

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

JEFFREY RYAN FENTON,

PLAINTIFF

v.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

CASE NO. 3:24-cv-01282

RECEIVED

MAR 07 2025

**U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN**

**SECOND¹ MOTION TO EXTEND TIME AND ASSIST
WITH PERFECTING SERVICE²**

This testimony and motion is being brought pursuant to 28 U.S. Code § 1746; F.R.Civ.P. 4(c)(3), 4(e)(1), 4(h)(1)(A), 4(j)(2)(B), and Mich. Ct. R. 2.105, specifically including Mich. Ct. R. 2.105(K)(3); F.R.Civ.P. 4(m) with *good cause*, Rule 9(2)(b), 11(b), 16, 46³, 63⁴, 83; U.S. Code § 455(a), (b)(1); U.S. Const. amend V §§ 1, 5.1, 7.1, 7.9, 9.1, 9.10, 9.4, and amend XIV §§ 1.3, 1.5, 1.6, 1.8.12.3, 1.8.13.1; Case Law; and 18 U.S. Code § 4 - Misprision of felony.

¹ A “MOTION TO EXTEND SERVICE DEADLINE EXPEDITED CONSIDERATION REQUESTED” was filed in MIWD on August 19, 2024, in DOC 61 and 61-1, PID 4740-4743. | <https://rico.jeffenton.com/3-24-cv-01282/doc/61.pdf> | 61-1.pdf

² This lawsuit was originally filed on October 13, 2023, in the United States District Court for the Western District of Michigan (hereinafter “MIWD”) as case no. 1:23-cv-01097. On October 25, 2024, MIWD transferred this lawsuit as ordered in ECF 127 to the United States District Court for the Middle District of Tennessee (hereinafter “TNMD”) as case no. 3:24-cv-01282. The language used in the file stamps of each page filed is slightly different between the two courts. MIWD uses the term “ECF No.” (which I abbreviate as “ECF”), while in place of that, TNMD uses the term “Document” (which I abbreviate as “DOC”). Both courts use the term “PageID” (which I abbreviate as “PID”). Citations to the court record in this lawsuit will be notated without the case name or number, using the starting DOC/ECF number, followed by both the beginning and ending PID. The Notice of Electronic Filing for this transfer is recorded in TNMD DOC 131, at which point the DOC/ECF number from MIWD was retained and continued, but the PID was reset after DOC 130, PID 5727, to restart at zero.

³ https://www.law.cornell.edu/rules/frcp/rule_46 | “Failing to object does not prejudice a party who had no opportunity to do so when the ruling or order was made.”

⁴ https://www.law.cornell.edu/rules/frcp/rule_63

BACKGROUND

1. On August 19, 2024, I filed a motion in MIWD titled, “MOTION TO EXTEND SERVICE DEADLINE EXPEDITED CONSIDERATION REQUESTED⁵” in DOC 61 and 61-1, PID 4740-4743, which I qualified for under the *good cause* provision of Fed. R. Civ. P. 4(m), requiring the court to “extend the time for service for an appropriate period⁶.”

“...But if the plaintiff shows *good cause* for the failure, the court must extend the time for service for an appropriate period⁷.”

2. This lawsuit is against five judges, ten attorneys, five law firms, two real estate firms, two real estate brokers, two banks, one county, three courts, with a total of five state government entities in Tennessee.

3. Every individual BAR defendant being sued has exerted some effort (or some effort was exerted on their behalf) to dodge service and/or to obfuscate, defeat, deprive, deny the successful *confirmation of service* as required by the court’s rules. (See “Exhibit-A⁸” filed on October 4, 2024, in DOC 96-1, PID 5265-5285.)

4. Many of the defendants have gone out of their way to make service more difficult and costly for me, as an out of state litigant, by playing games, refusing to sign for registered and certified mail, leaving the service unclaimed at their post offices for weeks and months, and even returning it to the post office as “refused” weeks after they had accepted the delivery.

⁵ DOC 61, PID 4740-4741 | <https://rico.jefffenton.com/3-24-cv-01282/doc/61.pdf>

DOC 61-1, PID 4742-4743 | <https://rico.jefffenton.com/3-24-cv-01282/doc/61-1.pdf>

⁶ Fed. R. Civ. P. 4(m) | https://www.law.cornell.edu/rules/frcp/rule_4

⁷ Fed. R. Civ. P. 4(m) | https://www.law.cornell.edu/rules/frcp/rule_4

⁸ DOC 96-1, PID 5265-5285 | <https://rico.jefffenton.com/3-24-cv-01282/doc/96-1.pdf>

5. As a geographically displaced, indigent litigant, solely due to the crimes committed against my family by the defendants in this lawsuit, I have had to borrow over *six-thousand dollars* from my family, simply to serve the defendants, while many of them still cry foul and wrongfully claim that service was defective, incomplete, untimely, etc... in an effort to thwart lawful accountability, at seemingly any cost.

6. Regardless of what anyone claims about service, I have done everything reasonably within my power, knowledge, and means, to serve the defendants as quickly, efficiently, and fully as I have been physically capable of, under the circumstances.

7. To date, no court has assisted me with service nor timely answered my motions regarding service⁹, so that I could protect my interests while responding to the defendant's evasive misconduct, allowing me to ensure that service, reasonable under the circumstances and satisfactory to the court, was perfected to each and every defendant before moving forward to address other issues.

8. I have had to produce and have served roughly **sixty-nine**¹⁰ *lawsuit service packages*¹¹ to date, weighing about 3.875 lbs. each, and costing approximately \$100 per package for raw materials, including paper, ink, labels, flash drives, and postage; without counting time or labor, which were significant.

⁹ DOC 16, PID 2258-2266 | <https://rico.jeffenton.com/3-24-cv-01282/doc/16.pdf>
DOC 16-1, PID 2267-2330 | <https://rico.jeffenton.com/3-24-cv-01282/doc/16-1.pdf>
DOC 35, PID 3392-3393 | <https://rico.jeffenton.com/3-24-cv-01282/doc/35.pdf>
DOC 36, PID 3394-3396 | <https://rico.jeffenton.com/3-24-cv-01282/doc/36.pdf>
DOC 36-1, PID 3397 | <https://rico.jeffenton.com/3-24-cv-01282/doc/36-1.pdf>
DOC 61, PID 4740-4742 | <https://rico.jeffenton.com/3-24-cv-01282/doc/61.pdf>
DOC 61-1, PID 4742-4743 | <https://rico.jeffenton.com/3-24-cv-01282/doc/61-1.pdf>

¹⁰ https://rico.jeffenton.com/evidence/3-24-cv-01282_fenton-v-story-service-spreadsheet.pdf

¹¹ DOC 69, PID 5030-5042 | https://rico.jeffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

9. I estimated service of the thirty-four defendants to cost between \$3,000 - \$5,000 and had secured a loan from family for that amount, yet those projections were dwarfed by the actual costs and time required to produce and attempt to serve literally twice as many *lawsuit service packages*¹² as there are defendants in this case. (See attached exhibits “A” through “A-2”.)

10. There are defendant(s) in this lawsuit who are represented by counsel who still claim that they have not been served¹³ while asking the court to dismiss them from this lawsuit due to this alleged defect in service. This is deceptive atrocious gamesmanship¹⁴, in bad faith by the powerful defendants and their counsel, unbecoming of any office or position of public service or trust, while many have daily lorded over the lives of other litigants held to a far stricter standard.

11. This is frankly shameful and should be disciplined by the court for wasting both the courts’ and my critical time and resources on frivolous nonsense! (See attached exhibits “B” through “B-9”.)

12. This lawsuit was served in compliance with F.R.Civ.P. 4(e)(1), F.R.Civ.P. 4(h)(1)(A), or F.R.Civ.P. 4(j)(2)(B), depending upon the entity type, and Mich. Ct. R. 2.105.

**MICH. CT. R. 2.105 (K) JURISDICTION; RANGE OF SERVICE;
EFFECT OF IMPROPER SERVICE**

“(3) An action shall **not** be dismissed for improper service of process unless the service failed to **inform** the defendant of the action within the time provided in these rules for service¹⁵” (emphasis added.)

¹² DOC 69, PID 5030-5042 | https://rico.jeffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

¹³ DOC 183, PID 327-330 | <https://rico.jeffenton.com/3-24-cv-01282/doc/183.pdf>

DOC 184, PID 331-342 | <https://rico.jeffenton.com/3-24-cv-01282/doc/184.pdf>

¹⁴ DOC 114, PID 5623-5632 | <https://rico.jeffenton.com/3-24-cv-01282/ecf/114.pdf>

https://rico.jeffenton.com/evidence/2025-01-17_email-service-of-elaine-beeler-via-lisa-carson.pdf

¹⁵ <https://casetext.com/rule/michigan-court-rules/michigan-court-rules/chapter-2-civil-procedure/subchapter-2100-commencement-of-action-service-of-process-pleadings-motions/rule-2105-process-manner-of-service>

13. Upon information and belief, every defendant in this lawsuit received service which at the very least **informed** them about this lawsuit **during the period of time designated by MIWD for me to serve**, or shortly thereafter, during an extension of time to serve, which I both motioned the court for¹⁶ and qualified for under the *good cause* provision of Fed. R. Civ. P. 4(m), requiring the court to “extend the time for service for an appropriate period¹⁷.”

14. Yet frivolous pleadings and misconduct persists by the defendants, as their counsel has filed motions, including a motion for an “emergency” hearing, seeking to have defendants expeditiously dismissed from this lawsuit and/or granted summary judgments, while largely ignoring the critical constitutional merits and justice interests in this lawsuit. Accepting no responsibility for the damage the defendants clearly collectively caused me, without any language committed to working toward a meaningful remedy, compromise, or cure of any kind.

