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

RECEIVED
FEB 25 2025
US DISTRICT COURT
MID DIST TENN

JEFFREY RYAN FENTON,

PLAINTIFF

V.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

CASE NO. 3:24-CV-01282

FIRST OBJECTION TO ALL MOTIONS TO DISMISS, FOR SUMMARY JUDGEMENT, AND MOTIONS/ORDERS TO REDACT AND SEAL DOCUMENTS[1]

Plaintiff brings this objection pursuant to 28 U.S. Code § 1746, U.S. Const. amend. I, Case Law, F.R.Civ.P. Rule 11(b), and 18 U.S. Code § 4 - Misprision of felony.

GOVERNMENT RESOURCES MOBILIZED TO PROTECT BAD ACTORS

1. On October 25, 2024, a United States Attorney in Michigan[2] made an appearance in this matter on behalf of Judge Walker, claiming that defendant Walker has "privacy and safety concerns" because my complaint contains his home address, just as it does with every other individual defendant in this lawsuit, which was obtained online from public records.

[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://rico.jefffenton.com/evidence/2024-10_comms-with-usat-ryan-cobb-about-redactions.pdf

2. Still, the U.S. Attorney in Michigan filed multiple papers[3] seeking to have all claims dismissed against defendant Walker, while motioning the court to redact documents containing his home address from public access.

3. The case was electronically transferred from Michigan to Tennessee that same day, October 25th, where a different U.S. Attorney in Nashville[4] immediately began filing expedited and emergency motions to redact and seal the records[5] in my lawsuit, while requesting an emergency hearing to have him released from the lawsuit, claiming he has "absolute immunity" and being a defendant in my lawsuit could cause complications for his job as a federal bankruptcy judge, under that same federal court to which my lawsuit has now been transferred in the Middle District of Tennessee.

4. I've got a **lot** to say about that! I certainly wish defendant Walker had considered those concerns before he ignored the Federal Rules of Bankruptcy Procedure and violated multiple federal laws to assist a bunch of lawless perpetrators in the theft of my Brentwood home.

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[3] ECF 126, PID 5704-5705 | https://rico.jefffenton.com/1-23-cv-01097/ecf/126.pdf
ECF 128, PID 5711-5725 | https://rico.jefffenton.com/1-23-cv-01097/ecf/128.pdf
ECF 129, PID 5726 | https://rico.jefffenton.com/1-23-cv-01097/ecf/129.pdf
ECF 130, PID 5727 | https://rico.jefffenton.com/1-23-cv-01097/ecf/130.pdf
ECF 131, PID 5728-5729 | https://rico.jefffenton.com/1-23-cv-01097/ecf/131.pdf
ECF 132, PID 5730-5731 | https://rico.jefffenton.com/1-23-cv-01097/ecf/132.pdf
ECF 133, PID 5732 | https://rico.jefffenton.com/1-23-cv-01097/ecf/133.pdf
ECF 134, PID 5733 | https://rico.jefffenton.com/1-23-cv-01097/ecf/134.pdf
ECF 135, PID 5734 | https://rico.jefffenton.com/1-23-cv-01097/ecf/135.pdf
ECF 136, PID 5735 | https://rico.jefffenton.com/1-23-cv-01097/ecf/136.pdf

[4] https://rico.jefffenton.com/evidence/2024-11_comms-with-usat-anica-jones-about-redactions.pdf

[5] DOC 158, PID 114-116 | https://rico.jefffenton.com/3-24-cv-01282/doc/158.pdf
DOC 159, PID 117-119 | https://rico.jefffenton.com/3-24-cv-01282/doc/159.pdf
DOC 167, PID 143-146 | https://rico.jefffenton.com/3-24-cv-01282/doc/167.pdf
DOC 168, PID 147-161 | https://rico.jefffenton.com/3-24-cv-01282/doc/168.pdf

HIDING CRIMES AND CORRUPTION FROM THE PUBLIC

5. Just three days later on October 28, 2024, MIWD redacted my entire "First Amended Complaint[6]" (the heart of my lawsuit) and permanently blocked it in its entirety from public access[7].

6. TNMD took redacting and sealing my records even further, though I don't know precisely when or how, since the court did this secretly without notice.

7. TNMD sealed my entire original filing[8] in this lawsuit, consisting of roughly two thousand pages, comprised of my original complaint and most of the Tennessee Court Records from precipitating matters in the Chancery Court, Bankruptcy Court, the Court of Appeals, and the Tennessee Supreme Court. These records are packed with evidence of felony crimes committed by Tennessee court personnel and counsel. Hiding them is a violation of 18 U.S. Code § 4 - Misprision of Felony:[9]

> "Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both." (June 25, 1948, ch. 645, 62 Stat. 684; Pub. L. 103–322, title XXXIII, §330016(1)(G), Sept. 13, 1994, 108 Stat. 2147.)

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

7 ECF 137, PID 5736 | https://rico.jefffenton.com/1-23-cv-01097/ecf/137.pdf (This document is only available in MIWD docket.)

8 ECF 1, PID 1-2090 | https://rico.jefffenton.com/1-23-cv-01097/1.htm | https://rico.jefffenton.com/3-24-cv-01282/1.htm

9 https://www.law.cornell.edu/uscode/text/18/4

8. TNMD also sealed my entire First Amended Complaint[10].

9. I contacted the Nashville court clerk who told me that she had never seen that before (the links in PACER completely vanished), but after speaking with her tech support team, she blamed it on some abnormality having to do with MIWD transferring the case to TNMD. However, when I questioned the Michigan court clerk, she denied the sealing of the records having anything to do with their court.

10. The Nashville court clerk said that the records were only sealed temporarily, because I currently have no judge assigned to my case since every district and magistrate judge in TNMD has recused themselves[11] from hearing this matter.

11. I'm told that once the Sixth Circuit Court of Appeals appoints a judge from outside TNMD to my case, then the records will be unsealed and the battle over the redactions and sealing will continue.

12. Upon information and belief, based on my interactions with both MIWD and TNMD courts to date, the actions they both proactively took to heavy-handedly redact and seal substantive portions of my lawsuit, rather than doing a few line-level redactions of the only *four words* legitimately being concealed from the public (defendant Walker's street address), combined with my interactions with both U.S. Attorneys in Michigan and Tennessee, their posture, presence, and demands in both courts, seeking highly expedited and vastly sweeping redactions and sealed records, for a reason which honestly lacks reasonable support[12], while factoring in the data shown in the screenshots on page 9, from providing email service to Nashville Bankruptcy Judge Charles M. Walker, I find it likely that Walker is corrupt and is powerfully connected.

