UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN

JEFFREY RYAN FENTON, PLAINTIFF v. VIRGINIA LEE STORY ET AL., DEFENDANTS	CASE NO. 1:23-CV-1097

SMALL INDIVIDUAL EXHIBITS WITH WEB URLS

FOR QUICK & EASY REFERENCE (SECTION 4 OF 4)

I, Jeffrey Ryan Fenton, declare as follows:

1. My name is Jeffrey Ryan Fenton.
2. I am the Plaintiff in this federal lawsuit (CASE NO. 1:23-CV-1097).
3. Please file this exhibit in my case, so that I can reference it in my lawsuit.
4. Per the Clerk's request last time, I did not bind it.
5. Thank you.

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

Executed 3/25/2024

JEFFREY RYAN FENTON
17195 SILVER PARKWAY, #150
FENTON, MI, 48430-3426
JEFF.FENTON@LIVE.COM
(P) 615.837.1300
(F) 810.255.4438

IN THE COURT OF APPEALS OF TENNESSEE
MIDDLE DIVISION, AT NASHVILLE

JEFFREY RYAN FENTON, Appellant/Ex-Husband, v. FAWN [redacted] FENTON, Appellee/Ex-Wife	)))))))	**COA #M2019-02059-COA-R3-CV** Docket #48419B

MOTION TO SUPPLEMENT & CORRECT THE RECORD

1 COMES NOW the Appellant/Ex-husband, Jeffrey Ryan Fenton, representing myself "Pro
2 Se" in this matter, not being able to afford legal counsel or representation, filing the above-
3 captioned Motion, and for grounds would show as follows:

4 First, I would like to bring to the court's attention, the disabilities with which I have been
5 diagnosed, suffer from, and continue ongoing treatment for. Please see my ADA "Request for
6 Modification Form" (under Judicial Branch Policy 2.07), filed with the Court of Appeals on
7 7/8/2020, and attached hereto separately, for confidentiality purposes, per Mr. Hivner's
8 instructions. I hereby request any consideration which the Court is able to allow me under this
9 policy, as well as due to my poverty and my forced relocation to Michigan, both subsequent to the
10 actions of Ms. Fawn [redacted] Fenton, Attorney Virginia Lee Story, along with the rulings of the
11 Williamson County Chancery Court.

12 In accordance with T.R.A.P. RULE 24(g), my goal is to explain briefly (1) why the content wasn't
13 originally included or needs to be corrected, in the Record (2) explain the relevance and importance
14 of the content, (3) and why the content is "necessary to convey a fair, accurate and complete

account of what transpired in the trial court with respect to those issues that are the bases of (my) appeal."

I will specify my REQUESTS with a very concise WHY near the top of this document, before providing you with a more comprehensive and complete explanation, with what I believe justifies each request below. It is counter-intuitive for me to present my requests prior to the lengthy justification, however; to simplify, clarify, and expedite this process for the Court, I believe that in my circumstances that this format will best serve us both.

I'm trying to get some documentation to the Court to correct and complete my record, so that I can have a chance to Cite what REALLY transpired during my case in Williamson County Chancery Court.

REQUEST: Please SUPPLEMENT the attached "EXHIBIT-B" to my 8/29/2019 filing, currently titled "HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE EX PARTE ORDER OF PROTECTION AND FOR DATE CERTAIN FOR WALK THROUGH OF HOUSE AND MOTION FOR SCHEDULING ORDER"

ATTACHMENT: "2019-08-29 EXHIBIT-B to HUSBAND'S RESPONSE and COUNTER MOTION (SUPPLEMENT PLEASE).pdf"

WHY: Because I had it written and it is referenced in that ONE and ONLY filing which I presented to the Court. It contains CRUCIAL evidence to support my defense. But since this was my first time representing myself in Court, as I tried to compensate for first the negligence, followed by the omissions of my Counsel, I attempted to correct ALL the False/Fraudulent/Perjurious narratives, testimonies, and allegations brought against me to date, through all three actions (which I believed were OPEN for addressing, due to the broad language of Ms. Story's complaint). Consequentially, I was seriously overwhelmed, and worked on this tirelessly for days, right-up until I was already running LATE for my Court Hearing on the morning of 8/29/2019, forced to abandon that which I could not complete, or complete correctly.

You can verify this by viewing the TIMESTAMPS of my filings (TR. v1-v3, p119-380), that I was already 20-minutes late for Court. I had this "EXHIBIT-B" completely printed at my home before rushing to Court, but during my panic to hurry while printing/sorting/stacking/binding over a thousand pages (a copy for the Court, a copy for Ms. Story, and a copy for me, with piles of misprints), I assembled and GBC Bound this Exhibit last. Somehow the collated pages from my three copies got mixed-up, and despite my desperate attempts, I simply couldn't get them sorted-out and bound in time. I finally had no choice but to leave this Exhibit at my home, despite its value, so that I could rush to Court, file the documents at the Clerk & Masters, then run to the "Old Courthouse" in Franklin for my Hearing (which I was thankfully in time for).

REQUEST: Please CORRECT a typographical error in my 8/29/2019 filing, currently titled "HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE EX PARTE ORDER OF PROTECTION AND FOR DATE CERTAIN FOR WALK THROUGH OF HOUSE AND MOTION FOR SCHEDULING ORDER" (TR. v1-v2, p119-181).

The typographical ERROR is located at the top of TR. v2, p178 (document p60), on line item #1, which currently states: "1. The court order a full and final divorce to Husband and Wife, on the grounds of Irreconcilable Differences. The Order of Protection be made permanent and that Husband be required to pay her attorney's fees for having to bring this Motion."

This sentence was meant to only say: "1. The court order a full and final divorce to Husband and Wife, on the grounds of Irreconcilable Differences."

Please REMOVE/STRIKE the second sentence in that same line, which accidentally reads: *"The Order of Protection be made permanent and that Husband be required to pay her attorney's fees for having to bring this Motion."*

ATTACHED: "PAGE 178 (TR v2) REQUEST to CORRECT Typographical Error (STRIKE ERROR PLEASE).pdf"

WHY: I had used Ms. Story's document as a TEMPLATE, having no idea how to draft a response, and I left parts intact until I reached them, so to maintain some structure from which I could determine what I should write and where. Obviously in my rush, I forgot to remove this sentence from Ms. Story's pleading. Obviously I didn't INTEND to ask the Court to Order an OP against me, nor did I INTEND to ask the Court to Order that I pay all of Ms. Fenton's legal fees, since I am unemployed, broke, and I couldn't even afford legal counsel for myself!

In my rush to Court on the morning of 8/29/2018, this document was a bit of a mess, having drafted it AFTER I had composed all of my Exhibits. As such, I didn't have TIME to proof-read this document before rushing off to court. The FIRST time that I printed the document, feeling the immense pressure of running late for Court, but KNOWING that I couldn't leave without EXECUTING this document, otherwise my past 72-HOURS worth of work were for NOTHING (which regretfully has happened to me before), I accidentally printed THREE copies of this document with Ms. Story's name and signature as the author, before I could catch it and replace her name and signature with my own. That was my last "edit" before running out the door.

There COULD be other similar oversights within this document, which I hope that the Court will be graceful towards, having done my very best with the time, knowledge, and resources at my disposal. The formatting is horrible, attempting to indent for sub-topics, but then getting lost, rendering half the page useless, while I repeat myself in a number of places. I also wasn't sure of the number of Exhibits, so I started numbering with "EXHIBIT-A" for the most important exhibits, but at some point, I started backwards with "EXHIBIT-Z" for what I believed to be the least important of my exhibits, hoping to meet somewhere near the middle. As stated, I simply didn't have TIME after the fact, to go back and reorder the Exhibits sequentially starting with "A", as one would typically expect.

REQUEST: I ask that the Court PLEASE read, include, consider the full content of each of my EXHIBITS, using each Justice's own powers of deduction and reason to "connect-the-dots" between the EVIDENTIARY VALUE of my EXHIBITS, to my CLAIMS made in any filed answer, motion, counter-complaint, or otherwise.

I HOPE that the Court will please excuse my lack of legal experience, procedural practices and failures to CITE the Exhibits correctly, along with my horrible page formatting of that parent document, so that my full testimony may be heard and considered.

WHY: I didn't/don't understand HOW exhibits work, or are supposed to be referenced throughout, from the Parent document. I THOUGHT that as long as EXHIBITS were filed along with the Court response, as an EXHIBIT to that response, that each exhibit would be read in its entirety, being self-explanatory, and given consideration for the evidence which each contains. I didn't learn that I need to more specifically spell out references, links, and connections, from the parent document, until I had TIME to perform legal research, months later. I'm still not sure that I fully understand HOW I should reference Exhibits correctly, but I certainly have a much better idea now than when I drafted the documents currently in my Record.

REQUEST: Please CORRECT the TITLE/STYLE/INDEX/NAME/INTENT/PURPOSE of my 8/29/2019 filing, currently titled "HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE EX PARTE ORDER OF PROTECTION AND FOR DATE CERTAIN FOR WALK THROUGH OF HOUSE AND MOTION FOR SCHEDULING ORDER" (TR. v1-v2, p119-181).

TO:

<u>"HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE EX PARTE ORDER OF PROTECTION, AND IN OBJECTION TO ORDER GRANTING MOTION TO SELL THE MARITAL RESIDENCE, AND HUSBAND'S ANSWER AND COUNTER-COMPLAINT TO WIFE'S COMPLAINT FOR DIVORCE,</u>
<u>**HEREAFTER REFERRED TO AS HUSBAND'S "ONE AND DONE"**</u>

ATTACHMENTS:

- "PAGE 119 (TR v1) HUSBAND's RESPONSE & COUNTERMOTION - PAGE-1 (ORIGINAL - AS FILED and RECORDED).pdf"
- "PAGE 119 (REQUESTED) HUSBAND's RESPONSE & COUNTERMOTION - PAGE-1 (CORRECT TITLE PLEASE to MATCH CONTENT).pdf"
- "PAGES 174-181 (TR v2) HUSBAND'S RESPONSE & COUNTERMOTION (PROOF contents include DIVORCE ANSWER AND COUNTER).pdf"
- "2019-08-05 Duke & Story Agreed to Extension for Husbands Answer and Counter-Complaint.pdf"

IF: The Title can not be changed, then please denote that this document ALSO CONTAINS my Answer to Ms. Fenton's Complaint for Divorce, as well as my Counter-Complaint for Divorce. Although this is certainly unconventional, being my first opportunity to SPEAK for MYSELF, while having suffered catastrophic damages with no TIME to think let alone respond, this was my absolutely best effort at a **"ONE AND DONE!"** To address, correct, counter ALL claims made against me to date, while attempting to mitigate the continuing and inevitable future damages to both parties (without a final decree of divorce), before being abruptly forced out of my home and consequentially out of the State of Tennessee, with nowhere local to stay or the financial provision to survive on my own.

WHY: I was TRYING to match the language used by Ms. Story, but really my response ALSO included my DIVORCE ANSWER and COUNTER-COMPLAINT for DIVORCE. Hoping to mitigate the losses to both the Appellee and myself the Appellant, because I KNEW that Ms. Fenton would not stop short of a JUDICIAL DIVORCE DECREE, while I reduced what Ms. Fenton had previously promised me to less than HALF.

Although I still completely believed that the topic of our DIVORCE had yet to even BEGIN in the Court, since all that Ms. Story had showed any interest in so far was BINDING ME, EVICTING ME, and SELLING MY HOME.

Likewise, I had been instructed by my Counsel, Charles M. (Marty) Duke, that he and Ms. Story had agreed to an extension for filing my "Answer & Counter-Complaint", despite how far technically overdue. Mr. Duke further informed me in the attached email (which I ask that you also please supplement to my record, so that I can cite it in my brief), **"2019-08-05 Duke & Story Agreed to Extension for Husbands Answer and Counter-Complaint.pdf"** that I should NOT file ANYTHING PRO-SE prior to Shaffer & Duke being relieved as counsel in my case.

The hearing for Shaffer & Duke to be relieved as my Counsel, was scheduled for the morning of 8/29/2019, the very same day as I filed my exhaustive "ONE AND DONE" and had my Trial with Ms. Story and Chancellor Michael W. Binkley, where she and the Court threw the book at me.

Despite any accusations or filings to the contrary, to protect people's pride or interests, my initial Counsel, Ms. Brittany Gates completely, negligently, failed to perform. Day after day, and sometimes hour after hour, she promised to produce a draft of my "Husband's Answer and Counter-Complaint for Divorce", yet I have still to this day, never seen a single draft of that document. Nor did I ever receive any portion of my Client File which she also promised to provide me. So that's $4,500 of my mother's money, which I'd sure like to get back, but she has unfortunately refused.

On Thursday July 25th at 7:42 PM I finally gave-up and terminated my service with Ms. Gates, as evidenced by the attached email, and hired Schaffer & Duke in an emergency attempt at saving everything treasured in my life, which was scheduled for Trial on Thursday August 1st, at 9 AM. Schaffer & Duke had Friday July 26th (which was devoted to hiring them, signing contracts, borrowing another $5k from my mom to pay their retainer, on-boarding formalities). Which then left Shaffer & Duke only Monday July 29th, Tuesday July 30th, and Wednesday July 31st , as I unintentionally overwhelmed them with literally HUNDREDS of pages of "EVIDENCE", as they worked to get parts of my Client File from Brittany Gates, to write verbal responses due that day, on Monday per local Court Rules for Williamson County, with only TWO DAYS left (while also maintaining their pre-existing case loads) to prepare to FIGHT FOR MY LIFE at the Trial with Chancellor Binkley, scheduled on Thursday August 1st, at 9 AM.

169 Schaffer & Duke requested more TIME from both Ms. Story and from Chancellor Binkley, to
170 study the case and prepare, as they had only been on my case for a few days (due to Brittany Gates
171 negligence), but both Ms. Story and Chancellor Binkley refused to provide them with any time to
172 study my case and prepare to SAVE MY LIFE.

173 Instead, EVERYTHING was LOST in that one hearing, while later that day, after the hearing, I
174 learned that Schaffer & Duke had not only exhausted my $5k retainer already, but that I owed their
175 firms another thousand dollars. The firm owner Rachel Schaffer contacted me that evening
176 notifying me that she needed another $6k immediately, for them to continue representing me. At
177 which point, I told them that I could no longer afford to retain them.

178 Since Ms. Fenton had filed for Bankruptcy, so I wasn't going to obtain much if any support from
179 her (although previously promised $21k per year for 6-years), and the Court had just ordered the
180 forced sale of my treasured HOME, by Auction with no minimums. Meanwhile, by some slight-
181 of-hand by Ms. Story, all my personal property was being treated as marital property, to be
182 AUCTIONED along with our home – while Ms. Fenton's personal property was all off-site, in her
183 Apartment in addition to one or two storage units which she had filled-up, so there was nothing
184 left to fight for. I simply could not justify borrowing thousands of dollars more from my mother,
185 when unlike Ms. Fenton's family, my mother is NOT wealthy, but rather was a single nurse, who
186 worked 12-hour shifts, while raising FIVE children. Currently my mother lives in a 780 SqFt
187 home, left to her by my grandparents, on a very modest budget!

188 I had just wasted $10k of my mother's money, and we had not even BEGUN to talk about the
189 DIVORCE yet! As I understand it, that is by definition, LITIGIOUS ABUSE – intentionally
190 depleting someone's financial resources, defending themselves against FALSE CLAIMS in
191 DECEPTIVE, ABUSIVE, and UNNECESSARY legal actions, prior to the primary action even
192 being addressed!

193 I released Shaffer & Duke, not because of differences of opinion as they stated in court to save
194 face, but because I had no more MONEY to PAY them, and I had PROMISED them as a matter

of HONOR when they took my case, that I would NEVER ALLOW the Court to FORCE them to continue representing me FOR FREE!

Since I had no job, income, assets, Mitchell explained to me that I was "uncollectable", so the owner Rachel Schaffer requested that MY MOTHER sign with their firm as a "guarantor" to an undefined, open-ended amount of debt to them, to cover any legal fees which I accrued. I was not willing to do that, nor was my mother.

Mitchell explained to me how at times a Judge will order an attorney to continue representing a party, even when the party can no longer afford to pay, and that his boss Rachel Schaffer was merely trying to protect their firm from being required to essentially "work for free". That made plenty of sense to me, so I gave Mitchell my WORD that I would never allow that to happen to their firm, even if to prevent it, I needed to "FIRE" them. I would not allow them to be FORCED to WORK FOR FREE to represent me!

So, despite whatever their motion said, I had asked them to do whatever was needed to get released from my case, and I would SIGN it. No matter the wording, it was a matter of HONOR for me, never a DISAGREEMENT in how to proceed. We did see different values in "correcting" Ms. Story's "false narrative", which I felt was critical since it was the foundation upon which all three malicious actions were based. Still, that would have never caused us to part paths. I was never of any false belief that I would fare better without them. I just could not afford to pay them anymore (nor even rationalize it), and I did not want them to be required to work for free! The Court chastised me as though I was an egomaniac favoring self-representation, as if I believed that I could do a better job by myself, but that was not the case. I was just keeping my word, despite the consequences. Some people still do that.

Representing myself Pro-Se at that point, with almost everything lost anyways, I attempted what I referred to as my "ONE AND DONE". An in depth, comprehensive response, to nearly every LIE brought against me, during all three related actions, using graphic photographs, unmistakable text messages and emails between myself and Ms. Fenton, literally 250 pages of Exhibits, bound

into booklets by subject, type, and purpose, plus a 63 PAGE ANSWER/CONTER (TR.v1-2 , p119-181) which I hoped would PUT EVERYTHING TO BED once and for all!

Exposing the vast majority of lies waged against me! Showing without doubt that Ms. Fenton is not a victim! Showing her in living color with her Assault Weapons, performing military grade training in the Nevada Desert, along with her array of handguns, her 5,000 rounds of ammunition which I inventoried and she counted and signed for when she moved out. Displaying her NRA and TN State Licenses as a CERTIFIED HANDGUN INSTRUCTOR!

