

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

RECEIVED

NOV 25 2024

U.S. District Court
Middle District of TN

JEFFREY RYAN FENTON,

PLAINTIFF

v.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

CASE NO. 3:24-cv-01282

MOTION FOR ALTERNATIVE SERVICE¹

Plaintiff brings this motion pursuant to F.R.Civ.P. 4(f)(3) and existing case law in this circuit. Applying Rule 4(f)(3) and its predecessor, trial courts have authorized a wide variety of alternative methods of service including publication, ordinary mail, mail to the defendant's last known address, delivery to the defendant's attorney, telex, and most recently, e-mail. See *SEC v. Tome*, 833 F.2d 1086, 1094 (2nd Cir.1987) (publication); *Smith v. Islamic Emirate*, 2001 WL 1658211 (S.D.N.Y. Dec.26, 2001) (publication); *Levin v. Ruby Trading Corp.*, 248 F.Supp. 537, 541-44 (S.D.N.Y.1965) (ordinary mail); *International Controls Corp. v. Vesco*, 593 F.2d 166, 176-78 (2nd Cir.1979) (mail to last known address); *Forum Fin. Group LLC v. President & Fellows*, 199 F.R.D. 22, 23-24 (D.Me.2001) (service to defendant's attorney); *New Eng. Merchs. Nat'l Bank v. Iran Power Generation & Transmission Co.*, 495 F.Supp. 73, 80 (S.D.N.Y.1980) (telex); *Broadfoot v. Diaz*, 245 B.R. 713, 719-20 (Bankr.N.D.Ga.2000) (e-mail); and in the adjacent district: *Popular Enterprises, LLC v. Webcom Media Group, Inc.*, 225 F.R.D. 560 (E.D. Tenn. 2004) (e-mail).

¹ Citations to the court record in this lawsuit will be notated without the case name or number, using the starting ECF Number, followed by both the beginning and ending Page ID, which is abbreviated as "PID."

Plaintiff has been trying to serve certain defendants in this matter for months. Based upon gamesmanship exhibited by most of the defendants, it is clear that the holdouts are avoiding service. Plaintiff has tried numerous times—at *significant* financial expenditure each time—to inform the remaining renegades by certified and/or registered mail, as the case may be. As of now, he can not only prove that certain emails to defendants informing them about the case have not bounced but they have, in fact, *been opened and read*. Numerous software tools exist today to track when emails have been read. False positives are not possible; false negatives are. What this means is that if an email tracking program reveals that a particular email has been read, it has been read. If that program does *not* reveal that the email has been read, it could still have been read. The science behind this behavior is beyond the scope of this motion. The above cited cases do not go to this length of ensuring reception *and opening* of the email containing the summons and complaint—indeed, no settled law yet may.

Plaintiff therefore requests that email with tracking software be used to serve the remaining defendants, and—as part of the proof-of-service affidavit—evidence will be submitted that the emails have in fact been read. Of these holdouts, *all* are associated with the bankruptcy matter that was “litigated” in this state. Of those defendants, only *one* has made an appearance in this action, that being defendant Charles M. Walker. Plaintiff suspects that the reason he has done so is that he is a federal judge who most likely will try to claim immunity and thus be released as a defendant despite Plaintiff seeking no damages from him, thereby making such a claim legally meritless.

Plaintiff also suspects that the defense knows that without key players from the bankruptcy side of the crime ring, he will have an extremely difficult time connecting the dots

and proving part of his case. These remaining holdouts—Hildebrand, Ausbrooks, Koval, Rothschild & Ausbrooks, Bankers Title, and Spragins, Barnett, & Cobb—are all associated with the “bankruptcy” in this state. It is crucial that everyone responsible for the massive financial and psychological damage done to Plaintiff be held accountable. In order for this to happen, the unserved defendants must either make an entry in this matter or risk a substantial default judgment, which would need to be ordered in a manner making it difficult for them to later have it set aside, by their friends and associates throughout Tennessee’s courts.

As an alternative to email, Plaintiff suggests that U.S. marshals effect service on the remaining defendants but that the court order the service as it would a *pro se* plaintiff acting *in forma pauperis*. Plaintiff has expended more than \$10,000 thus far in this matter. He cannot sustain financial expenditures without proper reimbursement from the defendants to pay attorney fees and/or other legal expenses because the defendants have stolen all his money, assets, and property.

