

IN THE COURT OF APPEALS TENNESSEE  
AT NASHVILLE

JEFFREY RYAN FENTON,  
Appellant/Ex-Husband,

v.

FAWN [REDACTED] FENTON,  
Appellee/Ex-Wife.

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Appeal No.: M2019-02059-COA-R3-CV

CONCISE STATEMENT OF THE ISSUES PROPOSED TO BE RAISED  
BY THE APPELLANT/HUSBAND THROUGH THIS APPEAL

I Jeffrey Ryan Fenton, being the Appellant/Ex-Husband in this Appeal, am representing myself “Pro Se” in this action, as I have throughout most of this divorce, not because of an egotistical belief that I will be better served, as I was chastised in Williamson County Chancery Court, but rather simply because I have no financial means with which to hire any legal counsel or representation. Hence far my need to represent myself without a legal advocate, representative, counsel, or advisor, has absolutely overtaken and terrorized every facet of my life since legal proceedings were first secretly initiated and forced upon me, repetitively now without warning, by the Appellee Ms. Fenton, who is now my ex-wife.

Ms. Fenton, in her relentless pursuit of discarding me from her life, with as little financial damage to her future (specifically in the form of “alimony”), as she and her army of strategists, financial advisors, and the most ruthlessly skilled counsel as can be afforded only by individuals backed with substantial financial resources, or a family with such financial capacity. Meanwhile Ms. Fenton has alleged a financial need to file for Federal Bankruptcy protection and relief due to only about **\$50,000 of unsecured debts**, while

literally wasting almost twice as much in her home equity and probably a similar amount in legal fees, all to prevent (at all costs), avoiding only one nearly fatally dreaded embarrassment, amongst her prideful and powerful family: a fair & equitable divorce.

Before proceeding, I the Appellant and Ex-Husband, Jeffrey Ryan Fenton, would like to bring to the court's attention, while requesting both the Court's and the State of Tennessee's consideration and flexibility regarding the disabilities which I have been diagnosed with (listed below), that I daily continue ongoing treatment for, and struggle each day to live the best life that I can live, despite my own personal challenges, compounded by those socially forced upon me by others, both out of their ignorance and their selfishness.

**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)**

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 are well described, in Exhibit-A.

Written by my long-term and trusted mental health professionals, Exhibit-A describes how my disabilities personally impact my ability to process information, research, and proceed in a timely fashion. Especially when my entire life hangs in the balance, while not possessing legal training or experience, nor the time to learn or a proficiency with attention to details such as legal code or local rules and regulations. While also being unable to afford any competent legal counsel. My need for technical and procedural flexibility within the Court, in an honest effort for the Court to hear the heart of my testimony, without discarding it due to some technical lack of knowledge, absence of legally savvy expertise, or misunderstandings and failures in my delivery, are absolutely essential to me having any “fair” chance at “due process” of law.

I was absolutely denied any procedural flexibility to hear or include my testimony in Williamson County Chancery Court. I was even both chastised and lightly mocked for dismissing my counsel (for lack of funds) and requesting to be heard “pro se” without all the technical expertise of a licensed lawyer, while also requesting the slightest consideration for my personal handicaps and disabilities (in addition to my “poorness”).

Frustrated by the absolutely absurd, false, perverse, unethical, twisted, fraudulent, perjurious narrative provided to date by Attorney Virginia Lee Story and her client Ms. Fenton, which the Court embraced at face-value, without question, I devoted an entire week of my life, staying awake several days straight, working non-stop, to compile, explain, and present an all-in-one document titled “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”. I filed this 63-page document with the Williamson County Chancery Court Clerk & Master on 8/29/2019 at 9:17am, along with nearly 250-pages of colorful, revealing, and often shocking exhibits, which graphically exposed, explained, displayed, and proved (beyond any reasonable doubt) the truth about what had transpired to bring about the failure of our marriage. I admitted equal error and fault to that of Ms. Fenton in the poor decisions, lack of moral fiber, failure to commit to unselfish pursuits, and eventual demise of our marriage.

A portion of the Chancery Court’s Order, on the day of my exhaustive filing, states: “The Motion for Violation of the Order of Protection will be continued pending further Orders of the Court as Husband had filed a very lengthy response on the morning of the hearing being August 29, 2019.”

As evident in my audio recording (created with the Court’s permission) and the Transcripts from the Hearing, Ms. Story agreed to hold the October 21<sup>st</sup> Court Hearing with me over the phone. Since I was literally forced to move to Michigan to seek shelter with my mother, after the Court (at Ms. Story’s request) terminated my rental income and literally forced me to become homeless, having me physically removed from my lifelong investment and my home by four deputies from the Williamson County Sherriff’s Office. While also forbidding me from taking any of my personal property with me, except for a single carload of clothes, toiletries, and my medications.