We are both Life Members of the NRA, but I casually shoot once every two or three years at a local range, while she typically spends 4-days in the Nevada Desert, at a World Renowned training facility known as "Front Sight Firearms Institute", where her and her brother Mark (MBA & Ex-Marine) both have LIFE MEMBERSHIPS (costing around $20k each I believe), where they typically go through a thousand rounds of ammunition EACH during a 3 to 4 day training class. Ms. Fenton was also certified by and employed at "Front Sight Firearms Institute", as one of their LINE COACHES, in their Defensive Handgun class.

I can't remember a time, when I've ever gone to a gun range with Ms. Fenton, where the RANGE MASTER hasn't told me before leaving, **"You better be NICE to her!"** Because Ms. Fenton can outshoot me 10 to 1! For me, it is occasional FUN (and expensive), for her, its a SERIOUS DISCIPLINE! (I could greatly expound upon this, with documentation galore, but trust me, Ms. Fenton's greatest danger is to herself.)

I couldn't believe that ANYONE could SEE THE PICTURES included in the EXHIBIT-K filed on 8/29/2019 (TR.v2-3, p297-336), not to mention Ms. Fenton's Training RESUME, her Firearms Licenses and Certifications, the Photo of Ms. Fenton shaking hands with Mayor Karl Dean, while standing beside the Metro Police Chief, and still believe that she was in ANY DANGER of ANY KIND!

I was SURE that was one of those "GOTCHA" moments, where any man, woman, or child would say, WOW! That lady looks scary! NOBODYS going to mess with her! But to my great

disappointment, my shock, and my dismay, it didn't even raise an eyebrow! That was when I KNEW that I was in trouble!

BEFORE that realization of mine, I felt SURE that the COURT would be FURIOUS with Ms. Story and with Ms. Fenton, for intentionally "PLAYING THE COURT", manipulating the legal system, to intentionally harm the clearly disadvantaged party. I honestly believed that the Court was going to lash-out in my defense, after all the harm which I experienced under their command, based primarily upon the FALSE NARRATIVE, lies, manipulation, deception put forth by Ms. Story and Ms. Fenton.

It astonishes me that I must continue fighting day after day, trying to simply redeem a fraction of what was ALREADY MINE! While with the evidence which I submitted in my "ONE AND DONE" it seems like the truth would be self-explanatory, and my name would be redeemed. Yet that is not the case.

During two short hearings, my life was deprived of everything of substance that I had, while also branding me with criminal designations such as ordering that I have been proven to be a "STALKER", of having "ABUSED" my beloved wife, while permanently tarnishing my criminal record with an ORDER OF PROTECTION, all by "DEFAULT JUDGMENTS", without even considering the 250-PAGES of EVIDENTIARY PROOF which I had served to the Court on a silver platter!

I don't know any just way to understand or explain that. Even if the Court somehow was completely tricked by the false and fraudulent narrative of Attorney Virginia Lee Story, I was still entitled to be HEARD, and the Court had every bit of information in their hands to hear me, whether I was still residing in Tennessee or forced to relocate to Michigan (merely to survive).

Beyond that, I cried out to the Court for help, notifying them about the perceived intentional abuse I was experiencing by Ms. Story and Ms. Fenton (see below), plus I reached-out throughout the Tennessee Court System, emailing the Clerk & Master and Chancellor Binkley through his secretary and Ms. Beeler, as well as repeatedly pointing out the abusive inaccuracies to Ms. Story,

correcting her false accusations with the truth, trying to ensure there were no "oversights", that every harmful action was for cause or malice, not due to mistakes. Citing both the law and her oath of office, attempting to persuade her to at least allow me to LIVE through this and have the opportunity to start over from scratch, without a dollar to my name or a job or trade which can sustain me, at 51 years of age! She had told my Counsel Attorney Marty Duke that she was going to bring an MDA for me to the 8/29/2019 hearing, but she never gave me that opportunity either.

My understanding of TN law is that when these claims about legal abuse are made, the court is required to STOP and INVESTIGATE the voracity of the claims, but nothing slowed-down my execution. From what I experienced, there was no way within my means to convince the Court the TRUTH about anything, no matter how much "evidence" I have. Again, I'm experiencing the same thing, I'm not allowed to submit any real substantial, verifiable, even certified evidence. How can I stand up to the legal titans who have slain me, without even considering the evidence of what really happened? How does that ever give me a chance, if they never allowed me to participate so that I could defend myself against both the opening assumptions which Ms. Story leads with (assassinating my character) plus the closing justification of the home being a mess, in disarray, while I had over 30-days' notice… her assertions are not true. I have proof. Why can't I submit any of EVIDENCE about what truthfully happened?

Ms. Story starts off with claiming that I am a monster and I refused to cooperate to sell our home, if I can't SHOW the Court what really happened, then how am I to meet the "burden of proof", while the default assumption of the Appellate Court is that the Trial Court ruled correctly? Our divorce took over a year, it involved the most time working with Sandy Arons, MBA toward a "Collaborative Divorce", followed by two different legal actions (plus the two extra which Ms. Story filed simply to harass, abuse, and overwhelm me, draining my financial resources to defend myself in our actual "divorce") while assassinating my character before I ever entered a court room. No Court has heard 95% of that journey! Why am I not allowed any "case management" or to have anyone look at this holistically and try to figure out what is honestly fair, in the spirit of the law, rather than who can form the greatest legal argument and cite the best case law? In which case I never had a chance.

I understand the value of reaching the TRUTH, which is exactly what I want. But how can that happen when they tore my whole life apart in two-months' time, while I had to straddle such massive transitions, requesting TIME simply to complete my move to Michigan (having been rendered otherwise homeless). So, if I stayed in Tennessee, what would have happened to me? If not for my mother (who shouldn't need to intervene at my age, especially with the resources we HAD) would I just be sleeping in the streets starving or at the Rescue Mission downtown, with no shelter, provision, or opportunity at all for transition? Because they strategized to withhold notice from me of Ms. Fenton's financial failure, even when I emailed her and nicely asked? What does it take to just get someone to look at the legal fees alone which Ms. Fenton spent and determine that rendering me immediately homeless maybe isn't quite fair? Or in the best interest of either party, or society at large…

I knew that I had no chance against Attorney Virginia Lee Story, but I still honestly believed that the Court would at least hear me, care and give me some consideration before rendering me homeless and destitute, from a comfortable middle class living! I spent 25-years in Tennessee and loved it there, without incident. I never dreamed that I was only two-months (two thirty-minute hearings), comprised of 7.1 minutes of testimony away from being HOMELESS!

Again, I reached out repeatedly for help, to notify the Court that I was being litigiously abused, seeking any sort of intervention or Case Management which would help me NOT become homeless and destitute without being forced to relocate to Michigan to live in my mother's basement, but no one ever even acknowledged my pleas:

(TRv1-2, p148-152)

As verified by the attached exhibits, the fraudulent narrative, and the motions and petitions filed by Wife hence far, Husband respectfully asks the court for relief, under the legislation known as "Stalking by Way of the Courts". Wife has filed abusive motions and petitions in this divorce, designed to "harass or maliciously injure" the Husband, by exhausting his economic resources and trying to force him to make financial concessions.

This is simply a litigious form of domestic assault. Also referred to as "malicious prosecution or abuse of the legal process". All filings by Wife under Docket No: 48419B, show some form of this oppressive harassment, stalking, and domestic abuse.

Additionally, the "MOTION TO DEEM HUSBAND SERVED", and all the attached ugliness, including our custom "No Trespassing" signs (which Ms. Fenton designed at work using her CAD Architectural Software), at the entry, designed collaboratively by Husband and Wife together. Yet falsely portrayed by Wife, as an irrational act by Husband, further used as justification for the Ex Parte' Order of Protection, filed by Wife against Husband, to further harass, control, stifle, dominate, and injure Husband's first and second amendment constitutional rights, knowing exactly how crucial those freedoms are to both Husband and Wife.

Wife's counsel filed this motion on 6/20/2019, the day AFTER Husband's counsel (then), Attorney Brittany Gates, communicated with Ms. Story on 6/19/2019, informing her that Ms. Gates was representing Husband, that Husband had already received service, and that Ms. Gates was Husband's Counsel of Record. None the less, Wife's counsel filed this motion with the court, though totally unnecessary, purely for the opportunity to further smear the Husband's name, with their false and fraudulent narrative, solely for more litigious leverage over Husband. (They weren't going to let all that good ugliness go to waste.)

Furthermore, Ms. Story's Paralegal Heidi Macy directly emailed the documents to Husband, though they had already received notice that Ms. Gates was Husband's Counsel of Record. Such created an ex parte' communication, which was wholly abusive and unnecessary (Exhibit-C).

349 TRv2, p172-173

350 b Husband prays that the court will defend him in regard to Ms. Story's abusive treatment,
351 and/or that she be replaced by another member of her firm in this matter, having failed to act
352 as her office should require.

353 c Husband has no objection to waiving the Mediation, as Wife has made it clear to Husband
354 that she is in no way wanting to participate in any collaboration, mediation, or any other fair,
355 neutral third-party assisted solution, or we would be divorced by now. Wife is only interested
356 in a judgment, and refuses to settle by any other means, despite having filed bankruptcy, and
357 the dire financial condition of both parties.

358 i For the purpose or again correcting the narrative of Ms. Story's verbal attacks by legal
359 process, Husband wants to clarify that Wife's desire to skip mediation has nothing to do with
360 her fear of Husband, especially for the ridiculous benefit of being mindful of the safety of
361 everyone else involved in the process. I've never been more falsely harassed by anyone, and
362 again, I appeal to the court to please intervene.

363 ii The real reason why Wife has refused every attempt to sit down at the same table with
364 Husband and work towards a fair solution, has absolutely nothing to do with Husband's words,
365 the intensity of his presence, or any pressure which Husband could emotionally inflict upon
366 Wife.

367 iii The reason is because Husband is the one person in the entire World, which Wife really
368 struggles looking in the eyes and lying to, about her fraudulent, victimized narrative, since
369 Husband was THERE with Wife, and remembers vividly what really happened and what did
370 not. In contrast, most other people take Wife at face value, seeing her obviously distraught,
371 disheveled, and injured impressions, not realizing that the majority of what they are being told,
372 is either a really twisted version of the truth, or an absolute lie. While the signs of abuse which
373 she portrays, some of which are real, but are self-inflicted, and never ceasing, by Wife's
374 relentless desire to discard Husband without a penny of alimony, vocational rehabilitation, a

roof over his head, or food for his belly. Wife is absolutely destroying herself, fighting to be what she calls "free" or "independent", unwilling to recognize or accept any financial obligation, responsibility, or reparations for the impact which she has had upon the Husband's life, as it lies all in ruins now, and in two months another family will be living in the home which Husband invested the proceeds of his entire life, both financially, and in labor.

My ultimate goal in all of this, is to expose the truth. While at least RESTORING my PERSON, my reputation, and my rights as an AMERICAN CITIZEN, so that I can work on rebuilding my life from ground-zero. My secondary HOPE, is that the Court of Appeals, Williamson County, or some division of Tennessee Government might take actions to ensure that a more comprehensive system of "checks and balances" exists, that some government investigation be performed before allowing ANY Court to rule in situations resulting in such monumental damages to an individual, especially when that is ALL they have!

As I pray for the full force of perjury charges to become more accessible and widely used in the Tennessee civil Court system. Especially against Attorneys who are granted the "benefit of the doubt" in Court, yet who abuse that intentionally for profit or sport (domination).

Furthermore, that the financial penalties for any Attorney caught lying or deceiving the Court, regardless whether Civil or Criminal, be so ABSURDLY HIGH, that no attorney ever dare attempt such atrocities again, while acting under the umbrella of authority and trust granted to Members of the Court. Simultaneously enacting a system of prosecuting such cases automatically at the STATE level, rather than in their County Courts, where they have the "home field" advantage!

With everything that I've lost, with as quickly as I lost it, while never even being heard first, I sure wish there was a way that some change could result which would help protect the next person who unfortunately finds themselves in my shoes, broke in a rich man's county, lied about by my ex-wife (which happens to some degree in almost every divorce case, yet according to the orders of

the Court in my case, every word Ms. Fenton spoke was taken verbatim), backed by an attorney who is well known and trusted by the Court.

I am going to do my best to write a brief, I appreciate you still extending the opportunity, although it will never be stand-up to whatever Ms. Story can write in reply. If there is no consideration for the person, beyond the words and the arguments, then it will all be for nothing, but I must try before starting another two-year journey seeking justice and restoration somewhere else.

I ask that you please supplement the record with these few items, along with these few corrections, so that I have an opportunity to have something on record which I can cite to help expose the truth of what really happened.

Since there are no "agreed orders" in Williamson County for Pro Se litigants, Ms. Story literally got to write every meaningful word in my record to date. Please allow me something to stand upon in my defense.

DECLARATION

I, JEFFREY RYAN FENTON, declare under penalty of perjury that the foregoing is true
[Insert Appellant/Appellee or counsel]
and correct to the best of my knowledge.

Respectfully submitted on: 10/28/2020

[Signature of Appellant/Appellee or counsel]

JEFFREY RYAN FENTON (pro se)
17195 Silver Parkway, #150
Fenton, MI, 48430
jeff.fenton@live.com
(P) 615.837.1300
(F) 810.255.4438

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was forwarded either via U.S. mail, faxed, emailed, hand-delivered, and/or shipped by courier to:

Virginia L. Story
136 4th Ave. South
Franklin, TN 37064
Fax: (615) 790-7468
Email: virginia@tnlaw.org

Clerk & Master
P.O. Box 1666
Franklin, TN 37065-1666
Fax: (615) 790-5626
Email: elaine.beeler@tncourts.gov

Court of Appeals
100 Supreme Court Building
401 Seventh Avenue North
Nashville, TN 37219-1407
Fax: (615) 532-8757
Email: appellatecourtclerk@tncourts.gov

Forwarding Date: 10/28/2020

JEFFREY RYAN FENTON (pro se)

Jeff Fenton

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

Categories: 4-Email: Important Information

Jeff:

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

Thanks. have a good evening.
Marty

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

Thanks Marty.

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

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

Any other time critical dates would be greatly appreciated.

Thanks.

JEFF FENTON
METICULOUS.TECH
(615) 837-1300 OFFICE
(615) 837-1301 MOBILE
(615) 837-1302 FAX

TECHNICAL CONSULTING, SERVICES, AND SOLUTIONS,
WHEN IT'S WORTH DOING RIGHT THE FIRST TIME!

SUBMIT OR RESPOND TO A SUPPORT TICKET HERE.

A DIVISION OF METICULOUS MARKETING LLC

1. The court order a full and final divorce to Husband and Wife, on the grounds of Irreconcilable Differences. ~~The Order of Protection be made permanent and that Husband be required to pay her attorney's fees for having to bring this Motion~~.

2. That the Temporary Order of Protection be terminated. (Husband is willing to sign a "Hold Harmless" with Wife, which can be styled to include both of our families, our employers, etc... so to protect both parties from either defaming them or publishing anything online about them, for the rest of our lives. Not requiring yearly renewal as with an Order of Protection, and also not injuring Husband's vocational potential, like an Order of Protection.

3. If for any reason the court is not willing to terminate the Temporary Order of Protection, Husband respectfully requests that it only apply to Davidson and Williamson Counties, and that it not be converted into a full order, so not to affect Husbands employment potential. (Husband's firearms are located in a friend's gun vault in Goodlettsville. Husband needs to be able to legally pick them up in the U-Haul, while driving North toward Michigan, as Husband moves there for the foreseeable future.)

4. That the court divide any proceeds remaining from the sale of the home 50/50, while ordering both parties to continue assuming responsibility for the debts in their respective names. (Whether that be by bankruptcy or however the parties can.) Husband requests that his half of the split be paid directly to his mother, "Marsha A. Fenton" (810) [redacted], to help setup a trust for the future needs of Husband, educationally or otherwise. (Provided there is enough money to justify doing so.)

5. That in addition to the 50/50 split requested above, that the court repay Husband's mother, "Marsha A. Fenton" (810) [redacted], $10,000 directly out of Wife's

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
AT FRANKLIN

2019 AUG 29 AM 9:17

FILED FOR ENTRY

Docket No: 48419B

FAWN [redacted] FENTON, Plaintiff/Wife,	)
v.	)
JEFFREY RYAN FENTON, Defendant/Husband.	)

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

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

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

Husband suffers from the following handicaps:

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

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

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

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
AT FRANKLIN

2019 AUG 29 AM 9: 17

FILED FOR ENTRY _____
Docket No: 48419B

FAWN [redacted] FENTON, Plaintiff/Wife,	)
v.	)
JEFFREY RYAN FENTON, Defendant/Husband.	)

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

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

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

Husband suffers from the following handicaps:

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

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

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

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
AT FRANKLIN

FAWN [redacted] FENTON, Plaintiff/Wife, v. JEFFREY RYAN FENTON, Defendant/Husband.	)))))))	Docket No: 48419B

HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE EX PARTE ORDER OF PROTECTION, AND IN OBJECTION TO ORDER GRANTING MOTION TO SELL THE MARITAL RESIDENCE, AND HUSBAND'S ANSWER AND COUNTER-COMPLAINT TO WIFE'S COMPLAINT FOR DIVORCE, HEREAFTER REFERRED TO AS HUSBAND'S "ONE AND DONE"

76

COMES NOW the Defendant/Husband, Jeffrey Ryan Fenton, for his response to the Wife's Motions, along with Husband's Countermotions, addressing all allegations to date, stating as follows:

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

Husband suffers from the following handicaps:

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

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

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

7. Husband can't apply for any insurance, until Husband has either obtained vocational rehabilitation and subsequently found gainful employment, or until Wife starts paying adequate alimony to pay for said insurance, as well as meeting some of Husband's other real financial needs, such as purchasing food, paying for meds counseling, etc… Should the court be willing to order such support for Husband, then providing the sum is adequate, Husband will be happy to apply for such independent health insurance.

8. The reality is, that contrary to Wife, Husband can definitively prove each and every word written in this response and counter motion. Husband has put forth an absolutely exhaustive effort to provide the court with some of the information which Husband feels may be pertinent to helping the court discern whether Husband or Wife is presenting the truth to the court. At the same time, this is probably 1/100th of the documentation which Husband possesses in support of his claims. The unfortunate outcome of the path which Wife has committed her life to, and is pursuing with reckless abandon, which caused her bankruptcy, which still makes bankruptcy eventually inevitable for me, as Wife continues to refuse any solution except for one appointed and ordered by the court.