15. Upon information and belief, I don’t know of a single defendant to date who has honestly answered my sworn and verified complaint in this lawsuit.

16. Upon information and belief, I don’t know of a single responsive pleading filed by the defendants or their counsel, which honestly complies with F.R.Civ.P. Rule 11(b), despite the fact that **every** filing by officers of the court is supposed to be honest, accurate, and true, “after [performing] an inquiry reasonable under the circumstances¹⁸”, in compliance with F.R.Civ.P. Rule 11(b).

¹⁶ DOC 61, PID 4740-4741 | <https://rico.jeffenton.com/3-24-cv-01282/doc/61.pdf>
DOC 61-1, PID 4742-4743 | <https://rico.jeffenton.com/3-24-cv-01282/doc/61-1.pdf>

¹⁷ Fed. R. Civ. P. 4(m) | https://www.law.cornell.edu/rules/frcp/rule_4

¹⁸ “...an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances...” F.R.Civ.P. Rule 11(b) | https://www.law.cornell.edu/rules/frcp/rule_11

“Pleadings are intended to serve as a means of arriving at fair and just settlements of controversies between litigants. They should not raise barriers which prevent the achievement of that end. Proper pleading is important, but its importance consists in its effectiveness as a means to accomplish the end of a just judgment.” *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938) (emphasis added).

“The federal rules reject the approach *that pleading is a game of skill in which one misstep by counsel may be decisive to the outcome* **and accept the principle that the purpose of pleading is to facilitate a proper decision on the merits.**” The court also cited Rule 8(f) [8(e)] FRCP, which holds that all pleadings shall be construed to do substantial justice. *Conley v. Gibson*, 355 U.S. 41 at 48 (1957) (emphasis added).

17. Upon information and belief, I don’t know of a single defendant to date, who has honestly filed a pleading seeking **“to facilitate a proper decision on the merits¹⁹”** of this lawsuit, or who has used pleadings in this case so far, **“to serve as a means of arriving at fair and just settlements of controversies between litigants.²⁰”** That is ground zero in this matter, and unfortunately we’re still not there yet.

THE TIMELINE FOR SERVICE IN THIS LAWSUIT

18. I first obtained executed summonses by which I could **begin** service of this lawsuit on **August 21, 2024**, as recorded in the docket, stating “SUMMONS ISSUED...”.

19. Service began being sent on August 23, 2024, at 2:51 PM from the United States Postal Service in Linden, Michigan. Service was first sent to former Williamson County Chancery Court judge Michael Weimar Binkley²¹, in Franklin, Tennessee.

¹⁹ *Conley v. Gibson*, 355 U.S. 41 at 48 (1957)

²⁰ *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938)

²¹ DOC 118, PID 5658-5664 | <https://rico.jefffenton.com/3-24-cv-01282/doc/118.pdf>

20. In the NOTICE OF INTENT TO TRANSFER ACTION²² by District Judge Paul L. Maloney dated September 12²³, 2024, he states at the end of section “A.” at the top of page 2²⁴, **“Plaintiff continues his efforts to serve the defendants and no defendant has made an appearance in this lawsuit”** (emphasis added).

THE INTERESTS OF JUSTICE

21. To be clear, District Judge Maloney made the statement above, **twenty-one days after the August 22, 2024**, deadline for service to be completed by, according to the wrongful order²⁵ by the Magistrate Judge in DOC 55²⁶, PID 4383, which was afterwards justly ignored by District Judge Maloney.

22. I have an exhaustive defense for the timeline of service based on the Federal Rules of Civil Procedure and judicial misconduct²⁷ in MIWD, which I have documented in the docket of this lawsuit. This should be clear by the simple fact that MIWD elected to transfer this lawsuit to TNMD in the *interests of justice* rather than dismissing it (as the Magistrate Judge had repeatedly voiced his intent to do) for being filed in what they claimed to be the “wrong venue” or for failure to timely serve as the defendants have erroneously yet repeatedly claimed.

²² DOC 72, PID 5046-5050 | <https://rico.jefffenton.com/3-24-cv-01282/doc/72.pdf>

²³ Twenty-one days **after** the August 22, 2024, deadline for service wrongfully ordered by The Magistrate Judge in ECF 55, PID.4383.

²⁴ ECF 72, PID.5047 | <https://rico.jefffenton.com/3-24-cv-01282/doc/72.pdf>

²⁵ The Magistrate Judge’s order was the product of judicial bias and misconduct, as I reasonably proved on August 19, 2024, in my “MOTION TO RECUSE” filed in DOC 60, PID 4736-4739, and my “OBJECTION TO THIS COURT’S “ORDER REGARDING SERVICE”” filed in DOC 62, PID 4744-4760.

²⁶ DOC 55, PID 4378-4384 | <https://rico.jefffenton.com/3-24-cv-01282/doc/55.pdf>

²⁷ DOC 60, PID 4736-4739 | <https://rico.jefffenton.com/3-24-cv-01282/doc/60.pdf>

DOC 62, PID 4744-4760 | <https://rico.jefffenton.com/3-24-cv-01282/doc/62.pdf>

23. If the court is not satisfied with this explanation, I can provide much more detail while reviewing each motion for service²⁸ in MIWD and considering the correlating orders provided by that court.

24. I am entitled to have a fair opportunity to serve my lawsuit, and whether anyone likes it or not, that opportunity realistically began on **August 21, 2024**, when I first received my summonses back from the court executed, after having originally brought them to the court for execution on January 19, 2024, in DOC 16 and 16-1.

25. At which point the Magistrate Judge **went silent** and refused to make another appearance in this matter until July 8, 2024, *one hundred and seventy-one* days after I filed my motion regarding service²⁹ with “expedited consideration requested”.

26. The clerk of that court mistakenly filed my summonses in the docket as “proposed summonses³⁰” in DOC 16-1, PID 2267-2330, rather than executing them as intended and returning them to me within days. Once my summonses were docketed as “proposed summonses”, the court refused to return the summonses to me until after the Magistrate Judge finally ruled on my motion regarding service³¹, nearly six months later, at absolutely no fault of my own.

²⁸ DOC 16, PID 2258-2266 | <https://rico.jefffenton.com/3-24-cv-01282/doc/16.pdf>
DOC 16-1, PID 2267-2330 | <https://rico.jefffenton.com/3-24-cv-01282/doc/16-1.pdf>
DOC 35, PID 3392-3393 | <https://rico.jefffenton.com/3-24-cv-01282/doc/35.pdf>
DOC 36, PID 3394-3396 | <https://rico.jefffenton.com/3-24-cv-01282/doc/36.pdf>
DOC 36-1, PID 3397 | <https://rico.jefffenton.com/3-24-cv-01282/doc/36-1.pdf>
²⁹ DOC 16, PID 2258-2266 | <https://rico.jefffenton.com/3-24-cv-01282/doc/16.pdf>
³⁰ DOC 16-1, PID 2267-2330 | <https://rico.jefffenton.com/3-24-cv-01282/doc/16-1.pdf>
³¹ DOC 16, PID 2258-2266 | <https://rico.jefffenton.com/3-24-cv-01282/doc/16.pdf>

THE DEFENDANTS ARE REPEATEDLY VIOLATING F.R.C.P. RULE 11(B)

27. Many of the defendants in this lawsuit who have made an appearance to date have filed motions to dismiss citing even the most frivolous procedural defects when procedural defects (technicalities) are not allowed to rule over **merits** and **conduct** in lawsuits involving *pro se* litigants, especially while ignoring the critical constitutional merits of this lawsuit and the reprehensible misconduct by the courts and counsel in preceding matters (which has not been meaningfully disputed or denied by the defendants to date).

28. Since there is so much which must be quickly responded to in this lawsuit, with thirty-four powerful and well-funded defendants against one indigent *pro se* litigant, with significant communication disabilities, there is not time for me to possibly respond to every frivolous attempt to stymie and evade justice in this matter, especially not within the timelines provided in the federal rules.

SERVICE OF PROCESS

29. Before addressing motions by the defendants, I'm seeking to settle the last few outstanding issues related to service, some of which require the active participation of the court for me to complete.

30. To date, no meaningful litigation has begun. Therefore, any defendant claiming not to have received proper service so far can still be served by this court without suffering any prejudice in this lawsuit in any meaningful form or material fashion.

MOTIONS REGARDING SERVICE

31. I move the court to enter an order extending the deadline for the completion of service, until my motions³² involving service have been fairly heard and meaningfully addressed by this court, and I have had an opportunity to take appropriate actions based upon those orders.

32. This motion complies with the *good cause* provision in Fed. R. Civ. P. 4(m), which states in part, “But if the plaintiff shows *good cause* for the failure, the court **must** extend the time for service for an appropriate period” (emphasis added).

33. For more information about what caused the most significant delays in service of this lawsuit, and why that satisfies the provision for “good cause” provided in Fed. R. Civ. P. 4(m), please see my “SECOND OBJECTION TO ALL DISPOSITIVE MOTIONS, REDACTED AND SEALED FILINGS, WITH DECLARATION ABOUT JUDICIAL MISCONDUCT IN MICHIGAN CAUSING SUBSTANTIAL DELAYS IN SERVICE.”³³”

34. I move the court to enter an order granting my “MOTION FOR ALTERNATIVE SERVICE”, filed in TNMD on November 25, 2024, in DOC 177, PID 234-250, for the reasons stated therein.

35. I move the court to examine the service of every defendant in this lawsuit and to enter an order stating that service has been successfully perfected to every defendant named in this lawsuit, within the time limits allowed—or was successfully completed based on reasonable efforts, under the circumstances.