Unfortunately, as with many statements, assurances, and commitments made by Attorney Story, while in Court under oath, of which I have a plethora of audio and

transcribed evidence to prove, Ms. Story reneged without notice upon her commitment to hold this hearing with me over the phone. Days afterwards, while believing that the situation had “corrected” itself, I received papers from the Court notifying me that Ms. Fenton had been granted a “default” divorce, with me being named “at fault”. No portion of my exhaustive all-in-one 63-page testimony, with its nearly 250-pages of unquestionably revealing and substantiate exhibits were given any consideration whatsoever. My honest belief that the Court would be furious with Ms. Fenton and Ms. Story once it learned how they had intentionally deceived the Court, to manipulate the Court like a puppet, to literally cause unjustified and I believe illegal harm to myself, along with the enforcement of the Williamson County Sherriff’s Office, all based upon what was clearly fraudulent testimony and assertions, which I spent a week of my life, morning, noon, and night, to “leave no stone unturned” in showing in living color, the absurd extent of their deception and obvious manipulation of money and legal leverage, to play the Court, purely to **“do their dirty work”**. Causing me unjust damages which I will never in my lifetime be able to recover from.

I honestly believed that regardless of legal technicalities, procedural norms, local rules and regulations, that once the Court honestly discovered the vivid truth (which was undeniably clear, in the 300+ page submission, that I filed with the Court on August 29<sup>th</sup>) showing how Ms. Fenton and Ms. Story had intentionally and maliciously “played” the Chancery Court, along with creditors and financial institutions, and even the Federal Bankruptcy Court, all strategically planned at great length to harm me, purely to terrorize me, to financially and legally dominate me, to repeatedly harass and abuse me by legal process, to intentionally keep me overwhelmed in a frenzy, so that I was absolutely

powerless to defend myself against their wave after wave of absolutely unwarranted and purely malicious legal assaults, binding me and gagging me with their falsified “Order of Protection”, defaming and even destroying my character before the court, behind closed doors, before I ever even entered a court room. A robbery is a lot easier when the property owner is bound and gagged first.

Ms. Fenton with Ms. Story’s assistance, connections, and power literally robbed me of everything that I had built during my lifetime, while running me off my own property, with only five days’ notice, without allowing me to take with me any of my personal property, not even my very own bed (which my mother had recently purchased), executed and enforced with the muscle and firepower of the Williamson County Sherriff’s Office. As one might expect, the deputies dispatched to physically remove me from my home, were nervous and jumpy, with their hands on their guns, not knowing if I was really a danger or not, thanks to the ridiculous “Order of Protection”, based upon false testimony and a half dozen emails trying to determine the status of our mortgages, after learning about Ms. Fenton’s secret bankruptcy filing.

So, with the strategic planning of Ms. Fenton and Ms. Story, they had manipulated the Williamson County Chancery Court, into ordering a crime to take place at my residence, causing me catastrophic and unrepairable harm, while they dispatched the Sherriff’s Office to execute and oversee the operation. **Try to wrap your head around that.**

I honestly believed with every fiber of my being, that once the Williamson County Chancery Court took the time to read or at least casually review the 300+ pages of shocking and irrefutable evidence which I had provided to them, that they would without question squash the oppressive assault waged against me by ruthlessly unethical predators, **and rush to my aid**. Regretfully, that never happened. Regretfully, I never again heard any mention of what became of that testimony of mine. For reasons unknown, the Williamson County Chancery Court admitted receiving it, yet refused to address, comment, or act upon any portion of the evidence which I exhaustively compiled, printed, organized, bound, and submitted to them. Somehow it seemingly disappeared, as Ms. Fenton was awarded a “default” judgment, as though I never even bothered to show up at court, borrow \$10k from my mother to hire short spurts of emergency legal counsel, or picked-up a pen to write a word in my own defense.

To top that off, the Williamson County Chancery Court totally unnecessarily issued a full “Order of Protection” against me, staining my name forever, continuing to unconstitutionally deny me of my inalienable rights as a law-abiding American Citizen, even knowing that the only perceived threat was (later acclaimed “unwanted”) electronic communications. That there was never a single physical threat, complaint, or action of any kind. That there was absolutely no history of domestic disputes, that I have personally never been arrested during my 50-year lifetime, and that there is no claim anywhere, of me being a physically violent person.