As we are both completely broke, as recovery is realistically not even plausible for Husband, though his financial independence hopefully is, with some structured support and vocational training, leading to a technical certification or license in a progressive field, with vocational opportunities in the area which Husband resides. Continuing with this matter in the court is harmful to all parties, despite Wife's inability to stop injuring herself, and consequentially Husband, since Husband will never be able to focus, with his

handicaps (ADHD, OCPD, GAD, Sleep Disorder) as long as Husband's life is on trial, and due to Husband's financial shortcomings, and Wife's refusal to pay, Husband shall have no choice moving forward except to represent himself.

So at the end of the day, we can either continue as we have here today, for likely the next three years, forcing Husband to put recovery, rehabilitation, and all progress to rebuild his life on hold, until Husband no longer needs to "play lawyer", so that he can focus upon rebuilding some semblance of his life. Husband has serious concerns, about the proceeds from the sale being parked with the court for very long, since Wife's abusive and litigious counsel works right across the street from the courthouse, while Husband will not be in state or able to adequately defend himself.

Furthermore, Husband is absolutely terrified to drive over the Cincinnati bridge, as wife can well testify. (Husband has not driven over that bridge in a decade, and the last time Husband had a serious panic attack, and nearly passed out while driving a U-Haul with Wife.

So Husband's only options are either to take enough Xanax that he can probably drive over the bridge safely, to then need to shortly thereafter find a place to park and sleep it off, or to have someone else who can drive Husband over the bridge, of which Husband knows of no volunteers (mother is now too old for that drive). Therefore, due to these exceptionally complex and harmful consequences for both parties, to continue in court any longer, Husband asks that the court make an exceptional modification to protocol, and provide to Husband and Wife a full and final divorce, here today, upon the grounds of

irreconcilable differences, and determine as fair of a financial settlement between the parties as the court is realistically equipped with the information it has, including the exhibits provided herein. Should the court be willing to grant us a final divorce today, but require more time to review the abundance of documentation provided, which is honestly completely unbiased, and to issue said settlement in the near future, without requiring another court appearance, Husband would be very welcoming to such an outcome as well.

Despite Husband's real need for support in this matter, Husband needs even more to never need to drive back over the Cincinnati bridge, to continue this violent process against each other and our own persons. For reason of mental and physical health, I beg the court to end this once and for all today, to save us all the next three years of our lives, wrestling over breadcrumbs. Husband's requests for a settlement approximately half of what the parties previously discussed, planned, and verbally agreed upon, is outlined below, which Husband respectfully asks the court to consider granting. Should the court decide to grant less to Husband, then Husband shall find no need to object or file further motions, Husband shall gratefully accept whatever the court finds fair. Husband does request that the court not decide upon any judgment which can be modified, altered, or which leaves the door open for future litigation, by either party. Else Husband fears that this case shall perpetually carry on forever, costing both parties more than either party can financially, emotionally, and mentally afford.

Although settlements are typically reached between opposing counsel; due to the abusive manner in which Ms. Story has presented herself throughout her filings in this case,

Husband respectfully requests that the court make an exception here to help protect Husband from needing to sit with Ms. Story and endure her condescending narrative and tone. Instead Husband simply requests that the court make a full and final determination, without any further negotiations or litigation between the parties.

Therefore, should the court not find Husband's request to be in the best interest of both parties, as well as of that of the court, Husband is reasonably certain that he'll never realistically see or benefit from any of the proceeds from the sale of his home. As Wife's counsel and other demands nibble away at it, beyond the practical reach of Husband. Whereby losing his retirement savings, and everything which Husband has earned during his lifetime, which would be one final travesty to end this absolutely toxic divorce.

Yet whatever it must be, so be it. Husband just asks the court for fair and reasonable consideration, and to end this nightmare once and for all. So, Husband can focus on what lies ahead, returning from where he once came, but has been fortunate not to need to leave since reaching adulthood.

Should the court have any questions or need any information, please feel free to ask. Husband can be emailed directly at [redacted] A mountain of documentation pertaining to the marriage is available upon your request.

Thank you for accepting this late filing, and earnestly considering the plethora of complex findings contained herein.

WHEREFORE, Husband would respectfully request that:

1. The court order a full and final divorce to Husband and Wife, on the grounds of Irreconcilable Differences. ~~The Order of Protection be made permanent and that Husband be required to pay her attorney's fees for having to bring this Motion~~.

2. That the Temporary Order of Protection be terminated. (Husband is willing to sign a "Hold Harmless" with Wife, which can be styled to include both of our families, our employers, etc… so to protect both parties from either defaming them or publishing anything online about them, for the rest of our lives. Not requiring yearly renewal as with an Order of Protection, and also not injuring Husband's vocational potential, like an Order of Protection.

3. If for any reason the court is not willing to terminate the Temporary Order of Protection, Husband respectfully requests that it only apply to Davidson and Williamson Counties, and that it not be converted into a full order, so not to affect Husbands employment potential. (Husband's firearms are located in a friend's gun vault in Goodlettsville. Husband needs to be able to legally pick them up in the U-Haul, while driving North toward Michigan, as Husband moves there for the foreseeable future.)

4. That the court divide any proceeds remaining from the sale of the home 50/50, while ordering both parties to continue assuming responsibility for the debts in their respective names. (Whether that be by bankruptcy or however the parties can.) Husband requests that his half of the split be paid directly to his mother, "Marsha A. Fenton" (810) [redacted], to help setup a trust for the future needs of Husband, educationally or otherwise. (Provided there is enough money to justify doing so.)

5. That in addition to the 50/50 split requested above, that the court repay Husband's mother, "Marsha A. Fenton" [redacted] $10,000 directly out of Wife's

share of the sale proceeds, prior to paying any other debts, obligations, or creditors, except for the two mortgages. This is to reimburse Husband's mother for the expense of defending Husband against these totally unnecessary litigious claims, without even addressing the divorce yet in a conventional manner. Wife had previously assured Husband that she was finished with her litigious assaults, yet Wife still elected to execute her largest, most unfair, brilliant, but absolutely devastating legal assault upon Husband to date, again, without a moments warning. Husband therefore request the court to order Wife to repay Marsha A. Fenton for her resulting losses.

6. That at least a sum of $21,000 be paid to Husband's mother, Marsha A. Fenton, to repay Husbands debts to her, prior to paying off any other debts, obligations or creditors, except as stated herein.

7. That the court payoff the outstanding balances to Husband's legal counsel $8,600 to Marty Duke and $2,579.39 to Schaffer Law Firm, directly out of Wife's share of the sale proceeds, immediately following the repayment of Husband's mother, prior to paying off any other debts, obligations or creditors, except as stated herein.

8 That the court award Husband transitional alimony, which the court automatically deducts from wife's paycheck, in the amount of $1,000 per month, for a period of four years, and wife be ordered to have her bankruptcy plan modified to compensate for this.

9. If there are any emergencies where Wife cannot legally pay alimony for any reason, that all missed payments be added onto the end of the four years, so that the overall benefit to Husband is not diminished in the end. (With the proposed alimony of $1,000 per

month for a period of 4 years, that would equal a total alimony to be paid by Wife to Husband, of $48,000.)

10. That after the full four year term of alimony is paid, by Wife to Husband, after having made up for any months missed throughout, that Wife should owe Husband, no more alimony or support of any kind, ever again, regardless of Husband's health, need or any other circumstances, conditions, or factors.

11. That Wife's employer keep Husband insured, as Mr. Ken Adkisson previously promised until the end of this year, or until Wife is no longer employed with that firm, whichever comes first.

12. That afterwards, Husband be responsible for his own insurance needs, without demand or oversight by this court.

13. That the court would order that neither the Wife, nor her counsel, can further litigate, sue, or harass husband, by means of legal actions or otherwise.

14. That the court order a "do not contact" on both parties for a period of one year, regarding the other.

15. That both parties execute mutual lifetime "hold harmless" agreements, to include protection both to and from their families, employers, and friends, in addition to themselves.

16. The court order the auction date to be extended by a period of three-weeks after the final litigation is entered/heard in this matter, or after a 2-month moratorium is ordered by the court, forbidding anymore legal filings, until Husband has had an opportunity to complete his move to Michigan and get settled. During which time Husband

is not to be disturbed by any of the parties in this matter, so that he can focus on packing and realistically have a chance to complete it, on such a short deadline.

17. An Order be entered allowing Wife to sign any necessary listing contracts or agreements to sell the home including closing documents on behalf of she and Husband.

According to the LAW (on the next page), this filing should have been sufficient. It is bad enough that the trial court refused to give my sworn testimony and evidence, filed on court record on 8/29/2019, in what I call my "ONE AND DONE", any consideration whatsoever, but for me to have clearly pointed all this out in the Court of Appeals, proving the fact that I never failed to plead, yet having my life carelessly destroyed by fraudulent "default" judgments, from roughly 600 miles away, while still not being given the benefit of a single word of my own sworn testimony and evidence which had been on court record for over a year, that's simply **unreasonable**.

I spent over a year of my life trying to be heard, while filing over one thousand pages of sworn testimony and evidence on record between the trial and appellate courts, yet "defaults" stand, claiming that I chose not to participate. **That is not reasonable.**

Respectfully submitted,

Jeffrey Ryan Fenton (Pro Se)
1986 Sunnyside Drive
Brentwood, TN 37027
[redacted]
(615) 837-1300

This Motion is expected to be heard on the 29th day of August, 2019 at 9:00 a.m. If no written Response to this Motion is filed and served in a time set by Local Rules of Practice, the Motion may be granted without a hearing.

The appellate court has no legal right to review VOID judgments based upon the alleged merits, because the court was bias, I was never heard and justice never took place.

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was forwarded via email, hand-delivered, and/or first-class mail to Virginia Lee Story, Attorney for Wife, at 136 4th Avenue South, Franklin, TN 37064, on this the 29 day of August, 2019.

I was pro se, technicalities can not matter more than the merits of the case. I operated in good-faith and plead in the interests of justice. I reported the misconduct by Story and Binkley while providing supporting evidence. The court had a responsibility to discipline misconduct, to intervene and help the injured party.

Jeffrey Ryan Fenton (Pro Se)

Defendant Binkley was automatically disqualified for bias and criminal misconduct per Tenn. R. Sup. Ct. 2.11 (A)(1), and 28 U.S.C. § 455 (a)(b)(1), but he refused to lawfully recuse himself, hence the entire docket in #48419B is and has always been irrevocably VOID and must be vacated as a matter of law.

Furthermore per 28 U.S. Code § 1334(e)(1), the Chancery Court had no lawful jurisdiction over the marital residence, because it was part of a federal bankruptcy estate, predating any action in the state courts, while also being "core" to the bankruptcy, giving the federal courts both ***original*** and ***exclusive*** **jurisdiction**. The Chancery Court also lost all lawful jurisdiction to hear and decide any matters in this docket, and thereafter related to my person, because I was unlawfully forced outside the State of Tennessee's jurisdiction by the direct orders of the court, in contravention of T.C.A. § 39-16-507(a)(3), Coercion or Persuasion of Witness.

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.

"**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).

"**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, <u>but its importance consists in its effectiveness as a means to accomplish the end of a **just** judgment</u>." *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938) (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).

"Following the simple guide of rule 8(f) that **all pleadings shall be so construed as to do substantial justice**"... "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).

"Fraud upon the court" has been defined by the 7th Circuit Court of Appeals to "embrace that species of fraud which does, or attempts to, defile the court itself, or is a **fraud perpetrated by officers of the court so that the judicial machinery can not perform in the usual manner its impartial task of adjudging cases** that are presented for adjudication." *Kenner v. C.I.R.*, 387 F.3d 689 (1968); 7 Moore's Federal Practice, 2d ed., p. 512, ¶ 60.23. The 7th Circuit further stated "a decision produced by fraud upon the court **is not in essence a decision at all, and never becomes final."**

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

"An unconstitutional act is not law; it confers no rights; it imposes no duties; affords no protection; it creates no office; it is in legal contemplation, **as inoperative as though it had never been passed."** *Norton v. Shelby County*, 118 U.S. 425 p. 442 (emphasis added).

"Where rights secured by the Constitution are involved, **there can be no 'rule making' or legislation which would abrogate them."** *Miranda v. Arizona*, 384 U.S. 426, 491; 86 S. Ct. 1603 (emphasis added).

In 1994, the U.S. Supreme Court held that "**Disqualification is required** if an objective observer would entertain ***reasonable*** questions about the judge's impartiality. If a judge's **attitude** or **state of mind** leads a detached observer to conclude that a fair and impartial hearing is unlikely, **the judge must be disqualified."** *Liteky v. U.S.*, 114 S.Ct. 1147, 1162 (1994) (emphasis added).

Courts have repeatedly held that positive proof of the partiality of a judge is not a requirement, **only the appearance of partiality.** *Liljeberg v. Health Services Acquisition Corp.*, 486 U.S. 847, 108 S.Ct. 2194 (1988) (emphasis added).

That Court also stated that Section 455(a) "**requires a judge to recuse himself** in any proceeding in which her impartiality might **reasonably** be questioned." *Taylor v. O'Grady*, 888 F.2d 1189 (7th Cir. 1989) (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).

"Recusal under Section 455 is self-executing; a party need not file affidavits in support of recusal and **the judge is obligated to recuse herself sua sponte** under the stated circumstances." *Taylor v. O'Grady*, 888 F.2d 1189 (7th Cir. 1989) (emphasis added).

Should a judge not disqualify himself, **then the judge is violation of the Due Process Clause of the U.S. Constitution.** *United States v. Sciuto*, 521 F.2d 842, 845 (7th Cir. 1996) ("The right to a tribunal free from bias or prejudice is based, not on section 144, but on the Due Process Clause.") (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).

When appeal is taken from a void judgment, the appellate court must declare the judgment void, because the appellate court **may not address the merits,** ***it must set aside the trial court's judgment and dismiss the appeal.*** A void judgment may be attacked at any time by a person whose rights are affected. See *El-Kareh v. Texas Alcoholic Beverage Comm'n*, 874 S.W.2d 192, 194 (Tex. App.-Houston [14th Dist.] 1994, no writ); see also *Evans v. C. Woods, Inc.*, No. 12-99-00153-CV, 1999 WL 787399, at *1 (Tex. App.-Tyler Aug. 30, 1999, no pet. h.) (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).

A court cannot confer jurisdiction where none existed and cannot make a void proceeding valid. A void judgment which includes judgment entered by a court which lacks jurisdiction over the parties or the subject matter, or lacks inherent power to enter the particular judgment, **or an order procured by fraud,** can be attacked at any time, in any court, either directly or collaterally, provided that the party is properly before the court. See *Long v. Shorebank Development Corp.*, 182 F.3d 548 (C.A. 7 Ill. 1999) (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).

IN THE COURT OF APPEALS OF TENNESSEE
AT NASHVILLE

FILED
11/19/2020
Clerk of the
Appellate Courts

FAWN [redacted] FENTON v. JEFFREY RYAN FENTON

Chancery Court for Williamson County
No. 48419B

No. M2019-02059-COA-R3-CV

ORDER

The record on appeal was filed on June 15, 2020. Under Tenn. R. App. P. 29(a), the appellant's brief was originally due on July 15, 2020. On July 10, 2020, this Court granted the appellant an extension of time within which to file his brief through September 15, 2020. On September 15, 2020, this Court granted the appellant an additional extension of time through October 15, 2020, but admonished the appellant that no further extensions would be granted absent a showing of exigent circumstances. Rather than file a brief, the appellant filed a motion on October 16, 2020, requesting yet another, indefinite extension of time.

On October 27, 2020, this Court granted the appellant "one final opportunity to file a brief" and directed the appellant to file a brief on or before November 9, 2020. Our order provided that failure to file a brief by November 9, 2020, could result in dismissal of the appeal without further notice. As of the date of this order, the appellant has still not filed a brief.

It is, therefore, ordered that this appeal is dismissed. The appellant is taxed with the costs for which execution may issue.

PER CURIAM

I never requested an "indefinite extension of time". That statement is false.

I had been trying for months to get the Court of Appeals to supplement and correct my record to **show the truth** about what took place in the trial court, but they refused. I tried for almost a year to get either the trial court or the appellate court to record my 8/29/2019 "transcript of evidence" as such, since the trial court chose instead to bury the transcript amongst hundreds of pages of my "technical record" (in volume 4, pages 495-523), to hide it. The court doesn't want the document to stand out because it shows an absurd level of criminal misconduct by both Binkley and Story, where clearly "justice does not satisfy the appearance of justice". If you compare the 8/1/2019 & 8/29/2019 transcripts, **they are <u>not</u> congruent.**

I told the Court of Appeals that I DID NOT KNOW HOW TO WRITE AN "APPELLANT BRIEF" due to the overwhelming amount of FRAUD in the case by defendant Story. The case wasn't about an "issue of law" which I was contesting, but rather the fact that NOTHING done by the trial court was lawful, legal, in good faith, for the purpose of justice, in compliance with the State of Tennessee's rules of judicial & professional conduct.

Since the Court of Appeals refused to allow me any alternative other than writing an "Appellant Brief", to receive help, I told them I would try, but ultimately I was unsuccessful, after struggling with it for months, for the exact reasons which I had told them. Upon failure, I immediately tried to assemble booklets which I believed SHOWED (relative to a timeline) what I was unable to ARTICLUATE or WRITE in a comprehensive way. I later referred to these booklets, as my **"testimony in evidence"**. Showing the absurdity of what the courts and counsel had done to me, which has been beyond my skill level to articulate in both a believable and non-offensive manner. Using heavy markup on court documents throughout the case, to **tell the truth in-line** with the fraudulent narrative of the court and counsel. Due to the abundance of fraud and the influence of the parties against me, my burden of proof has been outrageous. I've proven misconduct repeatedly, yet the court rejected my efforts and dismissed my appeal.

FILED
04/07/2021
Clerk of the
Appellate Courts

IN THE SUPREME COURT OF TENNESSEE
AT NASHVILLE

FAWN [redacted] FENTON v. JEFFREY RYAN FENTON

Chancery Court for Williamson County
No. 48419B

No. M2019-02059-SC-R11-CV

ORDER

Upon consideration of the application for permission to appeal of Jeffrey Ryan Fenton and the record before us, the application is denied.

