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 12 2025 U.S. DISTRICT COURT MIDDLE DISTRICT OF TN

SECOND[1] MOTION TO STAY ALL DISPOSITIVE MOTIONS UNTIL SERVICE IS COMPLETED AND THE COURT HAS RULED ON PLAINTIFF'S OUTSTANDING EXPEDITED MOTIONS, WITH CLARIFICATIONS ABOUT HOW TO PROCEED[2]

This testimony and motion is brought pursuant to 28 U.S. Code § 1746; 28 U.S. Code § 455(a), (b)(1); U.S. Const. amend V §§ 1, 5.1, 7.1, 7.9, 9.1, 9.10, 9.4, and amend XIV §§ 1.3, 1.5, 1.6, 1.8.12.3, 1.8.13.1; and F.R.Civ.P. Rule 11(b).

1. This lawsuit exposes *predatory litigation*[3], fraud on the court by officers of the court, real estate deed fraud, and racketeering in Middle Tennessee's courts, along with serious public corruption in the areas of Williamson County, Franklin, Brentwood, and Nashville, Tennessee.

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[1] A "MOTION TO STAY ALL DISPOSITIVE MOTIONS 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)" was filed in MIWD on October 21, 2024, in DOC 109, PID 5577-5583. https://rico.jefffenton.com/3-24-cv-01282/doc/109.pdf

[2] 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.

[3] https://tninjustice.org/predatory-litigation-101/

https://jefffenton.com/predatory-litigation-how-us-courts-were-designed-to-produce-justice-why-they-fail-how-to-restore-justice-again/

2. Prior to moving forward and responding to each individual motion filed by the defendants, I need the court to rule on two of my outstanding motions, to provide me with the accommodations and tools necessary for me to have a fair chance at litigating this matter against the wall of power which I am obviously up against in this lawsuit.

3. This request is not only an attempt to even up the odds a bit technologically, by allowing me ECF filing privileges and remote participation which are essential to me being able to participate with the court in *real time* and respond timely and affordably to any individual pleadings, but it is also critical for the court to clarify their posture toward professional misconduct, dishonesty, and frivolous filings, in hopes of eliminating some of the misconduct which has been prevalent so far between the defendants and their counsel.

4. Good professional and judicial conduct is probably the most critical factor, often even the deciding factor, I believe, between whether the courts produce justice or injustice through their proceedings.

5. It's of critical importance in this matter, at least to my family, that the court doesn't just "go through the motions" common to "legal work" in this case, but that the product produced be real honest justice.

BACKGROUND

6. On October 21, 2024, I filed a motions in MIWD titled, "MOTION TO STAY ALL DISPOSITIVE MOTIONS 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)[4]" in DOC 109, PID 5577-5583.

[4] DOC 109, PID 5577-5583 | https://rico.jefffenton.com/3-24-cv-01282/doc/109.pdf

7. Since this time, the case changed venues, being transferred from case # 1:23-cv-01097 in the Western District of Michigan[5] to case # 3:24-cv-01282 in the Middle District of Tennessee[6], after which every federal district and magistrate judge in the Middle District of Tennessee recused themselves[7] from this matter.

8. As of February 10, 2025, a "NOTICE OF JUDGE ASSIGNMENT[8]" was posted in DOC 208, PID 686, stating as follows:

> "All District Judges of the Middle District of Tennessee have recused in this matter. Chief Judge Jeffery S. Sutton of the Sixth Circuit Court of Appeals has designated United States District Judge Patricia A. Gaughan to preside over the case."

9. In the next filing by the court on February 11, 2025, in DOC 209[9], PID 687, the court stated as follows:

> "This matter is hereby forwarded to the pro se staff attorney for initial review. IT IS SO ORDERED."

10. DOC 209, PID 687 also states in the footnote, "United States District Judge for the Northern District of Ohio, Eastern Division, sitting by designation."

11. I have never heard of a *"pro se staff attorney"*, so I am unclear what this means, or exactly what is expected of me at this juncture.

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[5] DOC 127, PID 5706-5710 | https://rico.jefffenton.com/3-24-cv-01282/doc/127.pdf

[6] DOC 131 | https://rico.jefffenton.com/3-24-cv-01282/doc/131.pdf

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

[8] DOC 208, PID 686 | https://rico.jefffenton.com/3-24-cv-01282/doc/208.pdf

[9] DOC 209, PID 687 | https://rico.jefffenton.com/3-24-cv-01282/doc/209.pdf

12. There are two specific motions of mine, which remain outstanding, that I honestly need for the court to hear and rule on, before I will have the tools, orders, and understanding necessary for me to proceed to protect my interests while making the best use of my time and resources along with the court's and the defendant's; so we can quickly dispense with frivolous claims and begin to honestly address the substantial merits of this lawsuit.

13. Those motions are listed below followed by a brief explanation why they are needed in the *interests of justice* before I can proceed. I'm trying to be mindful not to cause unnecessary redundancy in my filings, so for a deeper understanding of the *interests of justice* related to either motion, please reference it directly in the docket.

MOTIONS NEEDING RULINGS PRIOR TO PROCEEDING

I. Filed in MIWD on October 10, 2024, "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 (EXPEDITED CONSIDERATION REQUESTED)[10]" in DOC 100, 100-1, PID 5343-5374.

   a) This motion should weed out the vast majority of frivolous claims and filings presented by the defendants, which is estimated to currently be the majority of the defendant's motions pending before this court.

   b) This will significantly reduce the misconduct by the defendants and their counsel, while significantly raising the stakes for that misconduct.

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

c) This motion compels everyone to tell the **truth** and not play games wasting the court's time with nonsense, which should be important to everyone except bad actors who leverage our courts for purposes **contrary** to the honest interests of justice.

d) This motion should significantly reduce the need to address misconduct in this lawsuit, in order to protect my rights to equal protection and due process.

e) Upon information and belief, without this motion being granted, the defendants and their counsel will likely continue to overwhelm me and my disabilities[11] with frivolous filings[12] requiring I perform substantial **process** within tight deadlines, unjustly exhausting my time, energy, and resources to defend myself and my lawsuit against false, twisted, and fraudulent claims, citing inapplicable case law due to the dishonestly contorted claims and strategic material misrepresentations, which appears to have unfortunately become core to some of the defendant's practices, in stark violation of F.R.Civ.P. Rule 11(b), while simultaneously deprioritizing **merits**, **conduct**, and any real **justice**.

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[11] 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

[12] DOC 101, PID 5375-5390 | https://rico.jefffenton.com/evidence/2024-10-08_counter-affidavit-correcting-storys-false-claims.pdf
DOC 99, PID 5328-5342 | https://rico.jefffenton.com/evidence/2024-10-08_motion-for-sanctions-against-story-for-lying.pdf
DOC 102, PID 5391-5468 | https://rico.jefffenton.com/evidence/2024-10-09_concerns-about-transferring-to-tennessee.pdf
DOC 176, PID 225-233 | https://rico.jefffenton.com/evidence/2024-11-08_fenton-reply-to-storys-opposition-to-sanctions.pdf
https://rico.jefffenton.com/evidence/2025-01-17_email-service-of-elaine-beeler-via-lisa-carson.pdf
DOC 207, PID 583-685 | https://rico.jefffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf
DOC 211, PID 689-723 | https://rico.jefffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf
DOC 212, PID 730-907 | https://rico.jefffenton.com/evidence/2025-02-10_tn-motion-to-minimize-or-remove-redactions.pdf
DOC 216, PID 984-1015 | https://rico.jefffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf
https://rico.jefffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf
DOC 217, 218, 219 | "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS"

II. Filed in TNMD on January 21, 2025, "MOTION TO FILE ELECTRONICALLY AND FOR REMOTE PARTICIPATION (EXPEDITED CONSIDERATION REQUESTED)[13]" in DOC 197, 191-1, PID 445-486.

a) Without this I am literally unable to work in *real time* with the court, without receiving some compensation from the defendants—prior to proceeding—for the damages they have continued to cause me[14], because I can't afford the cost of postage while USPS service between Michigan and Tennessee can take up to a week, each way.

b) It costs me roughly $125 - $200 to mail **notice** of each filing to the defendants, while I have zero income, real property, and savings as a direct result[15] of the multiple felony crimes committed against my family by the defendants in this lawsuit.

c) It is substantially more work (sometimes days) and expense for me to print and mail notices to the seventeen different addresses currently necessary for noticing the defendants or their counsel about each and every filing. Further complicated by needing to time, execute, and serve a Certificate of Service for each to both the court and each party.

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[13] https://rico.jefffenton.com/3-24-cv-01282/doc/197.pdf | https://rico.jefffenton.com/3-24-cv-01282/doc/197-1.pdf

[14] DOC 99, PID 5328-5342 | https://rico.jefffenton.com/evidence/2024-10-08_motion-for-sanctions-against-story-for-lying.pdf

DOC 217, 218, 219 | "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS"

[15] DOC 214, PID 911-975 | https://rico.jefffenton.com/evidence/fenton-finances-roles-property-education-support-fraud.pdf

d) Almost all of my documents begin as "true" digitally created full-color PDF documents, with optical character recognition enabled, that could be searched in seconds, many containing electronic bookmarks linked to section headings for fast reference, in addition to embedded electronic indexes. A few of my larger documents, such as my FAC[16], even have a hyperlinked table of contents built-in, making them substantially faster, easier, and more intuitive to navigate, search, and work with in their original digital format.

e) Each filing I must make *without* ECF filing privileges, substantially *reduces* the efficiency and value of each document, while *increasing* the workload for the court clerks along with everyone else who encounters or works with the documents afterwards, as "flat" black and white images without many of the benefits which PDF documents are capable.

f) "The purpose of the Federal Rules of Civil Procedure is "to secure the **just**, **speedy**, and **inexpensive** determination of every action and proceeding[17]"" (emphasis added).

g) Granting this motion would allow me to participate much more fully and timely in this lawsuit (just), significantly increasing the speed of my responses (speedy) and my ability to directly address separate issues (just) without the need to bundle together pleadings to save on postage costs (inexpensive).