DIGITAL SERVICE PACKAGE FOR LAWSUIT

Plaintiff built a section of his website specifically to host the files necessary to effectuate *digital service* of this lawsuit, upon the court’s approval, by multiple means of alternative service. With the court’s permission, all that needs to be done is to provide the outstanding defendants a simple letter or notice by mail, email, publication, or the U.S. marshals service, that they have been *officially served* and need to make an *appearance* in this matter. It could be as simple as a letter mailed to them by the court, notifying them that they can download the digital files from Plaintiff’s *lawsuit service package* online, at **service.jeffenton.com**. (See attached exhibits² A-1 through A-5.)

² https://rico.jeffenton.com/evidence/3-24-cv-01282_fenton-v-story-digital-service-package.pdf

Plaintiff also created a page³ on his website devoted to his filings, which took place after the creation of his *lawsuit service package*, in order to quickly apprise and orient the defendants of important filings which have occurred since. (See attached exhibits⁴ B-1 and B-2.)

If the court approves, neither the U.S. marshals service nor the court need expend any resources on significant printing costs. They merely need to serve the outstanding defendants with a single page letter or notice (which is suitable to the court) stating they are defendants in this lawsuit and have now been *officially served*. At the same time, the court could inform them that digital copies of every summons, the AMENDED COMPLAINT FOR TORTIOUS CONDUCT AND INJUNCTIVE RELIEF⁵ filed in ECF 66, along with every other document in Plaintiff's *lawsuit service package*⁶, as itemized in ECF 69 and 69-1, are conveniently available online, from a single webpage, at **service.jefffenton.com**. Should they like to receive a copy of the lawsuit service package in printed media, that webpage has simple instructions for ordering a copy free of charge for any defendant in this lawsuit.

The truth is that every outstanding defendant in this lawsuit has already physically received Plaintiff's *lawsuit service package* with printed media at *least* once (unless they blatantly refused after knowing its contents). Some have received service multiple times, but one way or another they have obfuscated, defeated or deprived Plaintiff of the *confirmation of service* required by court rules, without which his mother cannot swear the service was successful under the penalty of perjury.

³ <https://jefffenton.com/digital-service-package-for-lawsuit/fenton-filings-since-service/>

⁴ https://rico.jefffenton.com/evidence/3-24-cv-01282_fenton-v-story-filings-since-service.pdf

⁵ ECF 66, PID.4870-5007 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf

⁶ ECF 69, PID.5030-5042 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

Unfortunately, the realistic “risk” of the outstanding defendants receiving a “default judgment,” which they can’t later get set aside (one way or another), does not appear to compel several of the bad actors (directly involved with the fraudulent bankruptcy scheme) to “risk” not making an appearance in this matter.

Short of the court requiring the outstanding defendants to make an appearance, it is doubtful there is anything Plaintiff can do to compel them to do so, to face and try to defend their actions based upon the real, honest merits of this lawsuit.

Unfortunately appeals don’t use juries, so it is believed that several of the outstanding defendants would rather *risk* trying to get a default judgment set aside later by an appellate court (or file bankruptcy), than *risk* making an appearance in this matter; when there is no conceivable, good faith, lawful justification for their actions in the preceding matters, which Plaintiff has near exhaustively proven, already on court record.

**STATE DEFENDANTS RUNNING INTERFERENCE FOR THE
BANKRUPTCY FRAUD TEAM**

It is also believed that certain defendants who have already made an appearance in this matter, who could not have realistically evaded service for long themselves, are working to frustrate and stymie justice by coaching and helping to conceal certain remaining renegades, while advocating for their interests, and notifying them of any serious developments which might justify them making a sudden appearance in this matter.

For example, by filing multiple frivolous motions to dismiss while claiming defective service and that the deadline for service had expired, in an attempt to “outperform” Plaintiff to have this lawsuit dismissed before the rest of the defendants are forced to make an appearance, contrary to the honest interests of justice, without due care and consideration for the critical

constitutional liberty and property interests involved.