PER CURIAM

Jeff Fenton

From:	Jeff Fenton
Sent:	Wednesday, October 28, 2020 6:42 AM
To:	appellatecourtclerk
Cc:	Lisa Marsh
Subject:	URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2
Attachments:	2020-10-28 Motion to Supplement and Correct the Record.pdf; PAGES 174-181 (TR v2) HUSBAND'S RESPONSE & COUNTERMOTION (PROOF contents include DIVORCE ANSWER AND COUNTER).pdf; 2020-07-08 ADA Request for Modification due to Mental Health (Under Tennessee Judicial Branch Policy 2_07).pdf; 2019-08-05 Duke & Story Agreed to Extension for Husbands Answer and Counter-Complaint.pdf; 2019-08-29 EXHIBIT-8 to HUSBAND'S RESPONSE and COUNTER MOTION (SUPPLEMENT PLEASE).pdf

Hello Mr. Hivner,

Please file the attached motion. (EMAIL 1 of 2)

I have one more email with some attachments following.

Thank you sir!

Jeff Fenton

17195 Silver Parkway # 150
Fenton, MI 48430-3426

Phone: (615) 837-1300

Relayed: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2

Microsoft Outlook <postmaster@outlook.com>

Wed 10/28/2020 6:42 AM

To:appellatecourtclerk <appellatecourtclerk@tncourts.gov>;Lisa Marsh <Lisa.Marsh@tncourts.gov>

1 attachments (26 KB)

URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2;

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

appellatecourtclerk (appellatecourtclerk@tncourts.gov)

Lisa Marsh (Lisa.Marsh@tncourts.gov)

Subject: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2

Jeff Fenton

From: Jeff Fenton
Sent: Wednesday, October 28, 2020 8:51 AM
To: appellatecourtclerk
Cc: Lisa Marsh
Subject: RE: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 2 of 2
Attachments: PAGE 178 (TR v2) REQUEST to CORRECT Typographical Error (STRIKE ERROR PLEASE).pdf; PAGE 119 (TR v1) HUSBAND's RESPONSE & COUNTERMOTION - PAGE-1 (ORIGINAL - AS FILED and RECORDED).pdf; PAGE 119 (REQUESTED) HUSBAND'S RESPONSE & COUNTERMOTION-PAGE-1 (CORRECT TITLE PLEASE TO MATCH CONTENT).pdf; Sandy Arons - Divorce Planning (Business Card).pdf; 2019-07-25 Brittany Gates - Termination of Services - Failed to Perform (URGENT DEADLINES).pdf; 2019-08-02 Schaffer Law Firm - Six Grand More Due Immediately to Continue Counsel.pdf; Custom No Trespassing Signs.pdf; FAWN Refused to Honor our Agreement to Sell our Home NOT Me.pdf; 2020-02-17 1986 Sunnyside Drive (Resale After $20k Flip).pdf; 2019-08-28 (A) Pro Se Notice to Court (Husband Filed 8-29-2019).pdf; 2019-09-19 Ms Story - Letter Threating to Sell and Dispose of MY Personal Property (opposite of promised under oath in court).pdf; 2019-01-21 Fawn Talks about Night Sweats and Narcolepsy Meds Problem (Only Seeping 1-Hour at a Time).pdf; 2016-05-25 Fawn - Why You Didn't Know Your Friend has Depression.pdf; 2018-10-27 @ 1731 (Email F-J) Fawn Outlining her Understanding and Conscent to our Verbal Settlement Agreement.pdf; 2018-12-24 Fawn - Text Messages - Planning Counseling with Terry.pdf

Hello Mr. Hivner,

Please file the attached motion. (EMAIL 2 of 2)

This combined with the previous email, is everything.

Thank you sir!

Jeff Fenton
17195 Silver Parkway # 150
Fenton, MI 48430-3426
Phone: (615) 837-1300

Relayed: RE: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 2 of 2

Microsoft Outlook <postmaster@outlook.com>

Wed 10/28/2020 8:51 AM

To:appellatecourtclerk <appellatecourtclerk@tncourts.gov>;Lisa Marsh <Lisa.Marsh@tncourts.gov>

1 attachments (25 KB)

RE: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 2 of 2;

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

appellatecourtclerk (appellatecourtclerk@tncourts.gov)

Lisa Marsh (Lisa.Marsh@tncourts.gov)

Subject: RE: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 2 of 2

Jeff Fenton

From: Jeff Fenton
Sent: Wednesday, October 28, 2020 9:13 AM
To: Virginia Story; Kathryn Yarbrough; Heidi Macy
Cc: elaine.beeler@tncourts.gov; Lisa Marsh
Subject: FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2
Attachments: 2020-10-28 Motion to Supplement and Correct the Record.pdf; PAGES 174-181 (TR v2) HUSBAND'S RESPONSE & COUNTERMOTION (PROOF contents include DIVORCE ANSWER AND COUNTER).pdf; 2019-08-05 Duke & Story Agreed to Extension for Husbands Answer and Counter-Complaint.pdf; 2019-08-29 EXHIBIT-B to HUSBAND'S RESPONSE and COUNTER MOTION (SUPPLEMENT PLEASE).pdf

Hello Ms. Story and Ms. Beeler,

Attached is a motion I just filed this morning, requesting to supplement an Exhibit I didn't have time to bring on 8/29/2019, though it was already completely printed out. I just couldn't get it sorted, bound, and out the door in time. It also requests a couple of minor corrections to my "one and done" on 8/29/2019 aka "HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE EX PARTE ORDER OF PROTECTION AND FOR DATE CERTAIN FOR WALK THROUGH OF HOUSE AND MOTION FOR SCHEDULING ORDER"

"One and Done" is a little shorter and succinct. I know that "succinct" isn't my best quality, but I think that I got it right this time. 😊

Please let me know if you have any questions or concerns.

Jeff Fenton
17195 Silver Parkway # 150
Fenton, MI 48430-3426
Phone: (615) 837-1300

From: Jeff Fenton
Sent: Wednesday, October 28, 2020 6:42 AM
To: appellatecourtclerk <appellatecourtclerk@tncourts.gov>
Cc: Lisa Marsh <Lisa.Marsh@tncourts.gov>
Subject: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2
Importance: High

Hello Mr. Hivner,

Please file the attached motion. (EMAIL 1 of 2)

Delivered: FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2

postmaster@tnlaw.org <postmaster@tnlaw.org>

Wed 10/28/2020 9:14 AM

To:Virginia Story <virginia@tnlaw.org>

1 attachments (52 KB)

FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2;

Your message has been delivered to the following recipients:

Virginia Story (virginia@tnlaw.org)

Subject: FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2

Delivered: FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2

postmaster@tnlaw.org <postmaster@tnlaw.org>

Wed 10/28/2020 9:14 AM

To:Kathryn Yarbrough <kyarbrough@tnlaw.org>

1 attachments (51 KB)

FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2;

Your message has been delivered to the following recipients:

Kathryn Yarbrough (kyarbrough@tnlaw.org)

Subject: FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2

Relayed: FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2

Microsoft Outlook <postmaster@outlook.com>

Wed 10/28/2020 9:14 AM

To:elaine.beeler@tncourts.gov <elaine.beeler@tncourts.gov>;Lisa Marsh <Lisa.Marsh@tncourts.gov>

1 attachments (28 KB)

FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2;

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

elaine.beeler@tncourts.gov (elaine.beeler@tncourts.gov)

Lisa Marsh (Lisa.Marsh@tncourts.gov)

Subject: FW: URGENT PLEASE: Fenton v. Fenton | COA #M2019-02059-COA-R3-CV | MOTION TO SUPPLEMENT & CORRECT THE RECORD (Please File) Email 1 of 2

ORIGINAL

FILED
OCT 30 2020
Clerk of the Appellate Courts
Rec'd By _____

IN THE COURT OF APPEALS OF TENNESSEE
AT NASHVILLE

FAWN [redacted] FENTON	)	
Appellee,	)	
	)	
v.	)	**No. M2019-~~0259~~ 02059-COA-R3-CV**
	)	**Trial Court No. 48419B**
JEFFREY RYAN FENTON	)	
Appellant.	)	

APPELLEE'S RESPONSE TO APPELLANT'S MOTION TO SUPPLEMENT AND CORRECT THE RECORD

COMES NOW Appellee, Fawn [redacted] Fenton ("Appellee"), by and through counsel, and hereby submits this Response to Appellant, Jeffrey Ryan Fenton's ("Appellant") Motion to Supplement and Correct the Record.

SUMMARY OF THE FACTS

Appellant filed a Notice of Appeal on November 20, 2020. Appellant failed to follow proper procedure and did not file a Statement of Evidence or Transcripts of the Proceedings and a Notice of Failure to Comply with Rule 24(b),(c) or (d) Administrative Order was entered by this Court on February 3, 2020 giving Appellant fifteen (15) days to comply. Thereafter, Appellee filed a Motion to Dismiss based on failure to comply with the Tennessee Rules of Appellate Procedure on February 5, 2020. On February 18, 2020, Appellant filed a 52-page Response to the Notice of Failure to Comply with 27 exhibits and filed the transcripts from a hearing held on August 1, 2019. On February 24, 2020, this Court issued an Order denying Appellee's Motion to Dismiss and giving Appellee an extension to February 25, 2020, to file the transcript with the Court. The technical record was sent by the Chancery Court on March 31, 2020 and was filed with this Court on June 15, 2020. Appellant's brief was due on July 15, 2020. On July 9, 2020,

Appellant filed a Motion for an Extension to file his brief which this Court granted by Order of July 10, 2020. Appellant was given until September 15, 2020 to file his brief. Thereafter, on September 11, 2020, Appellant filed a Motion for a SECOND Extension, requesting an additional 122 days to file his brief. On September 15, 2020, the Court granted Appellant an extension to October 15, 2020, to file his brief, noting that no other extensions would be allowed pending exigent circumstances. On October 16, 2020 Appellant once again requested an extension and was granted his third extension by Order of October 27, 2020 requiring his brief to be filed on November 9, 2020. Appellant has now come to this Court with a request to supplement and correct the record.

ARGUMENT

Appellants Motion and request to supplement the record is improper as it lists numerous documents that were never considered by the trial court in this matter and therefore cannot now be made a part of the record after the matter has concluded. Additionally, many of the documents listed in the Exhibit list were not provided to the trial court for filing and thus the trial court has no way of including said documents in the record on appeal. These documents were never presented to the trial court and therefore the trial court had no means by which to even include many of these documents in the record. Documents that are not provided to the trial court or considered by the trial judge are precluded from being included in the appellate record pursuant to Tenn. R. App. P. 24.

Moreover, Appellant's most recent filing is yet another regurgitation of the same allegations of being disadvantaged as a pro se party and grievances with the trial court. This most recent filing is eighteen (18) pages long with eighteen (18) attachments or "exhibits." Appellant clearly has time to put forth drafting and filing numerous lengthy documents to request additional time to file his brief, but someone cannot find the time to get his actual brief completed and filed

in a timely manner. This is yet another attempt by the Appellant to prolong this litigation and run up fees for Appellee.

CONCLUSION

Based upon the foregoing, the Motion filed by the Appellant should be DENIED with costs taxed to the Appellant and Appellee awarded her attorney's fees.

Respectfully submitted,

Virginia L. Story; BPR #11700
Kathryn L. Yarbrough; BPR #32789
Attorneys for [redacted] Fawn Fenton
136 Fourth Avenue, South
P.O. Box 1608
Franklin, TN 37064
(615) 790-1778
virginia@tnlaw.og
kyarbrough@tnlaw.org

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was forwarded via first-class mail to Jeffrey Fenton, Appellant, at 17195 Silver Pkwy. #150, Fenton, MI 48430, on this the 30th day of October 2020.

VIRGINIA LEE STORY

ORIGINAL

FILED
OCT 30 2020
Clerk of the Appellate Courts
Rec'd By _____

IN THE COURT OF APPEALS OF TENNESSEE
AT NASHVILLE

FAWN [redacted] FENTON	)	
Appellee,	)	
	)	02059
v.	)	**No. M2019-~~0259~~-COA-R3-CV**
	)	**Trial Court No. 48419B**
JEFFREY RYAN FENTON	)	
Appellant.	)	

APPELLEE'S RESPONSE TO APPELLANT'S MOTION TO SUPPLEMENT AND CORRECT THE RECORD

COMES NOW Appellee, Fawn [redacted] Fenton ("Appellee"), by and through counsel, and hereby submits this Response to Appellant, Jeffrey Ryan Fenton's ("Appellant") Motion to Supplement and Correct the Record.

SUMMARY OF THE FACTS

Appellant filed a Notice of Appeal on November 20, 2020. Appellant failed to follow proper procedure and did not file a Statement of Evidence or Transcripts of the Proceedings and a Notice of Failure to Comply with Rule 24(b),(c) or (d) Administrative Order was entered by this Court on February 3, 2020 giving Appellant fifteen (15) days to comply. Thereafter, Appellee filed a Motion to Dismiss based on failure to comply with the Tennessee Rules of Appellate Procedure on February 5, 2020. On February 18, 2020, Appellant filed a 52-page Response to the Notice of Failure to Comply with 27 exhibits and filed the transcripts from a hearing held on August 1, 2019. On February 24, 2020, this Court issued an Order denying Appellee's Motion to Dismiss and giving Appellee an extension to February 25, 2020, to file the transcript with the Court. The technical record was sent by the Chancery Court on March 31, 2020 and was filed with this Court on June 15, 2020. Appellant's brief was due on July 15, 2020. On July 9, 2020,

Appellant filed a Motion for an Extension to file his brief which this Court granted by Order of July 10, 2020. Appellant was given until September 15, 2020 to file his brief. Thereafter, on September 11, 2020, Appellant filed a Motion for a SECOND Extension, requesting an additional 122 days to file his brief. On September 15, 2020, the Court granted Appellant an extension to October 15, 2020, to file his brief, noting that no other extensions would be allowed pending exigent circumstances. On October 16, 2020 Appellant once again requested an extension and was granted his third extension by Order of October 27, 2020 requiring his brief to be filed on November 9, 2020. Appellant has now come to this Court with a request to supplement and correct the record.

ARGUMENT

Appellants Motion and request to supplement the record is improper as it lists numerous documents that were never considered by the trial court in this matter and therefore cannot now be made a part of the record after the matter has concluded. Additionally, many of the documents listed in the Exhibit list were not provided to the trial court for filing and thus the trial court has no way of including said documents in the record on appeal. These documents were never presented to the trial court and therefore the trial court had no means by which to even include many of these documents in the record. Documents that are not provided to the trial court or considered by the trial judge are precluded from being included in the appellate record pursuant to Tenn. R. App. P. 24.

Moreover, Appellant's most recent filing is yet another regurgitation of the same allegations of being disadvantaged as a pro se party and grievances with the trial court. This most recent filing is eighteen (18) pages long with eighteen (18) attachments or "exhibits." Appellant clearly has time to put forth drafting and filing numerous lengthy documents to request additional time to file his brief, but someone cannot find the time to get his actual brief completed and filed

https://rico.jefffenton.com/evidence/2020-10-30_storys-objection-to-correcting-the-court-record.pdf Case 1:23-cv-01097-PLM-RSK (FENTON v. STORY et al.)

in a timely manner. This is yet another attempt by the Appellant to prolong this litigation and run up fees for Appellee.

CONCLUSION

Based upon the foregoing, the Motion filed by the Appellant should be DENIED with costs taxed to the Appellant and Appellee awarded her attorney's fees.

Respectfully submitted,

Virginia L. Story; BPR #11700
Kathryn L. Yarbrough; BPR #32789
Attorneys for [redacted] Fawn Fenton
136 Fourth Avenue, South
P.O. Box 1608
Franklin, TN 37064
(615) 790-1778
virginia@tnlaw.og
kyarbrough@tnlaw.org

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was forwarded via first-class mail to Jeffrey Fenton, Appellant, at 17195 Silver Pkwy. #150, Fenton, MI 48430, on this the 30th day of October 2020.

VIRGINIA LEE STORY

RE: TN Courts: Help Request Form - Appeal to Supreme Court (REQUEST TO ESCALATE CASE FROM AP...

File Message Help Acrobat

RE: TN Courts: Help Request Form - Appeal to Supreme Court (REQUEST TO ESCALATE CASE FROM APPELLATE T...

Reply Reply All Forward

Jeff Fenton

Tue 1/19/2021 11:47 PM

To Jim Hivner; Lisa Marsh; appellatecourtclerk; elaine.beeler@tncourts.gov; john.coke@tncourts.gov; appellatecourtclerk

Cc Virginia Story; Kathryn Yarbrough; marybeth@rothschildbklaw.com; complaints@tbpr.org

You replied to this message on 1/20/2021 12:03 AM.

2021-01-17 MIchigan Unemployment Insurance EXHAUSTED - NEED IMMEDIATE RELIEF OF OP TO WORK or SUPPORT, Restutution, Damages PLEASE.pdf
295 KB

2004-02-09 WHY Fawn LOVES Jeff with Markup (Redacted).pdf
65 KB

2004-04-28 Hunts Complaint Letter (Standing-Up for Fawn).pdf

Hello Mr. Hivner,

To need to spend 12-16 hours every day, sifting through remnants of the life that was stolen from you, just to get free… do you know how inhumane that is? I have wasted over 4,000 hours of my life this past year, seeking the smallest drop of justice.

3/13/18, 6:42 PM to Fawn Fenton

So are you blaming me in the papers, or simply seeking a fair no fault divorce?

3/13/18, 6:43 PM to Fawn Fenton

Please put yourself in my shoes, and ask how you would survive this, if you were me.

3/13/18, 6:48 PM from Fawn Fenton

I know, I'm so sorry. I've tried to put up with the conflict for years, because I knew how devastated you would be if we broke up, and I didn't want to do that to you. But I just can't keep going, it's killing me inside.

3/13/18, 6:49 PM from Fawn Fenton

"Irreconcilable Differences."

3/13/18, 6:54 PM to Fawn Fenton

Conflict is always a choice. You can never have conflict without at least two people trying to dominate each other with their opinions.

Without two people committed to changing each other's minds, more than they are committed to the other PERSON.

