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

JEFFREY RYAN FENTON, PLAINTIFF v. **VIRGINIA LEE STORY ET AL.,** DEFENDANTS	**CASE NO. 3:24-CV-01282**

RECEIVED
MAR 0 3 2025
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

NOTICE, DECLARATION, AND MOTION TO AMEND THE NAMING OF DEFENDANT "SPRAGINS, BARNETT & COBB, PLC" IN THIS LAWSUIT AND TO COMPEL THEM TO MAKE AN APPEARANCE IN THIS MATTER[1]

Plaintiff brings this testimony and motion pursuant to 28 U.S. Code § 1746; Mich. Ct. R. 2.105[2]; F.R.Civ.P. 4[3](h)(1)(A), 15[4](a[5])(2[6]), 15(c[7]); U.S. Const. amend V and amend XIV.

I, Jeffrey Ryan Fenton, declare under oath as follows:

1. I am the plaintiff in this federal lawsuit, domiciled in Genesee County, Michigan.

2. I am a citizen of the United States of America, born in Washington State.

---

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

[2] https://www.courts.michigan.gov/siteassets/rules-instructions-administrative-orders/michigan-court-rules/court-rules-book-ch-2-responsive-html5.zip/index.html

[3] https://www.law.cornell.edu/rules/frcp/rule_4

[4] https://www.law.cornell.edu/rules/frcp/rule_15

[5] Amendments Before Trial

[6] Other Amendments

[7] Relation Back of Amendments

PRO SE LITIGANT – MERITS RULE OVER TECHNICALITIES

3. I am acting in a *pro se* capacity in this lawsuit by necessity and entitled to a liberal reading and less stringent standards since my filings have been prepared without assistance of counsel. See *Haines v. Kerner,* 404 U.S. 519, 92 S. Ct. 594 (1972).

PARTY: SPRAGINS, BARNETT & COBB, PLC

4. One of the defendants in this lawsuit is a law firm by the name of SPRAGINS, BARNETT & COBB, PLC (hereinafter "SBC"), which has SOS Control # 000334328, according to the Tennessee Secretary of State, Division of Business Services, as shown in the Proof of Service filed concurrently with this motion.

5. This company is registered as an active, domestic, professional limited liability company, which is member managed.

6. According to the filing information with the Tennessee Secretary of State, "Alan Rheney"is the registered agent for this company, with an address of 312 E Lafayette ST, Jackson, TN 38301-6220.

Registered Agent Address:	Principal Address:
ALAN RHENEY	SHELBY THOMAS
312 E LAFAYETTE ST	312 E LAFAYETTE ST
JACKSON, TN 38301-6220	JACKSON, TN 38301-6220

7. The principal address for this company lists the same street address, with the name "Shelby Thomas" associated with it.

8. Spragins, Barnett & Cobb, PLC (TN SOS Control #000334328).

TYPOGRAPHICAL ERRORS INVOLVING THE NAMING OF SBC

9. On page 1[8] of my original complaint[9] filed in case 1:23-cv-01097 in the United States District Court for the Western District of Michigan on 10/13/2023, I included an *extra comma* after the word "BARNETT", prior to the ampersand symbol, otherwise naming the company correctly as a defendant in my complaint. Hence "SPRAGINS, BARNETT, & COBB, PLC" should be "SPRAGINS, BARNETT & COBB, PLC".

10. On page 3[10] of that same complaint, I accidentally added an extra "T" in the middle of the word "BARNETT" (naming it incorrectly "BARTNETT"), while repeating the *extra comma* between that word and the following ampersand symbol, also using an incorrect abbreviation for the business entity type, showing "PLCNS" when it was in fact a "PLC", which I obviously mistakenly misnamed.

11. Therefore, the naming of this defendant on page 3[11] of my original complaint, which states "Spragins, Bartnett, & Cobb, PLCNS" is an incorrect, unintentional, misspelling and typographical error. This was purely an accidental oversight, which was simply missed until it was recently discovered while making multiple attempts to serve this defendant.