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

[11] DOC 165, PID 139 | https://rico.jefffenton.com/3-24-cv-01282/doc/165.pdf

[12] See the "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS".

THE BLURRY LINES CURRENTLY BETWEEN POLITICS AND LAW

13. Upon information and belief, I further believe that some bad actors in Washington, D.C., began pulling strings to steer/impact this case and the actions of the U.S. Attorney's Offices for defendant Walker's benefit. This might explain why MIWD redacted my entire complaint under the guise of concealing just the ***four words*** related to his address almost immediately upon request by the U.S. Attorney's Office.

14. Upon information and belief, the actions to date so far in this case strongly suggest that government offices and public resources at county, state, and federal levels are being inappropriately misused and exploited under color of law by high-profile officers of the court, for private interests, to hide serious felony crimes and corruption from the public committed by other influential court and government actors—in direct contravention of both state and federal constitutions along with the most basic principles of the rule of law.

15. I've lost over a month of my life so far trying to appease both of these U.S. attorneys, while working to redact defendant Walker's address from both my filings and my website, despite the fact that both U.S. attorneys along with both federal courts took actions significantly contrary to my interests and even their stated objectives in the end[13].

16. I tried to work with both U.S. attorneys[14] in good faith toward solving the claimed problem of protecting defendant Walker's privacy concerns, without the need to block public

[13] The claimed objective was to conceal defendant Walker's home address, while that was only accomplished in **three** out of **eighteen** documents filed in this lawsuit containing defendant Walker's residential address. Defendant Walker's address is present in the following documents on the pages specified: ECF 16-1, PID 2293; 66, PID 4874; ECF 90-2, PID 5170; ECF 90-4, PID 5172; ECF 95-1, PID 5252 & 5254; ECF 96, PID 5263; ECF 96-1, PID 5273; ECF 92-2, PID 5293; ECF 97, PID 5300; ECF 98, PID 5326; ECF 99, PID 5335; ECF 100, PID 5352; ECF 100-1, PID 5362; ECF 101, PID 5383; ECF 102, PID 5467; ECF 109, PID 5582; ECF 110, 5592; ECF 111, PID 5607.

[14] https://rico.jefffenton.com/evidence/2024-10_comms-with-usat-ryan-cobb-about-redactions.pdf
https://rico.jefffenton.com/evidence/2024-11_comms-with-usat-anica-jones-about-redactions.pdf

access to any document in this lawsuit. Ultimately, neither U.S. attorney showed any interest in limiting the reach of their proposed redactions to the scope of their stated concerns, concealing defendant Walker's home address.

17. Meanwhile the courts took the opportunity to order vastly over-reaching redactions, substantially interfering with the public's ability to research and understand this lawsuit, along with the critical justice interests involved.

18. Upon information and belief, these redactions and sealed records are the result of attorney and judicial misconduct by the U.S. attorney's offices and the federal courts, both in Michigan and Tennessee.

19. Upon information and belief, defendant Walker does not have any legitimate concern about the public disclosure of his home address in this lawsuit—at least not more so than any other defendant, based on the public records available. (This is explained in detail in my "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS".)

20. Upon information and belief, unnecessary redactions/sealing of entire documents was simply the **excuse** given to protect the much broader concerns of many, if not all the defendants, regarding the public disclosure of substantial testimony, facts, and evidence, which could be detrimental to many of their careers, proving several law firms, courts, clerks, judges, and municipal entities in Middle Tennessee, even including divisions of the Tennessee Supreme Court, worked together in direct contravention of both state and federal laws, along with both Constitutions and the Bill of Rights, while knowingly participating in egregious felony crimes, fraud on the court, bankruptcy fraud, official corruption, racketeering, and much more.

THE REAL NEED (IF EVER ONE EXISTED)

21. All that needed to be redacted from my complaint, was the following **four words** containing defendant Walker's:

		Example:
(1) **House Number**	|	1234
(2) **Street Name**	|	Defendant Drive
(3) **City**	|	Nashville
(4) **+4 Code** (last four)	|	0000

22. That's it! Just ***four words***, in *one sentence*, on only *one page* of my complaint!

23. According to Microsoft Word, my amended complaint[15] contains:

- one hundred and thirty-eight pages (138)
- six hundred and ninety-one paragraphs (691)
- two thousand five hundred and sixty-seven lines (2,567)
- thirty-one thousand and fifteen words (31,015)

24. Along with my first complaint, ***all*** of this has been completely redacted or entirely sealed from the public, for the alleged purpose of concealing those **four words** in defendant Walker's address, despite being publicly available records for anyone to easily find while doing a rudimentary Internet search from the browser of their choice.

25. I do not believe that is a reasonable, responsible, or lawful action, by any party involved.

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

ALTERNATIVE SERVICE

26. As an extra precaution, since I knew the type of people that I am dealing with and that many of them will go to great lengths to *dodge service* and avoid being held accountable in an honest court of law, I also had many of the defendants served by email, with what is called "alternative service[16]."

27. The images on the next page are screenshots[17] of the email service I had sent to United States Bankruptcy Judge Charles M. Walker (hereinafter "Judge Walker" or "defendant Walker"), from the Middle District of Tennessee.

28. Again, because I knew these were bad actors, some who would certainly deny the truth; at the recommendation of a friend, I had the email service executed using Streak Email Tracking Software[18]. This was to provide me with proof that they were in fact served while also verifying that each defendant not only received alternative service by email but how many times they opened and viewed that email as well.

29. The screenshots show that Judge Walker was emailed alternative service for this lawsuit on September 24, 2024, at 2:48 PM.

30. The top screenshot on the next page shows that as of October 1, 2024 (7-days after emailing defendant Walker), the email service sent to Judge Walker had been viewed by him and forwarded repeatedly throughout Washington DC, being viewed at least **58 times** during that first week alone.