Even more absurdly, the Williamson County Chancery Court knew that I had just been financially forced to move 600 miles away from Brentwood, for shelter and

assistance from my mother as a result of this Courts horrendously damaging and unfair rulings, while knowing that I am terrified to drive over the Cincinnati Bridge, so without a driver I won't be returning. Williamson County Chancery Court further ordered no means of replacement housing for me, financial or medical support, or provision by any means, though Ms. Fenton is an MIT educated licensed professional Architect, with over 20 years of experience, while I have only a high school diploma and some outdated blue-collar mechanical skills for employment, in an industry which no longer exists. Likewise, Ms. Fenton had admittedly been our family's primary "breadwinner" for over the past 12 years. (While my support was critical in building her career.)

Both my Psychiatrist and my Psychotherapist wrote letters to the Court testifying that they don't believe that I am a danger to either myself or anyone else. The excerpt below, is from the Transcript of the Williamson County Chancery Court hearing, on 8/1/2019, where Ms. Story is explaining to the Judge why the parties have agreed that they prefer not to issue a full "Order of Protection" against me:

- 16 MS. STORY: Because what we don't
- 17 want to do is have something go down on his
- 18 record that's going to affect his employability,
- 19 because he needs to get a job ASAP...

So, what has changed to justify placing something "on (my) record" that's going to "affect (my) employability", since I am still unemployed and now I'm also homeless, without having any provision, while needing meaningful employment now more than ever

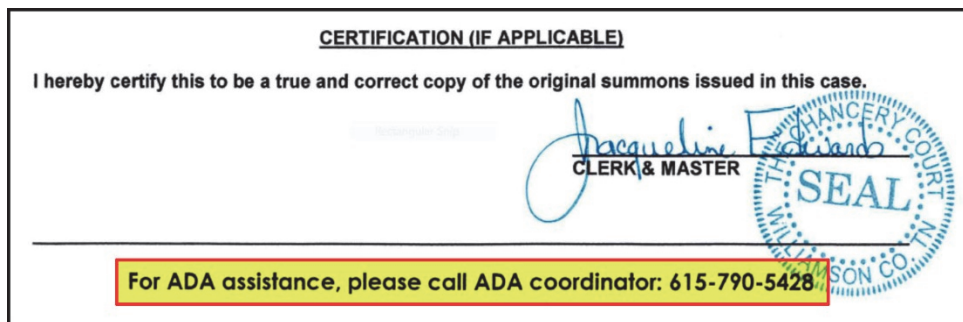


before in my life? The only conclusion that I can draw, is that my employment, housing, healthcare, and provision are no longer deemed a concern for the State of Tennessee, since I've been physically run-off, and forced to seek shelter in the State of Michigan, where I have family, and have now been forced to join the State of Michigan's welfare programs, in an attempt to help meet my most basic physical and mental health care needs. Now it would just be nice to have my own shelter, food, fuel, insurance, vocational training, and gainful employment, without a fraudulently obtained, warrantless, "Order of Protection" to continue **to restrain me from moving forward and working toward becoming financially independent again.** This unjust assault upon my character and my person, if not removed and completely expunged from my record, can harm my employment opportunities for the rest of my life.

I'm already 50 years old, unemployed, in desperate need of vocational rehabilitation, with no means yet of obtaining that, while having been robbed of every penny of my retirement savings, and having paid very little into Social Security, for over the past decade, since Ms. Fenton was (by mutual agreement) the primary breadwinner for our family. Yet the State of Tennessee, or at least the Williamson County Chancery Court, has rationalized now that this "Order of Protection", somehow serves my ex-wife, Ms. Fenton (who has never been in any physical danger from me), more so than this same "Order of Protection" continues to defame and damage my character, my employment opportunities and potential, restricting and defining my ability (or lack thereof) to provide for myself. If only the Court had just perused the photographs in my 300+ page answer and counter-motion, which I invested a week of my life to provide to them, in hopes of finally being heard. The irony and injustice just don't end for me. It is simply beyond all

reasonable comprehension, of what one expects from those government “servants”, whom we elect **to employ to protect us**, our families, and our homes.

I have literally been deprived of my life, my liberty, my property, and my pursuit of happiness without any constitutionally demanded due process of law. Not to mention the repeated failures of the Court to make minor procedural modifications as needed to fairly hear my case, considering my well documented and clearly proclaimed disabilities and personal handicaps, which continue to plague my life.



