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

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US DISTRICT COURT
MID DIST TENN

JEFFREY RYAN FENTON,

PLAINTIFF

V.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

CASE NO. 3:24-CV-01282

DECLARATION AND MOTION TO CORRECT AND MINIMIZE OR STRIKE AND REMOVE REDACTIONS, WHILE UNSEALING ALL RECORDS[1]

Plaintiff brings this declaration and motion pursuant to 28 U.S. Code § 1746 and 18 U.S. Code § 4 - Misprision of felony.

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

1. I am the plaintiff in this federal lawsuit.
2. I am a citizen of the United States of America.
3. I was born in Washington State during 1969.
4. I am domiciled in Genesee County, Michigan.

[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.

BACKGROUND

5. I received an email[2] dated October 25, 2024, from Assistant United States Attorney Ryan Cobb, with the United States Attorney's Office for the Western District of Michigan. This email stated: "I will be representing Judge Walker in this action. I'm writing to seek concurrence in removing Judge Walker's private address from the pleadings filed in this matter. He has privacy and safety concerns about having that address be publicly available and we would like it redacted from the filings. If you concur, I will send you a stipulation to redact it from the filings. If not, I will go ahead and file a motion."

6. I've been through a lot the past few months, as I have tried to work with both U.S. Attorneys, in Michigan[3] (see attached "Exhibits A-I"), and Tennessee[4] (see attached "Exhibits J-U"), to meaningfully address Judge Walker's claimed "privacy and safety concerns", without the need to block public access to any document in this lawsuit. Ultimately, neither U.S. attorney showed any interest in limiting the reach of their proposed redactions to the scope of their stated concerns, concealing defendant Walker's home address.

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

8. The heart of this lawsuit is about public corruption amongst high-ranking officers of the Tennessee Court System, some of whom are literally entrusted with the oversight of the "practice of law" throughout the state. It is imperative that nothing in this lawsuit be withheld,

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[2] See attached "Exhibit B" | https://rico.jefffenton.com/evidence/2024-10_comms-with-usat-ryan-cobb-about-redactions.pdf

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

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

redacted, sealed, or otherwise hidden from the public, except that which is absolutely critical, with a reasonable, honest, and lawful purpose; without redacting one word, page, or document more than is absolutely necessary.

9. Upon information and belief, as will be explained in other filings, I do not believe that Judge Walker ever had any "privacy and safety concerns" related to the disclosure of his home address in this lawsuit. (Based on a reasonable interpretation of Judge Walker's actions as related to that information, independent of this lawsuit, which out of care for his privacy I am refraining from providing details about here.)

10. Upon information and belief, I believe that this was a rouse from the start and is in fact misconduct by the U.S. Attorney's Offices in both Michigan and Tennessee. Misusing the weight and resources of their public offices to protect both the private and criminal interests of many of the defendants, seeking to hide felony crimes and corruption from the public, **which most if not all of the defendants, knowingly participated in.**

TENN. R. SUP. CT. 1.0 TERMINOLOGY[5]

> (f[6]) "Knowingly," "known," or "knows" denotes actual awareness of the fact in question. A person's knowledge may be inferred from circumstances (emphasis added).
>
> (j[7]) "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" (emphasis added).

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[5] ECF 41, PID 3570-3608 | https://rico.jefffenton.com/evidence/tennessee-rules-of-judicial-and-professional-conduct.pdf ECF 41, PID 3572 | https://www.tncourts.gov/rules/supreme-court/8

[6] ECF 41, PID 3572 | Tenn. R. Sup. Ct. 1.0 TERMINOLOGY (f) "Knowingly". https://www.tncourts.gov/rules/supreme-court/8

[7] ECF 41, PID 3572 | Tenn. R. Sup. Ct. 1.0 TERMINOLOGY (j) "Reasonably should know". https://www.tncourts.gov/rules/supreme-court/8 |

18 U.S. CODE § 4 MISPRISION OF FELONY

11. These records are packed with evidence of felonies committed by Tennessee court personnel and counsel. Hiding them is a violation of 18 U.S. Code § 4 - Misprision of Felony:[8]

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

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

13. Once that much extra work has been done by me, depleting my critical time and resources on largely nonsense, there needs to be some sort of financial consideration or sanctions that take place, to compensate and reimburse me for my time and resources wasted to defend against what were largely frivolous claims and motions to dismiss, which were honestly **never** in the interest of justice from the start.