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[16] DOC 177, PID 234-250 | https://rico.jefffenton.com/evidence/2024-11-18_fenton-motion-for-alternative-service.pdf

[17] https://rico.jefffenton.com/evidence/3-24-cv-01282_alt-proof-of-service-for-charles-m-walker.pdf

[18] Streak email tracking demonstration: https://www.youtube.com/watch?v=dMKtSYU-rd8
https://www.streak.com

DEFENDANT: CHARLES M. WALKER ALTERNATIVE EMAIL SERVICE RECEIVED SERVICE: 9/30/2024 (or earlier)

in:sent

Missed Earlier Email - Important

Tim Schell to charles_walker Tue, Sep 24, 2:48 PM (7 days ago)

Hello -
I emailed a few days ago but I am not sure the message was received since I did not hear back. My earlier correspondence concerned matters regarding certain outstanding payments to the court I believe I still owe. As of now, it might be best to consider that I have tried to remit timely whatever is due in order to avoid late fees and/or penalties

I also want to inform you that you have been named as a defendant in lawsuit 1:23-cv-01097 in the U.S. District Court for the Western District of Michigan. You should have received service of process by registered/certified mail pursuant to Michigan rule of civil procedure 2.105. Details of served process and the entire case can be found and downloaded here:

freely downloadable civil action in its entirety

If you choose not to accept the relevant U.S. mail and/or decline to enter an appearance in the matter, a default judgment against you will be entered since you now have knowledge of the case.

Website URL with Tracking Code

Tracking

Viewed 4h ago
29 views of last msg

58 total views 0 total clicks Learn more

Washington, DC 12:51 PM
Columbus, OH Sep 30
Columbus, OH Se
Washington, DC Sep 30
Luxembourg Sep 30
Nashville, TN Sep 30
Columbus, OH Sep 30
Washington, DC Sep 30
Columbus, OH Sep 30
Washington, DC Sep 30
Washington, DC Sep 30
Washington, DC Sep 30
Washington, DC Sep 30

4:37 PM 10/1/2024

in:sent

Missed Earlier Email - Important

Tim Schell to charles_walker Tue, Sep 24, 2:48 PM

Hello -
I emailed a few
back. My earlie
to the court I be
remit timely wh

From: Tim Schell
charles_walker@tnmb.uscourts.gov
Sep 24, 2024, 2:48 PM
Missed Earlier Email - Important
gmail.com

since I did not hear
outstanding payments
that I have tried to

I also want to in
lawsuit 1:23-cv-01097
in the U.S. District Court for the Western District of Michigan. You should have received service of process by registered/certified mail pursuant to Michigan rule of civil procedure 2.105. Details of served process and the entire case can be found and downloaded here:

freely downloadable civil action in its entirety

If you choose not to accept the relevant U.S. mail and/or decline to enter an appearance in the matter, a default judgment against you will be entered since you now have knowledge of the case.

Link to Website with Tracking Code

Tracking

Viewed 10d ago
168 views of last msg

1 link opened
latest 2mo ago

336 total views 1 total click Learn more

Detroit, MI Dec 3
Unknown location Oct 28
Bedford, IA Oct 27
Unknown location Oct 27
Reston, VA Oct 25
Reston, VA Oct 17
Columbus, OH Oct 16
New York, NY Oct 11
Reston, VA Oct 10
Reston, VA Oct 10
Reston, VA Oct 10
Columbus, OH Oct 9
Columbus, OH Oct 8

10:23 PM 12/13/2024

RICO SERVICE: EMAIL VIEWED 336 TIMES & LINK OPENED ONCE M.D. Tenn. Case 3:24-cv-01282 (FENTON v. STORY et al.)

31. Shown on the bottom screenshot above, as of December 13, 2024, this email had been viewed by Judge Walker and forwarded repeatedly throughout Washington DC (government channels I'm assuming), Virginia, New York, Tennessee, Ohio, Michigan, and other states, while being viewed at least **336 times**!

32. Please keep in mind the fact that this email contains the email address and personal information of a federal judge in it. I can't imagine he would have forward it to anyone he does not **trust**. (Which makes hundreds of views even more suspicious.)

33. My email service also included a link to my website at https://service.jefffenton.com where my entire lawsuit can be digitally downloaded quickly and easily for free. I built this section of my website[19] to serve as a tool to help facilitate "alternative service." I wanted to eradicate every excuse for ignoring and refusing to respond to my lawsuit[20].

34. Streak also tracks the number of times recipients click on links in an email, the one taking them to my website where they had access to my entire digital lawsuit service package in this instance.

PERSPECTIVE

35. I think that one thing this screenshot (shown on page 9) meaningfully helps provide is perspective about the **depth** and **breadth** of **corruption** upon which this lawsuit touches and **exposes** along with the influence of **powerful people** who wish to prevent that by any means within their reach. The staggering number of times a *single* email was read indicates just how deep those ties might be.

36. There is so much more to tell... but I only know how to explain this in small sections, which I try to **show** evidence of; otherwise, it all sounds too outrageous to be **real**[21].

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[19] DOC 177-1, PID 244-250 | https://jefffenton.com/digital-service-package-for-lawsuit/

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

[21] This is often one of the *strategic tactics* employed in "predatory litigation", to *overwhelm* the victim with a **truth** that is near polar opposite the public personas of the BAR members involved, while also being so *outrageous*, *cruel*, and *unconscionable* that in all honesty the **truth sounds less plausible** and realistic, **than the lie**. Taxing the victim with a burden **too big** for them to effectively communicate. (https://tninjustice.org/predatory-litigation-101/) While picking targets with weak, depleted, and impoverished support systems (a staple in family court), stacking the odds steeply against any victim who tries to tell the truth, reach out for help, or to have any chance at holding the bad actors accountable.

37. It is real though. You can drive by my Brentwood home[22] at 1986 Sunnyside Drive[23], Brentwood, TN 37027, and meet the new "owners" if you like. You can likewise scour the court records in search of a way that the forced auction of my home[24] (without one dollar directly to me or my ex-wife[25], to the best of my knowledge) might have possibly been done legally[26] and ethically by a court with lawful jurisdiction[27] to hear and dispose of the matters before it—except that no such court or records exist in my preceding matters in Tennessee[28]. None!

38. So far I have (truthfully) accused[29] (with evidence[30]) an obscene number of powerful and influential (highly-trusted) members of the Middle Tennessee court system (including top-tier positions on the oversight boards for the Tennessee Supreme Court) of committing and helping to cover-up serious felony crimes including bankruptcy fraud, literally committed **by** the bankruptcy court, trustee, judge, and counsel, while to date I have yet to see a single defendant deny my claims while signing under the penalty of perjury[31] that they are telling the truth.