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

[17] https://www.uscourts.gov/forms-rules/current-rules-practice-procedure/federal-rules-civil-procedure

h) This would also substantially reduce the workload for the court's clerks (speedy & inexpensive) while significantly increasing the **value** of my documents filed (just, speedy, and inexpensive) for both the court and each of the law firms working with those files.

i) The defendants have and continue to literally misappropriate public resources and offices for private and criminal purposes, harming me and my family (along with other members of the public), while protecting the bad actors herein[18].

j) It seems a reasonable request, for the court to allow me the benefit of public resources to improve my *access* to the court and opportunity to *participate* therein, through ECF filing and remote participation. That seems like a very logical, practical, and efficient request, in complete alignment with the Federal Rules of Civil Procedure and truly beneficial to the honest interests of justice.

REGARDING MY FIRST MOTION TO STAY ALL DISPOSITIVE MOTIONS

14. Referring back to my first motion to stay all dispositive motions[19], which I filed in MIWD on October 21, 2024, in DOC 109, PID 5578-5579, where I wrote in part:

> "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."

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

[19] DOC 109, PID 5577-5583 | https://rico.jefffenton.com/3-24-cv-01282/doc/109.pdf

"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" (emphasis added).

"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" (emphasis added).

"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."

A BRIEF TO SUBSTANTIATE MY MOTION TO STAY ALL DISPOSITIVE MOTIONS

15. What I need to quickly address is the expectation I set in this October 21 motion, which I was unable to fulfill, at least as specified, due to the overwhelming interference and misconduct I experienced in the days and weeks to follow. (See the two underlined sentences in the above motion for what I am referring to.)

16. I stated in my October 21, 2024, motion to stay all dispositive motions, "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."

17. In the days immediately following October 21st, I rushed to file executed summonses with the court, while cooperating with opposing counsel who requested extensions of time to reply to my complaint, as both are evidenced in the docket.

18. Amidst that was when I was approached by the U.S. Attorney's Office in Michigan[20], on October 23, regarding defendant Walker's claimed "privacy and safety concerns", which almost immediately hijacked my focus and work flow, prioritizing itself above every other issue, concern, and commitment I was working on, for the alleged "safety" of a federal judge, which I took seriously while diligently working towards a remedy which would protect defendant Walker's privacy without compromising the public's access to any meaningful matters in my lawsuit.

19. Then on October 25th this lawsuit was transferred[21] from Michigan to Tennessee, after which I was quickly contacted by the U.S. Attorney's Office in Tennessee[22] regarding those same alleged concerns of defendant Walkers, after which I could not "come back up for air" (except for very brief periods) for **months**. I am still trying to rectify the damage I was caused by this misconduct, as explained in other filings[23], on this seventh day of March 2025.

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[20] DOC 212-1, PID 757-766 | https://rico.jefffenton.com/evidence/2024-10_comms-with-usat-ryan-cobb-about-redactions.pdf

[21] DOC 217, PID 5706-5710 | https://rico.jefffenton.com/3-24-cv-01282/doc/127.pdf

[22] DOC 212-1, PID 767-783 | https://rico.jefffenton.com/evidence/2024-11_comms-with-usat-anica-jones-about-redactions.pdf

[23] DOC 211, PID 689-723 | https://rico.jefffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf
DOC 212, PID 730-907 | https://rico.jefffenton.com/evidence/2025-02-10_tn-motion-to-minimize-or-remove-redactions.pdf
https://rico.jefffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf
https://rico.jefffenton.com/evidence/2025-03-05_second-motion-to-extend-time-for-service.pdf
DOC 217, 218, 219 | "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS"

20. I have filed several documents trying to substantiate and explain the predominate reasons for my requested motion to stay, but I overlooked naming them in a way which specifically related to that motion or anticipated "brief". I likewise never made it back to write and file a *brief* specifically in support of that one motion as I originally planned when I set that expectation.

21. That is the reason why I am filing this "SECOND MOTION TO STAY ALL DISPOSITIVE MOTIONS UNTIL SERVICE IS COMPLETED AND THE COURT HAS RULED ON PLAINTIFF'S OUTSTANDING EXPEDITED MOTIONS". To further clarify the basis for that original motion, along with this second motion, emphasizing why the motions to stay are important and necessary to the interests of justice in the matters before the court.

22. As a result of needing to respond to so many motions, many of which present similar claims and arguments, I am struggling to understand **how** best and most efficiently to respond to them. Whether to draft and file papers which address specific **topics** and **claims**, for example "Objection to all Defendant Claims that Service was Untimely", or whether I need to redundantly copy and paste the same responses into separate objections which I must file for each and every defendant making similar claims. I would greatly appreciate some instruction or clarification on this question from the court.

23. Therefore, I have worked hard to file documents which address specific aspects of multiple defendant motions, addressing substantive **issues** and **claims**, while seeking to clarify the truth about what I have experienced along with the constitutional merits and justice interests in this lawsuit; hopefully showing the court that some of the frivolous filings by the defendants and their counsel, are just that.

MISCONDUCT AND INTERFERENCE

24. Upon information and belief, there was significant judicial bias by the Magistrate Judge[24] in the Western District of Michigan, and significant professional misconduct[25] by the defendants and their counsel, some who continued to dodge service[26], while others continued refusing to sign[27] for service successfully received. One of the defendants even went so far as to mail service back weeks after receiving it[28], claiming not to have been served thereafter[29].

INTERFERENCE BY THE U.S. ATTORNEY'S OFFICES

25. Upon information and belief, I have also had to contend with roughly two months' worth of **extra** work created for me, by misconduct and interference caused by defendant Walker and the United States Attorney's Offices in both Michigan and Tennessee, costing me literally hundreds of extra hours of work, as addressed in the documents named in the next four paragraphs.

26. "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS" filed in DOC 217, 218, and 219.

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[24] DOC 222, PID 1164-1214 | https://rico.jefffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf
DOC 60, PID 4736-4739 | https://rico.jefffenton.com/3-24-cv-01282/doc/60.pdf
DOC 62, PID 4744-4760 | https://rico.jefffenton.com/3-24-cv-01282/doc/62.pdf

[25] DOC 101, PID 5375-5390 | https://rico.jefffenton.com/evidence/2024-10-08_counter-affidavit-correcting-storys-false-claims.pdf

[26] DOC 180, PID 281-296 | https://rico.jefffenton.com/3-24-cv-01282/doc/180.pdf
DOC 192, PID 379-408 | https://rico.jefffenton.com/3-24-cv-01282/doc/192.pdf
DOC 205, PID 562-578 | https://rico.jefffenton.com/3-24-cv-01282/doc/205.pdf

[27] DOC 182, PID 313-326 | https://rico.jefffenton.com/3-24-cv-01282/doc/182.pdf
DOC 204, PID 537-561 | https://rico.jefffenton.com/3-24-cv-01282/doc/204.pdf

[28] DOC 114, PID 5623-5632 | https://rico.jefffenton.com/3-24-cv-01282/doc/114.pdf

[29] DOC 183, PID 331-184 | https://rico.jefffenton.com/3-24-cv-01282/doc/183.pdf
DOC 184, PID 327-330 | https://rico.jefffenton.com/3-24-cv-01282/doc/184.pdf

27. "FIRST OBJECTION TO ALL MOTIONS TO DISMISS, FOR SUMMARY JUDGEMENT, AND MOTIONS/ORDERS TO REDACT AND SEAL DOCUMENTS[30]" filed in DOC 211, PID 689-723.

28. "DECLARATION AND MOTION TO CORRECT AND MINIMIZE OR STRIKE AND REMOVE REDACTIONS, WHILE UNSEALING ALL RECORDS[31]" filed in DOC 212, PID 730-907.

29. "SECOND OBJECTION TO ALL DISPOSITIVE MOTIONS, REDACTED AND SEALED FILINGS, WITH DECLARATION ABOUT JUDICIAL MISCONDUCT IN MICHIGAN CAUSING SUBSTANTIAL DELAYS IN SERVICE[32]" filed in DOC 222, PID 1164-1214.

NASHVILLE'S CULTURE OF CRONYISM AND COURT CORRUPTION

30. Upon information and belief, a big part of the problem with much of this group is that they refuse to confront, report, discipline, or correct egregious fraudulent attorney and judicial misconduct by some of their friends, peers, subordinates, and colleagues, creating a **culture** in Middle Tennessee where **peer pressure** between legal professionals **compels** them to **keep** each other's **secrets** and **cover** for **each other**, rather than obeying their oaths of office and duty to report, discipline, or correct, substantial attorney and judicial misconduct.

31. Upon information and belief, this has nothing to do with the types of misconduct or the severity, such as limiting "the reporting obligation to those offenses that a self-regulating

[30] DOC 211, PID 689-723 | https://rico.jefffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf

[31] DOC 212, PID 730-907 | https://rico.jefffenton.com/evidence/2025-02-10_tn-motion-to-minimize-or-remove-redactions.pdf

[32] DOC 222, PID 1164-1214 | https://rico.jefffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

profession must vigorously endeavor to prevent[33]", as encouraged in Tenn. R. Sup. Ct. 8.3 - REPORTING PROFESSIONAL MISCONDUCT - Comment [3]. That's **not** what I'm talking about here. As you will see in the next paragraph, some officers of the Middle Tennessee courts, such as defendant Binkley, openly admit that they have **never** reported **any attorney misconduct**, prior to his boisterous public vendetta against Attorney Whistleblower Brian Manookian.