[8] https://www.law.cornell.edu/uscode/text/18/4

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

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

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

16. Upon information and belief, it is critical to the honest interests of justice in this matter, along with the timeliness of the actions in this lawsuit, that the court either grant my motion to require real accountability in each filing, under the **penalty of perjury,** or by strictly discipling **all** attorney misconduct with **steep** sanctions, while granting me extra time to argue against their nonsense.

17. If Judge Walker does have any real "privacy and safety concerns" about the disclosure of his home address in this lawsuit, his counsel certainly failed to address that in any meaningful capacity, in either Federal Court, Michigan or Tennessee.

18. Between the two courts currently, there are literally thousands of pages of my lawsuit, which **don't** contain defendant Walker's address, which have been either temporarily or permanently redacted in their entirety or sealed from public access.

THE INDECENT PROPOSAL

19. In the proposed order to redact (see attached "Exhibit F"), filed in MIWD, ECF 136, PID 5735, there are **four** pages listed in **three** documents which contain Judge Walker's home address; those are as follows:

1) ECF No. 16-1, PageID.2293 (the court redacted 64 pages)
2) ECF No. 66, PageID.4874 (the court redacted 138 pages)
3) ECF No. 95-1, PageID.5252 and 5254 (the court redacted 22 pages)

THE REAL NEED (IF EVER ONE EXISTED)

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

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

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

22. According to Microsoft Word, my amended complaint[9] contains:

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

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

23. All of which has been completely redacted for the alleged purpose of concealing those **four words** in defendant Walker's address, despite being information easily available on public records for anyone to find while doing a rudimentary web search from the browser of their choice.

WHAT REALLY HAPPENED BETWEEN FEDERAL COUNSEL AND COURTS

24. Upon information and belief, this appears to have been an "excuse" for some of the high-profile bad actors in this lawsuit to exploit both another *public office* (tax funded counsel) and a loophole (safety of a federal judge) by which they could reasonably argue the *need* to redact and seal *some* of the court's records. Then in the execution of that, I believe that they planned and in fact somehow obtained massively *overreaching redactions* for the real purpose of **hiding** glaring evidence and testimony about **public corruption** and numerous **felony crimes** committed **by high-ranking officers of the Tennessee Court System.**

25. Despite the obscenely overreaching redactions ordered, such as blocking **all** public access to **all** *one hundred and thirty-eight pages* of my amended complaint[10], to allegedly conceal just *four words*, printed on only *one page*, contained within a *single line*, from the public.

26. While missing the other **fifteen documents** that contain **defendant Walker's address**, filed in this lawsuit, which have remained publicly accessible.

27. Defendant Walker's address is present on these specific pages (see correlating redacted pages attached): ECF 16-1, PID 2293; 66, PID 4874; ECF 90-2, PID 5170; ECF 90-4, PID 5172; ECF 95-1, PID 5252 & 5254; ECF 96, PID 5263; ECF 96-1, PID 5273; ECF 92-2, PID 5293; ECF 97, PID 5300; ECF 98, PID 5326; ECF 99, PID 5335; ECF 100, PID 5352; ECF 100-1, PID 5362; ECF 101, PID 5383; ECF 102, PID 5467; ECF 109, PID 5582; ECF 110, 5592; ECF 111, PID 5607.

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

28. Still, I set out to cure the *claimed concern* as completely as I am *able*, not just on the pages the officers of the court *chose to hide from the public*, but to the best of my knowledge and ability throughout this *lawsuit*, as well as throughout multiple sections of my *website*. This has been a lot of work, no thanks to the U.S. Attorneys in Michigan and Tennessee, who both refused to work with me on the issue while limiting the scope of the redactions performed by the court to their stated concern: *defendant Walker's address.*

29. I have been working for months to cure this problem without the "unintended" consequence of limiting the public's access to this lawsuit in any other way.

30. The current implementation by the court is "overly broad and burdensome" for me in many ways, as I told both U.S. Attorneys[11], while hiding the real merits of this lawsuit from the public, along with the challenges I have and continue to face in the federal courts, as an indigent *pro se* litigant seeking justice.

31. More will be said on the surrounding circumstances in other filings, but this motion is intended to **correct** this problem, hopefully once and for all, by treating the concern as legitimate and providing a real remedy, regardless of the defendant's motives.