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[22] DOC 19-1, PID 2624-2628 | https://rico.jefffenton.com/evidence/2011-04-29_1986-sunnyside-brentwood-tn-deed.pdf
DOC 19-1, PID 2620-2623 | https://rico.jefffenton.com/evidence/2011-04-29_fenton-marital-residence-tenancy-by-entirety.pdf
DOC 42, PID 3631-3657 | https://rico.jefffenton.com/evidence/2011-04-29_1986-sunnyside-premarital-assets-invested.pdf
DOC 42, PID 3665-3676 | https://rico.jefffenton.com/evidence/1986-sunnyside-property-improvement-highlights.pdf
DOC 19-1, PID 2629 | https://rico.jefffenton.com/evidence/1986-sunnyside-brentwood-tn-2019-property-taxes.pdf

[23] DOC 52, PID 4202-4207 | https://rico.jefffenton.com/evidence/2022-01-03_1986-sunnyside-brentwood-tn-appreciation.pdf
DOC 52, PID 4211-4217 | https://rico.jefffenton.com/evidence/2023-05-31_1986-sunnyside-brentwood-tn-appreciation.pdf

[24] DOC 48, PID 4019-4029 | https://rico.jefffenton.com/evidence/2019-10-29_illegal-auction-closed-wilco-rico-deed-fraud.pdf

[25] DOC 48, PID 4002-4003 | https://rico.jefffenton.com/evidence/2019-10-10_chancery-no-proceeds-from-forced-auction.pdf

[26] DOC 38, PID 3445-3496 | https://rico.jefffenton.com/evidence/2019-04-26_bankruptcy-crimes-rules-and-laws-violated.pdf

[27] DOC 54-1, PID 4367 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3
DOC 28, PID 3276-3288 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf

[28] DOC 53, PID 4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf

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

[30] DOC 65-3, PID 4822-4850 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-document-index.pdf
DOC 1-12, PID 479-596 | https://rico.jefffenton.com/evidence/2019-10-29_tn-wilco-deed-fraud-ada-financial-exploitation.pdf
DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf
DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf
DOC 1-2, PID 48-63 | https://rico.jefffenton.com/evidence/2020-10-13_affidavit-of-mother-marsha-ann-fenton.pdf
DOC 18, PID 2417-2616 | https://rico.jefffenton.com/evidence/2024-01-16_marsha-fenton-sons-tn-legal-proceedings.pdf

[31] DOC 100, PID 5343-5374 | https://rico.jefffenton.com/evidence/2024-10-08_motion-all-filings-be-under-penalty-of-perjury.pdf

39. All the defendants seem interested in talking about are matters **immaterial** to the heinous merits of my lawsuit, such as how long it took me to bring this lawsuit against them all and/or claiming they have some *"immunity"* which protects them from being held accountable for *intentionally* committing egregious *felony* crimes against the public, while others refused to lawfully intervene, to require the bad actors to obey the law, to report and discipline attorney and judicial misconduct, to help the obviously injured party, refusing all efforts to mitigate damages.

40. Some of the defendants have even had the audacity to ask the court to dismiss them from my lawsuit under the *false* claim that I "failed to state a claim upon which relief can be granted," when in fact my lawsuit lists an overwhelming litany of claims, counts, and crimes committed by the defendants, requiring lawful and equitable remedies.

41. Why would the defendants fight to **redact** and **seal** a complaint from the public (as they have done in this case), when that complaint was allegedly so *weak* that it failed to even *"state a claim upon which relief can be granted"*? False or overstated privacy concerns removed, which look good at a distance, but can't survive honest reasonable scrutiny. The desire by the defendants to redact and seal substantial portions of this lawsuit speaks to the significant, material, and egregious merits of this case. That is the precise reason why this lawsuit should **never** be redacted, sealed, or kept from the public in any meaningful capacity. This is a lawsuit against official misconduct and public corruption, at some of the highest levels within Tennessee!

42. Since "failure to state a claim..." is one of the *generic* claims routinely raised against *pro se* litigants, I prepared in advance for this frivolous misconduct by creating and filing a simple three-minute video[32], clearly showing one of my significant constitutional claims in this lawsuit, which **requires** lawful and equitable relief. To further substantiate the facts and testimony in this video for the court in a more traditional format, I also executed a sworn

[32] DOC 59, PID 4724 | https://rico.jefffenton.com/evidence/3-24-cv-01282_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4

declaration[33] certifying that the facts and testimony in that video are factually accurate and true, to which I have sworn and signed under the penalty of perjury.

43. Still, the defendants are trying to have this lawsuit dismissed for any random technicality they think the court might entertain over actual justice. Another such attempt is frivolously claiming that it took me *too long* to track down all the defendants, corner them, and serve them with this lawsuit, while many of them actively dodged service and/or refused to sign for service[34] upon successful completion. Again, the burden of proof is unfairly thrust upon me while many of the defendants have acted and continue to act in manners unbecoming of any public office, office of trust, or officer of the court.

ACTUAL INNOCENCE ACTS DIFFERENTLY

44. If I was innocent of committing *felony* crimes against someone, **that would be the first defense I would raise.** I would not spend months arguing about frivolous technicalities, attempting to evade answering for my actions.

45. Sometimes a failure to answer is an **answer by omission.**

46. Upon information and belief, several of the defendants and/or their counsel are twisting the facts and making material misrepresentations in their motions to dismiss, supporting briefs, and other filings, which are the equivalent of "fraud on the court by officers of the court". Then they tax me with the burden of needing to do multiple times as much work with each filing, taking significantly more time for me and the court, so that I can try to clearly articulate, explain, and prove to the court each attorney's misconduct taking place.

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[33] DOC 59, PID 4723-4735 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-video-declaration.pdf

[34] See "Exhibit-A" filed on 10/04/2024, in DOC 96-1, PID 5265-5285.

INDECENT PROPOSALS BY THE DEFENDANT'S COUNSEL

47. Attorneys are filing motions to dismiss and for summary judgment (indecent proposals), not supported by fact or law (since some are twisting both), while hoping for a judge with similar interests, preferring to squelch complaints exposing government misconduct and corruption, to give the "benefit of the doubt" to the legion of BAR counsel over an unknown indigent *pro se* litigant. Finding it often more professionally rewarding and far more enjoyable work (with less personal, professional, political, and social pressure), to deny the outrageous criminal misconduct which took place by the defendants in precipitating matters (as irrefutably evidenced in this case), than to hold the powerful bad actors accountable for both their actions and inactions, while providing a meaningful and just remedy to protect Tennessee residents, better our courts, and our nation as a result.