³² DOC 61, PID 4740-4743 | <https://rico.jeffenton.com/3-24-cv-01282/61.htm>
DOC 89, PID 5126-5146 | <https://rico.jeffenton.com/3-24-cv-01282/89.htm>
DOC 90, PID 5147-5189 | <https://rico.jeffenton.com/3-24-cv-01282/90.htm>
DOC 177, PID 234-250 | <https://rico.jeffenton.com/3-24-cv-01282/177.htm>
DOC 221, PID 1129-1163 | <https://rico.jeffenton.com/3-24-cv-01282/221.htm>

³³ https://rico.jeffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

36. There have been some questions or concerns amongst clerks regarding the filing of summonses issued by MIWD in the TNMD case, due to procedural differences between Michigan and Tennessee district courts, different case numbers, etc.

37. I move the court to examine the summonses returned executed on the docket, and determine if they are acceptable as filed, especially those most recently returned, after the case was transferred from MIWD to TNMD courts, or if there is reason to issue new summonses, executed by TNMD with the current case number, to any or all of the defendants.

38. If the court determines that any or all of the summonses are defective in any way, or should be replaced, I move the court to issue new summonses using the printed summons forms which I am submitting simultaneously with this motion, for use as needed.

39. Out of respect for the privacy of the defendants, due to concerns about home addresses being publicly disclosed, I filled out each summons with the party's name, addressed to the care of (C/O) their counsel of record in this matter. I provided three summons forms for each defendant, to be used however the court determines.

40. In my mind the court could simply execute these and file them on the record, while notifying the defendant's counsel via PACER, where they could have instant access to the documents, with instructions for the defendant's counsel to download the Tennessee summonses and to provide them to their clients (the defendants). This seems like a relatively quick and easy way for the court to ensure that all related quibbling quickly ceases by the defendant's counsel, so that we can proceed with more important matters. The court could also mail these to the defendant's counsel or have them served to the defendant's via the United States Marshal Service if the court deems that appropriate.

41. Should the court prefer that I resubmit the summonses with the defendant's home

and business addresses listed rather than in “care of” their counsel of record, I move the court to provide me notice so that I can quickly comply.

42. Since no material matters have yet been heard by any court in this matter, no defendant would be prejudiced in any way by being issued new summonses or service by the court at this time, prior to proceeding.

43. I move the court to provide me notice of any defendant(s) which the court requires a more detailed explanation of the efforts to serve.

44. I move the court to provide me notice of any defendant(s) which the court finds service to have been insufficient, defective, or lacking along with an extension of time to cure such defects with the court’s assistance prior to moving forward with this lawsuit.

45. In any instance where the court finds that service was insufficient, lacking, or improperly executed, I move the court to enter an order to have the court re-serve those defendants per Fed. R. Civ. P. 4(c)(3), using the U.S. Marshals Service, and to compel them to make an appearance in this matter so that the court can begin to address the weighty merits in this lawsuit.

**FED. R. CIV. P. RULE 4 SUMMONS (C) SERVICE (3) BY A MARSHAL OR
SOMEONE SPECIALLY APPOINTED**

“At the plaintiff’s request, the court may order that service be made by a United States marshal or deputy marshal or by a person specially appointed by the court.³⁴”

46. Service can be executed by the court at almost no cost using “alternative service³⁵,” since all the documents for service are digitally hosted on my website³⁶, saving

³⁴ https://www.law.cornell.edu/rules/frcp/rule_4

³⁵ DOC 177, PID 234-243 | <https://rico.jeffenton.com/3-24-cv-01282/doc/177.pdf>

significantly on printing, paper, and production costs.

47. I have put forth extraordinary efforts regarding service³⁷ of this lawsuit, while being actively fought by both the defendants and the Michigan Magistrate Judge³⁸, as is well documented in several filings in this matter.

48. In an effort not to bloat the filings in this lawsuit with unnecessary redundancy, I will skip expounding further on the “good cause” substantiation for this motion and the requests herein. However, if for any reason the court finds this explanation lacking in specificity, substance, or details, I move the court to provide me notice and I will devote more time and work to providing the court with a more robust pleading about the justice interests in this lawsuit, along with the individual obstacles to service I have experienced to date.

DOC 177-1, PID 244-250 | <https://rico.jefffenton.com/3-24-cv-01282/doc/177-1.pdf>

³⁶ <https://service.jefffenton.com>

<https://jefffenton.com/digital-service-package-for-lawsuit/>

<https://jefffenton.com/digital-service-package-for-lawsuit/defendant-summonses/>

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

<https://rico.jefffenton.com/3-24-cv-01282/>

³⁷ DOC 69, PID 5030-5042 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

DOC 65-3, PID 4822-4850 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-document-index.pdf

DOC 65-1, PID 4798 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-website-instructional-video.mp4

DOC 65, PID 4796 | https://rico.jefffenton.com/evidence/1-23-cv-01097_plaintiff-flash-drive-1.zip

DOC 65, PID 4794-4820 | https://rico.jefffenton.com/evidence/1-23-cv-01097_plaintiff-flash-drive-1-info.pdf

DOC 177, PID 234-250 | <https://rico.jefffenton.com/3-24-cv-01282/177.htm>

<https://jefffenton.com/digital-service-package-for-lawsuit/> | <https://service.jefffenton.com>

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

<https://rico.jefffenton.com/3-24-cv-01282/> | <https://rico.jefffenton.com/1-23-cv-01097/download.htm>

<https://rico.jefffenton.com/1-23-cv-01097/audio.htm> | <https://rico.jefffenton.com/1-23-cv-01097/video.htm>

³⁸ See my “SECOND OBJECTION TO ALL DISPOSITIVE MOTIONS, REDACTED AND SEALED FILINGS, WITH DECLARATION ABOUT JUDICIAL MISCONDUCT IN MICHIGAN CAUSING SUBSTANTIAL DELAYS IN SERVICE”

https://rico.jefffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

**ORDER REGARDING SERVICE, JULY 8, 2024, DOC 55, PID 4381
BY THE MAGISTRATE JUDGE IN MICHIGAN**

“In exercising its discretionary authority under Fed. R. Civ. P. 4(c)(3), the Court considers whether there is a sufficient reason to burden the USMS with serving plaintiff’s initial pleading. The purpose of this rule “is to reduce the burden on the United States Marshal Service of serving civil process in private litigation, without endangering the effective and efficient service of civil process.” Advisory Committee Notes for Fed. R. Civ. P. 4, 93 F.R.D. 255, 262 (1981). “[T]he plaintiff is expected **first** to seek service by private means whenever feasible rather than impose the burden on the Marshals Service” and “court orders directing service by marshal should not be issued *unless they really are necessary*.” *Id.* “In short, the aim is to encourage use of methods that do not involve marshals.” *Id.*” (Emphasis added.)

49. The implication in the paragraph above, by the Michigan Magistrate Judge, is that a plaintiff would have more than *one* opportunity to request the court’s assistance with service, (which is contingent upon the court timely responding to the plaintiff’s motions regarding service, which has not been my experience yet, but remains an important need for due process.)

50. The expectation set by the Magistrate Judge in the paragraph above was that the plaintiff should **first** attempt to serve their lawsuit on their own (which I have done), whenever possible, while deferring or reserving court ordered service by the USMS to those situations where their services “*really are necessary*” (which I have also done).

51. Upon information and belief, I have done everything reasonably within my power, at my limited price point, to serve the defendants, while they have **all** been satisfactorily served per Michigan’s Court Rules³⁹, some multiple times.

³⁹ https://rico.jefffenton.com/evidence/3-24-cv-01282_fenton-v-story-service-spreadsheet.pdf

52. In my mind this issue boils down to how much of the defendant’s shenanigans the court chooses to allow, entertain, or tolerate, while I am merely asking for the court’s assistance in compensating for any defect in service thereby caused or claimed by the defendant’s actions to intentionally dodge service and/or to deny, deprive, or interfere with the successful return of the “return receipt” which was requested and purchased from the USPS, as required by the court’s rules, but was not correctly returned by a single individual BAR defendant in this matter⁴⁰. Along with helping to compel four outstanding defendants who have been successfully served, to make an appearance in this matter. That seems like a very reasonable request, after having exhausted a significant amount of my family’s resources toward service.

53. Upon the satisfactory completion of all service-related matters herein, I move the court to enter an order that all service-related claims, complaints, and defenses by the defendants and their counsel are moot moving forward.

COMPELLING CERTAIN DEFENDANTS TO MAKE AN APPEARANCE

54. I move the court to compel the following four defendants, who have been served, to make an appearance in this matter:

- 1) Attorney Kathryn Lynn Yarbrough⁴¹ (BPR# 032789)
 Proofs of Service: DOC 95, PID 5213-5234; DOC 180, PID 281-296

 Confirmed Post Office Box:
 223 TOWN CENTER PKWY UNIT 1897
 SPRING HILL, TN 37174-3040

 Unconfirmed Home Address:
 408 PREAKNESS DR
 THOMPSONS STATION, TN 37179-5238

⁴⁰ See “Exhibit-A” filed on October 4, 2024, in DOC 96-1, PID 5265-5285 | <https://rico.jeffenton.com/3-24-cv-01282/doc/96-1.pdf>

⁴¹ DOC 95, PID 5213-5234 | <https://rico.jeffenton.com/3-24-cv-01282/doc/95.pdf>
 DOC 180, PID 281-296 | <https://rico.jeffenton.com/3-24-cv-01282/doc/180.pdf>

2) Bankers Title & Escrow Corporation⁴² (TN SOS Control #000259388)

Proof of Service: DOC 201, PID 493-509

Registered Agent: R L MOORE

Address (Registered Agent & Principal):

3310 WEST END AVE, STE 540

NASHVILLE, TN 37203-6802

3) Attorney Alexander Sergey Koval⁴³ (BPR# 029541)

Proof of Service: DOC 192, PID 379-408

Confirmed Email: akoval@cw13.com

Confirmed Work Address:

CLARK & WASHINGTON, PC

1321 MURFREESBORO PIKE

STE 320

NASHVILLE, TN 37217-2858

(615) 251-9782

Unconfirmed Home Address:

281 PARAGON MILLS RD

NASHVILLE TN 37211-4034

4) Spragins, Barnett & Cobb, PLC⁴⁴ (TN SOS Control #000334328)

Proof of Service: DOC 221, PID 1129-1163

Registered Agent Address:

ALAN RHENEY

312 E LAFAYETTE ST

JACKSON, TN 38301-6220

Principal Address

SHELBY THOMAS

312 E LAFAYETTE ST

JACKSON, TN 38301-6220

⁴² DOC 201, PID 493-509 | <https://rico.jefffenton.com/3-24-cv-01282/doc/201.pdf>

⁴³ DOC 192, PID 379-408 | <https://rico.jefffenton.com/3-24-cv-01282/doc/192.pdf>

⁴⁴ DOC 221, PID 1129-1147 | <https://rico.jefffenton.com/3-24-cv-01282/doc/221.pdf>

DOC 221-1, PID 1148-1163 | <https://rico.jefffenton.com/3-24-cv-01282/doc/221-1.pdf>

MY PREVIOUS MOTION TO EXTEND TIME FOR SERVICE

55. On August 19, 2024, I filed a motion in MIWD titled, “MOTION TO EXTEND SERVICE DEADLINE EXPEDITED CONSIDERATION REQUESTED⁴⁵” in DOC 61 and 61-1, PID 4740-4743.