I called the phone number for “ADA assistance”, listed on the bottom of the Court Summons (shown above), asking twice very clearly for assistance from the Court regarding my disabilities, which I explained very transparently. In return, the “ADA coordinator” whom took my call, stated twice definitively, that the only assistance which the Court can offer, is to bring a wheelchair out from the Courthouse to your vehicle curbside, if you need help walking into the Courthouse.

In the “Administrative Policies And Procedures” of the Tennessee Supreme Court, Index #: 2.07, Effective: 11/14/08, Page-2, Section VI “Procedures”, Subsection-A it states: “Upon request, the Tennessee Judicial Branch will provide **reasonable**

**modifications to its rules, policies, services, procedures, and practices** when doing so is necessary to provide effective access to a qualified individual with a disability.... Such modifications shall be designed to make each service, program, or activity, **when viewed in its entirety**, readily accessible to be usable by a qualified individual with a disability.”

Somehow it appears that this mandate created by the Tennessee Supreme Court, modeled after our Federal Government, to provide an equal opportunity for a fair trial to all Tennesseans, regardless of the disabilities which they unfortunately must struggle with each day, has been reduced and interpreted by the Williamson County Court system to merely refer to assisting those with minor mobility problems, requiring just four-wheels and a little push, to step-up to equality inside their court rooms. Somehow, I had more in mind, when I called the Williamson County “ADA Coordinator” and requested assistance. Once again, it was not for a lack of trying.

I honestly believed that it would be refreshing, and lend credibility to my testimony, for the Court to read a motion which didn’t just blame the other party for once. Which instead equally exposed my faults as it did those of Ms. Fenton. Which showed no partiality or favor regarding the actions and inactions which lead to the failure of our marriage. Which requested a termination of our marriage, for irreconcilable differences, as requested by Ms. Fenton, as quickly as possible, for both of our benefit. To help protect Ms. Fenton from harming herself further, in this insane quest at logically unjustifiable expenses. While requesting only the most meager financial settlement for myself, of approximately one quarter of what Ms. Fenton and I had previously discussed and agreed was fair.

At the same time undeniably exposing, confronting, and debunking many of Ms. Fenton's fraudulent, deceptive, unconscionable, and perjurious strategies, tactics, actions, and statements presented thus far to both the Federal Bankruptcy Court and the Williamson County Chancery Court, by herself and her legion of legal counsel and financial advisors, including the office of Attorney Virginia Lee Story. Revealing a highly intelligent, deeply strategic, meticulously planned-out and precisely executed, which passes completely unseen to the untrained eye. But to those who know the person, their past passions, endeavors, and escapes, their deeply seeded motivations, their desperation to succeed as the "victor" (at all costs), while "crushing" her "opponent" (me), in her family's sight.

I plainly exposed and explained the difficult to see and almost unbelievably plotted, fraudulent, dishonest, immoral, unethical, and substantially criminal plan to "rig" Ms. Fenton's bankruptcy, to avoid an estimated \$120k to 150k+ in support payments, while being court ordered to provide me with equivalent legal representation, and future alimony. Plus Ms. Fenton's strategic bankruptcy allowed her to force me out of our home, a feat which she couldn't tackle for a year and a half, due to my sizable investment in the property, along with my joint ownership, the fact that she chose to move-out, that I had done nothing wrong which she could legally use to justify and leverage my removal. While Ms. Fenton was also stuck (actually we both were) with all the financing for our property being in solely her name.

Though I made countless offers to assume her mortgages, to give her my equity, to buy-out hers over time, many of which were extremely generous on my part, and all which ended countless times better than the bankruptcy which she finally insisted upon. After

Trump's new tax laws went into place, as of January 1<sup>st</sup>, 2019 (which was an absolutely critical deadline in Ms. Fenton's mind), she was never again willing to discuss or entertain me keeping the property, for any price, under any circumstances. She was only once more willing to entertain an offer I made to again give her my equity in our home, provided that she chose to live in the property, which she gleefully considered for a few days, then having lost all hope again, Ms. Fenton adamantly refused to ever consider another proposition besides us both selling our home. (That too we explored and even agreed upon, but eventually Ms. Fenton reneged upon our "Verbal Settlement Agreement" also, due again to the agreed upon alimony, which I will explain later in detail.)

Finally, cruelly, but very intelligently, Ms. Fenton realized that her quickest path to financial recovery was through filing Chapter-13 Bankruptcy. Whereby she pre-planned the secret default upon our mortgages, manipulating the Chancery Court's order to force the sale of our home (to "save us" from foreclosure, which would have actually provided me with Federal protections which I was denied, in Chancery Court). Ms. Fenton even decided to discard our equity via an auction, simply to quickly kick me out, while settling the debts with both of her Mortgagors.