12. Apparently I used the information on page 3 of my original complaint, when I prepared the summons for SBC filed in DOC 16-1[12], PID 2307, because that repeats the same naming errors and mistakes, by incorrectly calling the company "Spragins, Bartnett, & Cobb, PLCNS", when it should have been "Spragins, Barnett & Cobb, PLC".

---

[8] DOC 1, PID 1 | https://rico.jefffenton.com/3-24-cv-01282/doc/1.pdf

[9] DOC 1, PID 1-33 | https://rico.jefffenton.com/3-24-cv-01282/doc/1.pdf

[10] DOC 1, PID 3 | https://rico.jefffenton.com/3-24-cv-01282/doc/1.pdf

[11] DOC 1, PID 3 | https://rico.jefffenton.com/3-24-cv-01282/doc/1.pdf

[12] DOC 16-1 | PID 2307 | https://rico.jefffenton.com/3-24-cv-01282/doc/16-1.pdf

13. When I filed my "AMENDED COMPLAINT FOR TORTIOUS CONDUCT AND INJUNCTIVE RELIEF[13]" (hereinafter "FAC") on August 21, 2024, in DOC 66, PID 4870-5007, I repeated the typographical errors, having not yet realized my mistakes.

14. On the first[14] page of my FAC, I included an *extra comma* after the word "BARNETT", prior to the ampersand symbol, otherwise naming the company correctly as a defendant in my complaint. Again, "SPRAGINS, BARNETT, & COBB, PLC" should be "SPRAGINS, BARNETT & COBB, PLC". Similarly on page 5[15] of my FAC, I incorrectly misnamed the defendant again as "Spragins, Bartnett, & Cobb, PLCNS".

15. Below is an excerpt showing how SBC was named on the summons executed by the United States District Court for the Western District of Michigan on August 19, 2024:

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Spragins, Bartnett, & Cobb, ~~PLCNS~~ PLC ← Court Clerk Corrected
312 East Lafayette Street
Jackson, TN 38301

16. The court clerk crossed out "PLCNS" with a blue ink pen and wrote by hand above it, "PLC". Unfortunately, the accidental letter "t" was still included in the middle of "Barnett" (incorrectly naming it "Bartnett"), while repeating the *extra comma* between that word and the following ampersand symbol.

17. Again, the intent was always to refer to this company by the **same** name, that being their official legal name, "SPRAGINS, BARNETT & COBB, PLC" as registered with the

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

[14] DOC 66, PID 4870 | https://rico.jefffenton.com/3-24-cv-01282/doc/66.pdf

[15] DOC 66, PID 4874 | https://rico.jefffenton.com/3-24-cv-01282/doc/66.pdf

Tennessee Secretary of State, for SOS Control #000334328. Anything contrary to this was simply an accidental misspelling and typographical error.

18. Any and all variants of this spelling in every document filed in this lawsuit, is referring to "SPRAGINS, BARNETT & COBB, PLC", as registered with the Tennessee Secretary of State, for SOS Control #000334328.

19. Having a company name as unique and unusual as SBC, I would expect most people to reasonably connect the dots and understand that this was simply an accidental misspelling and oversight. That the plain intent of the language in my lawsuit, complaint, and summons involves and refers to "SPRAGINS, BARNETT & COBB, PLC". For some reason though, so far SBC has failed or refused to make an appearance in this matter, despite the fact they have been successfully served twice, with delivery restricted to the registered agent, "Alan Rheney", precisely as specified in their filing information with the Tennessee Secretary of State.

20. For that reason, I am filing this document and mailing a copy directly to SBC, in an attempt to correct both the court record and to make my intentions crystal clear, that SPRAGINS, BARNETT & COBB, PLC, as listed with the Tennessee Secretary of State, with SOS Control #000334328 is being sued in this lawsuit and should make an appearance in this matter, if they have any desire or duty to defend themselves or their company from damages which they contributed to causing myself and my family, which they are financially, ethically, and legally responsible for.