56. This motion was quickly drafted due to a mechanical failure with my laser printer, forcing me to wait on parts to be delivered to finish service.

57. After addressing this mechanical failure (which only took a few days), there have been several other delays in service, caused by instances of misconduct by the defendants⁴⁶, their counsel, and MIWD, immediately prior to and after the transfer of this lawsuit from the Western District of Michigan to the Middle District of Tennessee, further exacerbated by the outstanding defendants dodging service and obfuscating/interfering with the successful confirmation of service as required by the court’s rules⁴⁷, which I have mentioned in multiple filings.

58. It should be noted that I did not file additional papers with the court, related to my previous motion, to substantiate further extending the time to serve, while itemizing each additional challenge I faced with service, after my printer was repaired.

59. The reason I did not elaborate on the other delays in service after the printing problem was fixed, despite the fact that I believe they qualify for consideration under the *good cause* provision in F.R.Civ.P. Rule 4(m), for extensions of time as necessary to finish perfecting service, is because the court never ruled on my motion to extend time for service⁴⁸ filed on August 19, 2024.

⁴⁵ DOC 61 and 61-1, PID 4740-4743 | <https://rico.jeffenton.com/3-24-cv-01282/doc/61.pdf> | [3-24-cv-01282/doc/61-1.pdf](https://rico.jeffenton.com/3-24-cv-01282/doc/61-1.pdf)

⁴⁶ DOC 211, PID 689-723 | https://rico.jeffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf
DOC 212, PID 730-907 | https://rico.jeffenton.com/evidence/2025-02-10_tn-motion-to-minimize-or-remove-redactions.pdf

⁴⁷ See “Exhibit-A” filed on October 4, 2024, in DOC 96-1, PID 5265-5285 | <https://rico.jeffenton.com/3-24-cv-01282/doc/96-1.pdf>

⁴⁸ DOC 61 and 61-1, PID 4740-4743 | <https://rico.jeffenton.com/3-24-cv-01282/doc/61.pdf> | [3-24-cv-01282/doc/61-1.pdf](https://rico.jeffenton.com/3-24-cv-01282/doc/61-1.pdf)

60. As such, based on my previous experience requesting an extension of time to serve⁴⁹ on January 19, 2024, in DOC 16, PID 2258-2266, which was not ruled on until July 8, 2024, in DOC 55, PID 4378-4384, where the court order took effect beginning as of the date the court finally ruled on it.

61. It is therefore believed that the court counts days for an extension, beginning as of the date of the court order. So, until the court rules on my motion for “an additional thirty (30) days” to serve, it is believed that the additional need (caused by dodging, interference, or misconduct) would continue to be satisfied by the additional time required, while waiting for the court to respond to this motion and rule on it.

62. I just want to clarify that the entire justification for the extension needed to complete the final aspects of perfecting service, wasn’t due to my laser printing breaking down, though it certainly began that way and remains a pending motion before this court.

63. It was likewise believed that with all the difficulty I have had trying to move the court for assistance, accommodations, and clarification related to the service of my lawsuit, and the subsequent wait times which followed, that I didn’t have time for long-winded pleadings, I needed to concentrate all my time, money, and energy on completing service, as quickly as I physically could.

64. That remained my primary focus until the misconduct and interference related to defendant Walker and the United States Attorney’s Offices⁵⁰, both in Michigan and Tennessee hijacked my attention, demanding hundreds of hours of work for me to meaningfully remedy.

⁴⁹ DOC 16, PID 2258-2266 | <https://rico.jeffenton.com/3-24-cv-01282/doc/16.pdf>

⁵⁰ DOC 211, PID 689-723 | https://rico.jeffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf
DOC 212, PID 730-907 | https://rico.jeffenton.com/evidence/2025-02-10_tn-motion-to-minimize-or-remove-redactions.pdf
DOC 217, 218, 219 | “DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER’S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS”
DOC 216, PID 984-1015 | https://rico.jeffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf

SUPPORTING CASE LAW

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 (emphasis added).

“Pro se pleadings are to be considered without regard to technicality; pro se litigants’ pleadings are not to be held to the same high standards of perfection as lawyers.” *Jenkins v. McKeithen*, 395 U.S. 411, 421 (1959); *Picking v. Pennsylvania R. Co.*, 151 Fed 2nd 240; *Pucket v. Cox*, 456 2nd 233 (emphasis added).

“Due to sloth, inattention or desire to seize tactical advantage, lawyers have long engaged in dilatory practices... **the glacial pace of much litigation breeds frustration with the Federal Courts and ultimately, disrespect for the law.**” *Roadway Express v. Pipe*, 447 U.S. 752 at 757 (1982) (emphasis added).

The 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) (emphasis added).

This cannot be ignored its fact recorded! Judgment is a void judgment if court that rendered judgment lacked jurisdiction of the subject matter, or of the parties, **or acted in a manner inconsistent with due process**, Fed. Rules Civ. Proc., Rule 60(b)(4), 28 U.S.C.A., U.S.C.A. *Const. Amend. 5 - Klugh v. U.S.*, 620 F.Supp. 892 (D.S.C. 1985) (emphasis added).

The Court Has a Responsibility to Correct a Void Judgment: The statute of limitations **does not apply** to a suit in equity to vacate a void judgment. (*Cadenasso v. Bank of Italy*, p. 569; *Estate of Pusey*, 180 Cal. 368,374 [181 P. 648].) This rule holds as to all void judgments. In the other two cases cited, *People v. Massengale* and *In re Sandel*, the courts confirmed the judicial power and responsibility to correct void judgments (emphasis added).

When rule providing for relief from void judgments is applicable, **relief is not discretionary matter, but is mandatory.** *Omer. V. Shalala*, 30 F.3d 1307 (Colo. 1994) (emphasis added).

“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*, 445 U.S. 622 (1980) (emphasis added).

CONCLUSION

65. I move the court to enter an order extending the deadline for the completion of service, until my motions⁵¹ involving service have been fairly heard and meaningfully addressed by this court, and I have had an opportunity to take appropriate actions based upon those orders.

66. I move the court to enter an order granting my “MOTION FOR ALTERNATIVE SERVICE”, filed in TNMD on November 25, 2024, in DOC 177, PID 234-250, for the reasons stated therein.

67. I move the court to examine the service of every defendant in this lawsuit and to enter an order stating that service has been successfully perfected to every defendant named in this lawsuit, within the time limits allowed—or was successfully completed based on reasonable efforts, under the circumstances.

68. I move the court to examine the summonses returned executed on the docket, and determine if they are acceptable as filed, especially those most recently returned, after the case was transferred from MIWD to TNMD courts, or if there is reason to issue new summonses, executed by TNMD with the current case number, to any or all of the defendants.

⁵¹ DOC 61, PID 4740-4743 | <https://rico.jeffenton.com/3-24-cv-01282/61.htm>
DOC 89, PID 5126-5146 | <https://rico.jeffenton.com/3-24-cv-01282/89.htm>
DOC 90, PID 5147-5189 | <https://rico.jeffenton.com/3-24-cv-01282/90.htm>
DOC 177, PID 234-250 | <https://rico.jeffenton.com/3-24-cv-01282/177.htm>
DOC 221, PID 1129-1163 | <https://rico.jeffenton.com/3-24-cv-01282/221.htm>

69. If the court determines that any or all of the summonses are defective in any way, or should be replaced, I move the court to issue new summonses using the printed summons forms which I am submitting simultaneously with this motion, for use as needed.

70. If the court wants me to resubmit the summons forms with the defendant's home or business addresses on the summonses (instead of addressing them "care of" their counsel of record), I move the court to provide me notice so that I can quickly comply.

71. I move the court to provide me notice of any defendant(s) which the court requires a more detailed explanation of the efforts to serve.

72. I move the court to provide me notice of any defendant(s) which the court finds service to have been insufficient, defective, or lacking along with an extension of time to cure such defects with the court's assistance prior to moving forward with this lawsuit.

73. In any instance where the court finds that service was insufficient, lacking, or improperly executed, I move the court to enter an order to have the court re-serve those defendants per Fed. R. Civ. P. 4(c)(3), using the U.S. Marshals Service, and to compel them to make an appearance in this matter, so that the court can begin to address the weighty merits in this lawsuit.

74. Upon the satisfactory completion of all service-related matters herein, I move the court to enter an order that all service-related claims, complaints, and defenses by the defendants and their counsel are moot moving forward.