32. On March 21, 2021, the Knoxville News Sentinel published an article[34] titled, "Appeals court removes Tennessee judge from case with lawyer who revealed his secret arrest", which included a video showing defendant Binkley[35] chastising a "courtroom of attorneys" while he was actively employed as a Williamson County Chancery Court Judge. Between the 1:26 and the 1:43 timestamps of that video[36], defendant Binkley stated, "**I've never turned in a lawyer in my entire career.** But there's one, Brian Manookian, I'm going to turn in. And I've got about *seventy* different examples. And I'm not stopping" (emphasis added).

33. Upon information and belief, that statement above by defendant Binkley was a **confession** that throughout his career he had **violated** the court's **codes of conduct**, which are **not optional**, refusing to report misconduct which he witnessed or knew about, except in the case of Brian Manookian, whom Binkley claimed he was reporting for an alleged *seventy* ethics violations.

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[33] DOC 41, PID 3606 | Tenn. R. Sup. Ct. 8.3 - REPORTING PROFESSIONAL MISCONDUCT - Comment [3]

DOC 41, PID 3570-3608 | https://rico.jefffenton.com/evidence/tennessee-rules-of-judicial-and-professional-conduct.pdf

[34] https://www.knoxnews.com/story/news/crime/2021/03/22/tennessee-appeals-court-pulls-judge-michael-binkley-casey-moreland-brian-manookian/4450016001/

DOC 52, PID 4174-4179 | https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf

[35] DOC 1-15, PID 614-615 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf

[36] DOC 54-1, PID 4368 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4

34. Upon information and belief, for those who don't know Brian Manookian was the attorney whistleblower[37] who first reported corrupt former Nashville judge Casey Moreland for ethics violations before the FBI[38] arrested Moreland and put him in prison on multiple corruption related charges[39]. Brian Manookian was also the attorney whistleblower who former judge Michael W. Binkley suspected leaked his secret[40], that Binkley was **arrested** during a 2010 **prostitution sting** on Dickerson Avenue in Nashville, before he became a judge. After which Binkley hired Moreland's own personal attorney, **Ed Yarbrough**[41], to broker a deal with Moreland by which Binkley's Solicitation of Prostitution, or substantially similar charge, was both dismissed and expunged from the Davidson County Court System in a "highly unusual manner, both in timing and procedure[42]."

35. Upon information and belief, interestingly, there is another Yarbrough who is a defendant in this lawsuit. Attorney **Kathryn Lynn Yarbrough** (BPR# 032789) who worked for defendant Story's law firm in Franklin, Tennessee, and actively participated in the RICO scam with Binkley and Story, used to steal my Brentwood home. Defendant Kathryn Lynn Yarbrough has refused to make an appearance in this matter to date, despite receiving service months ago, on multiple occasions.

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[37] DOC 43, PID 3694-3695 | https://rico.jefffenton.com/evidence/2017-02-01_scene-ethics-complaint-against-two-judges.pdf
DOC 58-2, PID 4628-4630 | https://rico.jefffenton.com/evidence/2019-07-01_tenn-bpr-targets-whistleblowers-not-corruption.pdf

[38] DOC 43, PID 3698-3701 | https://rico.jefffenton.com/evidence/2017-04-03_nc5-moreland-tried-to-plant-drugs-on-witness.pdf
DOC 54-1, PID 4360 | https://rico.jefffenton.com/evidence/2017-04-03_wtvf-moreland-tried-to-plant-drugs-on-witness.mp4
DOC 54-1, PID 4362 | https://rico.jefffenton.com/evidence/2017-04-03_wtvf-undercover-fbi-video-of-casey-moreland.mp4

[39] DOC 52, PID 4180-4201 | https://rico.jefffenton.com/evidence/2018-02-28_tn-judge-cason-moreland-fbi-criminal-complaint.pdf

[40] DOC 52, PID 4174-4179 | https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf

[41] DOC 42, PID 3677-3679 | https://rico.jefffenton.com/evidence/2014-10-23_tenn-moreland-reprimanded-by-state-board.pdf
DOC 54-1, PID 4358 | https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.mp4
DOC 43, PID 3696-3697 | https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.pdf

[42] DOC 43, PID 3697 | https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.pdf

36. Upon information and belief, after which the Board of Professional Responsibility of the Supreme Court of Tennessee retaliated against Brian Manookian and **suspended** him from the practice of law (apparently subsequent to defendant Binkley's complaint alleging *seventy* ethics violations), which ultimately ended with attorney whistleblower Brian Manookian being **disbarred** from the practice of law in Tennessee (though they claim for other reasons).

37. Tennessee Supreme Court Justice Sharon G. Lee wrote in her dissenting opinion about Brian Manookian being disbarred[43], "For the first time, this Court has increased an attorney's discipline through the exercise of the Court's inherent jurisdiction **outside of the process** outlined in Rule 9 by disbarring Brian Philip Manookian **without giving fair notice** of its intent" (emphasis added). Further stating toward the end, "In sum, no matter how offensive the Court deems Mr. Manookian's conduct, the Court **in its haste to disbar Mr. Manookian** should rule in a respectful, **unbiased**, and **even-handed manner** and **not dispense with notice** and **an opportunity to be heard**" (emphasis added).

38. Upon information and belief, when the Tennessee Supreme Court **suspended** attorney whistleblower Connie Reguli[44] and then **disbarred** attorney whistleblower Brian Manookian, they sent a clear message throughout the legal profession in Tennessee, that if you **confront** or **report judicial misconduct** and **court corruption** in Tennessee, you will be **retaliated** against by the Board of Professional Responsibility of the Supreme Court of Tennessee,

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[43] DOC 58-4, PID 4712-4716 | https://rico.jefffenton.com/evidence/2024-02-16_tnsc-manookian-disbarment-opinion-justice-lee.pdf

[44] Reguli v. Woodruff et al (3:2024-cv-00694) | https://dockets.justia.com/docket/tennessee/tnmdce/3:2024cv00694/99766
Reguli et al v. Hetzel et al (3:2024-cv-00541) | https://dockets.justia.com/docket/tennessee/tnmdce/3:2024cv00541/99331
DOC 54-1, PID 4355 | https://rico.jefffenton.com/evidence/2010-10-05_reguli-tn-senate-judiciary-comm-retaliation-pt-1.mp4
DOC 54-1, PID 4356 |https://rico.jefffenton.com/evidence/2010-10-05_reguli-tn-senate-judiciary-comm-retaliation-pt-2.mp4
DOC 54-1, PID 4364 | https://rico.jefffenton.com/evidence/2010-10-05_savoie-tn-senate-judiciary-comm-jud-misconduct.mp4
DOC 54-1, PID 4376 | https://rico.jefffenton.com/evidence/2016-08-11_reguli-tn-indigent-task-force-poverty-fam-dep-ct.mp4
DOC 54-1, PID 4377 | https://rico.jefffenton.com/evidence/2019-02-26_reguli-tn-gen-assy-conflict-in-child-welfare-sys.mp4
DOC 58-5, PID 4718-4722 | https://rico.jefffenton.com/evidence/2024-05-02_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf

you will have your business **attacked**, be wrongly **sanctioned**, **suspended**, and **disbarred**. You will have your reputation attacked, be professionally smeared, get fined, lose your business, lose your law license, and unless you have another means of supporting yourself and your family, lose your livelihood.

39. I forgot to mention, upon information and belief, Binkley also hit Manookian with *seven hundred thousand dollars* in sanctions[45], which later the Tennessee Court of Appeals overturned due to Binkley's publicly demonstrative *bias* (vendetta). Attorney Whistleblower Connie Reguli was also wrongfully sanctioned, in addition to being arrested and charged with a fake felony[46], to prohibit her from participating as a judicial candidate in Williamson County.

40. Upon information and belief, this is the court culture in Middle Tennessee currently, where the peer pressure amongst legal professionals often works contrary to the honest interests of justice, while compelling attorneys **not** to report professional and *especially* judicial misconduct.

F.R.CIV.P. RULE 11(B)

41. One of the biggest problems with litigating for a remedy against this group of actors, is that many of them are dishonest and have learned to weaponize the "practice of law" in unethical and illegal ways, contrary to the interests of justice[47], their oaths of office, and the trust they have been afforded as "officers of the court[48]".

42. On top of that, some of the defendants in this case are literally entrusted with the oversight of the "practice of law" throughout the entire State of Tennessee, while protecting

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[45] DOC 52, PID 4174-4179 | https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf

[46] https://tennesseeconservativenews.com/fake-felony-charge-used-to-disqualify-conservative-judge-candidate-overturned-for-client/
https://tntribune.com/dcs-and-a-fearless-attorney/
https://www.youtube.com/watch?v=-rC6CjUATTk

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

[48] DOC 216, PID 984-1015 | https://rico.jefffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf

others in this group from being disciplined (sanctioned, suspended, and disbarred) for substantial professional and judicial misconduct, even after they have been reported to the Tennessee Supreme Court, the Tennessee Court of Appeals, the Tennessee Administrative Offices of the Courts, and even the Board of Professional Responsibility of the Supreme Court of Tennessee. Which is precisely why those entities and some of their leaders have been named as defendants in this lawsuit, because they have repeatedly refused to obey their oaths of office, along with the court's codes of judicial and professional conduct, while acting honestly in good faith, to uphold the law and to require their friends, peers, colleagues, and subordinates to do the same.