You know a divorce isn't God's will for us, or the reason that he brought us together.

You want to keep all the good and throw away all the bad, when EVERYONE is a mixture of both good and bad.

That's what you could never accept. That your feelings aren't always accurate. That you are an emotional roller-coaster, especially since menopause began five years ago. You are relationally unable to commit to any path of progress, to believe there is ANY hope, to visualize and walk toward the light.

That breaks my heart! Since there isn't a dang thing that I can do about that!

RE: Ali...

File Message Add-ins Help Tell me

RE: Alimony

SA Sandy Arons <sandyarons@getasr
To Jeff Fenton
7/27/2018

You replied to this message on 7/27/2018 12:17 PM.

Yes, I told Fawn the range for alimony is about 22.5% of her gross income.

Sandy

Sandy Arons, MBA
Certified Divorce Financial Analyst
Certified Financial Divorce Specialist
Accredited Financial Counselor & Mediator
750 Old Hickory Blvd
Building Two, Suite 150
Brentwood, TN 37027
Tel: 615-376-8204 Fax: 615-376-8121
email: sandyarons@getasmartdivorce.com
website: www.getasmartdivorce.com

Please forgive the fact that much of this was not written for "public release", it was a rough draft, choppy in places, and written for the free legal help website, as well as for the Board of Professional Responsibility and the Board of Judicial Conduct, whom I'll also forward this to, so please likewise download the files to have the evidence to proceed with my complaints.

RE: Offer to settle - Message (HTML)

RE: Offer to settle

Fawn Fenton
To Jeff Fenton; Fawn Fenton
Cc Sandy Arons

Reply Reply All Forward
Thu 8/30/2018 5:49 PM

You replied to this message on 8/30/2018 6:02 PM.

Ken says he is willing to keep paying for you to be on our plan for 1 year, maybe through the end of 2019, "as long as you don't cause more problems", heh.

Beyond that, we'll have to see where things stand with you, and with my company.

(Our office lease is up in March 2020, and Ken really wants to retire, and so there's no telling what my job will be after that.)

Hopefully the Tennessee Supreme Court can resolve this minor issue of imminent importance, without which I can't work due to my mother's immunity disorder. Hence, I need to work all day every day at somehow getting Williamson County's noose off from around my neck. Through some sort of "peaceful protest", political or legal action, or toward a cure of some humanitarian nature. If this fails, then I need to escalate this to the United States Court of Appeals, because I can't wait years longer to be able to work, and I believe that I have a better shot with them than the federal court in Tennessee.

The only downside is that the only federal portion which has been heard so far by the Tennessee federal courts, is Ms. Fenton's bankruptcy. So, my best chance is to file for bankruptcy fraud in the United States Court of Appeals for the Sixth Circuit. Then I believe that I'll be able to add the "color of law", 14th Amendment, HUD violations, ADA exploitation and abuse. I've spoken with the FBI and I'm hoping to possibly have the "bad players" prosecuted under the RICO Act, since this has created a financial burden upon another state's financial resources and welfare system, totally without need.

I'd hate to risk the potential criminal consequences for Ms. Fenton to appeal her bankruptcy for fraud, by not disclosing my equal or greater financial investments, interests, and ownership of our equally deeded marital residence, as "tenants by the entirety". As well as me being the owner of almost all the personal property inside, as stated in Attorney Story's divorce complaint. Her team had the federal bankruptcy court make judgments about my personal property, under horribly bad, manipulative faith, to strategically supersede the State of Tennessee's "Protected Income and Assets" (Affidavit of Claim Exemptions), which I had properly filed.

Fawn Fenton
(615) [redacted] 7377 · mobile

Thanks!

I was just reading about the 2018 tax code...

Have you figured out the income tax ramifications of having no mortgage interest deduction (because you will live in an apartment), plus no spousal dependant (another lost $12k write-off), plus not being able to write-off the alimony you pay me, combined with the new 2018 tax laws? (Not to mention the loss of the 'business in home' and other MM write-offs)?

Seriously, I'm concerned for how you have and continue to set yourself-up for your future.

It looks to me, like you will have double the taxable income that you previously had, which won't likely change for 5-10 years, until you can afford to purchase another condo and complete paying my alimony.

Have you really ran the numbers on all of this and considered for a moment if maybe there is some way for you to mitigate your tax losses?

It looks to me like you have created and are walking into the worst possible scenario tax wise, which will largely defeat much of the vocational success you've reached in recent years.

Am I missing something, misreading something, not understanding anything correctly? Have you discussed options with a CPA or even your brother, or someone with an MBA, or at least a tax professional?

Uh OH!

I hate to see you screw yourself, especially to solely benefit Uncle Sam.

Is there no better way of doing this?

Dec 22, 2018

Correct, my tax situation is going to suck for a very long time.

Fawn Fenton (mobile) · Dec 22, 2018

Is there nothing we can do h

To help that?

Dec 22, 2018

Not that I know of.

Fawn Fenton (mobile) · Dec 22, 2018

???

The Moment I KNEW!

Have you talked to your brother about it or asked an accountant?

Dec 22, 2018

Yes I've talked to mark and my dad. No haven't talked to an accountant. 90k gross - 31k taxes - 21k alimony = 38k net. Plus or minus.

Fawn Fenton (mobile) · Dec 22, 2018

No Incentive to Earn!

Goodbye Alimony!

Didn't your dad or Mark have any suggestions to bring down those insane taxes?

Dec 22, 2018

Nope. This is why I cannot afford to keep house, and need sale to help pay down debts.

Fawn Fenton (mobile) · Dec 22, 2018

Bye!

Yet the house would save you how much in taxes?

Debts are all from this year... how did we fall so far so fast?

Dec 22, 2018

Someday when alimony is done, I can get a job making only $43k gross and have same net of +/- $38k

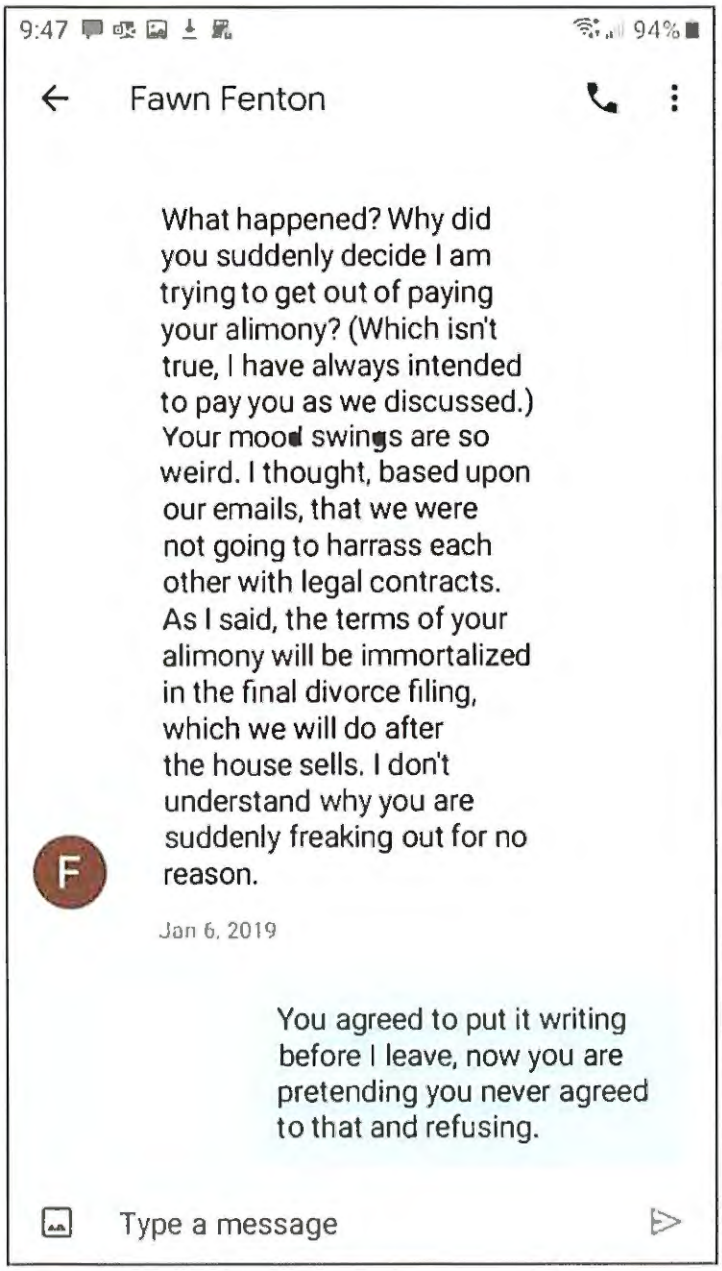
Fawn Fenton (mobile) · Dec 22, 2018

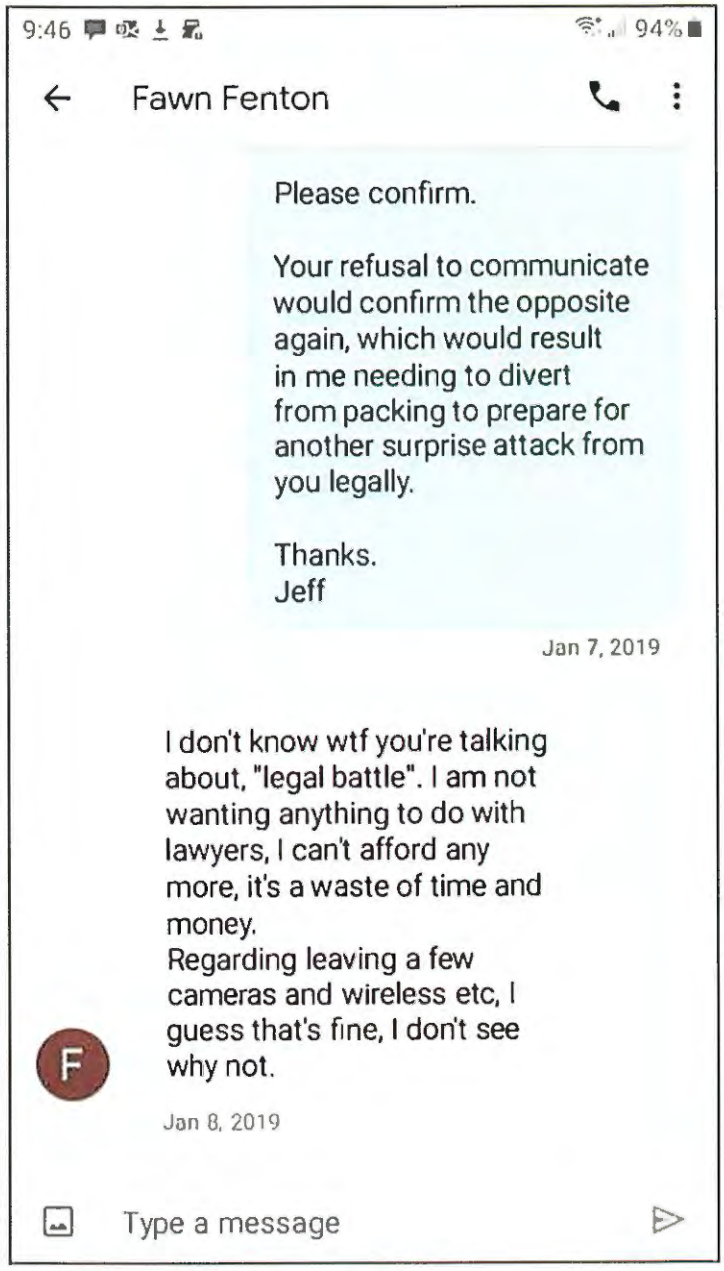
The Goal :(

That is crazy... their must be a smarter way to spend all that you've worked for?

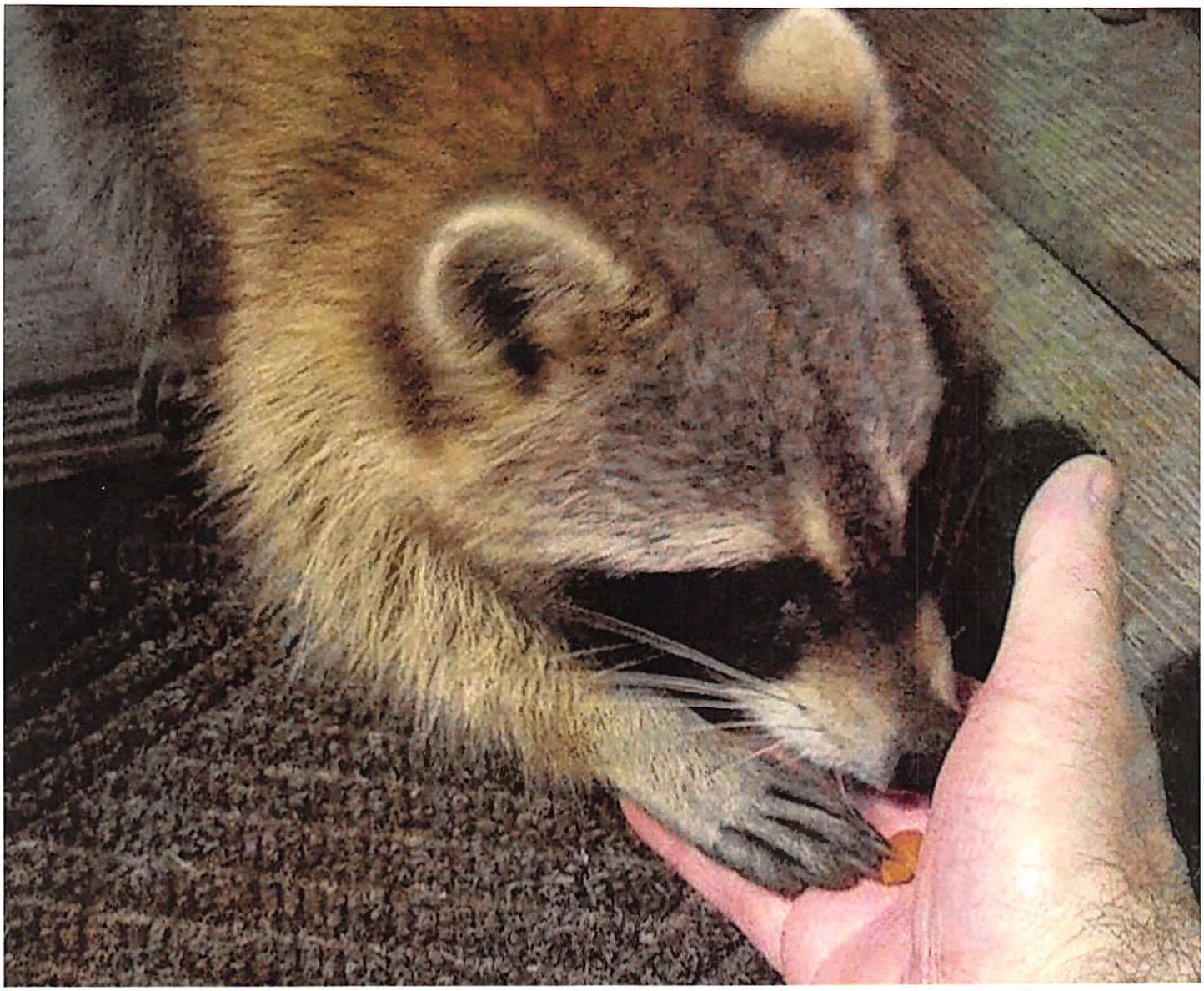
I really don't know which is worse, Attorneys Story, Yarbrough, and Ausbrooks committed so many felony crimes and gross violations of professional conduct in this case. They intentionally manipulated bankruptcy fraud to solely injure the highly disadvantaged, disabled, unemployed, and currently unemployable spouse. While the bankruptcy was staged, having known a year in advance when Ms. Fenton's employer planned to retire (as documented in this case). Every motion in the chancery court was not only fraudulent, it was literally a "decoy divorce". Intentionally planned as three separate but simultaneous high-value attacks, to strategically exploit my known and fully documented disabilities. While the specific exploits targeted and leveraged against me by Story's crew, just happen to be my ex-wife's pet peeves about my disabilities. That I'm too slow and that I am psychologically incapable of effectively multi-tasking significant concurrent tasks. While Ms. Story refused to allow me to take my personal property, to only try to discard it later, through a federal court order to supersede my protections under Tennessee State law. That is about as unconscionable as it gets.

Then to slap me with default judgments, as if the court found it reasonable to only read part of a sentence, rather than reading the whole sentence in context. It was completely unreasonable to assume that after working myself tirelessly and filing 250+/- pages of evidence & sworn testimony on 8/29/2019, that I just quit caring and decided not to bother participating or defending myself further. That was not true. In all honesty, since Story and Binkley decided to revoke my freedom interest, rendering me literally unemployable, I should have been provided an attorney and certainly heard, with full due process of law. But they refused. Story filed an unreasonably fraudulent affidavit, upon which, without confirmation, judge Binkley ruled to omit me from further participation in the litigation, while ruling harsh punitive default judgments against me.





Just two 30-minute hearings between close family friends, without due process or any opportunity to save my property interests, in either my income or my home. "Under color of law", pretending that the exact opposite of the law happens to be "legal".



I held out good for my raccoon buddy in my hand tonight, and he touched both his cold little nose and his paw to my hand.

I DID IT!!!

Apr 23, 2019

F

OMG! raccoon!!! 😃

Fawn Fenton (mobile) • Apr 23, 2019

Was that not COOL AS HECK? I did like you told me... Trying to keep the door barely split so he didn't come inside, while taking a video with one hand, holding out the food in the other hand, trying to focus, call to him..... And you say that I can't multi-task!

I've interacted with him a ton through the glass, and a little outdoors, but that was the first time that we touched each other. He was super gentle, with his warm soft little tongue eating out of my hand, with never the slightest nip!

Apr 23, 2019

F

Love little raccoon!! 😊

Fawn Fenton (mobile) • Apr 23, 2019

This case is blatant & clear criminal misconduct. Every day that I can't work, I get a little more of my evidence sorted out. Eventually I will be able to clearly articulate the crimes against me, while organizing my evidence good enough to publish it. Then I'll be able to distribute the **truth** to people throughout state and federal government as well as the courts, from Tennessee to Michigan to Washington DC.