48. Upon information and belief, I see each defendants motion, which fails or refuses to acknowledge the critical constitutional merits and justice interests in this lawsuit, as an attorney engaged in *professional misconduct*, filing papers (indecent proposals) under the *guise of law* (color of law), which ultimately seeks to undermine and **erode the lawful protections of the people.**

> "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).

49. With the object of their pursuit being to benefit an extreme minority of powerful bad actors (engaged in criminal acts), who refuse to live **under** the *rule of law*, yet somehow are in positions of local power, trust, and influence, where some have and continue to leverage or even

administer the **law** in ways which **unlawfully** lords over the lives, liberty, families, property, wealth, and interests of others, sometimes to the substantial detriment of society.

50. This is where there is a deep divide between **legal professionals** who are committed to **justice** versus those focused on obtaining and exercising **power**. Legal professionals committed to justice seek to empower the people to enjoy their freedoms. Those focused on the "practice of law" for purposes *other* than justice, are involved in a technical career, seeking to hone a **skill** by which to *disempower* and *defeat* their *opponents*, without all the complications, considerations, and potential conflicts involved in ethics, honesty, dignity, respect, honor, truth, or justice. Many of the defendants in this lawsuit clearly prioritize the latter.

51. This is where the court and judge must separate themselves from the other "legal professionals" in the room, many whom have interests significantly contrary to the honest interests of justice in the matters before the court.

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

52. This is where a strong, conscientious, honest, impartial, honorable, fair, and fiercely independent judge, is **needed** <u>to proactively **define** and **protect** the **honest interests of justice** in the matters before the court</u>. Without which the "adversarial system" is predisposed to rule in favor of the litigants with the most connections, social and political favor, with the deepest pockets. *(Not directly due to judicial impropriety, it could just be laziness, lack of interest, or lack of judicial willingness to face the peer, social, and political conflict created by forcing justice upon a group of influential, well financed attorneys, committed to contrary interests.)*

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

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

53. Upon information and belief, the point that I'm trying to make is despite the multitude of "legal filings" by the defendants and their counsel in this matter, so far I have not read a **single one** whose pleadings I believe **could** reasonably be interpreted to "serve as a means of arriving at fair and just settlements of controversies between litigants[35]". Not one!

54. Upon information and belief, from what I can see of the defendant's filings to date, they seem to almost exclusively do precisely what they "should not[36]", namely "rais[ing] barriers which prevent the achievement of that end… of a just judgment.[37]"

55. Upon information and belief, while I am a *pro se* litigant, whose "pleadings are to be considered without regard to technicality[38]". Yet it appears to me that most if not every defendant in this lawsuit is seeking to be dismissed from this lawsuit and released of all liability, for the damages they cruelly and illegally caused me, not for any meritorious reasons which I can see, but due to primarily technical defenses, limitations, and defects in my ability to bring this lawsuit against such a powerful, well-funded, and indignant horde of actors.

56. Upon information and belief, it appears to me that most if not every defendant and their counsel is treating pleading **as if it were a game**[39], where everything they have invested to date is devoted to emphasizing, amplifying, and calling out my "**one misstep**[40]" in the technical[41] and procedural execution of this lawsuit, which they hope will be **decisive**[42] in this matter, and

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

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

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

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

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

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

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

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

cause the court to release the defendants, without any care, interest, or regard for the honest merits[43] of this lawsuit, or devoting a single sentence in their pleadings to what an honest "decision on the merits[44]" might even look like.

> Repeated for emphasis: "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).

57. Upon information and belief, violating this case law appears to be the exact strategy currently being employed by most of the defendants and their counsel.

58. Upon information and belief, until the pleadings filed by the defendants and their counsel complies with the case law cited in these pages, focusing on the merits of this lawsuit and the matters before the court (rather than procedural technicalities, defects, and escapes), while incorporating language into their filings devoted to seeking, determining, understanding, and obtaining "fair and just settlements of controversies between litigants", for the purpose of "[facilitating] a proper decision on the merits", I believe they are simply playing **games**, involved in **misconduct**, potentially committing **crimes**, while wasting my critical time and resources along with the courts'.

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

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

ATTORNEY MISCONDUCT FISHING, WAITING, AND HOPING FOR JUDICIAL MISCONDUCT TO JOIN

59. Upon information and belief, from what I have seen and experienced to date, BAR members involved in misconduct try to meet each other midway in the misconduct, to limit their individual liability and complicity if caught. This is enough to notify other BAR members involved of their *intent*, while leaving them a *plausible escape*, prior to following through with the misconduct, if they are called out and confronted, which could happen, but I expect is rare.

60. For attorneys involved in misconduct, each document filed with the court is an opportunity to sow fraud into the court record, in support of a pre-determined outcome or to develop a narrative and "build a case" toward their desired outcome. I also experienced this by the Magistrate Judge in Michigan[45], who tried to proactively dismiss my lawsuit prior to service[46].

61. The best analogy that I can think of for describing this type of attorney misconduct, which I believe to be experiencing repeatedly in this case, is **fishing**.

62. Upon information and belief, every motion filed by the defendants and their counsel, which is not focused on "arriving at fair and just settlements of controversies between litigants", I see as another attorney involved in misconduct, who is **fishing** (with an indecent proposal) for a judge with similar interests, who is willing to meet them **midway**, with judicial misconduct, by granting their motion which was never grounded in law or focused on the honest interests of justice in the first place, likely seeking to evade or circumvent the law instead.

63. Upon information and belief, this lawsuit is an active crime scene currently. New

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[45] ECF 55, PID 4378-4384 | https://rico.jefffenton.com/3-24-cv-01282/doc/55.pdf
ECF 60, PID 4736-4739 | https://rico.jefffenton.com/3-24-cv-01282/doc/60.pdf
ECF 62, PID 4744-4760 | https://rico.jefffenton.com/3-24-cv-01282/doc/62.pdf

[46] ECF 8, PID 2101-2106 | https://rico.jefffenton.com/3-24-cv-01282/doc/8.pdf

crimes are being actively committed by the defendants and their counsel, as they seek to ignore and evade responsibility, while effectively covering-up multiple serious felony crimes committed by the defendants against my family, along with other Middle Tennessee households.