43. This is not a new phenomenon[49], though it rarely makes the evening news, because there is substantial social, political, professional, and financial pressure not to challenge or expose such illicit groups of lawless centralized power in certain regions throughout the country.

44. The courts have also made a habit of disavowing the legitimacy of such actions, likely in an effort to protect their own or to downplay the prevalence of impropriety and municipal corruption within the courts, as well as in all branches and tiers of state and federal government.

45. There also seems to be a greater appetite within the court system to stifle the **appearance** of impropriety[50], rather than discouraging, addressing, reporting, disciplining, and removing the actual **impropriety** itself. I'm not sure if that is because judges view impropriety by their peers and colleagues as "inevitable", therefore they believe that silencing it is the most

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[49] Operation Greylord | https://www.fbi.gov/history/famous-cases/operation-greylord
Kids for Cash | https://www.npr.org/2022/08/18/1118108084/michael-conahan-mark-ciavarella-kids-for-cash
Thomas Girardi | See attached "Exhibit A" and "Exbibit B".
Girardi attached "Exhibit A" | https://rico.jefffenton.com/evidence/girardi-investigation-for-the-state-bar-of-california.pdf
Girardi attached "Exhibit B" | https://rico.jefffenton.com/evidence/girardi-lion-air-flight-610-crash-memorandum-order.pdf
https://podcasts.apple.com/us/podcast/edelson-v-girardi-collapse-of-a-titan/id1654960102?i=1000602422362
https://davisvanguard.org/2023/06/petition-for-antitrust-complaint-against-state-bar-and-chairman-filed-and-decided-without-complainants-knowledge/

[50] DOC 58-2, PID 4628-4630 | https://rico.jefffenton.com/evidence/2019-07-01_tenn-bpr-targets-whistleblowers-not-corruption.pdf

effective way to maintain "public confidence in the judiciary", but if so that is a counterproductive belief, out of alignment with literature published by the Department of Justice, in stark contrast with both the ethical canons and the federal rules.

46. Ultimately efforts to silence or hide attorney and judicial misconduct, without discipline and correction, sow dishonesty and fraud into an institution claiming to be based upon truth and law, undermining the ethical credibility of the courts, as well as their realistic ability to produce honest and impartial justice, while substantially eroding the public's confidence in our courts also.

47. As addressed by the U.S. Courts online[51], "How should the judiciary promote public trust and confidence in the federal courts in a manner consistent with its role within the federal government?"

> "The ability of courts to fulfill their mission and perform their functions is based on the public's trust and confidence in the judiciary. In large part, the judiciary earns that trust and confidence **by faithfully performing its duties; adhering to ethical standards; and effectively carrying out internal oversight, review, and governance responsibilities.** These responsibilities include accountability for a failure to observe scrupulous adherence to ethical standards. <u>The surest way to lose trust and confidence is failure to live up to established ethical standards and failure to hold judges and judiciary personnel accountable for misconduct</u>. Transparency in efforts to ensure accountability for misconduct, where possible and appropriate, helps foster public trust and confidence" (emphasis added).

[51] https://www.uscourts.gov/data-news/reports/strategic-planning/strategic-plan-federal-judiciary/issue-2-preserving-public-trust-confidence-and-understanding

48. Upon information and belief, so far in this lawsuit, I've had to confront lies told by defendant Story in her affidavit[52].

49. Upon information and belief, I've had to deal with significant misconduct and interference caused by defendant Walker[53] and both Assistant United States Attorneys[54], costing me hundreds of hours of unnecessary work[55].

50. Upon information and belief, defendant Beeler still claims that she has never been served[56], since she decided to reject service **nineteen days after accepting it**, returning it to the Post Office as "refused"[57], thinking that would usurp the court's jurisdiction over her.

51. Upon information and belief, defendants Garrett and Coke have both refused to sign for service, abandoning packages at the Post Office for weeks and months in an attempt to evade accountability and stymie justice, despite both being employed by supervisory divisions of the Tennessee Supreme Court.

52. Upon information and belief, every individual BAR defendant in this lawsuit exerted some effort (or some effort was exerted on their behalf) to dodge service and/or to obfuscate, defeat, deprive, deny the successful *confirmation of service* as required by the court's rules. (See "Exhibit-A" filed on 10/04/2024, in DOC 96-1, PID 5265-5285.) Every last one!

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[52] DOC 76-1, PID 5076-5079 | https://rico.jefffenton.com/evidence/2024-09-16_affidavit-of-virginia-lee-story.pdf
DOC 101, PID 5375-5390 | https://rico.jefffenton.com/evidence/2024-10-08_counter-affidavit-correcting-storys-false-claims.pdf
DOC 99, PID 5328-5342 | https://rico.jefffenton.com/evidence/2024-10-08_motion-for-sanctions-against-story-for-lying.pdf

[53] DOC 217, 218, 219 | "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS"

[54] DOC 212-1, PID 757-766 | https://rico.jefffenton.com/evidence/2024-10_comms-with-usat-ryan-cobb-about-redactions.pdf
DOC 212-1, PID 767-783 | https://rico.jefffenton.com/evidence/2024-11_comms-with-usat-anica-jones-about-redactions.pdf

[55] DOC 211, PID 689-723 | https://rico.jefffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf
DOC 212, PID 730-907 | https://rico.jefffenton.com/evidence/2025-02-10_tn-motion-to-minimize-or-remove-redactions.pdf

[56] https://rico.jefffenton.com/evidence/2025-01-17_email-service-of-elaine-beeler-via-lisa-carson.pdf
DOC 183, PID 327-330 | https://rico.jefffenton.com/3-24-cv-01282/doc/183.pdf

[57] DOC 114, PID 5623-5632 | https://rico.jefffenton.com/3-24-cv-01282/doc/114.pdf

53. In DOC 78, PID 5082, paragraph 4, counsel for "The Tennessee Defendants" claimed[58], "Plaintiff wildly, and without merit, accuses all of the Defendants of numerous counts of fraud, coercion, vulnerable adult abuse, IIED, NIED, abuse of process, conspiracy, RICO, and violations of the U.S. Constitution as well as numerous statutes, the bankruptcy act and the ADA."

54. My response to "The Tennessee Defendants" stated in part[59], "This is a verified complaint, substantiated by roughly 5,000 pages of sworn testimony and evidence, including court transcripts which prove beyond any shadow of a doubt that obscene and horrific misconduct took place, including many (if not all of those) "wild" claims which counsel fraudulently claims are "without merit". This is gas lighting; it is improper to respond to a verified complaint without specificity. If it is not worth counsel's time to write exactly what they claim is "without merit" and have an affidavit sworn to under the penalty of perjury by the defendant to substantiate their claim, then it's not worth my time to respond or the court's time to read it. They have no right to claim anything is without merit, without specificity and sworn testimony. That is plain abusive harassment. Which is no more an appropriate lawful response or substitute for a "responsive pleading" than standing in the doorway flexing your muscles, while chanting that the deep pockets of the state stand behind them."

55. Afterwards, did "The Tennessee Defendants" follow-up with specificity and sworn testimony to challenge and try to disprove my "wild" claims? No, they never brought it up again.

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[58] DOC 78, PID 5081-5084 | https://rico.jefffenton.com/3-24-cv-01282/doc/78.pdf

[59] DOC 110, PID 5584-5593 | https://rico.jefffenton.com/3-24-cv-01282/doc/110.pdf

56. After the Tennessee Attorney General and Reporter obtained custody of this case, first their office filed a motion for an extension of time[60], stating in part, "Undersigned counsel requires time to thoroughly review the Amended Complaint and the extensive number of exhibits attached to it. This request is not made to prolong justice or impede the swift resolution of these matters. For these reasons, Defendants request that the Court grant this motion to respond to the Amended Complaint by December 20, 2024."

57. It actually looked like they were taking the case seriously and planning to respond to the complaint based on the substantial merits in the case, which I was glad to grant them extra time for.

58. Unfortunately, on December 20, 2024, the Attorney General's Office filed a **two-paragraph** motion to dismiss, stating instead, "Eleventh Amendment immunity bars suits against the State, state agencies, and state officials in their official capacity. Absolute judicial immunity shields Chancellor Binkley from suit in his individual capacity. And the claims against Mr. Hivner, Mr. Coke, and Ms. Garrett in their individual capacities should be dismissed because a criminal statute does not create a private right of action and the statute of limitations bars the remaining civil claims. For these reasons, the State Defendants request that the Court grant their motion to dismiss."

59. Somehow, they overlooked the **first ten amendments** to the United States Constitution, known as the "**Bill of Rights**", and jumped directly to the eleventh, to materially misrepresent some of the core values, underlying themes, and primary purposes of that document, through a practice known as "proof-texting", to twist the language out of context to do their bidding.

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[60] DOC 166, PID 140-142 | https://rico.jefffenton.com/3-24-cv-01282/doc/166.pdf

60. Gone were the lies about my "wild" claims "without merit" made by their prior counsel in Michigan, and instead the Tennessee Attorney General's Office gave this court and my complaint the proverbial middle finger, without choosing to answer or defend a single action or inaction by the state defendants.

61. What do you want to bet that this "one finger salute" filed by the Tennessee Attorney General's Office in those two brief paragraphs fails to provide the court with an honest, ethical, lawful response to my complaint? One which reasonably complies with the requirement in F.R.Civ.P. 11(B), that the Attorney General's Office "certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances[61]" that **two paragraph** pleading is actually **appropriate** and **true**?