I know that my ex-wife told Story, who in turn told Binkley, that ***I have a reputation for successfully exposing criminal misconduct*** against our family over the Internet. This happened when our home suffered significant damages by a negligent roofing contractor, who after we sued them and won a judgment, they still refused to pay us.

After which it wasn't until I exposed two billion dollar insurance companies along with the roofing contractor that anybody began taking us seriously and finally paid for our damages. *Exposing the truth* is the only thing that anyone has *ever* had to *"fear"* about me. That is the real purpose of their fraudulent *"order of protection"* against me, to *extort my silence* about the *criminal misconduct* by the *courts* and *counsel*.

NOTE IN HINDSIGHT: When I saw the KnoxNews article in 2021 showing Judge Michael W. Binkley shaming the Tennessean Newspaper while he *read the riot act* to attorneys, during one of his rants from the **courthouse bench**, I finally understood. There are few things which Judge Michael Binkley hates or fears more than people *exposing* his criminal misconduct in the *media*. Captured on video, Judge Binkley is shown threatening and extorting both attorneys and the public alike, while he levied his vengeance and retaliation *"under color of law"* against Attorney *whistle blower* Brian Manookian. Allegedly Attorney Manookian was responsible for leaking Binkley's arrest during a **prostitution sting** back in 2010, which corrupt **Judge Casey Moreland** was persuaded to both dismiss and expunge from the court's records, "in a highly unusual fashion." Notably, Binkley hired Moreland's own attorney to represent him in that matter. Still Binkley put on a show fit for theater, while spewing about how he had *never* turned in an attorney [for misconduct] in his life, but vowing that Attorney Brian Manookian would be the exception. Binkley claimed that he had 70 examples of misconduct by Manookian, which he relished in reporting to the Tennessee Board of Professional Responsibility. Afterwards they suspended Attorney Manookian's law license.

In contrast, Judge Binkley helped attorney Virginia Lee Story commit an obscene number of state and federal **felony crimes** against me in "his" court, in addition to *non-stop* violations of the State of Tennessee's Rules of Professional Conduct. A judge is not allowed to pick and choose who he reports for misconduct. The Board of Professional Responsibility, the very same board *leveraged* by Judge Binkley to **"punish"** *whistle blower* Brian Manookian, is the same board which has repeatedly refused to file, vet, and take action upon my many complaints directly to Chief Disciplinary Counsel **Sandy Garrett**, against Attorneys Virginia Story, Kathryn Yarbrough, Mary Beth Ausbrooks, Clerk & Master Elaine Beeler, Judge Michael Weimar Binkley, along with other attorneys involved in *extreme misconduct* in my case.

(Continued on last page.)

2018-08-06 OFFERED TO GIVE MS. FENTON MY EQUITY FOR FREE!
(Regretfully She Declined)

OUR HOME (v2.0) - Message (HTML)

File Message Add-ins Help Tell me what you want to do

OUR HOME (v2.0)

Jeff Fenton
To Sandy Arons
Cc Fawn Fenton;

Reply Reply All Forward ...

Mon 8/6/2018 1:26 AM

You forwarded this message on 8/6/2018 1:44 AM.
This message was sent with High importance.

Hello Sandy,

Fawn came and got our fish today and we discussed OUR HOME some more. Apparently she did not understand before that I was offering to completely forfeit my equity in our home to her, provided that she LIVES in it (not for the purpose of selling the property).

I explained that I am willing to sign a Quit Claim deed, completely transferring ownership of the property to Fawn, with a separate contract specifying ONE stipulation, which is that she continue to RESIDE here at our HOME, as her primary residence, for a period of at least FIVE years.

- In the event that she chooses to put the property on the market, up for sale, transfer ownership of the property, lease or sell it by any means, then she would owe me a flat $75k for my equity.
- After five years (from the date of divorce or legal separation), she can do whatever she chooses with the home, owing me NOTHING.
- We would EACH be responsible for ALL the debts, in our OWN names, regardless of how we choose to deal with them: filing bankruptcy, paying them, not paying them, it would be each of our OWN business, and not related to any asset/debt computations.

Our personal ... n. (We are in agreement ... put it in writing prior t...

RE: Financial Consi...

File Message Add-ins Help Tell me what you want to do

RE: Financial Considerations to Keep in Mind

Fawn Fenton
To Jeff Fenton
Cc Sandy Arons

8/23/2018

You replied to this message on 8/23/2018 3:18 PM.

Fuck no, you are going to have to buy me out.

From: Jeff Fenton
Sent: Thursday, August 23, 2018 2:02 PM
To: Fawn Fenton
Cc: Sandy Arons <sandyarons@getasmartdivorce.com>
Subject: Re: Financial Considerations to Keep in Mind

Nice that you made that choice for me too!

So are you willing to surrender your equity in this house to me, so that I can try to keep our home, so that all isn't lost?

Jeff Fenton
METICULOUS.tech

The bankruptcy fraud in this case was simple, attorneys Story and Ausbrooks worked together to use the same fraudulent narrative, both in state and federal courts, that my ex-wife was the owner of our Brentwood marital residence when that was false. The attorneys as well as the bankruptcy trustee had a responsibility to check the property deed and tax records, to verify the property ownership, where my name was clearly listed on both, as an equally deeded property owner with Ms. Fenton, as "tenants by the entirety".

They counseled my ex-wife to secretly default upon our mortgage payments. Then they secretly filed a fraudulent bankruptcy petition on her behalf, lying about our property ownership, while specifically requesting to sell our marital residence, without notifying me about any of it.

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

Jeff:

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

Thanks. have a good evening.
Marty

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

Thanks Marty.

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

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

Any other time critical dates would be greatly appreciated.

Thanks.

JEFF FENTON
METICULOUS.TECH
(615) 837-1300 OFFICE
(615) 837-1301 MOBILE
(615) 837-1302 FAX

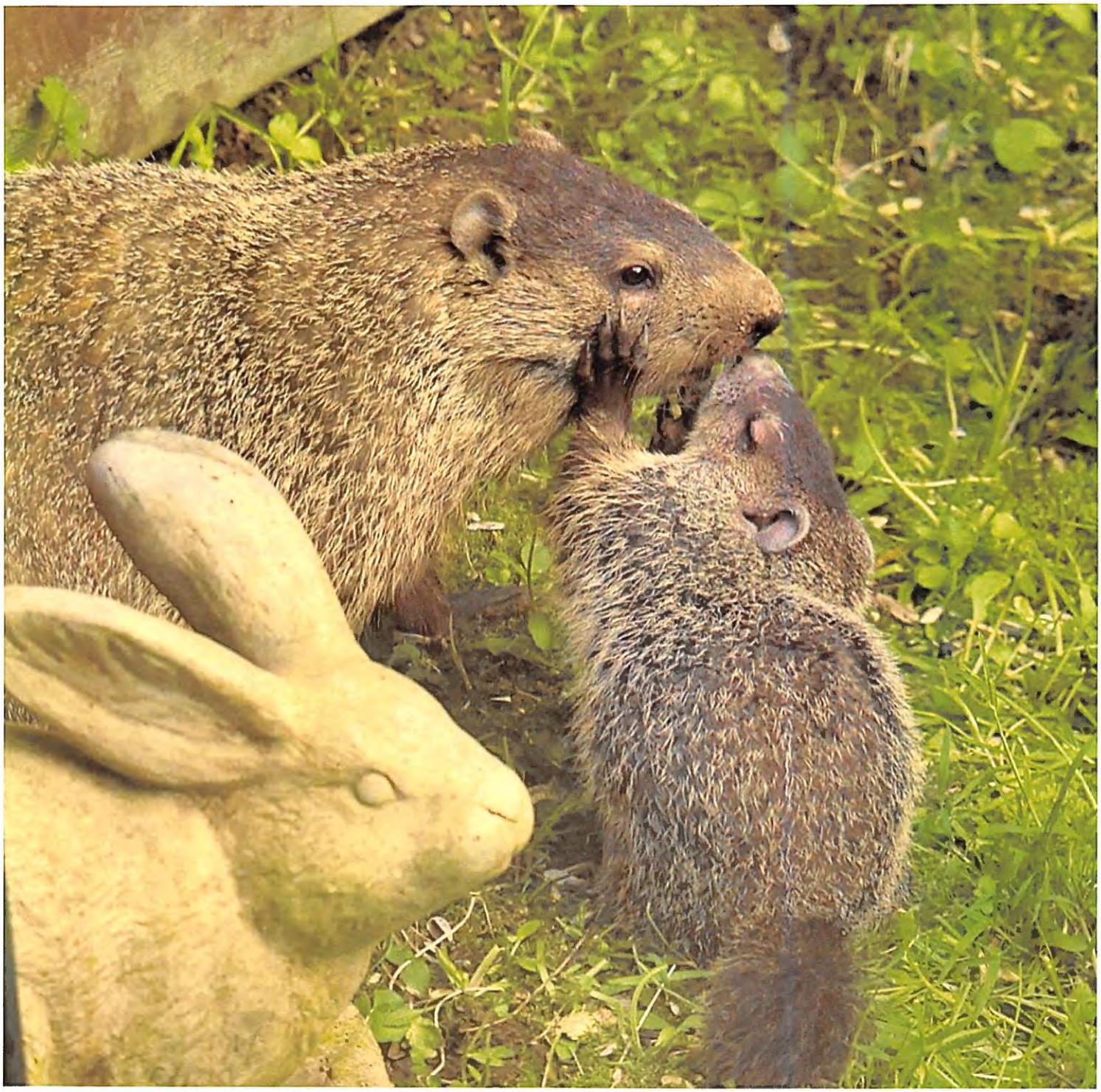
TECHNICAL CONSULTING, SERVICES, AND SOLUTIONS,
WHEN IT'S WORTH DOING RIGHT THE FIRST TIME!

SUBMIT OR RESPOND TO A SUPPORT TICKET HERE.

A DIVISION OF METICULOUS MARKETING LLC

Per the F.R.B.P. Rule #7001 and 11 U.S.C. § 363(h)(3) the bankruptcy court could not legally sell our property, because it didn't meet their requirements. Neither could the Chancery Court, because the **federal courts** had both ***original*** and ***exclusive*** **jurisdiction**. The only way this was physically possible was by corruption, deprivation of rights under color of law, and similar federal and state crimes.

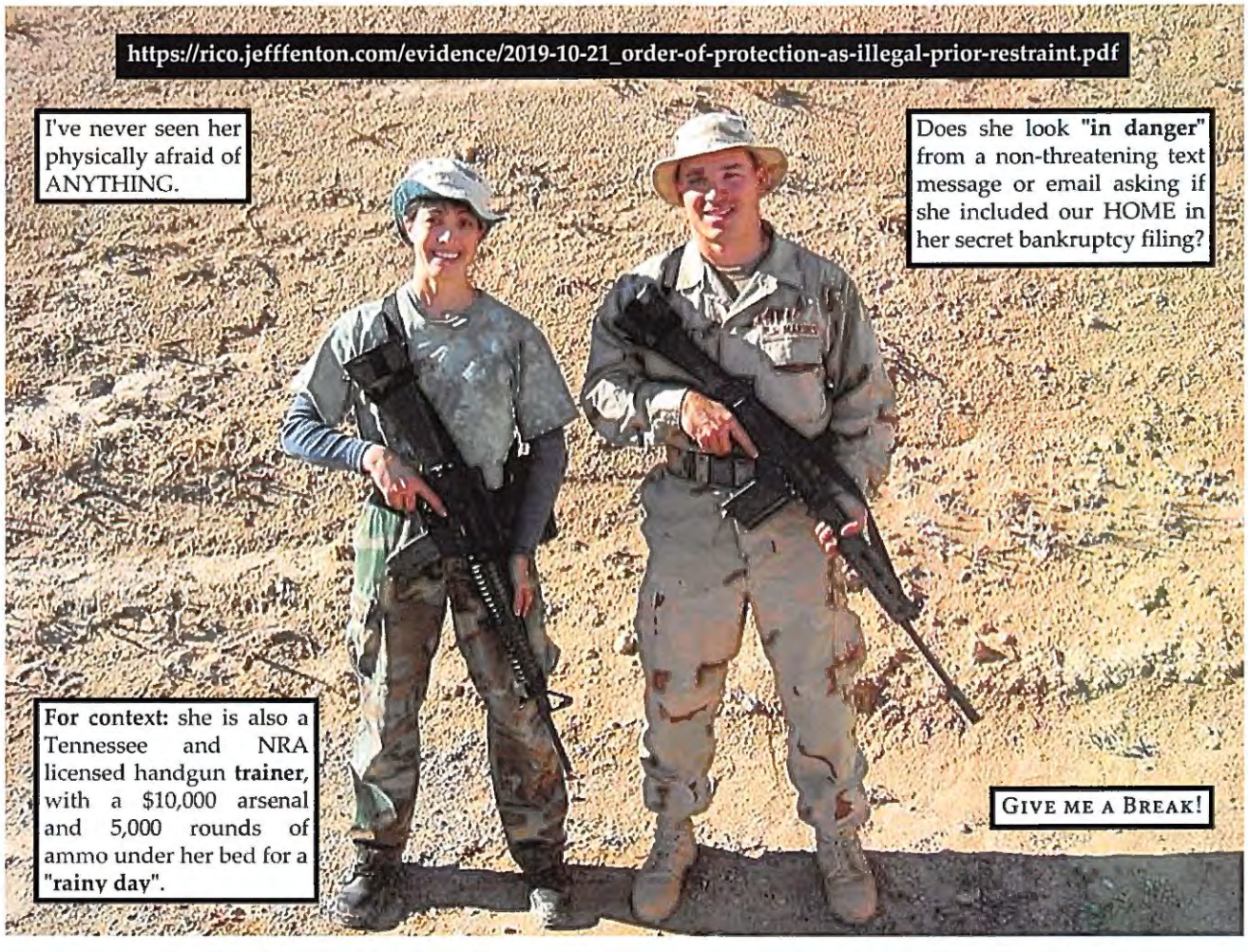
For the record, I wanted to be done communicating with Ms. Story because she unconscionably abused me repeatedly, which there are two "smoking guns" of evidence documenting in this case. But never did I want or plan to give up my right to protect myself or participate in ongoing litigation against me. My **note** offered to **sacrifice** the **money** lost in our **home** and the **alimony** which they "beat the system" to criminally cheat me out of. Never, ever, ever did I offer to forfeit my rights as a United States Citizen or to allow any judge who wasn't even willing to hear me, prior to the start of discovery, to end the divorce with default judgments against me. That is felony coercion & obstruction!



Attorney Marty Duke told me that Ms. Story agreed to a deadline extension for filing my divorce answer and counter complaint, since he and attorney Mitchell Miller were brought on to my case as emergency replacement counsel only a few days prior to my first hearing. Ms. Story and subsequently judge Binkley refused to give my counsel an extension for addressing the forced sale of my home (though they had no lawful jurisdiction, because the **federal courts** had **both *original*** and ***exclusive* jurisdiction**). Yet taking my home was clearly Attorney Story's priority during both hearings, but she did agree to an extended deadline for answering the divorce complaint. Unfortunately attorney Brittany Gates, whom I hired first, negligently failed to perform, promising me drafts of my divorce answer/counter complaint day after day, with my whole life hanging in the balance, until I was able to contact attorney Mitchell Miller, at which point I fired attorney Gates.

Meanwhile, I have never abused Ms. Fenton. She was in counseling when I met her, we went to counseling both separately and together multiple times throughout our marriage. We were involved in a few small church groups, home fellowships, with an unlimited amount of transparency and an open invitation to speak into our lives. Yet never once in my life, had I heard Ms. Fenton, a counselor, a friend, a pastor, or a church leader mention the word "abuse" related to our relationship, in any way. We both brought our own baggage into the relationship, which we each still have. However, the multiple acts of fraud which the court and counsel helped Ms. Fenton commit and become a party to, is by far the heaviest weight hanging around her neck, dragging down her physical health, while she has also had a horrible time with **menopause** for the past 7-documented years. Now her **hormone therapy** for menopause has been seriously **conflicting** with her "Xyrem", the mediation she successfully took for **narcolepsy** for over a decade (which cost insurance $11,000 per month, so I don't know if she still has access to it, since her boss retired.) Hormone therapy has prevented her from sleeping more than an hour or two at a time, waking up to constantly drenched sheets, which she had struggled with for years before moving out, to a lesser degree.

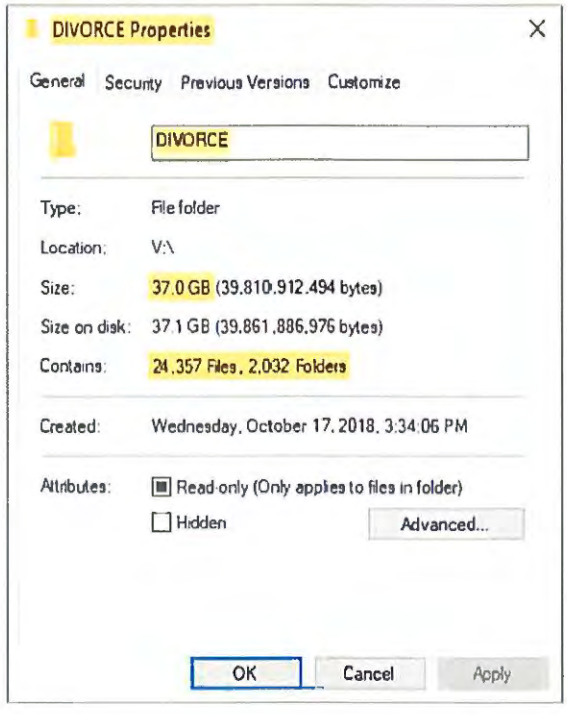
Ms. Fenton and her brother Mark at Front Sight Firearms Training Institute in Pahrump, Nevada, were they had life memberships.



We didn't sell the house because Ms. Fenton changed her mind and refused to commit on paper to the **$1,750 per month in alimony, for a duration of 6-years**, as we had both previously agreed in our "settlement agreement". Hence the false claims made by Attorney Story in an attempt to justify the forced sale of our marital residence was all "abuse by process" and fraudulent. The "no trespassing" signs which Ms. Story used to smear my name before the court were designed by Ms. Fenton at her work, using their CAD software, which I revealed in the Court of Appeals. Upon which Story was required to withdraw or disaffirm her fabricated evidence per Tenn. R. Sup. Ct. 3.3(g), yet she refused. I also included texts showing that Ms. Fenton's mother liked both our signs and security cameras, because they made her feel like Ms. Fenton was safe.