How else did Ms. Fenton's planned Chapter-13 Bankruptcy benefit her, prior to filing for a divorce a second time? I will explain all of that in detail in my brief. It actually opens-up like a flower, where once you can see it, you can see nothing else but.

Also, as a result of my disabilities, is my sheer inability to successfully multi-task, as Ms. Fenton has long criticized me. The Appellee's tactics of forcefully ambushing me

on multiple fronts simultaneously, with highly strategic, financially and legally false, manipulative and debilitating (bullying) claims, and highly offensive assaults upon my person, my character, my contribution, my legacy, and my life, while leveraging absolutely false, fraudulent, perjuring, and perversely twisted testimony, to maximize the injury and harm caused to me and my life. Expectantly overwhelming me and leaving me in a tailspin to try to literally “save my life” from absolute ruins, with next to no resources with which to do so.

I intend to demonstrate to the Court how the Appellee and her counsel knew and strategically exploited the fact **that regardless of how false their testimony was, they would win the legal battle, as long as they could simply out pace me.** I also intend to demonstrate how the Williamson County Chancery Court assisted the Appellee and her counsel in their efforts to “railroad” or “steam roller” me, due to their pre-trial prejudice toward me (by the multiple false accusations and motions brought against me, before the Court had ever met me), or the Court discriminated against me, I believe due to nepotism between the Court and Attorney Story, who was allowed to dictate almost verbatim most of the rulings in this case. I also believe that I was discriminated against by the Court, out of animosity for me choosing to represent myself “pro se”. First because of the failures to perform by the first attorney whom I hired, Attorney Brittany Gates (BPR #030936). I contacted her almost daily, trying to get Ms. Gates to produce my “Answer & Counter Complaint for Divorce”, to which I was repeatedly told by Ms. Gates that I would receive a draft via email shortly, within a matter of hours, by the end of the day, on the following day, etc... Finally, her father-in law passed, causing Ms. Gates to travel out-of-state, at which point she informed me that she was allowed a two-week extension to submit my “Answer &

Counter Complaint for Divorce”, due to her family emergency. When Ms. Gates continued to fail to perform, until I was literally down to only a few days prior to defaulting, out of desperation I fired Ms. Gates, borrowed another \$5,000 from my mother, and hired Attorneys Duke & Miller in a last-ditch effort to save my home. To this day, I have never once received or viewed any “draft” of the “Answer & Counter Complaint for Divorce” which Ms. Gates repeatedly assured me that she was diligently working on, and that I would receive for my comments either that day or the day after. I earnestly hope that through this Appeal the Court will order Ms. Gates to directly repay my mother the \$4,500 which I borrowed from my mother and paid to Ms. Gates, for services which she repeatedly failed to perform. In my experience, I found Ms. Gates to be a wonderful talker, a sympathetic listener (which earned her my trust), but impossible to extract any work product from.

Consequentially, in addition to the massive loss of both money and even more significantly the loss of time for Attorneys Duke & Miller to get up to speed, draft and file Court papers on my behalf, I was told by Attorney Duke **that Ms. Story had agreed to extend the deadline for filing my “Answer & Counter Complaint for Divorce” for an unspecified period of time**, while she refused to provide us with even a single day’s extension for responding to her motion to force the sale of our marital residence (the one and only real asset we had, in which Ms. Fenton and I had invested almost everything in our lives into). Likewise, the hearing for the fraudulently obtained “Exparte’ Order of Protection”, Ms. Story also insisted concurrently be heard.

So, with only two or three days to prepare, Attorney's Duke & Miller were put into a position to fight for literally everything that **I cared most about in my life**. My home, my life's work, my only asset, and my retirement savings, along with my constitutional freedoms (specifically my first and second amendment rights, treasured by both the appellee and the appellant) as citizens of these United States of America. Based upon Ms. Fenton's previously received fraudulent testimony and lie after lie asserted by Ms. Story. The resulting prejudice and discrimination by the Court, due to my gender, my lack of employment, the traditional familial roles widely known to be expected and favored by that Court, my acclaimed disabilities, their apparent disdain thereof, combined with what I interpreted to be nepotism between the Williamson County Chancery Court System (throughout) and Ms. Story's longstanding, neighboring, and almost mentoring relationship with them. (This was further confirmed in my research by independent third parties; including past clients of Ms. Story, her legal peers and members of that same court, and even by local law enforcement officers.) I don't believe that I ever had, or especially now will ever have, the slightest chance at a fair trial in Williamson County Chancery Court, while representing myself "pro se", against the crafty, highly skilled, ethically "flexible", and locally infamous Attorney Virginia Lee Story.