64. Upon information and belief, crimes which incidentally no defendant to date appears to be materially contesting being factually true, while certifying their testimony is accurate and true, filed in compliance with F.R.Civ.P. Rule 11(b), sworn to under the penalty of perjury[47], as much if not most of my testimony and evidence has been certified and sworn accurate and true.

65. This includes substantial, strong, and even irrefutable evidence of both judicial and professional misconduct[48], obstruction of justice[49], fraud upon the court by officers of the court[50], bankruptcy fraud[51], real estate deed fraud/theft[52], falsifying government records[53], official misconduct[54], official corruption[55], official oppression[56], cruel and unusual punishment[57],

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[47] DOC 100, PID 5343-5353 | https://rico.jefffenton.com/3-24-cv-01282/doc/100.pdf

[48] DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf
DOC 22, PID 2818-2862 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf

[49] DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf
DOC 22, PID 2818-2862 | https://rico.jefffenton.com/evidence/2019-08-29_authentic-chancery-transcript-and-audio.pdf
DOC 23, PID 2863-2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
DOC 23-4, PID 2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

[50] DOC 19, PID 2617-2716 | https://rico.jefffenton.com/evidence/2019_tn-court-motions-in-chronological-order.pdf

[51] DOC 38, PID 3445-3496 | https://rico.jefffenton.com/evidence/2019-04-26_bankruptcy-crimes-rules-and-laws-violated.pdf

[52] DOC 48, PID 4019-4029 | https://rico.jefffenton.com/evidence/2019-10-29_illegal-auction-closed-wilco-rico-deed-fraud.pdf
DOC 57-1, PID 4442-4450 | https://rico.jefffenton.com/evidence/2019-09-21_notice-listing-agreement-coerced-null-and-void.pdf
DOC 57-1, PID 4478-4480 | https://rico.jefffenton.com/evidence/2019-10-10_notified-bankers-title-sale-illegal-unauthorized.pdf

[53] DOC 57-1, PID 4481-4483 | https://rico.jefffenton.com/evidence/2019-10-10_notice-to-court-and-title-co-auction-was-illegal.pdf
DOC 19-6, PID 2669-2672 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-court-order-with-counsel.pdf
DOC 19-7, PID 2674-2677 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-court-order-once-pro-se.pdf
DOC 48, PID 4002-4003 | https://rico.jefffenton.com/evidence/2019-10-10_chancery-no-proceeds-from-forced-auction.pdf
DOC 19-13, PID 2706-2709 | https://rico.jefffenton.com/evidence/2019-10-21_chancery-final-decree-of-divorce.pdf

[54] DOC 54-1, PID 4361 | https://rico.jefffenton.com/evidence/2019-08-30_judgment-wrong-emergency-call-to-court.mp3

ADA interference[58], coercion, retaliation, and much, much more.

SWORN COMPLIANCE WITH RULE 11(B), UNDER PENALTY OF PERJURY

66. This is why it is critical that this court grant my "AMENDED MOTION TO REQUIRE ALL FILINGS TO INCLUDE A CERTIFICATION STATING THEIR CONTENTS ARE FACTUALLY TRUE AND COMPLIANT WITH F.R.C.P. RULE 11(B), SWORN TO UNDER THE PENALTY OF PERJURY[59] (EXPEDITED CONSIDERATION REQUESTED)" which I filed in MIWD on October 10, 2024, in ECF 100, PID 5343-5353.

67. Without this motion, unless this court closely monitors good professional conduct, and proactively sanctions each violator stiffly, there is likely more incentive for many of the defendants and their counsel to lie, twist the truth, operate in bad faith, and repeatedly violate Rule 11(b) in their filings, than to operate honestly, ethically, and lawfully.

68. I understand that Rule 11(b) sanctions are sometimes an effective deterrent to these types of attorney misconduct, but not when the oversight boards for the "practice of law" throughout the **state** have been captured, compromised, and are controlled by bad actors, as is true in this case.

DOC 57-1, PID 4405-4413 | https://rico.jefffenton.com/evidence/2019-08-30_notified-story-beeler-false-claims-in-court-order.pdf

55 DOC 54-1, PID 4358 | https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.mp4
DOC 1-14, PID 597-640 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf
DOC 53, PID 4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf

56 DOC 1-31, PID 1794-1873 | https://rico.jefffenton.com/evidence/2019-10-21_order-of-protection-as-illegal-prior-restraint.pdf

57 DOC 57-1, PID 4486-4501 | https://rico.jefffenton.com/evidence/2019-tn-wilco-48419b-tech-record-v3-pages-387-402-iied.pdf
DOC 1-31, PID 1794-1873 | https://rico.jefffenton.com/evidence/2020-09-24_5yr-op-ext-retaliation-no-notice-motion-hearing.pdf
DOC 57-1, PID 4463-4475 | https://rico.jefffenton.com/evidence/2019-09-26_motion-to-sell-contents-of-marital-residence.pdf
DOC 1-9, PID 226-227 | https://rico.jefffenton.com/evidence/2019-09-27_bk-order-to-sell-real-and-personal-property.pdf

58 DOC 1-12, PID 479-596 | https://rico.jefffenton.com/evidence/2019-10-29_tn-wilco-deed-fraud-ada-financial-exploitation.pdf

59 DOC 100, PID 5343-5374 | https://rico.jefffenton.com/3-24-cv-01282/doc/100.pdf

69. In Tennessee, peer pressure by colleagues in the legal profession, combined with retaliatory responses by the Board of Professional Responsibility of the Supreme Court of Tennessee, deter many honest patriotic attorneys from standing up and reporting attorney and judicial misconduct. (This should have **never** happened, **but it has**, and it needs to be fixed.)

70. To make matters even worse in Tennessee, Sandra Jane Leach Garrett, the Chief Disciplinary Counsel and Executive Director of the Board of Professional Responsibility of the Supreme Court of Tennessee, is actively protecting several of the defendants in this lawsuit, based upon their names and relationships, without showing any interest, care, or concern about their deeds and excessive fraudulent, deceptive, biased, and abusive misconduct.

71. Attorneys aren't typically required to swear under the penalty of perjury that their testimony is actually true. Contrary to what some people claim, attorneys don't actually have a "license to lie". This is the unfortunate consequence of oversight boards failing to be effective.