75. I move the court to compel the following defendants, who have been served, to make an appearance in this matter: Attorney Kathryn Lynn Yarbrough, Attorney Alexander Sergey Koval, Bankers Title & Escrow Corporation, Spragins, Barnett & Cobb, PLC.

76. I move the court to provide me notice and an opportunity to cure any defect in service before proceeding to address more substantive matters in this lawsuit.

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).

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.

All rights reserved.

Executed on March 5, 2025.



JEFFREY RYAN FENTON, PRO SE

17195 SILVER PARKWAY, #150

FENTON, MI, 48430-3426

CONTACT@JEFFFENTON.COM

(P) 615.837.1300

#TNinjustice

#iAMhuman

DOCUMENTS REGARDING (CASE: 3:24-CV-01282):

1. SECOND MOTION TO EXTEND TIME AND ASSIST WITH PERFECTING SERVICE

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2025, I mailed the foregoing or above-named papers to the United States District Court for the Middle District of Tennessee, at their address below, for filing in case number 3:24-cv-01282.

I further certify that on or before March 10, 2025, I am serving these same documents to the defendants or their counsel by first class or priority mail with postage prepaid at the addresses listed below. If for any reason beyond my control, I am unable to complete either on the date specified, I will do so on the very next business day.

UNITED STATES DISTRICT COURT (TNMD)
719 CHURCH ST
NASHVILLE, TN 37203-6940

MEGAN CALME & SARAH MATHEWS
WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP
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NASHVILLE, TN 37203-1623

PEAKO ANDREA JENKINS
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FRANKLIN, TN 37064-8039

CAROLINA MARTIN & COURTNEY WILLIAMS
GORDON & REES SCULLY MANSUKHANI, LLP
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FRANKLIN, TN 37067-2951

ALEXANDER SERGEY KOVAL
CLARK & WASHINGTON, P.C.
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PEACHTREE CORNERS, GA 30071-1570

R L MOORE
BANKERS TITLE & ESCROW CORPORATION
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B. GOLDAMMER & D. SUEDEKUM
KAY GRIFFIN, PLLC
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NASHVILLE, TN 37201-1649

G. CATE & K. INGRAM-HOGAN
BRADLEY ARANT BOULT CUMMINGS, LLP
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NASHVILLE, TN 37203-7238

ERIK HALVORSON
BRADLEY ARANT BOULT CUMMINGS
1221 BROADWAY STE 2400
NASHVILLE, TN 37203-7238

ELECTRONIC SERVICE OPTIONS

Many of my filings in this lawsuit are also made publicly available on the Internet, through my list¹ of documents filed by myself in this lawsuit, since the release of my lawsuit service package². I typically try to do this as quickly as I can after filing them in court, depending upon my workload. Not every filing warrants being electronically published in this manner, while my time is extremely limited, therefore I cannot provide any guarantees about which documents will or will not be made available online, or exactly when.

For those interested, these files are usually “true” digitally created PDF files, in full color, often with optical character recognition enabled, sometimes with electronic bookmarks, and occasionally with a built-in table of contents which is hyperlinked for easy and efficient referencing, in my largest and most significant documents, such as my amended complaint³.

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).

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct.

All rights reserved.

Executed on March 5, 2025.

JEFFREY RYAN FENTON, PRO SE

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¹ <https://jefffenton.com/digital-service-package-for-lawsuit/fenton-filings-since-service/>

² <https://jefffenton.com/digital-service-package-for-lawsuit/>

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

³ DOC 66, PID 4870-5007 | https://rico.jefffenton.com/evidence/3-24-cv-01282_fenton-vs-story-first-amended-complaint.pdf

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STORY AND ABERNATHY, PLLP	8/24/2024 at 11:25 AM	70203160000230011758	8/26/2024 at 11:09 AM	9590940286273244068244	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» VIRGINIA LEE STORY	8/24/2024 at 11:25 AM	70203160000230014919	8/26/2024 at 11:08 AM	9590940286273244068220	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
» KATHRYN LYNN YARBROUGH (1ST ATTEMPT @ STORY'S OFFICE)	8/24/2024 at 11:25 AM	70203160000230014902	REFUSED/RETURNED	9590940286273244068213	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
— KATHRYN LYNN YARBROUGH (2ND ATTEMPT @ HOME)	9/04/2024 at 1:45 PM	70203160000230014698	9/06/2024 at 11:28 AM	9590940286273244068480	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
» — KATHRYN LYNN YARBROUGH (3RD ATTEMPT @ PMB)	10/17/2024 at 11:55 AM	RF753202335US	10/25/2024 at 1:05 PM	ELECTRONIC: D SIGNED			
CHANCERY COURT FOR WILLIAMSON COUNTY TN	8/28/2024 at 4:09 PM	70202450000036715105	9/03/2024 at 11:13 AM	9590940286273244068350	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» MICHAEL WEIMAR BINKLEY	8/23/2024 at 2:51 PM	70203160000230014711	8/26/2024 at 12:39 PM	9590940286273244068503	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» ELAINE BEATY BEELER	8/24/2024 at 11:25 AM	70203160000230014704	8/26/2024 at 2:30 PM	9590940286273244068497	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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ROTHSCHILD & AUSBROOKS, PLLC	8/24/2024 at 11:14 AM	70202450000036715211	8/26/2024 at 2:19 PM	9590940286273244067865	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» MARY ELIZABETH MANEY AUSBROOKS (1ST ATTEMPT @ WORK)	8/24/2024 at 11:25 AM	70202450000036715204	8/26/2024 at 2:19 PM	9590940286273244067810	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
— MARY ELIZABETH MANEY AUSBROOKS (2ND ATTEMPT @ HOME)	10/17/2024 at 11:55 AM	RF753202318US	UNCLAIMED & RETURNED				
» — MARY ELIZABETH MANEY AUSBROOKS (3RD ATTEMPT @ WORK)	10/28/2024 at 3:46 PM	RF708196483US	11/21/2024 at 2:41 PM	ELECTRONIC: D SIGNED		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» » — MARY ELIZABETH MANEY AUSBROOKS (4TH ATTEMPT @ HOME)	10/29/2024 at 12:25 PM	70203160000230013578	REFUSED/UNCLAIMED		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» ALEXANDER SERGEY KOVAL (1ST ATTEMPT @ HOME)	8/24/2024 at 10:59 AM	70203160000230014728	8/26/2024 at 11:29 AM	9590940286273244068473	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
— ALEXANDER SERGEY KOVAL (2ND ATTEMPT @ WORK)	10/21/2024 at 10:41 AM	RF753202406US	REFUSED/UNCLAIMED				
» — ALEXANDER SERGEY KOVAL (3RD ATTEMPT @ HOME)	10/28/2024 at 3:46 PM	RF708196470US	REFUSED/UNCLAIMED				
» » — ALEXANDER SERGEY KOVAL (4TH ATTEMPT @ WORK)	10/29/2024 at 12:25 PM	70203160000230013585	10/31/2024 at 10:36 AM				
HOSTETTLER, NEUHOFF & DAVIS, LLC	8/24/2024 at 2:06 PM	70203160000230014933	8/26/2024 at 10:26 AM	9590940286273244068190	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» CARL A NEUHOFF JR (2ND ATTEMPT @ RA via REG MAIL)	10/28/2024 at 11:52 AM	RF753202383US	11/04/2024 at 3:03 PM	ELECTRONIC: RA SIGNED			
» THOMAS E. ANDERSON	8/23/2024 at 4:29 PM	70203160000230014896	8/26/2024 at 2:16 PM	9590940286273244068206	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MCARTHUR SANDERS REAL ESTATE	8/24/2024 at 2:06 PM	70202450000036715198	8/26/2024 at 3:25 PM	9590940286273244068268	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» ROY PATRICK MARLIN	8/24/2024 at 10:59 AM	70203160000230014780	8/26/2024	9590940286273244068411	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
— ROY PATRICK MARLIN (2ND ATTEMPT @ WORK)	9/04/2024 at 1:45 PM	70203160000230017330	9/06/2024 at 10:40 AM	9590940286273244067551	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
BANKERS TITLE & ESCROW CORPORATION	8/24/2024 at 2:06 PM	70202450000036715945	8/27/2024 at 1:55 PM	9590940286273244068374	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» R L MOORE (2ND ATTEMPT @ RA via REG MAIL)	10/28/2024 at 11:52 AM	RF753202366US	11/02/2024 at 12:31 PM	ELECTRONIC: A SIGNED			
» SAMUEL FORREST ANDERSON (1ST ATTEMPT @ HOME)	8/24/2024 at 10:59 AM	70203160000230014759	8/26/2024 at 11:40 AM	9590940286273244068442	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
— SAMUEL FORREST ANDERSON (2ND ATTEMPT @ WORK)	10/17/2024 at 11:55 AM	RF753230985US	10/23/2024 at 11:00 AM	ELECTRONIC: D SIGNED			
BK: HENRY EDWARD HILDEBRAND III (1ST ATTEMPT @ HOME)	8/24/2024 at 10:59 AM	70203160000230014803	8/26/2024 at 2:59 PM	9590940286273244068398	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
— BK: HENRY EDWARD HILDEBRAND III (2ND ATTEMPT @ WORK)	10/21/2024 at 10:41 AM	RF753202352US	10/28/2024 at 9:12 AM	ELECTRONIC: A SIGNED			
» — BK: HENRY EDWARD HILDEBRAND III (3RD ATTEMPT @ HOME)	10/29/2024 at 12:25 PM	RF753231067US	11/15/2024 at 10:48 AM	ELECTRONIC: A SIGNED			
BK: CHARLES M. WALKER	8/24/2024 at 2:06 PM	70203160000230014889	8/26/2024 at 1:20 PM	9590940286273244068183	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
— BK: CHARLES M. WALKER (2ND ATTEMPT)	10/21/2024 at 10:41 AM	RF753202349US	10/28/2024 at 9:15 AM	ELECTRONIC: D SIGNED			
» — BK: CHARLES M. WALKER (UNITED STATES ATTORNEY GENERAL)	12/09/2024 at 3:55 PM	RF753231084US	12/17/2024 at 5:31 AM	ELECTRONIC: A SIGNED			
» » — BK: CHARLES M. WALKER (U.S. ATTORNEY'S OFFICE—NASHVILLE)	12/09/2024 at 3:55 PM	RF753231075US	12/13/2024 at 1:18 PM	ELECTRONIC: A SIGNED			
BANK OF AMERICA N.A.	9/18/2024 at 9:10 AM	70202450000036716195	9/23/2024 at 10:43 AM	9590940286273244067575	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
— C T CORPORATION (2ND ATTEMPT @ RA)	10/17/2024 at 11:55 AM	RF753202321US	10/21/2024 at 9:57 AM	ELECTRONIC: A SIGNED			
» RUBIN LUBLIN TN, PLLC	9/04/2024 at 10:06 AM	70203160000230017262	9/09/2024 at 4:31 PM	9590940286273244067742	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
— RUBIN LUBLIN TN, PLLC (RA: Northwest Reg Agt)	9/04/2024 at 10:06 AM	70202450000036715129	9/05/2024 at 10:27 AM	9590940286273244068305	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CADENCE BANK	9/03/2024 at 2:20 PM	70203160000230014957	9/06/2024 at 12:58 PM	9590940286273244067797	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» CADENCE BANK (RA: CT Corporation System)	9/03/2024 at 2:20 PM	70203160000230014940	9/05/2024 at 10:15 AM	9590940286273244067780	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» SPRAGINS, BARNETT, & COBB PLC	8/28/2024 at 4:09 PM	70202450000036715143	9/03/2024 at 1:21 PM	9590940286273244068312	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
— ALAN RHENEY (2ND ATTEMPT @ RA via REG MAIL)	10/28/2024 at 11:52 AM	RF753202397US	11/13/2024 at 12:18 PM	ELECTRONIC: A SIGNED			