The fact is that most defendants—if not every one of them—in this lawsuit, are in significantly less danger of being held fully and justly accountable for their roles in this criminal enterprise and undertaking if only the state actors involved in Plaintiff’s divorce make an appearance. Holding back those who laid the foundation for the RICO scam by coaching his ex-wife into filing a secret fraudulent bankruptcy action, while specifically motioning for the sale of their marital residence in the filing, which Plaintiff was lawfully in possession of, without notifying him or providing him an opportunity to participate in the bankruptcy or an adversarial proceeding, denied him adequate protection as was required by the Federal Rules of Bankruptcy Procedure and multiple bankruptcy laws.

BANKRUPTCY FRAUD COMMITTED BY THE BANKRUPTCY COURT

It’s important to note, this wasn’t just a scam set up and executed by Plaintiff’s ex-wife’s counsel. The crimes which took place in the United States Bankruptcy Court for the Middle District of Tennessee against Plaintiff’s multiple federally protected property interests were not *reasonably possible* without the willful criminal complicity, participation, and/or extreme negligence by both the Chapter 13 bankruptcy trustee and the bankruptcy judge who presided over the case.

These are significant charges against powerful people who are trusted to behave according to law. Plaintiff has made clear significant dangers⁷ to the public health and safety of residents throughout Williamson County Tennessee, sworn to under the penalty of perjury. These claims must be honestly and responsibly heard, while considering not just what harm they

⁷ ECF 102, PID.5391-5468 | https://rico.jefffenton.com/evidence/2024-10-09_concerns-about-transferring-to-tennessee.pdf

have already caused, but the potential ongoing harm which they can continue to cause, each and every day certain defendants remain actively licensed BAR members who have not been disciplined or held accountable for their actions. The potential for future damages to exceed the county and state's ability to provide a timely cure, demands this not be ignored, postponed, or dismissed for anything less than actual innocence, as determined by a jury of Plaintiff's peers.

THE TRUTH IS OBVIOUS IN THIS COURT'S RECORD

Any honest and impartial review of Plaintiff's evidence in this case, will clearly reveal that Plaintiff has and is continuing to act honestly in good faith, at tremendous expense to himself, while doing everything reasonably within his power to hold the bad actors accountable, despite the power they wield.

Plaintiff brought this action and wrestled a court for nearly a year who sought to proactively dismiss his lawsuit before he could even get it served. Plaintiff's honest goal is to help improve the judicial integrity⁸ throughout Middle Tennessee while protecting litigants from experiencing the injustice which seized and destroyed his life almost instantly. He is doing this for the common benefit of both the state and the people, while seeking a remedy which will restore his freedom to live his life again and enjoy it, along with all our natural freedoms bestowed by our creator and guaranteed/protected by our government, through the rule of law.

This court has a duty to *sua sponte* act in the real interests of justice in this matter. It begins by ordering all the defendants to quit playing games and make an appearance in this case thusputting this cat and mouse game of dodging service behind us so we can begin to focus on what really matters, which can't be done without requiring the defendants to quit wasting the

⁸ The actual honest judicial integrity, not the misplaced appearances which refuse to honestly question or admit defects.

court's time with frivolous motions and arguments about extraneous issues. It is time to answer the complaint based upon the merits, with all testimony sworn to under the penalty of perjury.

TECHNICAL GAMES ARE A WASTE OF TIME AND RESOURCES

The defendants need to quit searching for a technical escape hatch. This is a *pro se* complaint involving serious constitutional issues and criminal activities wherein technicalities should not be allowed to rule over substantive merits. It is time to address *why* this lawsuit has been filed and by what acts of *cruelty* every attempt to mitigate Plaintiff's damages has been repeatedly denied⁹ while causing damages to compound each and every day that Plaintiff has been deprived of his property, his freedom, and justice.

CONCLUSION

Plaintiff requests that his motion be granted, i.e., service of the remaining defendants be allowed by alternative service, using email or the U.S. Marshals Service via court order and expense *if justice is to be really served.*

⁹ https://rico.jefffenton.com/evidence/2024-11-08_fenton-reply-to-storys-opposition-to-sanctions.pdf

CERTIFICATION AND DECLARATION

By signing below, I, Jeffrey Ryan Fenton, certify that this document has been executed in good faith, in the honest pursuit of justice, and in strict compliance with F.R.Civ.P. 11(b). I further swear that no part of this action is motivated by a desire to cause any party financial harm, and that I have done everything physically within my means, with the resources and knowledge at my disposal, to reach a cure as quickly as possible and mitigate losses for all parties, yet the defendants have unreasonably refused my every effort and attempt.