72. Attorneys aren't typically required to swear under the penalty of perjury, because they are already **required** to tell the truth and operate honestly before the court with clean hands.

73. Similarly, every paper filed by an attorney is **supposed** to comply with F.R.Civ.P. Rule 11(b), though I don't recall seeing **one** yet which honestly does:

> (b) Representations to the Court. By presenting to the court a pleading, written motion, or other paper—whether by signing, filing, submitting, or later advocating it—an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

(1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;

(2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;

(3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and

(4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

(c) Sanctions.

74. I've already proven[60] to the court that the responsibilities, expectations, and requirements for BAR members to operate honestly, in compliance with Rule 11(b) above, is **not** sufficient enough to cause some of the defendants in this case and their counsel to tell the **truth** (to testify without material misrepresentations), or to limit their filings to those which comply with the requirements above.

[60] DOC 76-1, PID 5076-5079 | https://rico.jefffenton.com/3-24-cv-01282/doc/76-1.pdf
DOC 101, PID 5375-5384 | https://rico.jefffenton.com/3-24-cv-01282/doc/101.pdf
DOC 101-1, PID 5385-5386 | https://rico.jefffenton.com/3-24-cv-01282/doc/101-1.pdf
DOC 101-2, PID 5387-5390 | https://rico.jefffenton.com/3-24-cv-01282/doc/101-2.pdf

THE HIGH COSTS OF DISHONESTY AND ATTORNEY MISCONDUCT

75. For anyone who wants to claim that defendant Story's lies and material misrepresentations in her affidavit[61] are insignificant, or "not that bad", or who think my motion for a *hundred thousand dollars* in sanctions[62] is extreme and unjustified, I will have them and the court know that I lost my home, my livelihood, my independence, more than I know how to concisely communicate to date (hence roughly six thousand pages in this docket and climbing), almost instantly in previous matters, by that same silver tongue which refused to speak the truth[63] or obey the courts rules; which everyone to date has overlooked and refused to discipline, despite causing me catastrophic and even irreparable damages, the likes of which I expect would cause most people with a conscience to cringe.

76. Each motion to dismiss is an attempt by a defendant and their counsel to evade responsibility for over a million dollars' worth of damages I have been collectively caused by the defendants, while nobody to date has acknowledged their role and responsibility for what they collectively did. (I don't see **any** defendants working "to facilitate a proper decision on the merits[64].")

77. If the court is not doing everything reasonably possible to ensure that every filing by each of the defendants and their counsel is first and foremost the **truth**, and secondly **complies with the court's own rules**, while my life literally hangs in the balance, what in God's name are we doing in court? It's common knowledge that with great power comes tremendous responsibility. The defendants in this case did not hesitate in exercising unethical, unlawful, and perversely unrestrained power over my life, now it's time to take responsibility for their choices.

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[61] DOC 76-1, PID 5076-5079 | https://rico.jefffenton.com/3-24-cv-01282/doc/76-1.pdf

[62] DOC 99, PID 5328 | https://rico.jefffenton.com/3-24-cv-01282/doc/99.pdf

[63] DOC 19, PID 2617-2716 | https://rico.jefffenton.com/evidence/2019_tn-court-motions-in-chronological-order.pdf

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

78. My life should not hang in the balance without at least the law licenses and livelihood of the attorneys involved being at material risk, should they choose to continue being dishonest while violating F.R.Civ.P. 11(b) in their pleadings.

79. Either steep sanctions need to begin immediately, to help fund counsel to defend myself against their frivolous games, or the court needs to clearly raise the expectations of all involved by granting my "AMENDED MOTION[65] TO REQUIRE ALL FILINGS TO INCLUDE A CERTIFICATION STATING THEIR CONTENTS ARE FACTUALLY TRUE AND COMPLIANT WITH F.R.C.P. RULE 11(B), SWORN TO UNDER THE PENALTY OF PERJURY (EXPEDITED CONSIDERATION REQUESTED)".

80. There can be no more critical and urgent matter before this court than ensuring that all filings, pleadings, and arguments placed before this court are held to the highest standards of honesty, ethics, and law.

81. Without honesty and ethics being consistently foundational, accurate, reliable, and trustworthy in this case, this court is not ready to hear any pleadings or to consider any motions, supported by case law being presented by the defendants. (Case law presented with any argument, absent honest facts and ethical pleadings can easily produce deception and fraud on the court.)

82. I understand what I am arguing here is typically *taken for granted* by the court, but I also know that it is frequently violated, while my life has been lawlessly destroyed beyond recognition by attorneys and judges who are party to this lawsuit, who violated these exact foundational principles, without recourse, consequences, or a remedy within my reach for **years**.

83. I can't do that again, and I should have never been placed in a situation where I was **forced** to submit to such lawless deception[66] "under color of law" in the first place.

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[65] DOC 100, PID 5343-5353 | https://rico.jefffenton.com/3-24-cv-01282/doc/100.pdf

[66] DOC 19, PID 2617-2716 | https://rico.jefffenton.com/evidence/2019_tn-court-motions-in-chronological-order.pdf

84. The privileges granted to BAR members are just that, and as is often seen with privileges, once they are abused, they are often revoked, and in this case need to be, in the honest interests of justice.

85. I don't have another life I can afford to lose. I need to make what's left of this life count! I can't do that without ensuring that the testimony and pleadings by the defendants and their counsel is both ethical and true, or having criminal perjury charges against the offenders, I can try to have lawfully enforced and prosecuted.

86. **Truth is the cornerstone of justice.** Without truth, there should be no business done in court! Until the defendants and their counsel are **forced to tell the truth**, with real, substantial, material consequences for "twisting" the facts and law in their filings while ignoring the critical constitutional merits and interests of justice in this lawsuit, reading and responding to their fillings will remain an unfair exercise in futility, of thirty-four defendants (plus their counsel) against one indigent *pro se* litigant (me). Where the scope of the task alone will substantially burden and overwhelm me, for no honest, good, lawful, or just purpose whatsoever, while substantially deferring critical justice interests, if not completely defeating justice in the end.

87. I have gone to great lengths to provide the court with a simple cure[67], to cause this lawsuit to operate far more efficiently for all involved, especially knowing the character of some of the defendants, but unless this court orders the defendants to comply, certifying that each filing has been "executed in good faith, in the honest pursuit of justice, and in strict compliance with F.R.Civ.P. 11(b)", while certifying their words to be actually true, sworn to under the penalty of perjury… this will unfortunately remain an arduous and unfair task.