	DATE MAILED	TRACKING NUMBER	DATE DELIVERED	RETURN RECEIPT TRACKING NUMBER	GREEN CARD RETURNED	GREEN CARD SIGNED	GREEN CARD SIGNED BY NAMED DEFENDANT
TENNESSEE COURT OF APPEALS MIDDLE DIVISION	9/05/2024 at 4:25 PM	7020245000036716157	9/07/2024 at 10:49 AM	9590940284183156988917	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» JAMES MICHAEL HIVNER	8/24/2024 at 2:06 PM	70203160000230014834	8/27/2024 at 1:43 PM	9590940286273244068381	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» FRANK GOAD CLEMENT JR.	8/28/2024 at 4:09 PM	7020245000036715167	8/30/2024 at 2:41 PM	9590940286273244068282	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» ANDY DWANE BENNETT	8/28/2024 at 4:09 PM	7020245000036715150	9/03/2024 at 10:05 AM	9590940286273244068299	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» WILLIAM NEAL MCBRAYER	8/28/2024 at 4:09 PM	7020245000036715136	8/31/2024 at 12:35 PM	9590940286273244068275	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SUPREME COURT OF THE STATE OF TENNESSEE	8/28/2024 at 4:09 PM	7020245000036715082	8/30/2024 at 9:25 AM	9590940286273244067827	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
TNSC - ADMINISTRATIVE OFFICE OF THE COURTS	8/28/2024 at 4:09 PM	7020245000036715075	8/30/2024 at 12:25 PM	9590940286273244067834	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» JOHN BRANDON COKE	8/24/2024 at 2:06 PM	7020245000036715181	UNCLAIMED & RETURNED	9590940286273244068251	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
— JOHN BRANDON COKE (2ND ATTEMPT @ WORK)	9/04/2024 at 10:06 AM	7020245000036715846	9/07/2024 at 12:35 PM	9590940286273244067766	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
TNSC - BOARD OF PROFESSIONAL RESPONSIBILITY	9/04/2024 at 10:06 AM	70203160000230017163	9/09/2024 at 1:01 PM	9590940286273244067759	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» SANDRA JANE LEACH GARRETT	8/23/2024 at 4:29 PM	70203160000230014797	REFUSED/UNCLAIMED	9590940286273244068404	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
— SANDRA GARRETT (2ND ATTEMPT @ WORK)	9/18/2024 at 9:10 AM	7020245000036716232	9/20/2024 at 11:30 AM	9590940286273244067612	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
STATE OF TENNESSEE (OFFICIALS SERVED BELOW):							
» TN - GOVERNOR BILL LEE	8/28/2024 at 4:09 PM	7020245000036715099	9/11/2024 at 1:34 PM	9590940286273244068343	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
— TN - GOVERNOR BILL LEE (ALL TN SUMMONSES)	9/18/2024 at 9:10 AM	7020245000036716201	9/20/2024 at 3:43 PM	9590940286273244067582	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» TN - ATTORNEY GENERAL JONATHAN SKRMETTI	9/03/2024 at 2:20 PM	7020245000036715853	9/06/2024 at 7:37 AM	9590940286273244067773	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
— TN - JONATHAN SKRMETTI (ALL TN SUMMONSES)	9/18/2024 at 9:10 AM	7020245000036716218	9/20/2024 at 7:14 AM	9590940286273244067599	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» TN - SECRETARY TRE HARGETT	9/05/2024 at 4:25 PM	7020245000036716119	9/09/2024 at 12:40 PM	9590940286273244067537	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» TN - TREASURER DAVID LILLARD	9/05/2024 at 4:25 PM	70203160000230017279	9/09/2024 at 12:40 PM	9590940286273244067544	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» TN - SENATOR RICHARD BRIGGS	8/28/2024 at 4:09 PM	70203160000230014988	8/29/2024 at 11:48 PM	9590940286273244068169	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» TN - JUSTICE SHARON G. LEE	9/10/2024 at 2:07 PM	7020245000036716188	9/12/2024 at 2:41 PM	9590940284183156988887	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COUNTY OF WILLIAMSON TENNESSEE (OFF BELOW):					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» WC - ROGERS ANDERSON (MAYOR)	8/28/2024 at 4:09 PM	70203160000230014971	8/30/2024 at 10:52 AM	9590940286273244067841	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
— WC - ROGERS ANDERSON (ALL WC SUMMONSES)	9/18/2024 at 9:10 AM	7020245000036716225	9/20/2024 at 11:47 AM	9590940286273244067605	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» WC - JEFF WHIDBY (COUNTY CLERK)	9/05/2024 at 4:25 PM	7020245000036716133	9/09/2024 at 2:38 PM	9590940284183156988962	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» WC - STACEY EDMONSON (DISTRICT ATTORNEY)	9/05/2024 at 4:25 PM	7020245000036716126	9/07/2024 at 12:01 PM	9590940286273244067513	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
» WC - SHERRY ANDERSON (REGISTER OF DEEDS)	9/05/2024 at 4:25 PM	7020245000036716140	9/09/2024 at 2:35 PM	9590940284183156988955	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
» WC - LISA CARSON (COUNTY ATTORNEY)	9/18/2024 at 9:10 AM	7020245000036716249	9/20/2024 at 12:28 PM	9590940286273244067629	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

69— LAWSUIT SERVICES PACKAGES PRODUCED & MAILED AS OF DECEMBER 12, 2024 (Costing Approximately \$100 Each for Materials and Postage, without Counting Time or Labor.)

69 Lawsuit Service Packages Weighing 3.875 lbs Each (finished) = 267 lbs of Paper (plus drafts, setup, and waste), 483 Adhesive Labels, 69 Flash Drives...

For a list of documents & media in each lawsuit service package, please see https://rico.jeffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

A Motion for Alternative Service was filed in ECF 177, PID.234-243, on 11/25/2024. (<https://rico.jeffenton.com/3-24-cv-01282/ecf/177.pdf>)

For Alternative Service please visit <https://service.jeffenton.com>



FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

From Jeff Fenton
Date Fri 1/17/2025 2:33 PM
To lcarson@buergerlaw.com <lcarson@buergerlaw.com>
Cc contact@jeffenton.com <contact@jeffenton.com>



Hello Ms. Carson,

I'm writing today to see if your clients are willing to sign a stipulated motion to vacate and expunge the order of protection wrongfully placed against me by the Chancery Court on 10/21/2019 in docket #48419B, by fraudulent default, and illegally extended for five more years without motion, notice, or hearing, on 9/24/2025? This has critically interfered with my employment (ADA Interference) and the exercise of my constitutional first and second amendment rights, as a citizen of the United States of America and a life member of the National Rifle Association, who cherishes their right to keep and bear arms, wrongfully deprived for over five years now, which needs to be immediately remedied prior to considering any other matter in this case.

There can be no *statute of limitations* or *immunity* which can prevent me from **stopping** people who are still **actively harming me**, without lawful jurisdiction, authority, good cause, or lawful right.

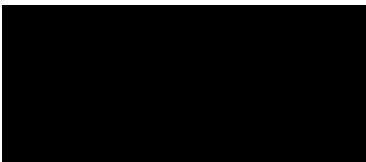
This is an issue which shouldn't cost your clients a dollar to remedy.