32. Since it is so labor intensive to try to sift back through the court records to redact defendant Walker's address from my filings, from both Nashville and Michigan dockets online, as well as from other documents hosted on my website, wherever practical I am also redacting the **home addresses** of the other defendants, in hopes of preventing similar issues from arising again.

33. I don't know how the court handles redactions; therefore I've tried my best to provide each page and document needing redactions to the court, both printed and as digital media

[11] See attached Exhibits: C, C-2, H, K, M, M-2, P, Q, Q-2, Q-3, and U.

(on a DVD[12]), in every document set and format, which I can envision potentially being helpful to the court in facilitating the redactions as quickly and easily as I can imagine, without compromising the publics access to any document in this lawsuit.

A REAL REMEDY REGARDLESS OF THE DEFENDANT'S MOTIVES

34. All source files were downloaded from PACER and should be identical to those recorded in the docket with the court, except for the obvious redactions which I have performed to protect the privacy of the defendants.

35. I am providing each page requiring redactions, printed on paper media, both with and without the court's case specific headers.

36. I'm assuming that the court will want to scan the redacted pages without the court's case specific headers printed on them, to then have the clerk add the headers electronically after scanning.

37. I provided each page both ways, to avoid confusion about which page is which, and for the court to use however is most beneficial to the clerk's workflow.

PACER DIGITAL MEDIA FILES—AFTER APPLYING REDACTIONS

38. I have also provided a DVD[13] with the digital media files originally downloaded from PACER, after I applied the redactions to them, both with and without the court's case specific headers on them, for the court to use however they like.

39. Since in many cases, the redactions are only on one or two pages of a much larger document, but PACER does not provide downloads of those individual pages (to my knowledge),

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[12] This DVD is included in attached "Exhibit V".

[13] This DVD is included in attached "Exhibit V".

I have prepared these digital files in multiple different document set configurations, for the court to use however it works best with their workflow.

40. Wherever applicable, I tried to provide the digital media files on the ZIP level, the DOCUMENT level, and also on the PAGE level. I also tried to provide PAGE level redactions in two separate *variants*, one where defendant Walker's home address **alone** has been redacted (notated with *"walkers page"* in the file name), the other where the home addresses for **all** the defendants, including Walker, has been redacted, to provide improved privacy for all the defendants (notated with *"redacted pages only"* in the file name).

MOTION TO CORRECT AND MINIMIZE OR STRIKE AND REMOVE REDACTIONS, WHILE UNSEALING ALL DOCUMENTS IN THIS LAWSUIT

41. It is critical to me that nothing in this lawsuit be redacted or sealed from the public except for minimal line-level redactions which can be executed, on a page-by-page basis, **without** redacting or sealing **any** full page or document in this lawsuit.

42. It is my preference that the court use all the pages which I have taken the time to redact and provide to the court herein, to protect the privacy of many of the defendants, not just defendant Walker, in hopes of preventing similar issues in the future, in as much as is both practical and possible, without significantly increasing the scope of this task.

43. However, since I cannot control whether the court elects to do the minimum for defendant Walker's benefit alone, or takes the extra steps to conceal the home addresses of the other defendants, in as much as is practical, while handling the same scope of documents, I have provided both document sets for the court to choose which is most helpful to use.

44. At the court's option, the clerk can substitute the included redacted pages, using either paper or digital media (on DVD[14]), or perform line-level redactions of just the sensitive residential addresses of the defendants.

45. In the event that the court is not willing to help perform, execute, or facilitate line-level redactions without any full page or document level redactions blocking the public from material matters in this lawsuit, **then please strike and remove all redactions** and/or unseal all documents, to make this lawsuit fully accessible to the public once again.

46. As will be substantiated in other filings, defendant Walker's home address **never was private.** Upon information and belief, defendant Walker has not taken some of the most basic steps necessary for privately owning real property, without which he has no reasonable expectation for privacy related to his home address. We are each responsible for creating our own privacy, and in substantive matters involving defendant Walker's home address, he has failed or refused to take actions to make the location of his home private.

47. Upon information and belief, this demand was improper from the start, apparently for the real purpose of **hiding** glaring evidence and testimony about **public corruption** and numerous **felony crimes** committed by high-ranking officers of the Tennessee Courts, against my family and the general public in Middle Tennessee.