[67] DOC 100, PID 5343-5353 | https://rico.jefffenton.com/3-24-cv-01282/doc/100.pdf
DOC 100-1, PID 5354-5374 | https://rico.jefffenton.com/3-24-cv-01282/doc/100-1.pdf

ABOUT THIS BLANKET OBJECTION

88. I have filed this blanket objection of **all** motions and orders to redact and seal documents in this lawsuit, from the public, as well as **all** motions to dismiss, and **all** motions for summary judgement by the defendants to date, in an effort to timely notify the court and all parties about my general position and intentions regarding most outstanding filings, as quickly and directly as I know how.

89. In filing this blanket objection, I am not forfeiting my right to reply to each individual motion with greater specificity, arguments, and case law. Though I will need significantly more time for that, and I believe that the justice interests in this lawsuit justify giving me as much time as is reasonably needed.

90. If the court agrees that some of the filings by the defendants to date are frivolous, fail to comply with F.R.Civ.P. Rule 11(b), and are frankly a waste of this courts time and resources, potentially deferring critical justice interests, it is my hope that they will strike and dismiss some of the defendant's pleadings, to accelerate the path moving forward. If not, I will continue to respond to them as quickly as I can, with greater specificity, to the best of my ability[68].

91. My failure to provide any argument or defense does not mean that I can't, won't, or forfeit my opportunity to do so, but rather that I am the highly disadvantaged party, unlawfully destroyed and deprived of all resources by which I might have afforded counsel, struggling to meet every demand of the court in this "David vs. Goliath" battle for **my life**, without any legal training, while I have not yet found the time and resources to devote to thoroughly writing an

[68] DOC 52, PID 4254-4257 | https://rico.jefffenton.com/evidence/tn-ada-disabilities-exploited-for-advantage-ocpd-merck.pdf
DOC 32, PID 3296-3309 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-declaration-of-disabilities.pdf
DOC 1-38, PID 2032-2045 | https://rico.jefffenton.com/evidence/2020-07-08_tnsc-coa-ada-request-for-modification.pdf

objection, reply, or response for each specific matter.

92. I reserve the right to file a robust and complete response in every matter before the court enters any orders detrimental to my interests and the justice this lawsuit seeks.

CLOSING STATEMENTS OF FACT

93. Upon information and belief, until the court compels the defendants **to answer for their preceding crimes and misconduct**, I don't believe that much done in court can honestly be toward the "interests of justice". Personally, I believe that any contrary actions are simply "fraud on the court by officers of the court" and "obstruction of justice" for however long as the court allows the prestigious officers of the court to continue filing papers which ignore or seek to evade the critical constitutional merits and justice interests in this lawsuit.

94. I've devoted the past couple of years of my life, working diligently ten to twelve hours per day, at least six days per week, to bringing this lawsuit while I've seen no one yet answer it based on the merits. It is time for that to happen, with the defendants' pleadings written and sworn to be accurate and true, under the penalty of perjury, before burdening me further.

95. Unlike the bad actors in this lawsuit, **justice cares about the truth.** While one of the primary purposes of our courts **is to discover the truth** in any given case and then to **apply the law to the truth.**

96. People can and do lie about what they are doing and call it "legal" and "justice," day in and day out when instead it is simply fraud and deceit.

97. **That's why I fight:** because the actions taken so far by the courts cannot be honestly, lawfully justified in any way, shape, or form. **If they could be justified, they would render the Constitution of the United States of America to be dead letter!**

98. No matter how big, powerful, and corrupt some of the defendants are in my lawsuit, **the court cannot prove the Constitution to be dead letter** in order to protect bad actors, some who honestly outlived their benefit to society long ago and need to be impeached and disbarred to protect the public health and safety of society at large.

CONCLUSION

99. It is critical that the public, justice advocates, court reform advocates, indigent and *pro se* rights advocates, court watchers, court oversight boards, government and court watchdogs, as well as people involved in numerous state and federal "equal access to justice[69]" programs, along with segments of society interacting with all different tiers of our justice system, have full unfettered access to the filings in this lawsuit. **A government "for the people by the people" cannot fix problems which are <u>hidden</u> from them.**

100. The public's right to know how the federal courts prioritize and allocate resources for the benefit of different socioeconomic demographics in our country, such as indigent and disabled litigants in this case, far exceeds any legitimate privacy concerns by the defendants, which the court could easily compensate for by using single line-level redactions to conceal any home addresses without the need to redact any section, full page, or document in this lawsuit.

101. Everything I have filed, which has been sealed or redacted in this lawsuit to date, in both MIWD and TNMD should be made publicly available again, except for word-level or line-level redactions which the court can effectuate to address any real privacy concerns, without redacting, sealing, or restricting from the public any more than is "absolutely necessary".

102. It is critical to the honest interests of justice in this matter, along with the

[69] https://www.acus.gov/ | https://eaja.acus.gov/?action=list&entity=CaseRecord

timeliness of the actions in this lawsuit, that the court either grant my motion to require real accountability in each filing, under the **penalty of perjury** or by *sua sponte* striking frivolous motions filed by the defendants and strictly discipling **all** attorney misconduct with **steep** sanctions, while granting me extra time to argue against their frivolous claims.

103. For a better understanding of the challenges I have and continue to face in the Federal Courts and in Tennessee's state courts prior, the level of impropriety by the defendants and their counsel, acting contrary to the honest interests of justice in this matter and others, please read my "DECLARATION EXPLAINING MY PURSUIT OF JUSTICE[70]", filed in TNMD on February 6, 2025, in DOC 207, PID 583-619. **Justice is all that I seek, all day, every day!**

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 February 08, 2025

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[70] DOC 207, PID 583-685 | https://rico.jefffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

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

1. FIRST OBJECTION TO ALL MOTIONS TO DISMISS, FOR SUMMARY JUDGEMENT, AND MOTIONS/ORDERS TO REDACT AND SEAL DOCUMENTS

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 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 February 28, 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)
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ELECTRONIC SERVICE OPTIONS

These documents should also be available on the Internet, within the next few days, on my list[1] of documents filed by myself in this lawsuit, since the release of my lawsuit service package[2].

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 22, 2025

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

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

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