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 November 18, 2024



JEFFREY RYAN FENTON, PRO SE

17195 SILVER PARKWAY, #150
FENTON, MI, 48430-3426
CONTACT@JEFFFENTON.COM
(P) 615.837.1300

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- Limited international insurance.**
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*Insurance does not cover certain items. For details regarding claims exclusions see the Domestic Mail Manual at <http://pe.usps.com>.

** See International Mail Manual at <http://pe.usps.com> for availability and limitations of coverage.

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FENTON, MI 48430-3426**

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Middle District of TN

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EP14F July 2022
OD: 12 1/2 x 9 1/2

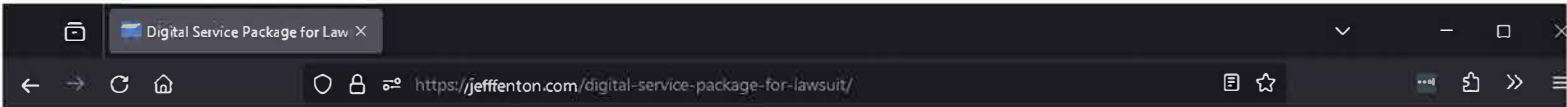


USPS.COM/PICKUP

UNITED STATES DISTRICT COURT

**ATTN: CLERK OF THE COURT
719 CHURCH ST
NASHVILLE, TN 37203-6940**

This package is made from post-consumer waste. Please recycle - again.



SHORTCUT to my Lawsuit Service Package: <https://service.jeffenton.com>

FENTON v. STORY et al.

Federal Civil Rights, Conspiracy, Fraud, and Racketeering Lawsuit (Case 3:24-cv-01282)



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Digital Service Package for Lawsuit

Each of the Defendants were Served the Following Documents on Paper Media, via USPS Certified Mail with Restricted Delivery (the complete digital service package is available at the links below):

Williamson County Tennessee: Real Estate Deed Fraud, Racketeering ...

Watch later Share

Street View

LAST SOLD ON FEB 14, 2020 FOR \$540,000

1986 Sunny Side Dr, Brentwood, TN 37027

2.5 Baths 2,640 Sq Ft

Estimated sale price \$346,000 - \$1.01M

32 photos

Brief Video Video Introduction to the Cause of Action in this Lawsuit



1. [Summons from the United States District Court for the Western District of Michigan](#)
2. [Video Introduction to this Lawsuit](#) on DVD, along with [DECLARATION CERTIFYING TESTIMONY IN VIDEOS ACCURATE AND TRUE](#)
3. [DECLARATION OF IRREFUTABLE PROOF OF A CRIMINAL CONSPIRACY SPANNING STATE AND FEDERAL COURTS](#) (Rev. 3/13/24)
4. [AMENDED COMPLAINT FOR TORTIOUS CONDUCT AND INJUNCTIVE RELIEF](#)
5. ["PLAINTIFF FLASH DRIVE-1" INFORMATION](#)
6. [INDEX OF DOCUMENTS FILED IN THIS FEDERAL LAWSUIT](#)
7. [8/1/2019 CHANCERY COURT HEARING PACKAGE](#)
8. [DECLARATION ABOUT PROFESSIONAL AND JUDICIAL MISCONDUCT DURING MY 8/1/2019 HEARING IN CHANCERY COURT](#)
9. [8/29/2019 CHANCERY COURT HEARING PACKAGE](#)
10. [MEMORANDUM OF LAW REGARDING VOID TENNESSEE COURT ORDERS](#)
11. [FLASH DRIVE \(30gb Zip Download\)](#) | More than needed, either package below will suffice.
12. [DIRECTLY DOWNLOAD THIS ENTIRE LAWSUIT\(3gb Zip Download\)](#) | All documents filed in this case as of August 21, 2024, when the court issued the summonses, without the digital media exhibits.
13. [DIRECTLY DOWNLOAD THIS ENTIRE LAWSUIT WITH DIGITAL MEDIA EXHIBITS \(18gb Zip Download\)](#) | Everything filed in this case as of August 21, 2024, when the court issued the summonses, including the digital media exhibits.
14. [LAWSUIT SERVICE PACKAGE DETAILS \(Declaration\)](#)
15. [FENTON FILINGS SINCE SERVICE](#)

If you are a party to this lawsuit who did not physically receive service of this *lawsuit service package* (as detailed above), and would like a copy, please send an email to contact@jeffenton.com with your name, request, and the address which you would like to receive it at, and one will be mailed to you by certified mail, within the next week. Please ensure that someone will be available to sign for receipt of the package.