[14] This DVD is included in attached "Exhibit V".

REDACTION CORRECTIONS NEEDED

ECF 16-1

1. Please **remove** the document level redaction of ECF 16-1, PID 2271-2323, to make this document available to the public again.

2. Please swap out the redacted pages provided for ECF 16-1, PID 2271-2323, or on each of the defendant's summonses, perform a line-level redaction of just the house numbers and street names (one line per page). Defendant Walker's address is shown on PID 2293.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 16-1".
- Digital Media Files Provided on DVD:
  - 16-1 (redacted pages only).pdf
  - 16-1 (walkers page).pdf
  - 16-1.pdf (This is the **complete document** with the redactions applied.)
  - ecf-16.zip
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/16-1.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-16.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/16-1.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/ecf-16.zip

ECF 66

3. Please **remove** the document level redaction of ECF 66, PID 4870-5007, to make this document available to the public again.

4. Please swap out the redacted pages provided for ECF 66, PID 4873 and 4874, or perform line-level redactions of just the residential house numbers and street names of the defendants (one line only). Defendant Walker's address is shown on PID 4874.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 66".
- Digital Media Files Provided on DVD:
  - 66 (redacted pages only).pdf
  - 66 (walkers page).pdf
  - 66.pdf (This is the **complete document** with the redactions applied.)
  - ecf-66.zip

- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/66.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-66.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/66.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/doc-66.zip

ECF 90-2

5. Please swap out the redacted page provided for ECF 90-2, PID 5170, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 90-2".
- Digital Media Files Provided on DVD:
  - 90-2 (redacted pages only).pdf
  - 90-2 (walkers page).pdf
  - 90-2.pdf (This is the **complete document** with the redactions applied.)
  - ecf-90.zip
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/90-2.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-90.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/90-2.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/doc-90.zip

ECF 90-4

6. Please swap out the redacted page provided for ECF 90-4, PID 5172, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 90-4".
- Digital Media Files Provided on DVD:
  - 90-4 (redacted pages only).pdf
  - 90-4 (walkers page).pdf
  - 90-4.pdf (This is the **complete document** with the redactions applied.)
  - ecf-90.zip
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/90-4.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-90.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/90-4.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/doc-90.zip

ECF 95-1

7. Please **remove** the document level redaction of ECF 95-1, PID 5237-5258, to make this document available to the public again.

8. Please swap out the redacted pages provided for ECF 95-1, PID 5242, 5252, 5254 or perform line-level redactions of just the residential house numbers and street names of the defendants (one line per page). Defendant Walker's address is shown on PID 5252 and 5254.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 95-1".
- Digital Media Files Provided on DVD:
  - 95-1 (redacted pages only).pdf
  - 95-1 (walkers pages).pdf
  - 95-1.pdf (This is the **complete document** with the redactions applied.)
  - ecf-95.zip
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/95-1.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-95.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/95-1.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/doc-95.zip

ECF 96

9. Please swap out the redacted page provided for ECF 96, PID 5263, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 96".
- Digital Media Files Provided on DVD:
  - 96 (redacted pages only).pdf
  - 96 (walkers page).pdf
  - 96.pdf (This is the **complete document** with the redactions applied.)
  - ecf-96.zip
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/96.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-96.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/96.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/doc-96.zip

ECF 96-1

10. Please swap out the redacted pages provided for ECF 96-1, PID 5266-5279, or perform line-level redactions of just the residential house numbers and street names of the defendants (two lines per page). Defendant Walker's address is shown on PID 5273.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 96-1".
- Digital Media Files Provided on DVD:
  - 96-1 (redacted pages only).pdf
  - 96-1 (walkers page).pdf
  - 96-1.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/96-1.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/96-1.pdf

ECF 96-2

11. Please swap out the redacted page provided for ECF 96-2, PID 5293, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 96-2".
- Digital Media Files Provided on DVD:
  - 96-2 (redacted pages only).pdf
  - 96-2 (walkers page).pdf
  - 96-2.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/96-2.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/96-2.pdf

ECF 97

12. Please swap out the redacted page provided for ECF 97, PID 5300, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 97".
- Digital Media Files Provided on DVD:
  - 97 (redacted pages only).pdf
  - 97 (walkers page).pdf
  - 97.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/97.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/97.pdf