62. **I'll bet my life that it is not,** while that is the precise problem I'm experiencing with most of the defendants and pleadings filed in this matter.

> "Eleventh Amendment does not protect state officials from claims for prospective relief when it is alleged that state officials acted in violation of federal law." *Warnock v. Pecos County, Texas.*, 88 F3d 341 (5th Cir. 1996)
>
> "When a judge acts intentionally and knowingly to deprive a person of his constitutional rights he exercises no discretion or individual judgment; he acts no longer as a judge but as a "minister" of his own prejudices." 386 U.S. 547, 568
>
> "A judge is liable for injury caused by a ministerial act; to have immunity the judge must be performing a judicial function." *See, e.g., Ex parte Virginia,* 100 U.S. 339; 2 Harper & James, The Law of Torts 1642-1643 (1956).

[61] https://www.law.cornell.edu/rules/frcp/rule_11

The presence of malice and the intention to deprive a person of his civil rights is wholly incompatible with the judicial function.

63. Yet if the court takes them at face value, while I've had nowhere near enough time to respond to all of their misconduct, trusting them to have done the proper due diligence in this matter, then nearly half the defendants in this case could walk without answering for a single action or inaction which was previously portrayed by their counsel as being *so outrageous* that it couldn't possibly be true. But it is **true** and I reasonably believe that the Tennessee Attorney General's Office knows it.

64. Upon information and belief, many of these defendants are not honest people[62]. Many have violated their oaths of office repeatedly, which the courts have said in the past equates to being "engaged in acts of treason". They are not going to act honestly, honorably or show good professional conduct unless this court **forces them to**.

Note: Any judge who does not comply with his oath to the Constitution of the United States wars against that Constitution and engages in acts in violation of the supreme law of the land. The judge is engaged in acts of treason. The U.S. Supreme Court has stated that "no state legislator or executive or judicial officer can war against the Constitution without violating his undertaking to support it". Cooper v. Aaron, 358 U.S. 1, 78 S. Ct. 1401 (1958); See also In Re Sawyer, 124 U.S. 200 (188); U.S. v. Will, 449 U.S. 200, 216, 101 S. Ct. 471, 66 L. Ed. 2d 392, 406 (1980); Cohens v. Virginia, 19 U.S. (6 Wheat) 264, 404, 5 L. Ed 257 (1821).

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

65. Upon information and belief, this court has a responsibility to **require** and when necessary to **compel** the defendants and their counsel to **tell the truth** and operate honestly, ethically, and honorably in court filings, regardless of whether the defendants *want to* or not.

66. Upon information and belief, any motion pending before this court, which has the potential of being the deciding argument for having *any* of the defendants permanently released from this lawsuit, without providing my family any remedy for the harm caused, must have *every* reasonable assurance **it has been filed honestly**, in good faith, **in full compliance** with F.R.Civ.P. Rule 11(b).

67. Upon information and belief, I've already **proven**[63] to this court that the oath of office taken by BAR members, and their responsibilities thereunder are **insufficient** to compel some of the defendants and their counsel to operate honestly and ethically in their pleadings filed in this lawsuit.

68. **I have lost** my home, my life savings, my retirement, my stream of income, my freedom, my pursuit of happiness, my hobbies, my constitutional rights, my physical, financial, and legal independence, the community I lived peacefully in and loved for 25 years, along with health care providers, support systems, and friends I had known and worked with for decades, all because of lies and unethical pleadings, not so different than those which I have already exposed the defendants and their counsel filing in this case.

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[63] DOC 101, PID 5375-5390 | https://rico.jefffenton.com/evidence/2024-10-08_counter-affidavit-correcting-storys-false-claims.pdf
DOC 100, PID 5343-5374 | https://rico.jefffenton.com/evidence/2024-10-08_motion-all-filings-be-under-penalty-of-perjury.pdf
DOC 99, PID 5328-5342 | https://rico.jefffenton.com/evidence/2024-10-08_motion-for-sanctions-against-story-for-lying.pdf
DOC 212-1, PID 757-766 | https://rico.jefffenton.com/evidence/2024-10_comms-with-usat-ryan-cobb-about-redactions.pdf
DOC 212-1, PID 767-783 | https://rico.jefffenton.com/evidence/2024-11_comms-with-usat-anica-jones-about-redactions.pdf
DOC 211, PID 689-723 | https://rico.jefffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf
DOC 207, PID 583-685 | https://rico.jefffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

69. Upon information and belief, this court needs to significantly raise the bar for all pleadings, to begin **forcing** the defendants and their counsel to **operate honestly** in compliance with the court's codes of conduct, without giving them more opportunities to **hurt me** with lies and perverted pleadings.

70. That is the **exact** purpose of 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 (EXPEDITED CONSIDERATION REQUESTED)[64]" in DOC 100, 100-1, PID 5343-5374.

71. Upon information and belief, if the court is unable to certify that the defendants and their counsel are telling the **truth** in their pleadings, under the penalty of perjury, it is obscene to consider the court releasing **any** of the defendants from liability which I have clearly suffered, after certifying, swearing, and even evidencing on the record that the defendants have caused me, while swearing that to be the **truth** under the pains and penalty of perjury. Obviously, I have gone to more trouble and invested far more work than most middle-class litigants ever can or will to have this matter fairly and honestly adjudicated by the court.

72. Upon information and belief, requiring all pleadings to be honest and ethical is "ground zero" in this lawsuit, to fairly and honestly adjudicate anything, and we still aren't even there yet.

73. Upon information and belief, if anyone argues that the above motion is not needed, then we need to start holding "emergency hearings" for **sanctions** immediately (instead of to release defendants as improperly claimed), to compensate me for the real damages I have suffered, exposed, and proven was caused by the defendant's counsel, through lies and misconduct.

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

74. Upon information and belief, either I need the defendants to be compelled to tell the **truth** and operate **ethically**, or I need to be quickly **compensated**, with additional **time** (toward pending matters) and **money**, once I prove they have violated the court's trust **again**, so that I can afford to hire counsel to help me articulate and survive their misconduct. One or the other.

75. Upon information and belief, to me that seems like the lowest bar of what is "reasonable" under the circumstances.

76. Upon information and belief, I've yet to see any of the defendants answer my complaint based upon the merits or deny the claims therein in any significant capacity while swearing to be telling the truth under the penalty of perjury, as my complaint is sworn and certified accurate and true. I have furthermore yet to see a single responsive pleading filed by any of the defendants or their counsel, which I honestly believe complies with F.R.Civ.P. Rule 11(B), "formed [by defendant's counsel] after an inquiry reasonable under the circumstances[65]".

77. In truth, I haven't had **time** yet to **read** every word filed in this matter by the defendant's counsel, but of the many motions which I have read, the facts have been perverted with material misrepresentations while not appearing to acknowledge the substantial constitutional merits or most significant justice interests woven throughout this lawsuit.

78. Upon information and belief, many of the papers filed to date by the defendant's counsel, have been filed for improper purposes, to tax me with extra work (process), while grasping at seemingly any frivolous argument by which to seek release or dismissal from this lawsuit, without showing any interests or responsibility for the unconscionable misconduct clearly evidenced in the record of this lawsuit, or the merits for which this case has been filed.

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[65] F.R.Civ.P. Rule 11(B) "...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..." | https://www.law.cornell.edu/rules/frcp/rule_11

SUPPORTING DOCUMENTS FOR THE MOTION TO STAY ALL DISPOSITIVE MOTIONS

79. "DECLARATION REGARDING FINANCES, MARITAL ROLES, PROPERTY, EDUCATION, EARNING CAPACITY, SPOUSAL SUPPORT, AND FRAUD (AMENDED)[66]", filed in DOC 214, PID 911-975.

80. The document above describes how the defendants egregiously and unconscionably violated my *constitutional* rights along with my most basic *natural* human rights in the preceding matters in Tennessee's state and federal courts. Detailing how they illegally deprived me of my Brentwood marital residence, the sum total of my life's savings and even my premarital retirement investments, worth over *nine hundred thousand dollars* today combined, without one dollar to my benefit, by a court without lawful jurisdiction, to hear and dispose of the matters before it, by undisclosed close family friends and partying/vacationing[67] buddies. This also clarifies the crimes committed by the bankruptcy court and counsel, which Bankruptcy Judge Charles M. Walker "reasonably should [have] know[n][68]" were being executed improperly by both courts, while he signed off on it without bringing any of the concerns to light, failing or refusing to provide me and my two lawful tenants/roommates[69] with "adequate protection" throughout my ex-wife's secret bankruptcy, in strict violation of the federal rules of bankruptcy procedure and federal law[70].

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[66] DOC 214, PID 911-975 | https://rico.jefffenton.com/evidence/fenton-finances-roles-property-education-support-fraud.pdf

[67] DOC 43, PID 3726-3729 | https://rico.jefffenton.com/evidence/2018-08-30_tennessean-story-hosts-vacations-with-judges.pdf
DOC 44, PID 3740-3741 | https://rico.jefffenton.com/evidence/2018-09-24_tenn-binkley-defends-partying-with-lawyers.pdf
DOC 54-1, PID 4368 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4
DOC 1-14, PID 597-640 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf

[68] Tenn. R. Sup. Ct. 1.0 TERMINOLOGY: "(j) "Reasonably should know," when used in reference to a lawyer, denotes that a lawyer of reasonable prudence and competence would ascertain the matter in question." (https://www.tncourts.gov/rules/supreme-court/8)

[69] DOC 45, PID 3800-3807 | https://rico.jefffenton.com/evidence/2019-03-26_fenton-sunnyside-roommate-lease-merriman.pdf
DOC 45, PID 3808-3813 | https://rico.jefffenton.com/evidence/2019-04-09_fenton-sunnyside-roommate-lease-garcia.pdf

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

81. "NOTICE TO ALL BAR MEMBERS[71]" filed in DOC 216, PID 984-1015.