21. Below is an image taken from the court docket in this lawsuit using PACER, showing how the court clerk has this defendant currently listed:

> **defendant**
>
> **Spragins, Barnett & Cobb PLC**
> *also named as Spragins, Bartnett & Cobb, PLCNS in complaint*

22. This was one of the clues about this typographical inconsistency (error/mistake) in my filings, which caught my attention, and upon further research I discovered the mistakes detailed herein.

23. There's not much more to say about this. It was a simple typographical error/mistake. An accidental misspelling of SBC's company name, in both my original complaint[16], my FAC[17], and in the summonses drafted[18], executed[19], and served to SBC.

24. Consequently, every mention of "SPRAGINS, BARNETT & COBB, PLC", "SPRAGINS, BARNETT, & COBB, PLC", "SPRAGINS, BARTNETT, & COBB, PLCNS", and as abbreviated "SBC" and "SB&C", filed by myself in both docket 1:23-cv-01097 in the United States District Court for the Western District of Michigan and docket 3:24-cv-01282 in the United States District Court for the Middle District of Tennessee refers to this **same** business entity, that being **"SPRAGINS, BARNETT & COBB, PLC"** as registered with the Tennessee Secretary of State, with SOS Control **#000334328.**

---

[16] DOC 1, PID 1-33 | https://rico.jefffenton.com/3-24-cv-01282/doc/1.pdf

[17] DOC 66, PID 4870-4972 | https://rico.jefffenton.com/1-23-cv-01097/doc/66.pdf

[18] DOC 16-1, PID 2307 | https://rico.jefffenton.com/3-24-cv-01282/doc/16-1.pdf

[19] https://rico.jefffenton.com/evidence/1-23-cv-01097_summons-for-spragins-barnett-and-cobb.pdf

MOTION TO AMEND FAC TO CORRECT DEFENDANT NAMING

25. Page-1[20] of my FAC in DOC 66, PID 4870, please remove the comma after the word "BARNETT", prior to the ampersand symbol. That is the only correction needed regarding the naming of SBC on page-1 of my FAC.

26. On page-5 of my FAC in DOC 66, PID 4874, where it currently states, "Spragins, Bartnett, & Cobb, PLCNS is a law firm located at 312 East Lafayette, Jackson, TN 38301-6220 (hereinafter "SB&C")", please remove the extra "t" in the middle of the word "Bartnett" to correctly say the name "Barnett". Then remove the comma between the word "Barnett" and the ampersand symbol. Finally, remove the "NS" from the end of the abbreviation "PLCNS", to correctly say "PLC".

27. The corrected name and address on page-5 of my FAC[21], should read "Spragins, Barnett & Cobb, PLC is a law firm located at 312 East Lafayette, Jackson, TN 38301-6220 (hereinafter "SB&C")."

28. No other changes are needed to correct my FAC in any known regard, in relation to defendant SBC.

29. The same minor typographical corrections need to be made to the summons issued by the court regarding SBC, but I don't know how that can be timely, reasonably, or practically accomplished as the case stands currently, because the summonses were issued by the United States District Court for the Western District of Michigan (1:23-cv-01097), but that court has since transferred this lawsuit to the United Stated District Court for the Middle District of Tennessee (3:24-cv-01282). While every federal district and magistrate judge in the Middle

[20] DOC 66, PID 4870 | https://rico.jefffenton.com/3-24-cv-01282/doc/66.pdf

[21] DOC 66, PID 4874 | https://rico.jefffenton.com/3-24-cv-01282/doc/66.pdf

District of Tennessee has recused themselves from this matter and the case is awaiting the appointment of a judge from outside the Middle District of Tennessee by the Sixth Circuit Court of Appeals.

MOTION TO DEEM SERVICE PERFECTED & COMPEL TO APPEAR

30. I move the court to examine the attached service records of defendant "Spragins, Barnett & Cobb, PLC" in this lawsuit, and to enter an order that service has been successfully perfected, or to provide me notice of any defects in service found by the court, along with an extension of time to cure such defects.