If your client prefers to proactively handle this through the Williamson County Chancery Court, instead of waiting on the Federal Courts, I'm open to any reasonable remedy that justly restores my life, liberty, and pursuit of happiness as quickly and completely as possible.

https://rico.jeffenton.com/evidence/2019-10-21_order-of-protection-as-illegal-prior-restraint.pdf

https://rico.jeffenton.com/evidence/2020-09-24_5yr-op-ext-retaliation-no-notice-motion-hearing.pdf

Thanks.
Jeff Fenton



17195 SILVER PKWY, #150
FENTON, MI 48430-3426

3-MIN Video Intro about my Federal Lawsuit: <https://www.youtube.com/watch?v=AaYb-f8ux4o>

FENTON v. STORY (1:23-cv-1097) <http://rico.jeffenton.com/discovery/>
<https://casetext.com/case/fenton-v-story>

Fraud on the Court by Officers of the Court: Williamson County Chancery Court Docket #48419B

 Outlook


Delivered: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

From postmaster@buergerlaw.com <postmaster@buergerlaw.com>

Date Fri 1/17/2025 2:33 PM

To lcarson@buergerlaw.com <lcarson@buergerlaw.com>



 1 attachment (43 KB)

FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP);

Your message has been delivered to the following recipients:

lcarson@buergerlaw.com (lcarson@buergerlaw.com)

Subject: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

 Outlook

RE: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

From Lisa Carson <lcarson@buergerlaw.com>

Date Fri 1/17/2025 3:12 PM

To Jeff Fenton

Cc contact@jefffenton.com <contact@jefffenton.com>



Mr. Fenton, I hope you are well. I do not represent the Judges or the "Court". I represent only the Clerk and Master (who has not yet been served with process), the County and the Sheriff. My clients do not have the authority to grant the relief you request.

Lisa M. Carson
Buerger, Moseley & Carson, PLC
Two Town Center
4068 Rural Plains Drive, Suite 100
Franklin, Tennessee 37064
Phone: 615-794-8850



RE: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

From Jeff Fenton
Date Fri 1/17/2025 6:37 PM
To Lisa Carson <lcarson@buergerlaw.com>



📎 6 attachments (24 MB)

3-24-cv-01282_summons-for-elaine-beaty-beeler.pdf; 3-24-cv-01282_fenton-vs-story-first-amended-complaint.pdf; 114.pdf; Michigan Rule 2.105 Process - Manner of Service.pdf; 100.pdf; 100-1.pdf;

Hello Ms. Carson,

I don't completely understand the different roles between the county, the court, and the state. Are you saying that the Williamson County Chancery Court is strictly controlled by the state, so I need to seek relief from the state?

As for Ms. Beeler, she did in fact receive service (see attached DOC 114, PID 5623-5632, filed on 10/21/2024), but she refused to sign for it and apparently chose to mail it back a few weeks later. That was her choice, I can't force her to operate honestly in good faith, but I have very complete records.

If either you or Ms. Beeler would like me to reserve her by US Mail, this time at your office, for you to receive on her behalf and to be responsible for providing her, I would be happy to do so, simply let me know.

There are a lot of people in this case involved in significant misconduct and misappropriating public resources (government offices, programs & tax dollars) to cover-up felony crimes committed by select Tennessee court officers against the governed, gaming the courts for purposes contrary to both state and federal constitutions, while being wholly repugnant to Tennessee's Rules of Judicial and Professional Conduct. <https://rico.jefffenton.com/evidence/tennessee-rules-of-judicial-and-professional-conduct.pdf>

All that I can do is fight for justice while exposing both attorney and judicial misconduct, along with predatory practices, one step at a time.

This is going to take a long time for a court to sift through, since nobody is willing to proactively take responsibility for their actions to date, which is why I'm seeking to mitigate damages with stipulated motions, as quickly as I can.

Please forward this email to Ms. Beeler, to serve as notice that she has now been served by Alternative Service, through her counsel of record.

I do not have her email address, or I would have already emailed her notice.

- Summons for Elaine Beeler: https://rico.jefffenton.com/evidence/3-24-cv-01282_summons-for-elaine-beaty-beeler.pdf
- AMENDED COMPLAINT: https://rico.jefffenton.com/evidence/3-24-cv-01282_fenton-vs-story-first-amended-complaint.pdf
- DIGITAL SERVICE PACKAGE (SHORTCUT): <https://service.jefffenton.com>

- DIGITAL SERVICE PACKAGE FOR LAWSUIT: <https://jeffenton.com/digital-service-package-for-lawsuit/>
- Substantive Filings Since Service: <https://jeffenton.com/digital-service-package-for-lawsuit/fenton-filings-since-service/>



My MOTION FOR ALTERNATIVE SERVICE was filed in DOC 177 on 11/25/2024, as filed in this lawsuit in DOC 177, and 177-1, PID 234-250. (<https://rico.jeffenton.com/3-24-cv-01282/doc/177.pdf>)

My EXHIBITS from that MOTION above are filed in DOC 177-1. (<https://rico.jeffenton.com/3-24-cv-01282/doc/177-1.pdf>)

Individual service was executed in accordance with F.R.Civ.P. 4(e)(1) and Mich. Ct. R. 2.105(A).

RULE 2.105 (K) Jurisdiction; Range of Service; Effect of Improper Service.

(1) Provisions for service of process contained in these rules are intended to satisfy the due process requirement that a defendant be informed of an action by the best means available under the circumstances. These rules are not intended to limit or expand the jurisdiction given the Michigan courts over a defendant. The jurisdiction of a court over a defendant is governed by the United States Constitution and the constitution and laws of the State of Michigan. See MCL 600.701 et seq.

(2) There is no territorial limitation on the range of process issued by a Michigan court.

(3) An action shall not be dismissed for improper service of process unless the service failed to inform the defendant of the action within the time provided in these rules for service.

There is honestly nobody in this lawsuit who has not been successfully served by Michigan's court rules, regardless of their bad-faith claims to the contrary.

If they KNOW about this lawsuit, as obviously they **must** to be represented by Counsel, then they **have been successfully served**.

Defendant Beeler received service/notice about this lawsuit. Defendant Beeler later chose not to retain or keep the documents or digital materials which she had been served. (She was not able to reject or return the *notice* she received *about this lawsuit*, only the physical documents and digital materials which she had received inside the lawsuit service package.) I have no control over that, nor am I obligated to waste hundreds of dollars more trying to play "cat and mouse" games with defendant Beeler, in an effort to compel her to physically take possession of these documents again, against her will. I already acted in good faith and provided her with adequate service.

Again, I am happy to resend service by US Mail to defendant Beeler at your office, if either of you would like. At roughly \$40 in postage each time I have a lawsuit service package sent, in addition to the cost of the materials inside, I can not afford to keep paying to have additional packages produced and mailed to the defendants, when they have no honest interest of willingness to accept and sign for them.

It is frivolous claims such as this, which will exponentially increase the amount of time that it takes for the court to reach and address meaningful matters, frankly due to noting but bad faith

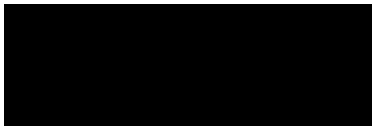
and misconduct, while attorneys are failing or refusing to vet the claims by their clients, prior to filing motions, objections, etc...

That is why it is critical in this case that the court approves my "AMENDED 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" filed in DOC 100, PID 5343-5374, on October 10, 2024.

Unless I hear back from you with instructions for cost effectively reserving Ms. Beeler by US Mail, which she or your office is willing to accept and sign for without dodging or delay, I will assume that she has been satisfactorily served herein, with my efforts in this matter to date.

Thank you for your attention to these matters.

Jeff Fenton



17195 SILVER PKWY, #150
FENTON, MI 48430-3426

3-MIN Video Intro about my Federal Lawsuit: <https://www.youtube.com/watch?v=AaYb-f8ux4o>

FENTON v. STORY (1:23-cv-1097) <http://rico.jefffenton.com/discovery/>
<https://casetext.com/case/fenton-v-story>

Fraud on the Court by Officers of the Court: Williamson County Chancery Court Docket #48419B

SLAM the GAVEL Podcast Interview from 8/4/2024 about my RICO Lawsuit with Authors Brian Vukadinovich and Maryann Petri: <https://www.youtube.com/watch?v=plg5eEEnVuU>

Brian Vukadinovich is the author of [MOTION for JUSTICE](#) (I Rest My Case), and [Rogues in Black Robes](#) (Destroying Lives and Committing Crimes with No True Accountability).

Maryann Petri is the author of [RAISED BY THESE WOLVES](#) (How Family and Federal Courts are Failing our Children), [Dismantling Family Court Corruption](#) ([Why Taking the Kids Was Not Enough](#)). Maryann is also the host of [SLAM the GAVEL](#) Podcast, focused on all family court topics, trauma, and healing.






Outlook

Delivered: RE: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

From postmaster@buergerlaw.com <postmaster@buergerlaw.com>

Date Fri 1/17/2025 6:36 PM

To Lisa Carson <lcarson@buergerlaw.com>

 1 attachment (44 KB)

RE: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP);

Your message has been delivered to the following recipients:

[Lisa Carson \(lcarson@buergerlaw.com\)](mailto:lcarson@buergerlaw.com)

Subject: RE: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)





Outlook

Read: RE: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

From Lisa Carson <lcarson@buergerlaw.com>

Date Fri 1/17/2025 6:48 PM

To Jeff Fenton

Your message

To: Lisa Carson

Subject: RE: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

Sent: Friday, January 17, 2025 5:36:18 PM (UTC-06:00) Central Time (US & Canada)

was read on Friday, January 17, 2025 5:48:53 PM (UTC-06:00) Central Time (US & Canada).





Outlook

RE: FENTON v. STORY (3:24-cv-01282) Terminating & Expunging 6-Year Order of Protection (Seeking to Mitigate Damages ASAP)

From Lisa Carson <lcarson@buergerlaw.com>

Date Sat 1/18/2025 10:27 AM

To Jeff Fenton

Mr. Fenton, please do not ever mistake silence on my part for agreement or concession. I often will not engage in debate in a forum where I do not think it can be productive. As you know, I have a filed a Motion to Dismiss on behalf of Ms. Beeler. I will allow the arguments laid out therein to stand for themselves and look forward to them being resolved in that forum. Debating them with you by email is unlikely to result in either of us convincing the other of our position.

