647-5940
Fax: 734-615-2436

January 13, 2022

To Whom It May Concern:

I had the pleasure of seeing Marsha Fenton on 12/10/2021. She is currently undergoing evaluation for immunodeficiency. I have recommended that she continue to take all precautions recommended for unvaccinated people given it is unclear whether she was able to produce a normal immune response to the COVID-19 vaccines and may not be protected. Therefore, if possible her son Jeff Fenton should continue to work remotely in order to avoid COVID-19 exposures for Marsha.

Any further questions can be directed to the office at the phone number listed above.

From the office of:
Mariel Rosati Benjamin, MD

CC
Marsha A. Fenton

This letter was initially viewed by Marsha A Fenton at 1/13/2022 3:44 PM.

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ASTHMA, ALLERGY AND IMMUNOLOGY CENTER

S. Anne, M.D. R. Botta, M.D. I. Badr, M.D. R. Mahajan, M.D. H. Azzam, M.D.

Patient Name: Marsha Fenton

DOB: [REDACTED] [74 years]

Visit Date: 7/2/2020

Ravikumar Peddireddy, M.D.
G-1071 North Ballenger Highway, Suite 206
Flint, MI 48504

Dear Dr. Peddireddy:

Thank you very much for letting me participate in the management of Marsha Fenton, who was seen by telephone consultation on 07/02/20. Marsha states that her IgA deficiency has been stable. She denies any upper or lower respiratory tract infection. She has been following strict avoidance measures from exposing to the COVID-19 infection. She is wearing the mask. She is staying home. Her son also stays with her, who is not working at this time. She denies any fever, chills, or rigors. She denies any upper or lower respiratory tract infection.

PHYSICAL EXAMINATION: Deferred at this time since this was done by telephone consultation.

IMPRESSION: Ms. Marsha Fenton has:

- 1. IgA deficiency, and
- 2. Chronic rhinosinusitis.

RECOMMENDATIONS:

- 1. Marsha is prone to develop recurrent infections. Therefore, I advised her to follow strict isolation measures from exposure to COVID-19 infection.
- 2. Since her son stays with Marsha, I strongly recommend that her son should do his work from home since it will reduce significantly the risk of exposure of Ms. Fenton to the COVID-19 virus.
- 3. A follow-up appointment has been scheduled in one year but I advised her to contact me as soon as the pandemic is over for further evaluation and treatment.

Once again, thank you very much for letting me participate in the management of Marsha Fenton. Please do not hesitate to contact me if you need any further information.

Respectfully,

Suresh Anne', M.D.

Signed Electronically By Suresh Anne, MD
Signed Date: 7/3/2020 9:16:00 AM

E-Faxed to Ravikumar Peddireddy, MD On 7/3/2020 9:16:00 AM

5155 Noriko Drive Flint, MI 48507 810-330-2300	801 Joe Mann Blvd Suite L Midland, MI 48642 810-624-2424	818 W King St. Suite 101 Owosso, MI 48867 810-330-4222	1254 N. Main Street Lapeer, MI 48446 810-345-2320	4792 Rochester Rd Troy, MI 48084 313-520-2020	18161 W. Thirteen Mile Rd. Suite C Southfield, MI 48076 313-666-2024	46325 W. 12 Mile Rd. Suite 215 Novi, MI 48377 248-347-0222
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Lab Results Report

Asthma, Allergy and Immunology Center

Patient: **FENTON, MARSHA**

DOB: XXXXXXXXXX

Gender: F

Order Number: 0011494

Provider: ANNE, SURESH

Account #: 45961

Source (Lab): Quest

Collection Time: 05/10/2018 10:43

Result Time: 05/11/2018 19:07

Received Time: 05/10/2018 10:44

Accession #: WX534222V

Specimen:

Volume (ml):

Fasting: NO

Comments:

Additional Information:

Test	Result	Flag	Unit	Status	Ref. Range	Lab
IMMUNOGLOBULINS :						
IMMUNOGLOBULIN A	<5	L	mg/dL	F	81-463	CB
IMMUNOGLOBULIN G	1494		mg/dL	F	694-1618	CB
IMMUNOGLOBULIN M	68		mg/dL	F	48-271	CB

Performing Laboratory Information:

CB Quest Diagnostics-Wood Dale, 1355 Mittel Blvd Wood Dale, IL 60191-1024, , Anthony V Thomas, M.D.

Abnormal Flags:

L Below low normal