82. This document explains and demonstrates that bad actors have captured the Board of Professional Responsibility of the Supreme Court of Tennessee, while leveraging it to protect some of the absolute worst actors involved in the "practice of law" throughout the State of Tennessee, including some of the defendants in this matter. This document further shows how those bad actors are leveraging that same board to *retaliate* against and *remove* some of the absolute best in class attorneys, from the "practice of law" in Tennessee, who have proven themselves to be fearless whistleblowers, devoted to defending the rights of the people against powerful local court corruption. These courageous and wrongfully persecuted whistleblowers have shown that they are willing to stand up against, report, and challenge *judicial misconduct* (as every BAR member is *required* to report, but few ever do), as well as other forms of *court corruption* in Williamson County Tennessee, despite the unconscionably harsh retaliation they have and continue to experience from the state as a result.

83. This document explains the ethical and legal responsibilities and potential fiscal liability of every BAR Member involved in this lawsuit. From licensed federal court employees to the defendants, to their counsel in this lawsuit, and the law firms defending each, including even the owners of each of those law firms.

84. Upon information and belief, every BAR member has a duty to report *attorney* and *judicial misconduct* rising to the level clearly proven repeatedly throughout this lawsuit, as well as *felony* crimes committed which they become aware of.

85. Upon information and belief, this document confronts the fact that it would be fundamentally unfair if not irresponsible for this court to *trust* the defendants and their counsel to *comply* with their oaths of office, to testify *honestly*, and for their pleadings to *comply* with F.R.Civ.P.

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[71] DOC 216, PID 984-1015 | https://rico.jefffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf

Rule 11(b), without some other *mechanism*[72] to compel or ensure that they do so. While providing evidence proving multiple violations have already taken place in this case.

86. "DECLARATION EXPLAINING MY PURSUIT OF JUSTICE[73]" filed in DOC 207, PID 583-685.

87. This document explains many of my efforts to seek justice, some of the obstacles I have encountered and misconduct I have experienced caused by the defendants, while clarifying that the primary objective of this lawsuit is expressly devoted toward pursuing the critical justice interests in this lawsuit, which are both constitutionally guaranteed and reasonably necessary for *anyone* to be secure in their rights, in absolute alignment with the purpose of our federal courts.

> "District courts conduct trials and hearings, resolving disputes by determining the facts and applying the law to those facts.[74]"

88. Upon information and belief, therefore entertaining any dispositive motion at this point would be extremely **premature**, because the court hasn't "conduct[ed any] trials [or] hearings" yet, nor have they begun to "determin[e] the facts", or to "apply[] the law to those facts".

89. Upon information and belief, I have invested well over *six thousand* hours of work into this lawsuit to date, working at least *ten hours* per day, and at least *six days* per week (often seven), for the past *two years,* nonstop. I believe that I deserve more than *two paragraphs* in return, accompanied by a *one finger salute*!

90. The lawless and unethical actions by the defendants has rendered my life *financially unsustainable*, while no remedy of *any* sort has yet been available to remedy that.

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

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

[74] https://www.uscourts.gov/about-federal-courts/court-role-and-structure/about-us-district-courts

THE EVIDENCE IS ON THE RECORD

91. Upon information and belief, as absurd as the odds are against me in this lawsuit, that is not due to the facts or the evidence, but rather how difficult it is to obtain a *just* remedy, especially against such an enormous wall of power, as I am up against; even when the plaintiff has a massive amount of clear and convincing facts and evidence, while some are even literally **irrefutable**. The conditions which caused this catastrophe of conscience throughout Middle Tennessee's court culture were a result of the state's negligence and failure, year after year, to properly discipline attorney and judicial misconduct as **required**.

92. Upon information and belief, this is a case where the power of the players has been more significant *so far* than the **law** and possibly even the court's ability to enforce it. There is no question whether the defendants substantially did as I have claimed, regardless of how "unbelievable", egregious, and repugnant of the law their actions actually were. **The evidence is on record, it's not even worth them contesting the facts, and so they have not.**

93. Why isn't Tennessee fervently acting to *discipline* the bad actors while *protecting* the public from this happening again? Upon information and belief, apparently because nobody so far will **force** them to. This is **not** an isolated case[75]! Both the court and every defendant in this matter can clearly see the **truth** of what has transpired. While having both ethical and lawful responsibilities[76] to report, confront, stop, correct, discipline *attorney* and *judicial misconduct* as well as *felony crimes*.

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[75] DOC 102, PID 5391-5468 | https://rico.jefffenton.com/evidence/2024-10-09_concerns-about-transferring-to-tennessee.pdf
DOC 215, PID 976-983 | https://rico.jefffenton.com/evidence/2025-01-24_i-protest-with-donald-jeffries-podcast.mp4

[76] DOC 216, PID 984-1015 | https://rico.jefffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf

94. Upon information and belief, if this case was backed by a strong national law firm, such as the **Institute for Justice**, I'm willing to bet the defendants would have already pooled resources and tried to settle this matter as quickly and quietly as they could. **Because on the merits and the evidence, the defendants don't have a chance!** While the best chances they can attempt to explore and argue, will still be repugnant of the public's trust, having to do with how long it has taken me, as an indigent, disabled, *pro se* litigant, to finally get them all in front of a court, while they continue to play games dodging service, refusing to make an appearance, and claiming government immunity, for *felony crimes* clearly committed with *malicious* intent.

95. Upon information and belief, if this case was being passionately represented by a legal powerhouse such as Robert Barnes, it would probably be for *ten* to a *hundred times* the amount of money as my lawsuit is presently for, and rightfully so, because there clearly is insufficient disincentive to compel states to *do the right thing* and protect the rights and property of people living within their boundaries, instead of the local bullies who prey upon the public for illicit private gain.

96. What should the **compounding factor** be when a member of the public is savagely betrayed and preyed upon by powerful public and private bad actors working together in concert, while committing felony crimes against the vulnerable, who then is repeatedly denied help, for several years, by roughly a dozen people holding elevated offices of public trust?

97. How should that **compounding factor** affect the statute of limitations for the crimes they collectively committed against him?

98. *Should* the court *order* bad actors to *pay for counsel* to help the plaintiff and victim reach a reasonable remedy for the crimes they committed against him? Upon information and belief, the court **could** pursuant to **sanctions** under F.R.Civ.P. Rule 11(b).

99. Upon information and belief, I think the court should. Bad actors shouldn't be able to collectively cause people damages which literally exceed their ability to reach a remedy, *at no fault of their own.*

100. Upon information and belief, meanwhile no attorneys will take this case because of how the Tennessee Supreme Court has harshly retaliated against and penalized whistleblowers who have stood up to *judicial misconduct* and *court corruption* in Tennessee during recent years[77].

101. Upon information and belief, there are a lot of similarities between how the Board of Professional Responsibility of the Supreme Court of Tennessee[78] has and continues to protect some of the defendants in this lawsuit, such as defendants Binkley and Story, while ignoring repeated complaints about their misconduct, and how the State Bar of California[79] protected Thomas Girardi[80] and the Girardi Keese law firm *for years* while ignoring and refusing to discipline him for one of the most prolific and heinous cases of *attorney misconduct* recorded in our nation.

102. **That's not acceptable.** This is being done at the substantial detriment of public health and safety, for private criminal interests, through misappropriation of public resources!

103. At the end of the day, no matter what anyone claims, the sale of my home was illegally executed using "fraud on the court by officers of the court" (which has no statute of limitations). Executed using a racketeering conspiracy[81] between law firms and government bad

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[77] DOC 58-5, PID 4718-4722 | https://rico.jefffenton.com/evidence/2024-05-02_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf
DOC 58-3, PIC.4632-4710 | https://rico.jefffenton.com/evidence/2024-02-16_tnsc-disbarred-whistleblower-brian-manookian.pdf
DOC 58-4, PID 4712-4716 | https://rico.jefffenton.com/evidence/2024-02-16_tnsc-manookian-disbarment-opinion-justice-lee.pdf

[78] DOC 207-1, PID 620-639 | https://rico.jefffenton.com/evidence/tnsc-board-of-professional-responsibility-weaponization.pdf

[79] Girardi attached "Exhibit A" | https://rico.jefffenton.com/evidence/girardi-investigation-for-the-state-bar-of-california.pdf

[80] Thomas Girardi | See attached "Exhibit A" and "Exbibit B".
Girardi attached "Exhibit B" | https://rico.jefffenton.com/evidence/girardi-lion-air-flight-610-crash-memorandum-order.pdf
https://podcasts.apple.com/us/podcast/edelson-v-girardi-collapse-of-a-titan/id1654960102?i=1000602422362
https://davisvanguard.org/2023/06/petition-for-antitrust-complaint-against-state-bar-and-chairman-filed-and-decided-without-complainants-knowledge/

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

actors, in both state[82] and federal[83] courts concurrently, by a *biased* judge[84] with a reputation for boisterous misconduct[85], without the lawful jurisdiction[86] to hear or dispose of my home. By two undisclosed close family friends of ill repute[87], who did so without due process[88], an impartial tribunal, or equal protection under the law.

