UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN

FILED - LN
October 21, 2024 4:17 PM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: pjw / SCANNED BY: 10/21/24

JEFFREY RYAN FENTON, PLAINTIFF v. VIRGINIA LEE STORY ET AL., DEFENDANTS	CASE NO. 1:23-CV-01097

MOTION TO STAY ALL DISPOSITIVE MOTIONS[1] UNTIL SERVICE IS COMPLETE, A RULING IS MADE ON PLAINTIFF'S "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", AND THIS CASE IS TRANSFERRED TO THE CORRECT VENUE (EXPEDITED CONSIDERATION REQUESTED)

The pace of this case currently is a threat to public safety and my health, because I don't physically have enough hours in the day to meet all the demands to protect my lawsuit from being wrongfully dismissed, despite the critical constitutional interests at stake.

I am still trying to serve my lawsuit to several of the defendants who have been actively dodging service, just like several of the state actors were until counsel was hired for all of them collectively, while some state actors still continued to reject and even **mail back** service up to two weeks **after** counsel made an appearance in this matter on their behalf[2]. While still claiming they were improperly served, and seeking to have the lawsuit thrown out due to no fault of my own.

[1] Citations to the court record in this lawsuit will be notated without the case name or number, using the starting ECF Number, followed by both the beginning and ending Page ID, which is abbreviated as "PID."

[2] See defendants Beeler, Coke, and Garrett, then check their credentials to see if their behavior is "reasonable".

At some point, somebody needs to take an interest in *justice*, not just thwarting justice at all costs.

I am hereby providing notice to all parties that they are putting my life and my safety in literal danger, while I run myself ragged, staying awake for days, needing to drive sleep deprived back and forth to Lansing, to defend myself against absolutely frivolous claims.

It was the same way in Tennessee too… sometimes necessitating that I stay awake for three or four days straight at a time, on multiple occasions, as I told the court, simply in an attempt to defend myself against fraudulent criminal misconduct, by defendants Story, Binkley, and their friends, when never should Binkley have heard a case by Story, and never should a Williamson County litigant been required to submit their lives, their fortunes, their family, and their freedom to the two under the pretense of anything lawful, honest, or impartial taking place.

The evidence in this case redundantly proves that beyond any plausible margin of "error", I'm willing to halt the entire lawsuit and hold a trial immediately on just that, if justice is interested in quickly uncovering the truth.

It's almost 3:00 on 10/21/2024, the court closes in an hour and a half, and it is well over a one-hour drive with construction.

I've been awake for so long, that it is not safe for me to drive, but I don't have a choice. Everyone is waiting to dismiss this case for a slew of different reasons, none of which are remotely lawful, equitable, or fair.

I need time to write a brief to substantiate why I'm asking for this motion to stay all dispositive motions, but I don't have time to write it today.

Tomorrow I must print, label, and mail 15 copies of what I'm filing in court today, so I

won't have time to drive to the court tomorrow to file my brief, I won't even have time to write it by then.

I don't have ECF, so I can't file it electronically, while the court doesn't accept faxes, so regardless of justice, I'm out of luck.

I will do my best to write a brief to support this on Wednesday, and mail it on Thursday, so the court will have more to substantiate my motion with.

I physically can't do anymore today, while still having any chance of making it to the court to file this before it closes.

I'm out of time. The court must protect the honest interests of justice, and whether I like it or not, I have no chance outside the court freely choosing to do so.

CONCLUSION

Dismissing a case with significant merit such as this one would not serve the interests of true justice at this point. Some defendants are responsible for deliberate wrongdoing—and even deliberate criminal acts. Others are either accessories to nefarious conduct or active participants in it. Allowing these culpable parties to escape justice because of political ties or improper influence or because of minor technicalities—some of which are at least partly the fault of the defendants—is not serving justice; it is serving *in*justice. Plaintiff's constitutional rights require that he have his day in court, which has yet to happen and thus necessitated this very action. For all of the preceding reasons, this matter cannot be dismissed against the defendants *if justice is to be really served*. Finally, should this court seriously entertain any motion to dismiss at this juncture, Plaintiff demands an evidentiary hearing prior to any related decision, and he is filing a separate motion accordingly.

CERTIFICATION & 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 October 21, 2024 @ 3:00 PM

JEFFREY RYAN FENTON, PRO SE

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CONTACT@JEFFFENTON.COM
(P) 615.837.1300

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2024, I am filing the foregoing papers in person, in the United States District Court in the Western District of Michigan, located in Lansing Michigan. I further certify that on October 22, 2024, I am serving these same documents to the defendants or their counsel, by first class mail, at the addresses below. If for any reason beyond my control, I am unable to complete either, I will do so on the very next business day.

U.S.D.C. WESTERN DISTRICT OF MICHIGAN
113 FEDERAL BLDG
315 W ALLEGAN ST RM 113
LANSING, MI 48933-1514

VALERIE HENNING MOCK
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CHARLES M. WALKER
1925B WARFIELD DR
NASHVILLE, TN 37215-3422

THOMAS E. ANDERSON
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BRENTWOOD, TN 37027-3916

ELECTRONIC SERVICE OPTIONS

This document will also be available on the Internet, 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.

Executed on October 21, 2024

JEFFREY RYAN FENTON, PRO SE

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

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