There was a time when I honestly believed that despite all odds, **that the truth would win the day**. Now as I sit here in Michigan, homeless and broke, looking out the front window of my mother's tiny house, sitting beside a highway, as I watch cars speed by, day after day. Instead of my tranquil life in our beautiful Brentwood home, which I had invested my life into, surrounded by hundreds of acres of protected woodlands, crawling with nature, located at the nexus of several of the most financially affluent



communities and opportunities in the State of Tennessee, and even of our Country. I am forced to sadly admit, that in the Williamson County Chancery Court, in my beloved state of residence for 25 years (Tennessee), as an honest law abiding, tax paying citizen, that in the end **relationships won the day**, and the **truth was not only unsought, but quickly and easily buried**. It was at that point, heartbroken, that I vowed to never step foot on Tennessee soil again.

With all the beauty, the opportunities, the privileges and the power, the state carelessly stole too much from me. Regretfully now, should I ever return, I'd reasonably fear for my own safety, from the very same state and county governments which I previously employed for 25 years. I personally know of no greater injustice or collective betrayal of an individual citizen. **"Guilty until proven innocent."** But only if you can afford it. If you possess the money, relationships, and power to prove it, beyond a reasonable doubt. At the same time, you sure better hurry, because the Court can take everything which you've dedicated your life to building, in one reasonably uneventful afternoon before tea, with the entire "burden of proof" immediately shifted onto your shoulders, If you are able to survive their casual afternoon ruling.

I'm asking herein that the Court please focus more upon the **spirit of the law**, rather than the letter of the law. This is not a matter for technical craftiness, dissection, and annihilation, as has been permitted thus far. How can **anyone rule** on the **substance of my life** or **my marriage** without ever **hearing**, considering, and weighing **my side** of the story? A divorce shouldn't be a matter of a popularity contest or who plays best with others. Ms. Fenton can lie more convincingly than I can tell the truth, any day of the week.

Simply because she is less **abrasive**. While trying to capitalize upon recent media hype and stereotypes about “mental illness” and firearms. Why is anyone interested in my guns or taking them away? I’m 600 miles away. Unless I own a ballistic missile, I’m pretty sure that I’m no danger to anyone South of the Ohio state line.

The real danger here is what is happening to our Constitution. Courts have watered down words such as “stalking” and “harassment” to the point that anyone could be legitimately accused of either. Right now, you could claim that I’m harassing the State of Tennessee, by writing this. The problem with watering-down those terms, and making the definitions so broad, is that the **extreme emergency remedies**, like an “Order of Protection”, which was created to **protect life and limb**, not to hide theft and deceit while garnering favor with the court (which ultimately “helps” to harm the life of another), are not concurrently being adjusted to compensate. We now need to have first-degree, second-degree, third-degree “stalking”, so that only the “third-degree”, where the dangerous psycho or pervert is actually lurching in the bushes and following someone around town, qualifies for denying any American Citizen of their constitutional rights, using one “loosey-goosey” term/definition for each attorney to manipulate and each judge to “interpret”, according to how well **they like the person** standing in front of them. That is a recipe for handing “god like” powers to way too many people and is the exact opposite of what our Constitution and Bill of Rights were written **to protect us all from**.

At the very least, anyone who is to be stripped of their constitutional freedoms should at the very least be provided with legal counsel with which to defend themselves (as in any criminal case). I shouldn’t need to borrow \$10,000 from my mom, simply in an

attempt to defend myself against a false claim, without even starting the primary purpose of the court action (a divorce, which has never been heard).

If this case is to be remanded back to a trial court, then I earnestly request a change of venue to Davidson County, where I have lived the majority of my 25 years in Tennessee. I also request that I please be able to participate in any legal proceedings remotely, as it is very difficult for me to travel with my disabilities, not to mention the fact that I have no money to travel with, to obtain lodging, or to feed myself away from Michigan now.

I also request, that if the Court finds it appropriate to send this back to a trial court (which I sincerely hope that you won't), that Ms. Fenton be ordered to provide me with equivalent representation to hers, along with interim support to meet my basic needs. (I'm told that "support payments" come before "debt payments" in bankruptcy plans.) I have gone above and beyond to try to mitigate our losses through any sort of "collaborative" divorce process, mediation, or simply hiring a very cheap non-biased third-party attorney to amicably facilitate our divorce. Ms. Fenton abhorrently refuses anything resembling a "fair" process here, and it is not because I'm any sort of "monster".