As for the "op" based upon non-threatening text messages and emails, which at the advice of her counsel, my wife decided in hindsight, that she no longer wanted to receive, though having never terminated communication with me. All that Ms. Fenton needed to do was click "block" on her cell phone. I'm not a mind reader. Clearly I had some extremely legitimate reasons for contacting her and being distressed, as she sabotaged our lives financially and then secretly filed bankruptcy, requesting to forfeit our home, yet denying me notice. Followed by incorrectly calling her credit card debts mine, when I had them almost all paid off before she decided to get divorced. Ms. Fenton used her credit cards to financially and legally bully me, hiring counsel repeatedly for malicious actions in multiple courts. I have proof of everything, but so far nobody has cared about the truth. Obviously, I had no control over any of that.

The fraudulent "op" made a ton of outrageously false claims which couldn't be further from the truth. For example, I was falsely alleged to claim that I was a *"member of the extraction team"*. Never in my life had I said those words before I read that statement absurdly woven into Story's fraudulent narrative, to *assassinate my character* before I ever entered the court. That is one of *countless* violations of professional conduct by Attorney Story.



We haven't covered 1/10th of my real evidence yet.

Attorney **Story** and Judge **Binkley** have manipulated the "**op**" to use **Ms. Fenton** as a **"human shield"** in an effort to ***protect themselves from public exposure for their own criminal misconduct***, such as that which brought two billion dollar insurance companies and a multi-million dollar Nashville roofing company to the table, with their top-tier corporate attorneys to draft up a mutually agreeable settlement with me and my wife. They paid us our judgment plus interest, plus an additional $10,000 to remove the dedicated YouTube Channel and WordPress blog which exposed both their horrible workmanship as well as their fraudulent and negligent business practices. Let me be clear, this exposure of their **bad business practices** filled 95% of the first four to six pages of Google when searching for their company. Despite my many attempts to mitigate both of our damages by trying to encourage them to pay our judgment **before I had to invest more time** trying to "make them", yet they refused. Unfortunately we both experienced exponentially greater losses as a result, which almost drove both our family and the roofing company into bankruptcy.

At the same time, Ms. Fenton had the Davidson County Sheriff's Office levy five of the roofing company's work trucks, including the owner's personal truck, to be auctioned off to pay our judgment. While they still had the audacity to hire an arrogant corporate bankruptcy attorney to try to smash *"ma and pa Fenton"* with a **motion to quash** while we represented ourselves *pro se*, with only a one or two day notice. Their bankruptcy attorney's game was that the trucks were the personal property of the owner, not business property. Fortunately I had already taken high resolutions photos at the impound lot, showing each truck in all its glory, outfitted with ladder racks, shingles, and shovels in the rear beds. Along with corporate logos on every side. We showed that the company was using **deceptive business practices**, with their assets in their personal names and their debts in their business name, while playing games with their operating capital, co-mingling funds, moving money from one bank to another. We **pierced their corporate veil** and they were ordered to pay our judgment or their trucks would be auctioned as scheduled.

Tennessee courts and counsel cannot "legally" deny me public redress for honest and incidentally criminal actions taken to forcefully deprive me of everything in my life. While even being inhumane enough to keep a fraudulent noose around my neck, from 600 miles away, without notice or hearing, preventing me from even being able to work for $10-$15 per hour from home, to help pay for my most basic essential and critical living expenses. Such as shelter/housing, soap, shampoo, shaving supplies, toilet paper, mental and physical health care, prescriptions, car insurance, auto maintenance, gas, etc... **for years.** That is not only inhumane and a violation of every oath of office, code of conduct, judicial canons, state and federal constitutions, civil and criminal laws, but it is also highly discriminatory ADA abuse, financial exploitation, coercion, harassment, extortion, retaliation, and interference of unconscionable proportions, which no state actors have immunity from.

Even the Bible says, that what is done in secret, shall be brought into the light. While this is 100% irrefutable evidence why there should be increased transparency and accountability in every court room, civil or otherwise. Why do you think it is, that the wealthiest county in the State of Tennessee, keeps no records or even cheap audio recordings of their civil hearings for transparency and protection of the people, from exactly this sort of collusion and corruption?

This is also definitive proof that no judge should hear an argument by an attorney whom they are *"friends"* with. There can be no justice in a court of "friends." This case was just two quick trials, a very complicated marriage and subsequent divorce, none of which the court or counsel cared to address, opting instead for a "decoy divorce", to take more, more quickly, than the truth would ever allow. As they say with every case of *malicious litigation* and *judicial corruption*, this is a *"case within a case"*. The inside case of my marital relationship is hardly worth rehashing. All that is there is more loss for both of us. But the outer case of how the court and counsel unconscionably violated a multitude of state and federal laws, constitutional and otherwise, along with their oaths of office, and every level of ethical care, without the slightest appearance of "impartiality". Zero "equal and due process" or even providing a means by which I could literally survive this divorce without becoming homeless, had my mother not intervened at the age of 50. When I owned a highly desirable $500k Brentwood home, which I had my life, my pre-marital 401k retirement savings, and around $20k leveraged from the equity of my own per-marital duplex and home invested into the purchase of our equally deeded marital residence as *"tenants by the entirety"*.

If it looks like a duck, if it quacks like a duck....

It is outrageously absurd to even pretend that the outcome of this case could have been caused by anything less than "close trusting friends". The damages caused by Attorney Story and Judge Binkley form the perfect argument and example for why the State of Tennessee **must** erect protections for the people, between those who **decide** the law and those who **argue** the law in their courts.

Their greed became insatiable, their cruelty unfathomable, their conduct unconscionable, and their orders inhumane.

I hope they are both **disbarred** and find themselves in **prison** cells beside **Casey Moreland**. They have proven him to be a stand-up guy in comparison. While that's not an easy thing to do.

I hope that the state or federal courts, and/or public outcry, holds the bad actors in this case fully accountable, so they can feel what I have felt at their abusive hands.

Whether in state or federal court, in Tennessee or afar, as long as Williamson County Chancery Court, Judge Michael Weimar Binkley, Attorney Virginia Lee Story, and Elaine Beaty Beeler keep a fraudulent ***noose around my neck***, without equal or due process of law, all that I can literally do each day is fight to expose their corruption, while working toward common sense legal reform throughout the state of Tennessee. Such as not allowing adversarial counsel to write court orders against *pro se* litigants, without even allowing them to participate in the proposed/agreed order process, as is allowed in some of the more ethical judicial districts in Tennessee. It's time to turn past the page of ***"plantation law"*** in Tennessee. (Based on the master/servant relationship, instead of equality, with the goal of justice.)

Right before the storm came through .... Two hard years of fighting, to get repaired and partially compensated.

Based upon the malicious litigation & judicial corruption evident in this case, I see the following changes as both justified and needed. I see no reason other than corruption to not implement these changes, which I am suggesting to the Tennessee Supreme Court:

- Be friends with whomever you want, but **no one should be allowed to hear an argument by a "friend".** Although Judge Binkley claimed that he can "separate" or compartmentalize opposing interests in his mind, he in fact did not. Not only did he fail to do so, he never came close. He lied to the people of Tennessee while Attorney Story publicly supported his unreasonable claims. Now through her greed, Attorney Story unmistakably revealed the truth. Judge Binkley & Attorney Story have perverted the judicial integrity of Williamson County. I can see no justification for the state of Tennessee continuing to ***"play with fire"*** on this issue. Without an impartial tribunal, the entire judicial system is of no value to the people of Tennessee. It becomes an overwhelming evil power yielded by a select few, who were chosen to serve the people, but instead serve themselves along with undisclosed interests.

- It is time to quit asking a man *"if he can fly"*, when by **simple human nature** none of us *"can fly"*. Judges are not *"super humans"*. If they tell us that they are, we need to send them in for psychological evaluations, question their motives for such irrationalness, caring more about their own **entertainment** and **recreation** than the **integrity** and **impartiality** of the **judiciary** throughout our state and country. That is a clear violation of the judicial canons, and I don't know why it hasn't been fixed yet. But now I believe they have pushed the issue into **absurd clarity**.

- The Williamson County Chancery Court told me on a recorded phone conversation that the only reason there is an ADA number at the bottom of their court summonses, is in case someone needs a wheelchair brought out curbside to help them get from their vehicle into the courthouse. Insisting that beyond that, no other ADA modifications are available or provided. That is a stark violation of Tennessee's Administrative Policy Index #2.07, along with the American with Disabilities Act.

- Chancery told me in the same recorded phone call, that there aren't any forms or information available for *pro se* parties. Repeatedly recommending that I hire an attorney instead. I think that is a wonderful idea, but my wife secretly blocked me out of all of our active marital income and credit lines. Repeatedly recommending that someone do something which is not within their means is not helpful.

- I believe that the literature, signage, about the "justice for all" program, TNCourts.gov, and ADA forms should be uniform in every courthouse in the state of Tennessee.

- Furthermore, I do not believe that judicial districts should be allowed to make any "rules" which could in turn discriminate against a people group. Whether that is "socioeconomic" (it seems that I've read that term somewhere), due to disability, or just because they don't want to lose their life's savings to someone who charges 25x more per hour than they can earn.

- I came up with a nifty little tag line, "**where transparency and accountability are stifled, corruption thrives.**" If I have my way, then Attorney Story will have created her own worst nightmare, by improving the judicial integrity of the state of Tennessee.

- Along with another common sense saying (no "sense" is "common"), *"there can be no justice in a court of friends"*.

- Catchy, eh?

- Ok, I've got to get this on its way. Please forgive the magnitude by which I'm overwhelmed, but then I have disabilities, which have been intentionally exploited by multiple compromised members of high repute, power, and authority. I may be expected to write a brief and stand up against another man or woman, but surely I'm afforded some protections from corruption under the laws of this great land. *(If not, that needs to change.)*

- Let's finish this up here, fairly and justly. Never again inside a Williamson County Courtroom. If this matter must be escalated to federal district court for bankruptcy fraud or Attorney Story's other crimes against me "under color of law", then she will have really made herself out to be a rank member of the court, working in the exact opposite of her *fiduciary duties* and her client's best interests, solely to continue abusing the disadvantaged and disabled party which she has unconscionably harassed, stalked, and abused.

DUE TO COVID-19

I NEED to get a JOB from HOME

Because of my Mother's Health

Which I CAN'T DO with this STUPID OP!

Please have the OP REMOVED and EXPUNGED or Start Sending Me

SUPPORT PLEASE!

ASTHMA, ALLERGY AND IMMUNOLOGY CENTER

S. Anne, M.D. R. Botta, M.D. I. Badr, M.D. R. Mahajan, M.D. H. Azzam, M.D.

Patient Name: Marsha Fenton
Visit Date: 7/2/2020

Thank you very much for letting me participate in the management of Marsha Fenton, who was seen by telephone consultation on 07/02/20. Marsha states that her IgA deficiency has been stable. She denies any upper or lower respiratory tract infection. She has been following strict avoidance measures from exposing to the COVID-19 infection. She is wearing the mask. She is staying home. Her son also stays with her, who is not working at this time. She denies any fever, chills, or rigors. She denies any upper or lower respiratory tract infection.

PHYSICAL EXAMINATION: Deferred at this time since this was done by telephone consultation.

IMPRESSION: Ms. Marsha Fenton has:
1. IgA deficiency, and
2. Chronic rhinosinusitis.

RECOMMENDATIONS:
1. Marsha is prone to develop recurrent infections. Therefore, I advised her to follow strict isolation measures from exposure to COVID-19 infection.
2. Since her son stays with Marsha, I strongly recommend that her son should do his work from home since it will reduce significantly the risk of exposure of Ms. Fenton to the COVID-19 virus.
3. A follow-up appointment has been scheduled in one year but I advised her to contact me as soon as the pandemic is over for further evaluation and treatment.

Signed Electronically By Suresh Anne, MD
Signed Date: 7/3/2020 9:16:00 AM

E-Faxed to Ravikumar Peddireddy, MD On 7/3/2020 9:16:00 AM

MORE EVIDENCE:

https://rico.jefffenton.com/evidence/2019_tn-court-motions-in-chronological-order.pdf
https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3
https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf
https://rico.jefffenton.com/evidence/2021-12-02_fbi-mark-shafer-binkley-story-corruption.mp3
https://rico.jefffenton.com/evidence/2023-12-13_wcso-racketeering-official-oppression.pdf

THE UNIVERSAL DECLARATION OF Human Rights

WHEREAS *recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world,*

WHEREAS *disregard and contempt for human rights have resulted in barbarous acts which have outraged the conscience of mankind, and the advent of a world in which human beings shall enjoy freedom of speech and belief and freedom from fear and want has been proclaimed as the highest aspiration of the common people,*

WHEREAS *it is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the rule of law,*

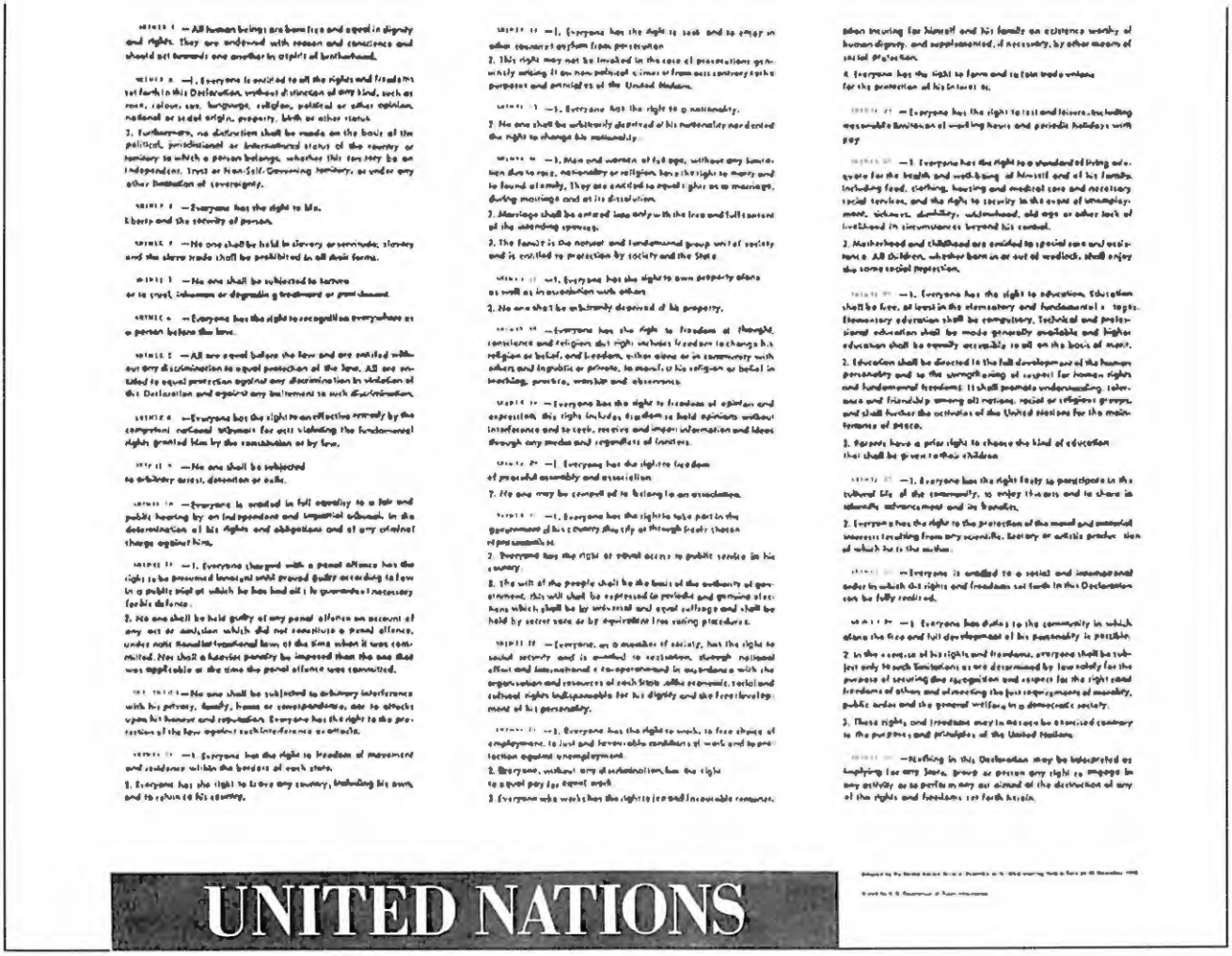
WHEREAS *it is essential to promote the development of friendly relations among nations,*

WHEREAS *the peoples of the United Nations have in the Charter reaffirmed their faith in fundamental human rights, in the dignity and worth of the human person and in the equal rights of men and women and have determined to promote social progress and better standards of life in larger freedom,*

WHEREAS *Member States have pledged themselves to achieve, in co-operation with the United Nations, the promotion of universal respect for and observance of human rights and fundamental freedoms,*

WHEREAS *a common understanding of these rights and freedoms is of the greatest importance for the full realisation of this pledge,*

NOW THEREFORE THE GENERAL ASSEMBLY
PROCLAIMS *this Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance, both among the peoples of Member States themselves and among the peoples of territories under their jurisdiction.*



UNITED NATIONS

Truly,

Jeff Fenton
17195 Silver Parkway, #150
Fenton, MI 48430-3426
Phone: (615) 837-1300

https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf
https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4
https://rico.jefffenton.com/evidence/2024-01-12_irrefutable-proof-of-criminal-conspiracy.pdf
https://rico.jefffenton.com/evidence/2024-01-18_binkley-disqualification-for-bias-coercion.pdf

Brian Manookian is the attorney *whistle blower* who first reported the misconduct of **Judge Casey Moreland** to the Tennessee Board of Judicial Conduct, before the **FBI** arrested him. If Attorney Manookian is also the party who reported that Judge Michael W. Binkley lied to the public when he ran for office, then Brian Manookian deserves an award for integrity and should be **protected** by the State of Tennessee and the Tennessee Supreme Court as a ***whistle blower*** (if either cares at all about honesty & integrity in Tennessee's judiciary).

