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

JEFFREY RYAN FENTON,	)	
	)	
Plaintiff,	)	
	)	**Case No. 3:24-cv-01282**
v.	)	**District Judge Campbell**
	)	**Magistrate Judge Holmes**
VIRGINIA LEE STORY, ET AL.,	)	
	)	
Defendants.	)	

MOTION TO EXTEND TIME TO FILE ANSWER
OR OTHER RESPONSIVE PLEADING

Come now Defendants[1], Williamson County, Tennessee and Williamson County Sheriff's Office and moves for an extension of time to file an answer or other responsive pleading in this case. In support of this motion, counsel would state that this case was transferred to this court from the Western District of Michigan on October 25, 2024. These Defendants have a currently pending Motion to Dismiss the case based on jurisdiction and venue issues (Doc. 78) that has likely been rendered moot by the transfer[2], but other grounds for dismissal exist. Counsel would state that additional time

[1] Counsel for the moving Defendants has also filed an appearance for limited purposes on behalf of Elaine Beeler, a former appointed official of Defendant Williamson County, while reserving all defenses including inadequacy of service. Ms. Beeler has not been served with process in this matter, does not waive service of process, and is therefore not a party to this motion for extension of time since her time to file a responsive pleading is not yet running.

[2] It is not clear to these Defendants whether the currently pending Motion to Dismiss related to venue and personal jurisdiction, which is likely moot, impacts the timing of their responsive pleading upon transfer. Accordingly, they file this Motion out of an abundance of caution.

is necessary to prepare a responsive pleading addressing these other grounds for dismissal of Plaintiff's allegations.

For the foregoing reason, Defendants Williamson County, Tennessee and Williamson County Sheriff's Office request an extension to November 22, 2024 in which to file an answer or other responsive pleading. Because of Plaintiff's pro se status, Defendants ask to be excused from the consultation requirement of the local rules.

Respectfully submitted,

/s/Lisa M. Carson
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been filed and delivered via U.S. mail on October 31, 2024 to the following:

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I certify that a true and exact copy of the foregoing has been forwarded via the Court's electronic filing system on October 31, 2024 to the following:

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