Ms. Fenton told me that she planned to try to have mediation waived with her first divorce filing, as we regularly spent time together. Yet now she claims to not only be "afraid" for her own safety, **but for the welfare of everyone involved in the mediation process.** I simply can't express how offensively ridiculous that is. How about we do mediation via Skype and have the Sherriff's Office online to monitor? I can't believe that

she has gotten so far, so fast, simply by changing lawyers and deciding that it is quicker to destroy herself and rebuild, than to give me anything.

It is simply beyond the scope of “reasonable” thought, that Ms. Fenton can afford the most expensive counsel in town for herself, while seeking to be absolutely as litigious as possible, while claiming not to be able to afford any counsel for myself, as she elected to “file bankruptcy” on \$50k in debt (to avoid support payments and kick me out of my home), when she made twice that annually. If she can “afford” to keep trying to “beat” me, then she can afford to provide me with counsel, to give me some chance at the smallest sliver of “equality” (now that our only asset has been liquidated). At least that is my hope.

I’m asking herein that the Court please handle our divorce with a **“Case Management”** approach, to provide a fair and holistic remedy to the sum of legal actions which she has unilaterally chosen to dissolve our union with. I ask that this please include the first filing for divorce which Ms. Fenton made on 6/29/2018, docket: 47426, with Attorney W. Edward Porter IV (#033893), along with my Pro Se Answer and Counter Complaint filed on 10/30/2018. The Voluntary Non-Suits which we both filed in November of 2018, with the Verbal Settlement Agreement which we had reached, until Ms. Fenton decided to default upon our agreement to sell our home and get divorced amicably, preferring instead to return to litigation. Ms. Fenton later admitted to me that the \$1,750 per month in “Transitional Alimony”, payable by her for a duration of 6-years, is what she changed her mind about, apparently finding attorney fees more favorable. Of course, also considering all the actions taken by Ms. Fenton and her Counsel, upon hiring

Ms. Virginia Lee Story (#11700) to re-file for a contested divorce on 6/4/2019 (docket: 48419B).

Regarding procedural technicalities, I understood the October 21<sup>st</sup> hearing to be the last of three hearings **regarding the OP**, after the Court and Ms. Story had a chance to read the 300+ pages of documentation and evidence which I filed with the Court on all the documentation which I filed with the court on 8/29/2019. As stated previously, that hearing was to take place **over the phone**, per Ms, Story on Court record, during the 8/29 hearing. I received no call.

Prior to October 21<sup>st</sup> (actually still to date), I have done everything in my power simply to keep up with the litigious ambush (trying to keep my home, transition roommates, then suddenly move to Michigan for shelter, get on Medicaid, welfare, etc...) which Ms. Story and Ms. Fenton kept steadily bombarding me with. It was my impression that Ms. Story and the Court were only concerned with the OP and the sale of our home, **until those matters were completed**. We had not even begun “discovery” yet, as my previous counsel had instructed me about. Nor had Ms. Story filed for a “Motion for Default Judgment”, which I was told was required before any “default” judgments could be ordered by the Court. Yet once my home was gone, with me being financially destitute and Ms. Fenton having filed for bankruptcy, **the money was gone**, and down came the gavel to abruptly end it all.

I was planning to file my “Answer and Counter-Complaint for Divorce” next. I planned to use the same basic Counter-Complaint as I filed the time before, in docket:

47426, on 10/18/2018. I just needed to change my answers to correspond with Ms. Fenton's latest complaints. I'm pretty sure that Ms. Story and Ms. Fenton expected that, but they never even gave me time to come up for air. I received no advance notice about this whatsoever.

If the Court is willing, I am respectfully seeking the immediate revocation and thorough expungement of any and all traces of any "Orders of Protection" issued in my name, throughout State and Federal resources and databases, in the above referenced case.

Should the court allow, I will seek financial relief, restitution, and support for the financial damages of unjustly losing my home without being afforded any opportunity to save the sum of my entire life's savings, from the following parties for their participation, roles, neglect, misrepresentation, discrimination, actions, inactions, ethical and moral failures, greed, selfishness, harassment, harm, abuse, misuse of power, authority, and professional licenses, bad-faith, and/or malice:

- Ms. Fawn [REDACTED] Fenton
- Ms. Virginia Lee Story and Story Abernathy & Campbell, PLLP
- Williamson County Tennessee
- Williamson County Chancery Court
- Williamson County Sherriff's Office
- Broker & Auctioneer Tommy Anderson and HND Realty LLC
- Broker & Auctioneer Pat Marlin and McArthur Sanders Real Estate