Also to ensure that your message is timely received, please follow-up by leaving a quick voice mail at (615) 837-1300, to let me know that you sent the email, so I can ensure that it doesn't get caught by my spam filter, causing a delay.

Producing, printing, binding, and serving this lawsuit has been an exhausting, expensive, and unrewarding experience to date. It has consumed my every waking moment for the past couple of months, while costing me over \$5,000 in raw materials and shipping expenses so far. Over half the defendants in this case are *playing games while dodging service*, like one might expect from *criminals*, more so than by *attorneys and judges*.

I have produced and released over **forty lawsuit service packages** so far, while doubling the cost of shipping to have each sent via *certified mail with return receipts*. Those which are sent to individual defendants at their homes, have additionally included "*restricted delivery*", to ensure that the correct party receives notice per the court's rules.

With over half of those packages shipped, the hard copy "*return receipt*" (green card) showing that the package was delivered and accepted, has either *mysteriously disappeared* or been returned *without a signature*, name of the recipient, or date of delivery, in violation of both USPS and court rules.

The postal carrier isn't even *allowed* to release these packages without obtaining a *signature*, while they are even required to verify the recipient's *ID* for the "*restricted delivery*" packages, yet these defendants have enough local influence they appear to be able to *persuade* their postal carriers to ignore and violate the rules for their own jobs, to *hide* the fact that they ever *received service*. So that I must spend more money and effort to attempt to serve them yet again, while some of these bastillions of injustice are on our *third and fourth attempts*.

Many of the people receiving these packages are or have been high ranking public officials throughout Middle Tennessee, employed by the taxpayers, who have enjoyed privileged positions and offices of public trust. This absolute refusal to "*play by the rules*" and submit themselves to the same *process of service and rules of law* which they daily demand of others is nothing short of giving the *middle finger* to the good people of Tennessee, while refusing to be held *accountable* for their own *criminal* actions.

That is unacceptable.

It is unacceptable for powerful Middle Tennessee attorneys, judges, clerks, disciplinary counsel, administrators, along with other elected and appointed officials to *leverage the law* and the power of *government offices*, while using the mail for *service of process to lord over the lives of others*, without being *honorable* enough to submit to that same *process of service*, the court's *rules of conduct*, and the *rule of law* which they demand of everyone else.

Most of the "*officers of the court*" named in this lawsuit, including those employed by the Tennessee Supreme Court, who oversee the *practice of law* throughout the state of Tennessee, are *dodging service* currently and *playing childish games* refusing to sign for their mail, like a bunch of lawless reprobates, gangsters, and goofballs.

I will soon present to the public the *evidence* of the *games played* by these people to unreasonably *dodge service*, while never would they tolerate such *negligent and dishonorable* behavior inside their courts. These people are **not above the law**, they just act as if they are, while it is almost impossible to find a division of government who is *willing* to hold them *accountable*.

It's time for that to change! I'm *not* going to give up. Each day they delay is *on them* not me. I have been at this for nearly *five years* now, trying to find a judge who will *force* the *state judges* in Middle Tennessee to *obey the law*. **I will show the public and the courts the truth** about their *games and misconduct*. All they are doing is *proving my point*, over and over, and over again. None of which is *reasonable*. You can't *exercise power* while refusing to *submit* to the *lawful limits* of that power.