Kind regards,

Lisa M. Carson
Buerger, Moseley & Carson, PLC
Two Town Center
4068 Rural Plains Drive, Suite 100
Franklin, Tennessee 37064
Phone: 615-794-8850



AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Civil Action No. 3:24-cv-01282

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* VIRGINIA LEE STORY

C/O MEGAN R. CALME,
WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP
3102 WEST END AVENUE, SUITE 400, NASHVILLE, TN 37203
(615) 324-7840
EMAIL: MEGAN.CALME@WILSONELSER.COM

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

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Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

MICHAEL WEIMAR BINKLEY

C/O PEAKO ANDREA JENKINS

TENNESSEE ATTORNEY GENERAL'S OFFICE

P O BOX 20207

NASHVILLE, TN 37202-0207

(615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

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_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) KATHRYN LYNN YARBROUGH
223 TOWN CENTER PKWY UNIT 1897
SPRING HILL, TN 37174-3040

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ELAINE BEATY BEELER

C/O LISA M. CARSON
BUERGER, MOSELEY & CARSON, PLC
4068 RURAL PLAINS CIRCLE, SUITE 100
FRANKLIN, TN 37064
615-794-8850

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

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v.

Civil Action No. 3:24-cv-01282

VIRGINIA LEE STORY et al.

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Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

MARY ELIZABETH MANEY AUSBROOKS

C/O CAROLINA V. MARTIN
GORDON & REES SCULLY MANSUKHANI LLP (NASHVILLE)
4031 ASPEN GROVE DRIVE, SUITE 290
FRANKLIN, TN 37067
615-772-9000

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Civil Action No. 3:24-cv-01282

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* ALEXANDER SERGEY KOVAL

C/O CLARK & WASHINGTON, PC
1321 MURFREESBORO PIKE STE 320
NASHVILLE, TN 37217-2858

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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I returned the summons unexecuted because _____ ; or

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) HENRY E. HILDEBRAND, III

C/O ANTHONY M. NOEL
LEITNER, WILLIAMS, DOOLEY, AND NAPOLITAN, PLLC (NASHVILLE)
750 OLD HICKORY BOULEVARD, BUILDING ONE, SUITE 200
BRENTWOOD, TN 37027
(615) 255-7722, EMAIL: TONY.NOEL@LEITNERFIRM.COM

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON)

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Plaintiff(s)

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v.

Civil Action No. 3:24-cv-01282

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VIRGINIA LEE STORY et al.

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Defendant(s)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) CHARLES M. WALKER

C/O ANICA CLARISSA JONES

U.S. ATTORNEY'S OFFICE (NASHVILLE)

719 CHURCH STREET, SUITE 3300

NASHVILLE, TN 37203

EMAIL: ANICA.JONES@USDOJ.GOV 615-736-2093

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Other *(specify)*:

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

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Civil Action No. 3:24-cv-01282

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Defendant(s)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ROY PATRICK MARLIN

C/O SANDRA J. DENSHAM
PLUNKETT COONEY (GRAND RAPIDS)
333 BRIDGE ST., NW, STE. 530
GRAND RAPIDS, MI 49504
(616) 752-4627

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

Civil Action No. 3:24-cv-01282

VIRGINIA LEE STORY et al.

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Defendant(s)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

THOMAS E. ANDERSON
C/O ADARO REALTY, LLC
1187 OLD HICKORY BLVD STE 125
BRENTWOOD, TN 37027-4248

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Civil Action No. 3:24-cv-01282

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* SAMUEL FORREST ANDERSON

C/O GREGORY BROWN
LOWE YEAGER & BROWN PLLC
920 VOLUNTEER LANDING, SUITE 200
KNOXVILLE, TN 37915
EMAIL: GB@LYB.LAW 865-521-6527

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

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CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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Server's signature

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Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

Civil Action No. 3:24-cv-01282

VIRGINIA LEE STORY et al.

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* ANDY DWANE BENNETT

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207
NASHVILLE, TN 37202-0207
(615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

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CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 3:24-cv-01282

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I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

)

)

)

)

Plaintiff(s)

)

v.

)

Civil Action No. 3:24-cv-01282

VIRGINIA LEE STORY et al.

)

)

)

)

)

Defendant(s)

)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* WILLIAM NEAL MCBRAYER

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207
NASHVILLE, TN 37202-0207
(615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

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designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

JAMES MICHAEL HIVNER

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207
NASHVILLE, TN 37202-0207
EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

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_____ on *(date)* _____ ; or

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_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

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I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) JOHN BRANDON COKE

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207
NASHVILLE, TN 37202-0207
EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

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on *(date)* _____ , and mailed a copy to the individual's last known address; or

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON)

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Plaintiff(s)

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v.

)

Civil Action No. 3:24-cv-01282

VIRGINIA LEE STORY et al.

)

)

)

)

Defendant(s)

)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

SANDRA JANE LEACH GARRETT

C/O PEAKO ANDREA JENKINS

TENNESSEE ATTORNEY GENERAL'S OFFICE

P O BOX 20207

NASHVILLE, TN 37202-0207

EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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I returned the summons unexecuted because _____ ; or

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I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ROTHSCHILD & AUSBROOKS PLLC

C/O CAROLINA V. MARTIN
GORDON & REES SCULLY MANSUKHANI LLP (NASHVILLE)
4031 ASPEN GROVE DRIVE, SUITE 290
FRANKLIN, TN 37067
615-772-9000

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

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_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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_____, a person of suitable age and discretion who resides there,
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I served the summons on *(name of individual)* _____ , who is
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_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Civil Action No. 3:24-cv-01282

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* RUBIN LUBLIN TN, PLLC

C/O BRET CHANESS
RUBIN LUBLIN, LLC
3145 AVALON RIDGE PLACE., STE 100
PEACHTREE CORNERS, GA 30071
EMAIL: BCHANESS@RLSELAW.COM (678) 281-2730

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

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on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
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I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

)

v.

)

Civil Action No. 3:24-cv-01282

VIRGINIA LEE STORY et al.

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Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* STATE OF TENNESSEE

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207
NASHVILLE, TN 37202-0207
EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

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CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

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Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) COUNTY OF WILLIAMSON TENNESSEE

C/O LISA M. CARSON
BUERGER, MOSELEY & CARSON, PLC
4068 RURAL PLAINS CIRCLE, SUITE 100
FRANKLIN, TN 37064
EMAIL: LCARSON@BUERGERLAW.COM 615-794-8850

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) TENNESSEE ADMINISTRATIVE OFFICE OF THE COURTS

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207
NASHVILLE, TN 37202-0207
EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON)

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)

Plaintiff(s)

)

v.

Civil Action No. 3:24-cv-01282

VIRGINIA LEE STORY et al.

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Defendant(s)

)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* TENNESSEE COURT OF APPEALS MIDDLE DIVISION

C/O PEAKO ANDREA JENKINS
 TENNESSEE ATTORNEY GENERAL'S OFFICE
 P O BOX 20207
 NASHVILLE, TN 37202-0207
 EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

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CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) CHANCERY COURT FOR WILLIAMSON COUNTY TENNESSEE

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207
NASHVILLE, TN 37202-0207
EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

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CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) STORY AND ABERNATHY, PLLC

C/O MEGAN R. CALME,
WILSON ELSEER MOSKOWITZ EDELMAN & DICKER, LLP
3102 WEST END AVENUE, SUITE 400, NASHVILLE, TN 37203
(615) 324-7840
EMAIL: MEGAN.CALME@WILSONELSER.COM

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Civil Action No. 3:24-cv-01282

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_____ on *(date)* _____ ; or

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Civil Action No. 3:24-cv-01282

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Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Civil Action No. 3:24-cv-01282

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* MCCARTHUR SANDERS REAL ESTATE

C/O SANDRA J. DENSHAM
PLUNKETT COONEY (GRAND RAPIDS)
333 BRIDGE ST., NW, STE. 530
GRAND RAPIDS, MI 49504
(616) 752-4627

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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was received by me on *(date)* _____ .

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_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

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Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Civil Action No. 3:24-cv-01282

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* CADENCE BANK, N.A.

C/O GEORGE H. CATE , III
BRADLEY ARANT BOULT CUMMINGS LLP (NASHVILLE, TN OFFICE)
1221 BROADWAY, SUITE 2400
NASHVILLE, TN 37203
EMAIL: GCATE@BRADLEY.COM 615-252-2347

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Date: _____

Server's signature

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Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) WILLIAMSON COUNTY SHERIFF'S OFFICE

C/O LISA M. CARSON
BUERGER, MOSELEY & CARSON, PLC
4068 RURAL PLAINS CIRCLE, SUITE 100
FRANKLIN, TN 37064
EMAIL: LCARSON@BUERGERLAW.COM 615-794-8850

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) SUPREME COURT OF TENNESSEE

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207
NASHVILLE, TN 37202-0207
EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) BOARD OF PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF TENNESSEE

C/O PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
P O BOX 20207, NASHVILLE, TN 37202-0207
EMAIL: PEAKO.JENKINS@AG.TN.GOV (615) 741-8059

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:24-cv-01282

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Server's signature

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AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

JEFFREY RYAN FENTON)

Plaintiff(s)

v.

VIRGINIA LEE STORY et al.

Defendant(s)

Civil Action No. 3:24-cv-01282

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* **BANK OF AMERICA N.A.**

C/O ERIK HALVORSON
BRADLEY ARANT BOULT CUMMINGS LLP (NASHVILLE, TN OFFICE)
1221 BROADWAY, SUITE 2400
NASHVILLE, TN 37203
EMAIL: EHALVORSON@BRADLEY.COM 615-252-2243

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

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CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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