**With the Court’s permission, I would like to re-write my previous answer and counter complaint (filed on 8/29/2019), not to add or subtract content, but to remove duplicity, confusion, and improve the workflow and readability. I would also like to be allowed to submit one Exhibit (EXHIBIT-B) which I did not have time to finish printing, before I had to rush off to Court for a hearing on the morning of the August 29th.**

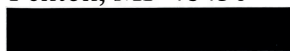
I know that this introductory statement is long, but this is a very complicated divorce, especially for not having any children. Everything that I state I can back with piles of evidence. My psychotherapist Terry M. Huff used to focus his practice on divorce workshops and told me that this is one of the most complicated divorces which he has been involved with. Ms. Fenton and Ms. Story are trying to reduce our marriage to a narrative of me being a “lazy leach”, while she is the “victim”. I promise you, **that is not the truth.** We were married for 14 years, and so far, the court hasn’t heard a single word (from either side), which dates back more than a **few months** before Ms. Fenton abruptly abandoned me, without warning or notice. Surely the other 13 years of our marriage deserve some consideration. Should you truly allow me to present my side of the story, hear, see, and weigh my evidence, yet still find that I am merely as Ms. Fenton claims, then the State of Tennessee and Ms. Fenton shall never be bothered by me again. Please, you be the judges. **I simply ask that you take the time to hear me first.**

Thank you for your consideration, and any help which you can offer.

Respectfully submitted,



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This one page summary was written by husband's mother, Marsha Fenton, in an attempt to significantly shorten his response for the court.

My primary reason for submitting this Appeal is because the Williamson County Chancery Court absolutely refused to hear any portion of my testimony. I believe that most of what the court was willing to hear, took place *ex parte*, either behind closed doors or at least beyond my presence and ability to hear, comment, object, or participate. (Because of my disability, my mother highlighted the main concerns on this one-page summary, my own writing follows.) Thank you for your consideration.

The first hearing took place on 8/1/2019:

1. I have a well-documented disability which the court refused to provide assistance for, or acknowledgement of, despite much documentation presented. The Williamson County ADA Coordinator told me they only provide wheelchairs, for the mobility challenged.
2. The judge did not acknowledge my disability nor ask what assistance I needed.
3. Re: Order of Protection – the judge never looked at my proof (pictures and emails) that proved the complaint was false. My wife had freely returned to our home, invited me to her apartment, and had me care for our dog while she went on vacation to CA.
4. The judge never asked me the validity of any of the accusations made against me. He just approved whatever Ms. Story said – even allowing her to dictate almost verbatim most of the rulings in this case – the judge asked Ms. Story questions about how to proceed???
5. I filed a counter motion on 8/29/2019 with approx. 250 pages of evidence.
6. I was allowed no access to our marital accounts, house payments, property taxes, etc. Per OP I was not allowed to contact Ms. Fenton. I believe the OP was designed to strip me of knowledge and prevent me from reaching out for help, as she fraudulently filed bankruptcy (as I provided proof of). She made \$94,000/year plus benefits, and then voluntarily refused to exclude our home.
7. The court terminated my rental income. They gave me 5-days to get out of my home – sheriffs supervising me as if I was a criminal. I was only allowed to take meds, toiletries, and some clothing.
8. Had the home gone into foreclosure, I would have had Federal protections as an equal property owner, which I was denied by the chancery court. I could have continued with my roommates for a season and paid the back payments (with family help), worked (once the incessant court papers stopped appearing) and had my home - my whole life's investments.
9. The home was auctioned (3 bidders) mysteriously for just enough to pay the mortgages with nothing returned to me for all my life's work and investments. Interestingly, just 1-month later, with only some basic cosmetic work (+/- \$15k), the home is up for sale (4-days on the market, over 1000 views on Zillow already) for \$300,000 more than the auctioned amount???. Who is friends with whom???
10. In a hearing on 8/1/2019, MS. Story explained to the judge that they prefer NOT to issue a full "Order of Protection" against me as it could harm my employability....
11. The next hearing for the OP was to be on 10/21/2019. Ms. Story agreed to it being held by phone, as I was rendered homeless by the court and needed to move into my mother's basement in MI.
12. I received NO call. In the mail, a court order said a full OP was issued (???) and my divorce was final with NO alimony and NO funds for career training (???) and I am responsible for paying Ms. Fenton's attorney fees!? This cannot be legal! Discovery hadn't even started, no motion for default was filed...

This is the United States of America. ALL people are entitled to a fair hearing, regardless of poverty or disability. Please correct this assault on me.....and prevent it from happening to others in this court.

Thank you for your assistance.