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

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

JEFFREY RYAN FENTON,

PLAINTIFF

V.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

CASE NO. 3:24-CV-01282

NOTICE REGARDING FUTURE FILING NOTICES FOR THE DEFENDANTS[1]

This testimony is being brought pursuant to 28 U.S. Code § 1746, U.S. Const. amend V and amend XIV.

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

1. I filed a MOTION TO FILE ELECTRONICALLY AND FOR REMOTE PARTICIPATION (EXPEDITED CONSIDERATION REQUESTED)[2] on January 21, 2025, in DOC 197, PID 445-468, with exhibits filed in DOC 197-1, PID 474-486.

2. There are currently seventeen different addresses which I am required to mail filing notices to, at a cost of roughly $150 - $200 per mailing.

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

[2] DOC 197, PID 445-468 | https://rico.jefffenton.com/3-24-cv-01282/doc/197.pdf
DOC 197-1, PID 474-486 | https://rico.jefffenton.com/3-24-cv-01282/doc/197-1.pdf

3. I cannot possibly afford to do this more than once each month.

4. I need to change how I am sending filing notices to the defendants and/or their counsel effective immediately, until there is an order allowing me to file electronically using ECF.

5. I will provide defendant notices near the time of filing each document with the court, via email instead of by mail, using the email addresses listed in the docket for noticing each attorney.

6. For any attorney in which this email notice will suffice, who does not require filing notices mailed on printed paper, please send me a short email at contact@jefffenton.com granting me your permission to completely substitute all written notices with email instead, which would help save critical resources for me, and I would sincerely appreciate.

7. Short of that, at the start or end of each month, I will mail each defendant or their counsel notice regarding my filings which took place in the month prior.

8. I understand that this could cause significant delay between the date when I file documents with the court and the date when you receive notice, it is for that reason I will **also** be providing email notice, in case a time sensitive response is warranted by you.

9. I understand this is not ideal. In truth, I can't even afford to spend $200 per month for a single mailing, but until the court rules on my motion to allow me to file electronically using ECF, this is the most responsible solution I know of realistically within my reach.

10. I understand that some of you would probably like to provide me with notices via email rather than using the USPS for traditional service. Unfortunately, at this time I cannot agree to accept notices by email, because there are simply too many defendants in this matter and **I need all the time I can get** to respond to your filings.

11. I'm not trying to be difficult in any way, I'm just extremely overwhelmed, and without ECF filing privileges, providing notice of each and every filing is a major undertaking for me, separate and independent from the financial burden. It requires a lot of time and work.

12. As for the defendants who have not yet made an appearance in this matter, where there is no email address currently listed in the docket for you or your counsel, if you would like to be added to the email list to receive notices about each of my filings, please email me your request at contact@jefffenton.com, and I'll be glad to add you.

13. By default, everyone will also receive traditional printed notices by mail, but that will only be done once per month.

14. Regardless of whether you receive notice by email or not, I will not discontinue mailing traditional printed filing notices (on a monthly basis), to the defendants and/or their counsel, unless each recipient grants me their express permission to completely substitute the printed notices with email.

15. Also, as a resource, my website has a section titled, "Fenton Filings Since Service[3]", where I try to post links to most of my filings. With or without notice, you can always check that to see what I have recently filed. I created a shortcut to help you get directly to this page at: **https://notice.jefffenton.com**.

16. Most of my documents linked from my "Fenton Filings Since Service[4]" are full color "true" digitally created PDF documents, typically with embedded character recognition and bookmarks, making them far easier to navigate, search, and work with. I will also upload these higher quality efficient PDF documents if or when the court grants me ECF filing permissions.

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

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

17. Please feel free to share any suggestions or concerns for making this experience more efficient and/or cost effective for all of us.

CERTIFICATION AND DECLARATION

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

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

All rights reserved.

Executed on February 27, 2025

JEFFREY RYAN FENTON, PRO SE
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HTTPS://JEFFFENTON.COM
(P) 615.837.1300
#TNinjustice
#iAMhuman

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

1. NOTICE REGARDING FUTURE FILING NOTICES FOR THE DEFENDANTS

CERTIFICATE OF SERVICE

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

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

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

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

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

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SPRING HILL, TN 37174-3040

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4068 RURAL PLAINS CIR STE 100
FRANKLIN, TN 37064-8039

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

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CLARK & WASHINGTON, P.C.
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KNOXVILLE, TN 37915-2584

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

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

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

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

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

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

ELECTRONIC SERVICE OPTIONS

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

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

CERTIFICATION AND DECLARATION

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

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

All rights reserved.

Executed on February 27, 2025

JEFFREY RYAN FENTON, PRO SE

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#iAMhuman

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

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

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

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

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

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MAR 03 2025
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MIDDLE DISTRICT OF TN

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ATTN: CLERK OF THE COURT
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