The message this sends currently to the Middle Tennessee legal profession is both unmistakable and a stark violation of Tennessee's own constitution, **"don't turn in corrupt members of the court, especially judges, or the State of Tennessee's legal apparatus will retaliate against you and revoke your license to practice law."**

That is unconscionable and near "treason" by those running Tennessee and her courts to allow. Not correcting such criminal racketeering through branches of the Tennessee Supreme Court, devalues the integrity of the institution with each day and mocks the very purposes for which our courts exist and are trusted to serve in society. This further reinforces the view that our courts are beyond reasonable reform or repair, proving to the public that those in power cherish their power more than any common good or service to the people.

If private attorneys can't get justice and instead remain under the thumbs of unconstitutionally oppressive government corruption, for fear of losing their own livelihoods, **then there is no cure left.** Law enforcement is overwhelmed and refuses to pursue or prioritize public integrity/corruption cases, while refusing to even allow victims to file criminal complaints against corrupt members of government and the courts. Now the high court's boards of conduct have been infiltrated by people who are sympathetic to, actively involved in, or afraid to confront corruption instead of being devoted to fighting corruption in alignment with their oaths of office. That's unacceptable.

This case seeks a jury trial to hold the State of Tennessee accountable for mis-allocating public resources toward the protection, cover-up, and advancement of criminal agendas, power structures, and enterprises, while betraying public trust.

June 30, 2020

Re: IGA deficiency

In October, 2014, I was referred by my Internal Medicine Dr. Peddireddy to consult with Dr. Suresh Anne at the Asthma, Allergy, and Immunology Center in Flint MI. I was diagnosed with a primary immune deficiency. I have no detectable immunoglobulin A (IgA).

Dr. Anne told me I could no longer visit hospital patients or work in any part of the hospital. As a retired pediatric intensive care nurse, I had wanted to volunteer to work with children. I had to retire from my voluntary parish nurse position. I could no longer visit ill church members at home due to the danger of contracting an infection.

This was over 5 years before the dangerous covid-19. I have not gone to a store, church, hair salon, etc. since, due to the danger to my health. All food and supplies are delivered. None of my family is allowed to visit.....only my son who helps me maintain my health. If he gets exposed, I could easily have a disastrous outcome.

Thank you,

Marsha A. Fenton

Marsha A. Fenton

Name: Marsha A Fenton | DOB: [redacted] | MRN: 027467957 | PCP: RAVIKUMAR R PEDDIREDDY, MD

Letter Details

MICHIGAN MEDICINE
UNIVERSITY OF MICHIGAN

Michigan Medicine Allergy Clinic | Brighton Center for Specialty Care
Entrance 1, Level 2
7500 Challis Rd
Brighton MI 48116-9416
Telephone: 734-647-5940
Fax: 734-615-2436

January 13, 2022

To Whom It May Concern:

I had the pleasure of seeing Marsha Fenton on 12/10/2021. She is currently undergoing evaluation for immunodeficiency. I have recommended that she continue to take all precautions recommended for unvaccinated people given it is unclear whether she was able to produce a normal immune response to the COVID-19 vaccines and may not be protected. Therefore, if possible her son Jeff Fenton should continue to work remotely in order to avoid COVID-19 exposures for Marsha.

Any further questions can be directed to the office at the phone number listed above.

From the office of:
Mariel Rosati Benjamin, MD

CC
Marsha A. Fenton

This letter was initially viewed by Marsha A Fenton at 1/13/2022 3:44 PM.

MyChart® licensed from Epic Systems Corporation © 1999 - 2022 - PRD4

ASTHMA, ALLERGY AND IMMUNOLOGY CENTER

S. Anne, M.D. R. Botta, M.D. I. Badr, M.D. R. Mahajan, M.D. H. Azzam, M.D.

Patient Name: Marsha Fenton
DOB: [redacted] [74 years]
Visit Date: 7/2/2020

Ravikumar Peddireddy, M.D.
G-1071 North Ballenger Highway, Suite 206
Flint, MI 48504

Dear Dr. Peddireddy:

Thank you very much for letting me participate in the management of Marsha Fenton, who was seen by telephone consultation on 07/02/20. Marsha states that her IgA deficiency has been stable. She denies any upper or lower respiratory tract infection. She has been following strict avoidance measures from exposing to the COVID-19 infection. She is wearing the mask. She is staying home. Her son also stays with her, who is not working at this time. She denies any fever, chills, or rigors. She denies any upper or lower respiratory tract infection.

PHYSICAL EXAMINATION: Deferred at this time since this was done by telephone consultation.

IMPRESSION: Ms. Marsha Fenton has:
1. IgA deficiency, and
2. Chronic rhinosinusitis.

RECOMMENDATIONS:
1. Marsha is prone to develop recurrent infections. Therefore, I advised her to follow strict isolation measures from exposure to COVID-19 infection.
2. Since her son stays with Marsha, I strongly recommend that her son should do his work from home since it will reduce significantly the risk of exposure of Ms. Fenton to the COVID-19 virus.
3. A follow-up appointment has been scheduled in one year but I advised her to contact me as soon as the pandemic is over for further evaluation and treatment.

Once again, thank you very much for letting me participate in the management of Marsha Fenton. Please do not hesitate to contact me if you need any further information.

Respectfully,

Suresh Anne', M.D.

Signed Electronically By Suresh Anne, MD
Signed Date: 7/3/2020 9:16:00 AM

E-Faxed to Ravikumar Peddireddy, MD On 7/3/2020 9:16:00 AM

5155 Norko Drive
Flint, MI 48507

801 Joe Mann Blvd
Suite L
Midland, MI 48642

818 W King St.
Suite 101
Owosso, MI 48867

1254 N. Main Street
Lapeer, MI 48446

4792 Rochester Rd
Troy, MI 48084

18161 W. Thirteen Mile Rd.
Suite C
Southfield, MI 48076

46325 W. 12 Mile Rd.
Suite 215
Novi, MI 48377

Lab Results Report

Asthma, Allergy and Immunology Center

Patient: FENTON, MARSHA DOB: [redacted] Gender: F

Order Number: 0011494
Account #: 45961
Collection Time: 05/10/2018 10:43
Received Time: 05/10/2018 10:44
Specimen:
Comments:

Provider: ANNE, SURESH
Source (Lab): Quest
Result Time: 05/11/2018 19:07
Accession #: WX534222V
Volume (ml):
Additional Information:

Fasting: NO

Test	Result	Flag	Unit	Status	Ref. Range	Lab
IMMUNOGLOBULINS :						
IMMUNOGLOBULIN A	<5	L	mg/dL	F	81-463	CB
IMMUNOGLOBULIN G	1494		mg/dL	F	694-1618	CB
IMMUNOGLOBULIN M	68		mg/dL	F	48-271	CB

Performing Laboratory Information:

CB Quest Diagnostics-Wood Dale, 1355 Mittel Blvd Wood Dale, IL 60191-1024, , Anthony V Thomas, M.D.

Abnormal Flags:

L Below low normal

Page 1 of 1 (5/15/2018 1:40:47 PM)

DUE TO COVID-19

I NEED to get a JOB from HOME
Because of my Mother's Health
Which I CAN'T DO with this STUPID OP!
Please have the OP REMOVED and EXPUNGED or Start Sending Me
SUPPORT PLEASE!

ASTHMA, ALLERGY AND IMMUNOLOGY CENTER

S. Anne, M.D. R. Botta, M.D. I. Badr, M.D. R. Mahajan, M.D. H. Azzam, M.D.

Patient Name: Marsha Fenton
Visit Date: 7/2/2020

Thank you very much for letting me participate in the management of Marsha Fenton, who was seen by telephone consultation on 07/02/20. Marsha states that her IgA deficiency has been stable. She denies any upper or lower respiratory tract infection. She has been following strict avoidance measures from exposing to the COVID-19 infection. She is wearing the mask. She is staying home. Her son also stays with her, who is not working at this time. She denies any fever, chills, or rigors. She denies any upper or lower respiratory tract infection.

PHYSICAL EXAMINATION: Deferred at this time since this was done by telephone consultation.

IMPRESSION: Ms. Marsha Fenton has:
1. IgA deficiency, and
2. Chronic rhinosinusitis.

RECOMMENDATIONS:
1. Marsha is prone to develop recurrent infections. Therefore, I advised her to follow strict isolation measures from exposure to COVID-19 infection.
2. Since her son stays with Marsha, I strongly recommend that her son should do his work from home since it will reduce significantly the risk of exposure of Ms. Fenton to the COVID-19 virus.
3. A follow-up appointment has been scheduled in one year but I advised her to contact me as soon as the pandemic is over for further evaluation and treatment.

Signed Electronically By Suresh Anne, MD
Signed Date: 7/3/2020 9:16:00 AM

E-Faxed to Ravikumar Peddireddy, MD On 7/3/2020 9:16:00 AM

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

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

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

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

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

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

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

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

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

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

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

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

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

Dated: 01/09/2021

By: /s/ John C. McLemore
Trustee

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

EXHIBITS TO
FINAL ACCOUNT

EXHIBIT 1 – GROSS RECEIPTS

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

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

EXHIBIT 2 – FUNDS PAID TO DEBTOR & THIRD PARTIES
NONE

EXHIBIT 3 – SECURED CLAIMS
NONE

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

EXHIBIT 4 – CHAPTER 7 ADMINISTRATIVE FEES and CHARGES

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

EXHIBIT 5 – PRIOR CHAPTER ADMINISTRATIVE FEES and CHARGES
NONE

EXHIBIT 6 – PRIORITY UNSECURED CLAIMS

CLAIM	CLAIMANT	UNIFORM	CLAIMS	CLAIMS	CLAIMS	CLAIMS

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

EXHIBIT 7 – GENERAL UNSECURED CLAIMS

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

FORM 1
INDIVIDUAL ESTATE PROPERTY RECORD AND REPORT
ASSET CASES

 Exhibit 8

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

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

1		2	3	4	5	6
	Asset Description (Scheduled and Unscheduled (u) Property)	**Petition/ Unscheduled Value**	**Estimated Net Value (Value Determined by Trustee, Less Liens, Exemptions, and Other Costs)**	**Property Abandoned OA =§ 554(a) abandon.**	**Sales/Funds Received by the Estate**	**Asset Fully Administered (FA)/ Gross Value of Remaining Assets**
Ref. #						
1	2017 Toyota Prius Mileage: 30,000 Other Information: VIN: [redacted]	$14,500.00	$6,188.16		$4,400.00	FA
2	Sofa, Rugs, End Table, Coffee Table, Bedroom Suite, Bookshelves, Gun Safe, Table & Chairs, Toaster, Pots & Pans, Misc. Household items	$1,420.00	$0.00		$0.00	FA
3	TV, Tablet	$575.00	$0.00		$0.00	FA
4	Breyer Horses	$450.00	$0.00		$0.00	FA
5	AR15, FN-FAL, Glock 23, Rugger SP101	$2,750.00	$50.00		$0.00	FA
6	Clothing/Shoes/Purse	$500.00	$0.00		$0.00	FA
7	Wedding Ring $1500 and Costume jewelry	$1,200.00	$300.00		$0.00	FA
Asset Notes:	Jeweler said worth $300. Burdensome Asset.					
8	Dog, 2 Bunnies, Fish	$0.00	$0.00		$0.00	FA
9	Items in storage Books, Luggage, Pet Supplies, Christmas Decorations	$435.00	$0.00		$0.00	FA
10	2 Aquarium located at 102 Plum Nelly Circle	$425.00	$0.00		$0.00	FA
11	Cash	$200.00	$0.00		$0.00	FA
12	Checking First Farmers & Merchants	$1,349.36	$0.00		$0.00	FA
13	Checking Ascend Federal CU	$0.00	$0.00		$0.00	FA
14	Savings First Farmers & Merchants	$1,350.65	$0.00		$0.00	FA
15	Savings Ascend Federal CU	$272.60	$0.00		$0.00	FA
16	Checking MIT FCU (u)	$255.00	$0.00		$0.00	FA
17	Savings MIT FCU (u)	$200.55	$0.00		$0.00	FA
18	Cellphone, Laptop (u)	$550.00	$0.00		$0.00	FA
TOTALS (Excluding unknown value)		**$26,433.16**	**$6,538.16**		**$4,400.00**	**Gross Value of Remaining Assets $0.00**

Major Activities affecting case closing:
07/21/2020 Filed Amended Claims Recommendation.

FORM 1
INDIVIDUAL ESTATE PROPERTY RECORD AND REPORT
ASSET CASES

Exhibit 8

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

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

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

07/07/2020 PC with Virginia Story 615-790-1778 who represents the Debtor in her Williamson County Divorce (Judge Binkley)
07/02/2020 PC from Jeff Fenton?? Debtor's former husband talked with him for more than 30 minutes.
05/27/2020 Filed Mt to Allow/Disallow Claims.
05/13/2020 Email to Jodie Thresher re: claims.
04/15/2020 Fawn Fenton picked up her ring.
04/01/2020 Email to Jody Thresher and Mary Beth Ausbrooks about Debtor's ring
03/19/2020 Filed Report of Sale.
03/19/2020 Jeweler said diamond ring and wedding band was worth $300. Burdensome asset. Will return ring to Debtor.
02/19/2020 Gave diamond ring and wedding band to Bobby Colson who will get a valuation.
02/10/2020 Filed Mt to Sell Equity in Vehicle to Debtor for $4,400.
02/03/2020 Claims bar 5/4/2020.
01/30/2020 Debtor wants to buy equity in vehicle
01/30/2020 Email to Jodie Thresher about wedding ring.
01/28/2020 Calculation of value of equity in 2017 Toyota Prius
01/20/2020 PC with Paul Spina counsel for Toyota Motor Credit.
01/08/2020 Email from Jodie Thresher, Debtor's attorney - Just wanted to give you a heads up that we will be filing an Amended Schedule A/B and C on this case.
01/07/2020 Email to Mary Beth - John told Ms. Fenton yesterday that he would like an independent valuation of her 2017 Toyota Prius. See attached instructions to forward to your client.

Initial Projected Date Of Final Report (TFR):

Current Projected Date Of Final Report (TFR):

/s/ JOHN C. MCLEMORE
JOHN C. MCLEMORE

FORM 2

Exhibit 9

CASH RECEIPTS AND DISBURSEMENTS RECORD

Case No.	19-02693-CW3-7	**Trustee Name:**	John C. McLemore
Case Name:	FENTON, FAWN [redacted]	**Bank Name:**	Pinnacle Bank
Primary Taxpayer ID #:	**-***41[redacted]	**Checking Acct #:**	******0194
Co-Debtor Taxpayer ID #:		**Account Title:**	
For Period Beginning:	4/26/2019	**Blanket bond (per case limit):**	$720,000.00
For Period Ending:	1/9/2021	**Separate bond (if applicable):**	

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

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

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

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

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

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

FORM 2

Exhibit 9

CASH RECEIPTS AND DISBURSEMENTS RECORD

Case No.	19-02693-CW3-7	**Trustee Name:**	John C. McLemore
Case Name:	FENTON, FAWN [redacted]	**Bank Name:**	Pinnacle Bank
Primary Taxpayer ID #:	**-***41[redacted]	**Checking Acct #:**	******0194
Co-Debtor Taxpayer ID #:		**Account Title:**	
For Period Beginning:	4/26/2019	**Blanket bond (per case limit):**	$720,000.00
For Period Ending:	1/9/2021	**Separate bond (if applicable):**	

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

TOTAL - ALL ACCOUNTS	NET DEPOSITS	NET DISBURSE	ACCOUNT BALANCES
	$4,400.00	$4,400.00	$0.00

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

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

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

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

/s/ JOHN C. MCLEMORE

JOHN C. MCLEMORE

Jeff Fenton

From: Mary Beth Ausbrooks <marybeth@rothschildbklaw.com>
Sent: Wednesday, January 27, 2021 11:53 AM
To: Jeff Fenton; Jim Hivner; Lisa Marsh; appellatecourtclerk; elaine.beeler@tncourts.gov; john.coke@tncourts.gov
Cc: Virginia Story; Kathryn Yarbrough; complaints@tbpr.org
Subject: RE: TN Courts: Help Request Form - Appeal to Supreme Court (REQUEST TO ESCALATE CASE FROM APPELLATE TO SUPREME COURT)

My representation was limited to the bankruptcy filing of Fawn Fenton, and that representation is complete. I am not involved in any of this. Please remove me from the emails.

Mary Beth Ausbrooks
Attorney at Law
Board Certified Consumer Bankruptcy Specialist
Fellow, American College of Bankruptcy
Rothschild & Ausbrooks, PLLC
1222 16th Ave. So., Ste. 12
Nashville, TN 37212
(615) 242-3996
Fax: (615) 690-3119

From: Jeff Fenton
Sent: Wednesday, January 27, 2021 10:40 AM
To: Jim Hivner <Jim.Hivner@tncourts.gov>; Lisa Marsh <Lisa.Marsh@tncourts.gov>; appellatecourtclerk <appellatecourtclerk@tncourts.gov>; elaine.beeler@tncourts.gov; john.coke@tncourts.gov
Cc: Virginia Story <virginia@tnlaw.org>; Kathryn Yarbrough <kyarbrough@tnlaw.org>; Mary Beth Ausbrooks <marybeth@rothschildbklaw.com>; complaints@tbpr.org
Subject: RE: TN Courts: Help Request Form - Appeal to Supreme Court (REQUEST TO ESCALATE CASE FROM APPELLATE TO SUPREME COURT)

Hello Mr. Hivner and Everyone Else,

I've significantly consolidated and updated my filing to the Tennessee Supreme Court and the Tennessee Board of Professional Responsibility.

Please download the latest package with one of the links below.

PLEASE USE THIS UPDATED LINK: https://1drv.ms/u/s!AlWyAYYGDEXa6lFyKIV2wOy_ya-Q?e=rJXI8c

This same information is also available on my SECURE (Password Protected) website, intended to improve communication with the Court and other supervisory/regulatory/judicial/law enforcement agencies at the URL below:

- https://tennesseecitizen.com/media/2021-01-27_supreme-court.zip