“No man in this country is so high that he is *above the law*. No officer of the law may set that law at *defiance*, with *impunity*. **All the officers of the government, from the highest to the lowest, are creatures of the law are bound to obey it.**” “It is the only *supreme power* in our system of government, and *every man* who, by *accepting office* participates in its functions, is only the more strongly **bound to submit to that supremacy, and to observe the limitations which it imposes on the exercise of the authority** which it gives.” *U.S. v. Lee*, 106 U.S. 196, 220 1 S. Ct. 240, 261, 27 L. Ed 171 (1882)

As stated in the Constitution of the State of Tennessee in Article I, Section 2: “That government being instituted for the *common benefit*, [actions by the judiciary as exhibited throughout this case, while also *dodging service*, proves the exercise of] *arbitrary power and oppression* [which] is *absurd, slavish, and destructive of the good and happiness of mankind.*”

For this reason I am forced to serve this lawsuit publicly, by *alternate service*, using email notices, public notices, printed and internet publications, by whatever means are realistically within my reach.

“I do not understand the government to contend that it is any less bound by the obligation than a private individual would be...” “It is not the function of our government to keep the citizen from falling into error; **it is the function of the citizen to keep the government from falling into error.**” *Perry v. United States*, 204 U.S. 330, 358

“Courts are constituted by authority and they cannot go beyond that power delegated to them. If they act *beyond* that authority, and certainly in *contravention* of it, their judgements and orders are regarded as **nullities**; they are not voidable, *but simply void*, and this **even prior to reversal.**” *WILLIAMSON v. BERRY*, 8 HOW. 945, 540 12 L. Ed. 1170, 1189 (1850).

“No judicial process, whatever form it may assume, can have any *lawful authority* outside of the *limits of the jurisdiction* of the court or judge by whom it is issued; and an attempt to *enforce* it beyond these boundaries **is nothing less than lawless violence.**” *Ableman v. Booth*, 21 Howard 506 (1859)

“Where *rights secured* by the *Constitution* are involved, **there can be no ‘rule making’ or legislation which would abrogate them.**” *Miranda v. Arizona*, 384 U.S. 426, 491; 86 S. Ct. 1603.

The United States Supreme Court has ruled and has reaffirmed the principle that “**justice must satisfy the appearance of justice**”, *Levine v. United States*, 362 U.S. 610, 80 S.Ct. 1038 (1960), citing *Offutt v. United States*, 348 U.S. 11, 14, 75 S.Ct. 11, 13 (1954).

Society’s commitment to institutional justice *requires* that **judges be solicitous of the rights of persons who come before the court.** **Geiler v. Commission on Judicial Qualifications*, (1973) 10 Cal. 3d 270, 286.

“The innocent individual who is *harmed* by an *abuse of governmental authority* **is assured that he will be compensated for his injury.**” *Owen v. City of Independence*



FENTON v. STORY et al.

Tennessee Court Docket
Michigan Court Docket
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Federal Civil Rights, Conspiracy, Fraud,
and Racketeering Lawsuit (Case 3:24-
cv-01282, previously 1:23-cv-01097)



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YouTube @OurTennesseeHome

How Courts were Designed to Produce
Justice, Why they Frequently Fail, and
How We as a Society Can Restore Justice

Resources by Friends

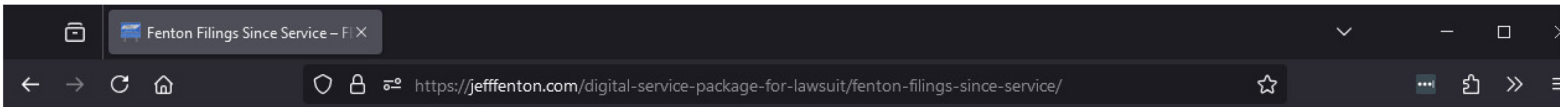
The Brady List
DEFALCATION PROJECTS
Exposing the Court Racket
Citizen's Public Safety Network
Investigate Judge Michael W. Binkley
Association of Certified Fraud Examiners