ECF 98

13. Please swap out the redacted page provided for ECF 98, PID 5326, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 98".
- Digital Media Files Provided on DVD:
  - 98 (redacted pages only).pdf
  - 98 (walkers page).pdf
  - 98.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/98.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/98.pdf

ECF 99

14. Please swap out the redacted page provided for ECF 99, PID 5335, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 99".
- Digital Media Files Provided on DVD:
  - 99 (redacted pages only).pdf
  - 99 (walkers page).pdf
  - 99.pdf (This is the **complete document** with the redactions applied.)
  - ecf-99.zip
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/99.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-99.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/99.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/doc-99.zip

ECF 100

15. Please swap out the redacted page provided for ECF 100, PID 5352, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 100".
- Digital Media Files Provided on DVD:
  - 100 (redacted pages only).pdf
  - 100 (walkers page).pdf
  - 100.pdf (This is the **complete document** with the redactions applied.)
  - ecf-100.zip

- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/100.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-100.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/100.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/doc-100.zip

ECF 100-1

16. Please swap out the redacted page provided for ECF 100-1, PID 5355-5368, or perform line-level redactions of just the residential house numbers and street names of the defendants (two lines per page). Defendant Walker's address is shown on PID 5362.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 100-1".
- Digital Media Files Provided on DVD:
  - 100-1 (redacted pages only).pdf
  - 100-1 (walkers page).pdf
  - 100-1.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/100-1.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/100-1.pdf

ECF 101

17. Please swap out the redacted page provided for ECF 101, PID 5383, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 101".
- Digital Media Files Provided on DVD:
  - 101 (redacted pages only).pdf
  - 101 (walkers page).pdf
  - 101.pdf (This is the **complete document** with the redactions applied.)
  - ecf-101.zip
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/101.pdf
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/zip/ecf-101.zip
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/101.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/zip/doc-101.zip

ECF 102

18. Please swap out the redacted page provided for ECF 102, PID 5467, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 102".
- Digital Media Files Provided on DVD:
  - 102 (redacted pages only).pdf
  - 102 (walkers page).pdf
  - 102.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/102.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/102.pdf

ECF 109

19. Please swap out the redacted page provided for ECF 109, PID 5582, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 109".
- Digital Media Files Provided on DVD:
  - 109 (redacted pages only).pdf
  - 109 (walkers page).pdf
  - 109.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/109.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/109.pdf

ECF 110

20. Please swap out the redacted page provided for ECF 110, PID 5592, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD(see attached "Exhibit V"), open the directory "ECF 110".
- Digital Media Files Provided on DVD:
  - 110 (redacted pages only).pdf
  - 110 (walkers page).pdf
  - 110.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/110.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/110.pdf

ECF 111

21. Please swap out the redacted page provided for ECF 111, PID 5607, or perform line-level redactions of just the residential house numbers and street names of the defendants.

- At the top-level of the DVD (see attached "Exhibit V"), open the directory "ECF 111".
- Digital Media Files Provided on DVD:
  - 111 (redacted pages only).pdf
  - 111 (walkers page).pdf
  - 111.pdf (This is the **complete document** with the redactions applied.)
- Redacted Online: https://rico.jefffenton.com/1-23-cv-01097/ecf/111.pdf
- Redacted Online: https://rico.jefffenton.com/3-24-cv-01282/doc/111.pdf

CONCLUSION

1. It is critical to me that nothing in this lawsuit be redacted or sealed from the public except for minimal line-level redactions which can be executed, on a page-by-page basis, **without** redacting or sealing **any** full page or document in this lawsuit.

2. Please **unseal** all documents I filed in this lawsuit, which are currently sealed for any reason.

3. Please **remove** the document level redaction of ECF 16-1, PID 2271-2323, to make this document available to the public again.

4. Please **remove** the document level redaction of ECF 66, PID 4870-5007, to make this document available to the public again.

5. Please **remove** the document level redaction of ECF 95-1, PID 5237-5258, to make this document available to the public again.

6. If this court is not willing to use line-level redactions to conceal defendant Walker's address (just four words), instead of page and document level redactions, which are currently

significantly interfering with the public's right, access, and ability to understand substantive portions of this lawsuit, **then please strike and remove all redactions** and/or unseal all documents, to make this lawsuit fully accessible to the public once again.