31. If the court finds that service was insufficient, lacking, or improperly executed, I move for the court to re-serve defendant "Spragins, Barnett & Cobb, PLC" using the U.S. Marshalls Service.

32. Defendants "Spragins, Barnett & Cobb, PLC" have been successfully served, more than once, for multiple months, yet to date they have failed or refused to make an appearance in this matter.

33. I move for the court to compel defendants "Spragins, Barnett & Cobb, PLC" to make an appearance in this matter, so that lawful litigation and discovery can proceed.

34. Service can be executed by the court at almost no cost using "alternative service[22]," since all the documents for service are digitally hosted on my website[23], saving significantly on printing, paper, and production costs.

---

[22] DOC 177, PID 234-243 | https://rico.jefffenton.com/3-24-cv-01282/doc/177.pdf
DOC 177-1, PID 244-250 | https://rico.jefffenton.com/3-24-cv-01282/doc/177-1.pdf

[23] https://service.jefffenton.com
https://jefffenton.com/digital-service-package-for-lawsuit/
https://jefffenton.com/digital-service-package-for-lawsuit/defendant-summonses/
https://jefffenton.com/digital-service-package-for-lawsuit/fenton-filings-since-service/
https://rico.jefffenton.com/3-24-cv-01282/

APPLICABLE COURT RULES

35. F.R.Civ.P. 15[24](a[25])(a[26]) states, "In all other cases, a party may amend its pleading only with the opposing party's written consent or the court's leave. *The court should freely give leave when justice so requires.*" (Emphasis added.)

36. F.R.Civ.P. 15(c) states, "the amendment changes the party or the *naming* of the party against whom a claim is asserted, if Rule 15(c)(1)(B) is satisfied and if, within the period provided by Rule 4(m) for serving the summons and complaint, the party to be brought in by amendment:

> (i) received such notice of the action that it will not be prejudiced in defending on the merits; and
>
> (ii) knew or should have known that the action would have been brought against it, *but for a mistake concerning the proper party's identity.*" (Emphasis added.)

37. F.R.Civ.P. 15(c)(1)(B) states, "the amendment asserts a claim or defense that arose out of the conduct, transaction, or occurrence set out—or attempted to be set out—in the original pleading;" (Which is exactly what took place, the counts in the complaint need not be modified in any way. I simply misspelled the name and entity type of defendant SPRAGINS, BARNETT & COBB, PLC.)

38. Despite this minor confusion, SPRAGINS, BARNETT & COBB, PLC has been served at the same time as the other defendants in this lawsuit, causing them no prejudice in defending on the merits whatsoever.

---

[24] https://www.law.cornell.edu/rules/frcp/rule_15

[25] Amendments Before Trial

[26] Other Amendments

39. I motion for the court to make these simple corrections to my FAC as outlined above, to correct the *naming* of defendant SPRAGINS, BARNETT & COBB, PLC, while specifically requesting, due to my *pro se* status and lack of experience, to **please let me know if any further action is required on my part to complete these corrections.**

40. Later should the court provide me the opportunity, I will update/correct this information while making other minor edits, improvements, and clarifications to my lawsuit, in my next amended complaint. This change is intended to take effect immediately.

IMPORTANT CASE LAW ABOUT WHY THIS MOTION SHOULD BE APPROVED

41. "*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."[27]

42. "Pleadings are intended to serve as a means of arriving at fair and just settlements of controversies between litigants. They should not raise barriers which prevent the achievement of that end. Proper pleading is important, but its importance consists in its effectiveness as a means to accomplish the end of a just judgment" (emphasis added).[28]

43. "Following the simple guide of rule [8(e)] 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 then-FRCP 8(f), now 8(e), which holds that all pleadings must be construed so as to do justice. (emphasis added).[29]

---

[27] Jenkins v. McKeithen, 395 U.S. 411, 421 (1959); Picking v. Pennsylvania R. Co., 151 Fed 2nd 240; Pucket v. Cox, 456 2nd 233

[28] Maty v. Grasselli Chemical Co., 303 U.S. 197 (1938)

[29] Conley v. Gibson, 355 U.S. 41 at 48 (1957)

CONCLUSION

44. Defendant Spragins, Barnett & Cobb, PLC is a law firm who has twice been successfully served but has failed or refused to make an appearance in this matter, so far to date.