No matter what **anyone** claims, the related Chancery Court orders to sell my home[89] are, always have been, and as a matter of law can never be anything other than **VOID**[90]. Bias, fraud on the court, obstruction of justice, unconscionable attorney and judicial misconduct, take your pick… there is no statue of limitations for vacating a void judgment or seeking a remedy, while a void judgment can never be repaired or made valid. Similarly, courts have a responsibility to vacate void judgments, and to award damages wherever a rule for damages applies.

JUDICIAL BIAS, FRAUD ON THE COURT, AND VOID JUDGMENTS

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

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

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

84 DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

85 DOC 54-1, PID 4368 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4
DOC 1-14, PID 597-640 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf
DOC 43, PID 3696-3697 | https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.pdf

86 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

87 DOC 43, PID 3726-3729 | https://rico.jefffenton.com/evidence/2018-08-30_tennessean-story-hosts-vacations-with-judges.pdf
DOC 44, PID 3740-3741 | https://rico.jefffenton.com/evidence/2018-09-24_tenn-binkley-defends-partying-with-lawyers.pdf

88 DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf

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

90 DOC 48, PID 4019-4029 | https://rico.jefffenton.com/evidence/2019-10-29_1986-sunnyside-real-estate-deed-fraud.pdf

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

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

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

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

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

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

The Supreme Court has ruled and has reaffirmed the principle that "**justice must satisfy the appearance of justice**", *Levine v. United States*, 362 U.S. 610, 80 S.Ct. 1038 (1960), citing *Offutt v. United States*, 348 U.S. 11, 14, 75 S.Ct. 11, 13 (1954) (emphasis added).

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

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

This cannot be ignored its fact recorded! Judgment is a void judgment if court that rendered judgment lacked jurisdiction of the subject matter, or of the parties, **or acted in a manner inconsistent with due process**, Fed. Rules Civ. Proc., Rule 60(b)(4), 28 U.S.C.A., U.S.C.A. *Const. Amend. 5 -Klugh v. U.S.*, 620 F.Supp. 892 (D.S.C. 1985) (emphasis added).

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

The Court Has a Responsibility to Correct a Void Judgment: The statute of limitations **does not apply** to a suit in equity to vacate a void judgment. (*Cadenasso v. Bank of Italy*, p. 569; Estate of Pusey, 180 Cal. 368,374 [181 P. 648].) This rule holds as to all void judgments. In the other two cases cited, *People v. Massengale* and *In re Sandel*, the courts confirmed the judicial power and responsibility to correct void judgments (emphasis added).

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

When rule providing for relief from void judgments is applicable, **relief is not discretionary matter, but is mandatory.** *Omer. V. Shalala*, 30 F.3d 1307 (Colo. 1994) (emphasis added).

"The innocent individual who is harmed by an abuse of governmental authority **is assured that he will be compensated for his injury.**" *Owen v. City of Independence* (emphasis added).

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).

ALL RIGHTS RESERVED TO ADD, AMEND, AND FURTHER SUBSTANTIATE

104. Due to the large number of defendants in this matter and outstanding motions which I need to both file and respond to in order to protect my rights, I have worked hard to file documents on the record recently which testify to and prove the **truth** to counter false claims made by multiple defendants in their motions. This way I can focus more resources on trying to clearly articulate the truth, rather than swatting down lies, in a more robust, comprehensive, and hopefully understandable fashion.

105. Due to the depth and breadth of this lawsuit, and the high number of powerful bad actors involved, most of whom have repeatedly violated the court's codes of conduct and acted in ways contrary to law and unbecoming of officers of the court, in many matters it is extremely difficult to quickly and concisely state the **truth**, while presenting it in a manner which makes sense and is believable on the face. That is not my fault. That is one of the strategic elements of *predatory litigation*[91] which makes it difficult to catch, articulate, and communicate to others, to reach help.

[91] https://jefffenton.com/predatory-litigation-how-us-courts-were-designed-to-produce-justice-why-they-fail-how-to-restore-justice-again/ https://tninjustice.org/predatory-litigation-101/

106. Therefore I have worked hard to articulate, explain, and evidence many complex matters on the record in declarations focused on communicating specific aspects, such as my "DECLARATION EXPLAINING MY PURSUIT OF JUSTICE[92]", my "NOTICE TO ALL BAR MEMBERS[93]", and my "DECLARATION REGARDING FINANCES, MARITAL ROLES, PROPERTY, EDUCATION, EARNING CAPACITY, SPOUSAL SUPPORT, AND FRAUD[94]."

107. My hope is that the court and/or the defendants will consider the facts, truth, and evidence in those documents, while applying those pleadings as objections and replies to any motions by the defendants or portions thereof claiming otherwise, to substantially reduce the scope of pleadings which I must individually address to prevent another miscarriage of justice. Without requiring me to redundantly copy and paste substantial chunks of facts and pleadings into multiple objections to motions filed by the defendants, alleging similar claims. (I honestly don't know *how* to communicate the *truth* about many of these matters in a more concise fashion than I already have.)

108. This would make far more efficient use of the court's time and everyone else's in this matter, to help quickly dispense with frivolous claims without exhausting more of my critically limited time and resources, defending myself against and responding to motions, or portions therein, which probably *never* should have been filed by opposing counsel in the first place. Considering the **truth** exposed and evidenced in the record by my filings, combined with the requirements in F.R.Civ.P. Rule 11(b)[95], not to file documents "for any improper purpose[96]", and "[b]y presenting to the court a pleading, written motion, or other paper[97]" that the defendant's counsel "certifies that to the best of the person's knowledge, information, and belief, formed after

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

[93] DOC 216, PID 984-1015 | https://rico.jefffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf

[94] DOC 214, PID 911-975 | https://rico.jefffenton.com/evidence/fenton-finances-roles-property-education-support-fraud.pdf

[95] https://www.law.cornell.edu/rules/frcp/rule_11

[96] F.R.Civ.P. Rule 11(b)(1)

[97] F.R.Civ.P. Rule 11(b)

an inquiry reasonable under the circumstances[98]" that the claims therein "are warranted by existing law or by a nonfrivolous argument[99]", with meaningful "evidentiary support[100]", with only those denials which are "warranted on the evidence[101]".

109. That does **not** mean that I am *forfeiting* my right or opportunity to provide the court with a direct, robust, well researched rebuttal to each and every claim made by every defendant, should the court require me to in order to apply the *truth* in my *pleadings* for my benefit to any matters being considered by the court. That will certainly take me a lot more time, while I believe that the interests of justice in the matters before this court require the court to provide me extensions of time as are reasonably needed, to protect my constitutional rights to due process and equal protection under the law, while obviously needing to make some accommodations to compensate for the almost impossible odds of having thirty-four well-funded professionals, plus almost as many attorneys representing them, against *one* indigent *pro se* litigant with significant communication *disabilities*[102] and only a high school *education*. The goal is a **substantially just** result, all the same.

> "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**" (emphasis added). *Conley v. Gibson*, 355 U.S. 41 at 48 (1957)

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[98] F.R.Civ.P. Rule 11(b)

[99] F.R.Civ.P. Rule 11(b)(2)

[100] F.R.Civ.P. Rule 11(b)(3)

[101] F.R.Civ.P. Rule 11(b)(4)

[102] 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

110. I have tried to address many of the false claims repeated by multiple defendants, in the best way I know how to communicate them. If I need to later go back and provide direct pleadings to each and every claim in every motion, I can and will do so, while specifically reserving my right herein, provided the court will allow me extensions of time as are necessary for that to be realistically possible for me.

111. I am doing this in good faith to provide both the court and the defendants with a high-profile view of my posture in this lawsuit. Hopefully, the court and the defendants can work to consolidate and/or strike the defendants' most frivolous motions, or portions therein, pending before this court, so I can focus on addressing those which the defendants and/or the court believe have honest, reasonable, merit considering the scope of this lawsuit, rather than being overtaxed with more attorney misconduct further delaying and deferring justice in these critical time sensitive matters.

CASE MANAGEMENT AND SCHEDULING ORDER

112. I am overwhelmed with a need to respond to a multitude of filings currently, several of which are frivolous, not knowing how I should prioritize them, which the court is most likely to entertain, or honestly how I should proceed from this point.

113. I don't understand the role of a *pro se staff attorney*, or the scope/purpose of their involvement in this case, or the "initial review[103]" they are apparently preparing. Similarly, I do not understand if or how this impacts what I should be focused on currently. I move the court to provide me with some guidance, information, or notice regarding these questions.

114. I move the court to begin case management and to apply my pleadings and objections already on record to the defendants' dispositive motions.

[103] DOC 209, PID 687 | https://rico.jefffenton.com/3-24-cv-01282/doc/209.pdf

115. I move the court to strike any motions filed by the defendant's counsel, which fail to clearly comply with F.R.Civ.P. 11(b), in light of my pleadings already filed on record in this case.

116. I move the court to narrow the matters needing a response by me, and to provide me with a scheduling order so that I will understand how I need to prioritize responding to them, and to what depth, while allowing me ample time to address **one motion at a time**, because of the real limitations caused by my disabilities[104].

117. In any instance where the court would otherwise rule contrary to my interests, I move the court to provide me with a clearly defined period of time to respond to each motion, on a point-by-point basis, factoring in a week for mailing time from Michigan to Tennessee, until or unless the court grants me ECF filing privileges.

118. That is the only way I know whereby this court can rule fairly based upon the **merits** of the matters herein, instead of me simply being *overwhelmed, outperformed,* and *procedurally* defeated because I am a disadvantaged *pro se* litigant who *must* defend myself against *five* judges, *ten* attorneys, *five* law firms, *two* real estate firms, *two* auctioneers, *two* banks, *one* county, and *three* courts, with a total of *five* divisions of state government in Tennessee, plus over a *dozen* law firms representing the defendants, with *two* attorneys from each in most cases, while leveraging public federal, state, and county resources against me and the critical interests of justice in this case.