7. If this court is willing to use line-level redactions to conceal defendant Walker's address instead of "overly broad and burdensome" page and document level redactions, which obstruct and interfere with the publics access and right to know, then please proceed with the remaining redactions, corrections, and changes, as outlined below.

8. Please swap out the redacted pages provided for ECF 16-1, PID 2271-2323, or on each of the defendant's summonses, perform a line-level redaction of just the house numbers and street names (one line per page). Defendant Walker's address is shown on PID 2293.

9. Please swap out the redacted pages provided for ECF 66, PID 4873 and 4874, or perform line-level redactions of just the residential house numbers and street names of the defendants (one line only). Defendant Walker's address is shown on PID 4874.

10. Please swap out the redacted page provided for ECF 90-2, PID 5170, or perform line-level redactions of just the residential house numbers and street names of the defendants.

11. Please swap out the redacted page provided for ECF 90-4, PID 5172, or perform line-level redactions of just the residential house numbers and street names of the defendants.

12. Please swap out the redacted pages provided for ECF 95-1, PID 5242, 5252, 5254 or perform line-level redactions of just the residential house numbers and street names of the defendants (one line per page). Defendant Walker's address is shown on PID 5252 and 5254.

13. Please swap out the redacted page provided for ECF 96, PID 5263, or perform line-level redactions of just the residential house numbers and street names of the defendants.

14. Please swap out the redacted pages provided for ECF 96-1, PID 5266-5279, or perform line-level redactions of just the residential house numbers and street names of the defendants (two lines per page). Defendant Walker's address is shown on PID 5273.

15. Please swap out the redacted page provided for ECF 96-2, PID 5293, or perform line-level redactions of just the residential house numbers and street names of the defendants.

16. Please swap out the redacted page provided for ECF 97, PID 5300, or perform line-level redactions of just the residential house numbers and street names of the defendants.

17. Please swap out the redacted page provided for ECF 98, PID 5326, or perform line-level redactions of just the residential house numbers and street names of the defendants.

18. Please swap out the redacted page provided for ECF 99, PID 5335, or perform line-level redactions of just the residential house numbers and street names of the defendants.

19. Please swap out the redacted page provided for ECF 100, PID 5352, or perform line-level redactions of just the residential house numbers and street names of the defendants.

20. Please swap out the redacted page provided for ECF 100-1, PID 5355-5368, or perform line-level redactions of just the residential house numbers and street names of the defendants (two lines per page). Defendant Walker's address is shown on PID 5362.

21. Please swap out the redacted page provided for ECF 101, PID 5383, or perform line-level redactions of just the residential house numbers and street names of the defendants.

22. Please swap out the redacted page provided for ECF 102, PID 5467, or perform line-level redactions of just the residential house numbers and street names of the defendants.

23. Please swap out the redacted page provided for ECF 109, PID 5582, or perform line-level redactions of just the residential house numbers and street names of the defendants.

24. Please swap out the redacted page provided for ECF 110, PID 5592, or perform line-level redactions of just the residential house numbers and street names of the defendants.

25. Please swap out the redacted page provided for ECF 111, PID 5607, or perform line-level redactions of just the residential house numbers and street names of the defendants.

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 10, 2025

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I'm a human being, not a corporation or property. Please treat my case accordingly.

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

1. DECLARATION AND MOTION TO CORRECT AND MINIMIZE OR STRIKE AND REMOVE REDACTIONS, WHILE UNSEALING ALL RECORDS (with Exhibits A through V-2)

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2025, I mailed the foregoing or above-named papers to the United States District Court for the Middle District of Tennessee, at their address below, for filing in case number 3:24-cv-01282.

I further certify that on or before February 28, 2025, I am serving these same documents to the defendants or their counsel by first class or priority mail with postage prepaid at the addresses listed below. If for any reason beyond my control, I am unable to complete either on the date specified, I will do so on the very next business day.

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

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WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP
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BRET CHANESS
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PEACHTREE CORNERS, GA 30071-1570

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BANKERS TITLE & ESCROW CORPORATION
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NASHVILLE, TN 37203-7238

ELECTRONIC SERVICE OPTIONS

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

CERTIFICATION AND DECLARATION

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

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

All rights reserved.

Executed on February 22, 2025

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

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

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