45. There were a couple of very minor typographical errors, in how I *named* defendant Spragins, Barnett & Cobb, PLC in this lawsuit, which I am submitting this declaration and motion to the court in an effort to correct.

46. This law firm was served at the same time as the other defendants in this matter, while the court has yet to rule on matters related to service, therefore Spragins, Barnett & Cobb, PLC has not been prejudiced in any way toward protecting their interests based on the merits in this lawsuit.

47. On page-1[30] of my FAC in DOC 66, PID 4870, I move the court to remove the comma after the word "BARNETT", prior to the ampersand symbol. That is the only correction needed regarding the naming of SBC on page-1 of my FAC.

48. On page-5 of my FAC in DOC 66, PID 4874, where it currently states, "Spragins, Bartnett, & Cobb, PLCNS is a law firm located at 312 East Lafayette, Jackson, TN 38301-6220 (hereinafter "SB&C")", I move the court to make the following corrections: remove the extra "t" in the middle of the word "Bartnett" to correctly say the name "Barnett". Then remove the comma between the word "Barnett" and the ampersand symbol. Finally, remove the "NS" from the end of the abbreviation "PLCNS", to correctly say "PLC".

49. The corrected name and address on page-5 of my FAC[31], should read "Spragins, Barnett & Cobb, PLC is a law firm located at 312 East Lafayette, Jackson, TN 38301-6220."

---

[30] DOC 66, PID 4870 | https://rico.jefffenton.com/3-24-cv-01282/doc/66.pdf

[31] DOC 66, PID 4874 | https://rico.jefffenton.com/3-24-cv-01282/doc/66.pdf

50. I move the court to make the same minor typographical corrections to the naming of SBC on the court's summons.

51. I move the court to examine the attached service records of defendant "Spragins, Barnett & Cobb, PLC" in this lawsuit, and to enter an order that service has been successfully perfected, or to provide me notice of any defects in service found by the court, along with an extension of time to cure such defects.

52. If the court finds that service was insufficient, lacking, or improperly executed, I move for the court to re-serve defendant "Spragins, Barnett & Cobb, PLC" with assistance by the U.S. Marshalls Service.

53. Defendants "Spragins, Barnett & Cobb, PLC" have been successfully served, more than once, for multiple months, yet to date they have failed or refused to make an appearance in this matter.

54. I move for the court to compel defendants "Spragins, Barnett & Cobb, PLC" to make an appearance in this matter, so that lawful litigation and discovery can proceed.

55. Service can be executed by the court at almost no cost using "alternative service[32]," since all the documents for service are digitally hosted on my website[33], saving significantly on printing, paper, and production costs.

56. Should Spragins, Barnett & Cobb, PLC have any questions or concerns related to the naming of their company in this lawsuit, complaint, or summons, they should reach out to me

---

[32] DOC 177, PID 234-243 | https://rico.jefffenton.com/3-24-cv-01282/doc/177.pdf
DOC 177-1, PID 244-250 | https://rico.jefffenton.com/3-24-cv-01282/doc/177-1.pdf

[33] https://service.jefffenton.com
https://jefffenton.com/digital-service-package-for-lawsuit/
https://jefffenton.com/digital-service-package-for-lawsuit/defendant-summonses/
https://jefffenton.com/digital-service-package-for-lawsuit/fenton-filings-since-service/
https://rico.jefffenton.com/3-24-cv-01282/

immediately at (615) 837-1300 and by email at contact@jefffenton.com so that we can quickly resolve this matter, so not to waste valuable time or prejudice their interests in any way.