Blogs by Friends

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Motion for Justice—I Rest My Case
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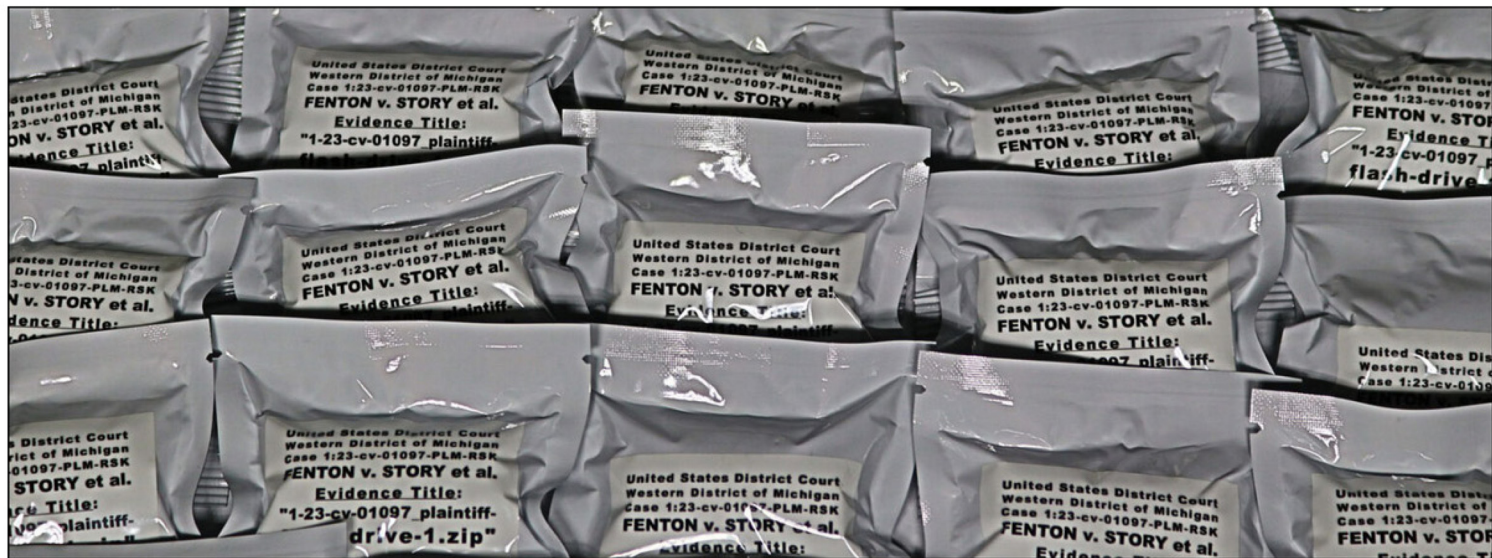




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Federal Civil Rights, Conspiracy, Fraud, and Racketeering Lawsuit (Case 3:24-cv-01282)

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Fenton Filings Since Service



- [2024-08-20 AMENDED COMPLAINT FOR TORTIOUS CONDUCT AND INJUNCTIVE RELIEF](#)
- [2024-08-22 MEMORANDUM OF LAW REGARDING VOID TENNESSEE COURT ORDERS](#)
- [2024-09-09 LAWSUIT SERVICE PACKAGE DETAILS](#)
- [2024-09-14 NOTICE, DECLARATION, AND MOTION REGARDING THE NAMING AND ADDRESS OF DEFENDANT BANK OF AMERICA IN THIS LAWSUIT](#)
- [2024-09-23 NOTICE, DECLARATION, AND MOTION REGARDING THE NAMING AND ADDRESS OF DEFENDANT THOMAS ANDERSON IN THIS LAWSUIT](#)
- [2024-10-08 COUNTER-AFFIDAVIT TO "AFFIDAVIT OF VIRGINIA LEE STORY"](#)
- [2024-10-08 MOTION TO REQUIRE ALL FILINGS TO INCLUDE A CERTIFICATION STATING THEIR CONTENTS ARE FACTUALLY TRUE AND COMPLIANT WITH F.R.C.P. RULE 11\(B\), SWORN TO UNDER THE PENALTY OF PERJURY](#)
- [2024-10-08 MOTION FOR SANCTIONS](#)
- [2024-10-09 DECLARATION VOICING PLAINTIFF'S CONCERNS ABOUT TRANSFERRING THIS ACTION TO TENNESSEE](#)

- [2024-11-08 PLAINTIFF'S REPLY TO "DEFENDANTS' VIRGINIA LEE STORY AND STORY AND ABERNATHY, PLLP'S BRIEF IN OPPOSITION TO PLAINTIFF'S MOTION FOR SANCTIONS"](#)

FENTON v. STORY et al.

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Federal Civil Rights, Conspiracy, Fraud,
 and Racketeering Lawsuit (Case 3:24-
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 How Courts were Designed to Produce
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 How We as a Society Can Restore Justice

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