[104] 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

CONCLUSION

STAY PHASE-1, RULING ON CRITICAL MOTIONS

119. I move the court to **stay** all dispositive motions until the following tasks or events are completed, and I have **afterwards** had a fair opportunity to respond to each individual dispositive motion remaining, filed by the defendants and/or their counsel:

120. Until after the court rules on 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 (EXPEDITED CONSIDERATION REQUESTED)[105]" filed on October 10, 2024, in DOC 100, 100-1, PID 5343-5374.

121. Until after the court rules on my "MOTION TO FILE ELECTRONICALLY AND FOR REMOTE PARTICIPATION (EXPEDITED CONSIDERATION REQUESTED)[106]" filed on January 21, 2025, in DOC 197, 191-1, PID 445-486.

122. If the court denies *either* of the two motions above, *then* I move the court to escalate my motion for **sanctions**[107] against defendant Story and/or her counsel, and to extend this stay until after the court rules on that motion, or in the alternate the court *sua sponte* orders sanctions against defendant Walker[108] and/or the U.S. Attorney's Offices[109] for their deception and misconduct, resulting in the loss of literally hundreds of hours of my time and work, due to

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

[106] https://rico.jefffenton.com/3-24-cv-01282/doc/197.pdf | https://rico.jefffenton.com/3-24-cv-01282/doc/197-1.pdf

[107] DOC 99, PID 5328-5342 | https://rico.jefffenton.com/evidence/2024-10-08_motion-for-sanctions-against-story-for-lying.pdf

[108] DOC 217, 218, 219 | "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS"

[109] DOC 211, PID 689-723 | https://rico.jefffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf
DOC 212, PID 730-907 | https://rico.jefffenton.com/evidence/2025-02-10_tn-motion-to-minimize-or-remove-redactions.pdf
DOC 222, PID 1164-1214 | https://rico.jefffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

dishonest and deceptive claims, which are unreasonable in light of the "DECLARATION AND MOTION TO FILE UNDER SEAL REGARDING DEFENDANT WALKER'S CLAIMED PRIVACY CONCERNS RELATED TO HIS HOME ADDRESS", filed in DOC 217, 218, and 219.

123. This is the only way I know of, without the top two motions, where I will have access to the resources necessary to litigate this lawsuit for a remedy, unless the court orders some of the defendants to provide me with counsel due to their substantial egregious attorney and judicial misconduct[110] both in this matter as well as in the precipitating Tennessee actions.

STAY PHASE-2, COMPLETING SERVICE & COMPELLING APPEARANCES

124. I move the court to extend this stay of all dispositive motions, until I am able to complete the initial service of this lawsuit and the four outstanding defendants (to follow) have been compelled by the court to make an appearance in this matter, as explained in my "SECOND MOTION TO EXTEND TIME AND ASSIST WITH PERFECTING SERVICE[111]", filed with the court this past week.

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[110] DOC 22, PID 2818-2862 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf
DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf
DOC 24, PID 2921-2947 | https://rico.jefffenton.com/evidence/2019-08-29_authentic-chancery-transcript-and-audio.pdf
DOC 23-4, PID 2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3
DOC 23, PID 2863-2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

[111] https://rico.jefffenton.com/evidence/2025-03-05_second-motion-to-extend-time-for-service.pdf

125. Below are the four outstanding defendants who have been served, yet have failed or refused to make an appearance in this matter to date (contact information for each is included in this motion[112]):

(1) Attorney Kathryn Lynn Yarbrough[113] (BPR# 032789)
Proofs of Service: DOC 95, PID 5213-5234; DOC 180, PID 281-296

(2) Bankers Title & Escrow Corporation[114] (TN SOS Control #000259388)
Proof of Service: DOC 201, PID 493-509

(3) Attorney Alexander Sergey Koval[115] (BPR# 029541)
Proof of Service: DOC 192, PID 379-408

(4) Spragins, Barnett & Cobb, PLC[116] (TN SOS Control #000334328)
Proof of Service: DOC 221, PID 1129-1163

STAY PHASE-3, CASE MANAGEMENT, STRIKING FRIVELOUS DEFENDANT MOTIONS, AND CREATING A SCHEDULING ORDER

126. I move the court to strike any motions filed by the defendant's counsel, which fail to clearly comply with F.R.Civ.P. 11(b), in light of my pleadings already filed on record in this case.

127. I move the court to strike frivolous motions, or parts thereof, filed by the defendants or their counsel, either based on the merits of my objections and recent filings, per this motion as outlined herein, or *sua sponte* in the interests of justice. To substantially reduce the workload for me in filing individual objections, or in the alternative to *notify* me that the court will *not* do so, thereby narrowing and/or clarifying the scope of work before me.

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[112] https://rico.jefffenton.com/evidence/2025-03-05_second-motion-to-extend-time-for-service.pdf

[113] DOC 95, PID 5213-5234 | https://rico.jefffenton.com/3-24-cv-01282/doc/95.pdf
DOC 180, PID 281-296 | https://rico.jefffenton.com/3-24-cv-01282/doc/180.pdf

[114] DOC 201, PID 493-509 | https://rico.jefffenton.com/3-24-cv-01282/doc/201.pdf

[115] DOC 192, PID 379-408 | https://rico.jefffenton.com/3-24-cv-01282/doc/192.pdf

[116] DOC 221, PID 1129-1147 | https://rico.jefffenton.com/3-24-cv-01282/doc/221.pdf
DOC 221-1, PID 1148-1163 | https://rico.jefffenton.com/3-24-cv-01282/doc/221-1.pdf

STAY PHASE-4, REQUIRING ALL DEFENDANTS TO ANSWER MY COMPLAINT BASED ON THE MERITS, CERTIFIED TRUE UNDER THE PENALTY OF PERJURY

128. I move the court to enter an order requiring every defendant in this lawsuit to file an answer based upon the **merits** of my complaint, while including specificity about any claims they seek to dispute or disavow, while including a declaration or affidavit with language specifically certifying that their claims, testimony, and contentions are in fact **correct** and **true**, sworn to under the penalty of perjury.

129. I move the court to ensure that those orders are executed in a manner which ensures that any defendant found and proven later to have lied or provided material misrepresentations in their answer will be guilty of committing perjury.

130. If for any reason this court denies this request, I move the court to provide me with an explanation or justification for this decision.

STAY PHASE-5, SET EXPECTATIONS REGARDING THE ROLE OF THE PRO SE STAFF ATTORNEY, NOTICE OF I SHOULD WAIT FOR THEIR INITIAL REVIEW

131. I move the court to notify me what the role is of the *pro se* staff attorney[117], clarifying what my expectations should be, and whether or not I should *wait* upon the completion of their *initial review* prior to proceeding with filing more objections to the defendant's outstanding motions.

[117] DOC 209, PID 687 | https://rico.jefffenton.com/3-24-cv-01282/doc/209.pdf

STAY PHASE-6, ANSWERING QUESTIONS AND PROVIDING CLARIFICATIONS

132. To quickly recap a concern: I am struggling to understand **how** best and most efficiently to respond to the defendants motions to dismiss. Whether to draft and file papers which address specific **topics** and **claims**, for example "Objection to all Defendant Claims that Service was Untimely", or whether I need to redundantly copy and paste the same responses into separate objections which I must file for each and every defendant making similar claims. Similarly, the interests of justice as related to each objection could be many pages long (possibly ten or twenty pages) and likely won't change much between objections, so do I need to redundantly repeat (copy and paste) that content into each and every individual objection?

133. I move the court to answer those questions while noticing me about the most practical and efficient means for me to object to the defendant's remaining motions, so that we can quickly move past these matters to timely address the substantial merits of this lawsuit.

STAY PHASE-7, ALLOW ME TIME TO RESPOND TO ALL REMAINING DISPOSITIVE MOTIONS AFTER THE COURT HAS RULED ON THE ABOVE

134. In the event that any part of this motion to stay is denied, I move the court to provide me an extension of time in all matters until the court has ruled on this motion and provided me notice of the order, and I have **afterwards** had a fair opportunity to respond to each individual dispositive motion remaining by the defendants and/or their counsel.

135. I emphatically object to any party being released from this lawsuit and to this lawsuit to be dismissed, for any reason prior to this court addressing my papers and pleadings regarding attorney and judicial misconduct by the defendants and their counsel—along with that performed by the previous district court in Michigan—while allowing me an opportunity to fairly respond

after the court has ruled on those matters, to protect my interests in any and all matters before this court, prior to any dispositive rulings.

> The plaintiff's civil rights pleading was 150 pages and described by a federal judge as "inept". Nevertheless, it was held "Where a plaintiff pleads pro se in a suit for protection of civil rights, the Court should endeavor to construe Plaintiff's Pleadings without regard to technicalities." *Picking v. Pennsylvania Railway*, 151 F.2d. 240, Third Circuit Court of Appeals

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 March 9, 2025.

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

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

1. SECOND MOTION TO STAY ALL DISPOSITIVE MOTIONS UNTIL SERVICE IS COMPLETED AND THE COURT HAS RULED ON PLAINTIFF'S OUTSTANDING EXPEDITED MOTIONS, WITH CLARIFICATIONS ABOUT HOW TO PROCEED

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 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 10, 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.

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NASHVILLE, TN 37203-6940

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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 March 10, 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

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

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