57. The amended naming changes requested in this declaration and motion comply with F.R.Civ.P. 15(c), therefore this motion should be granted, in the interest of justice, so that discovery can begin and litigation can proceed in this matter.

F.R.CIV.P. 15(c)

> "the amendment changes the party or the *naming* of the party against whom a claim is asserted, if Rule 15(c)(1)(B) is satisfied and if, within the period provided by Rule 4(m) for serving the summons and complaint, the party to be brought in by amendment:
>
> (i) received such notice of the action that it will not be prejudiced in defending on the merits; and
>
> (ii) knew or should have known that the action would have been brought against it, *but for a mistake concerning the proper party's identity.*" (Emphasis added.)"

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

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

58. This defendant was served per F.R.Civ.P. 4(h)(1)(A) and Mich. Ct. R. 2.105.

CERTIFICATION AND DECLARATION

By signing below, I, Jeffrey Ryan Fenton, certify that this document has been executed in good faith, in the honest pursuit of justice, and in strict compliance with F.R.Civ.P. 11(b).

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct, except as to matters herein stated to be on information and belief, and as to such matters, I certify as aforesaid that I verily believe the same to be true.

All rights reserved.

Executed on January 29, 2025

JEFFREY RYAN FENTON, PRO SE
17195 SILVER PARKWAY, #150
FENTON, MI, 48430-3426
CONTACT@JEFFFENTON.COM
HTTPS://JEFFFENTON.COM
(P) 615.837.1300
#TNinjustice
#iAMhuman

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

1. NOTICE, DECLARATION, AND MOTION TO AMEND THE NAMING OF DEFENDANT "SPRAGINS, BARNETT & COBB, PLC" IN THIS LAWSUIT AND TO COMPEL THEM TO MAKE AN APPEARANCE IN THIS MATTER

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2025, I mailed the foregoing or above-named papers to the United States District Court for the Middle District of Tennessee, at their address below, for filing in case number 3:24-cv-01282.

I further certify that on or before March 1, 2025, I am serving these same documents to the defendants or their counsel by first class or priority mail with postage prepaid at the addresses listed below. If for any reason beyond my control, I am unable to complete either on the date specified, I will do so on the very next business day.

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

MEGAN CALME & SARAH MATHEWS
WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP
3102 WEST END AVE STE 400
NASHVILLE, TN 37203-1623

PEAKO ANDREA JENKINS
TENNESSEE ATTORNEY GENERAL'S OFFICE
PO BOX 20207
NASHVILLE, TN 37202-4015

KATHRYN LYNN YARBROUGH
223 TOWN CENTER PKWY UNIT 1897
SPRING HILL, TN 37174-3040

LISA M. CARSON
BUERGER, MOSELEY & CARSON, PLC
4068 RURAL PLAINS CIR STE 100
FRANKLIN, TN 37064-8039

CAROLINA MARTIN & COURTNEY WILLIAMS
GORDON & REES SCULLY MANSUKHANI, LLP
4031 ASPEN GROVE DR STE 290
FRANKLIN, TN 37067-2951

ALEXANDER SERGEY KOVAL
CLARK & WASHINGTON, P.C.
1321 MURFREESBORO PIKE STE 320
NASHVILLE, TN 37217-2858

ANTHONY NOEL & LARUA BASSETT
LEITNER, WILLIAMS, DOOLEY, AND NAPOLITAN, PLLC
750 OLD HICKORY BLVD STE 200
BRENTWOOD TN 37027-4567

ANICA CLARISSA JONES
U.S. ATTORNEY'S OFFICE
719 CHURCH ST STE 3300
NASHVILLE, TN 37203-7155

SANDRA J. DENSHAM
PLUNKETT COONEY
333 BRIDGE ST NW STE 530
GRAND RAPIDS, MI 49504-5365

THOMAS E. ANDERSON
1187 OLD HICKORY BLVD STE 125
BRENTWOOD, TN 37027-4248

GREGORY BROWN & WILLIAM HICKERSON
LOWE YEAGER & BROWN, PLLC
920 VOLUNTEER LANDING LN STE 200
KNOXVILLE, TN 37915-2584

ALAN RHENEY
SPRAGINS, BARNETT & COBB, PLC
312 E LAFAYETTE ST
JACKSON, TN 38301-6220

BRET CHANESS
RUBIN LUBLIN, LLC
3145 AVALON RIDGE PL STE 100
PEACHTREE CORNERS, GA 30071-1570

R L MOORE
BANKERS TITLE & ESCROW CORPORATION
3310 WEST END AVE STE 540
NASHVILLE, TN 37203-6802

B. GOLDAMMER & D. SUEDEKUM
KAY GRIFFIN, PLLC
222 2ND AVE N STE 340M
NASHVILLE, TN 37201-1649

G. CATE & K. INGRAM-HOGAN
BRADLEY ARANT BOULT CUMMINGS, LLP
1221 BROADWAY STE 2400
NASHVILLE, TN 37203-7238

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

ELECTRONIC SERVICE OPTIONS

Many of my filings in this lawsuit are also made publicly available on the Internet, through my list[1] of documents filed by myself in this lawsuit, since the release of my lawsuit service package[2]. I typically try to do this as quickly as I can after filing them in court, depending upon my workload. Not every filing warrants being electronically published in this manner, while my time is extremely limited, therefore I cannot provide any guarantees about which documents will or will not be made available online, or exactly when.

For those interested, these files are usually "true" digitally created PDF files, in full color, often with optical character recognition enabled, sometimes with electronic bookmarks, and occasionally with a built-in table of contents which is hyperlinked for easy and efficient referencing, in my largest and most significant documents, such as my amended complaint[3].

CERTIFICATION AND DECLARATION

By signing below, I, Jeffrey Ryan Fenton, certify that this document has been executed in good faith, in the honest pursuit of justice, and in strict compliance with F.R.Civ.P. 11(b).

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

All rights reserved.

Executed on February 27, 2025

JEFFREY RYAN FENTON, PRO SE
17195 SILVER PARKWAY, #150
FENTON, MI, 48430-3426
CONTACT@JEFFFENTON.COM
HTTPS://JEFFFENTON.COM
(P) 615.837.1300
#TNinjustice
#iAMhuman

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

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

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

CERTIFIED MAIL

PRESS FIRMLY TO SEAL

7020 3160 0002 3001 3950

PRESS FIRMLY TO SEAL

Retail

U.S. POSTAGE PAID
PM
LINDEN, MI 48451
FEB 27, 2025

37203

$17.57

RDC 03

S2324P501513-03

UNITED STATES POSTAL SERVICE®

PRIORITY® MAIL

FROM: 17195 SILVER PKWY
PMB #150
FENTON, MI 48430-3426

- Expected delivery date specified for domestic use.
- Domestic shipments include $100 of insurance (restrictions apply).*
- USPS Tracking® service included for domestic and many international destinations.
- Limited international insurance.**
- When used internationally, a customs declaration form is required.

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

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

RECEIVED
MAR 03 2025
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

TO:

UNITED STATES DISTRICT COURT
ATTN: CLERK OF THE COURT
719 CHURCH ST
NASHVILLE, TN 37203-6940

FLAT RATE ENVELOPE

ONE RATE ■ ANY WEIGHT

TRACKED ■ INSURED

To schedule free Package Pickup, scan the QR code.

USPS.COM/PICKUP

PS00001000014

EP14F October 2023
OD: 12 1/2 x 9 1/2

PAPER POUCH

how2recycle.info

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

This packaging is the property of the U.S. Postal Service® and is provided solely for use in sending Priority Mail® and Priority Mail International® shipments. Misuses may be a violation of federal law. This packaging is not for resale. EP14F © U.S. Postal Service; October 2023; All rights reserved.