

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.

Because this lawsuit was transferred from MIWD to TNMD on October 25, 2024, all filings up to that point (ECF 1-130, PID 1-5727) were transferred between courts using the same ECF/DOC numbers and PID ranges, with the only difference being the COURT-SPECIFIC ELECTRONIC FILE STAMPS on the HEADERS (MIWD) and FOOTERS (TNMD) of each page.

Since nothing in this docket was REDACTED or SEALED by the court prior to the transfer, I was able to purchase every document filed in this lawsuit up to that point (ECF 1-130, PID 1-5727) from PACER.

To provide a complete court record for TNMD while minimizing confusion, I SUBSTITUTED documents in ECF 1-130, PID 1-5727 that were REDACTED or SEALED (in their entirety) by TNMD with the corresponding documents from the MIWD docket. To clearly SPECIFY which documents I substituted, I appended “**_miwd**” to the end of the file names. (This was only done with documents specific to my MISCONDUCT COMPLAINTS.)

I also applied BLACK word-level or line-level REDACTIONS to some documents AFTER they were filed with the court (hereinafter referred to as “REDACTED AFTER FILING”), in response to some of the defendants’ concerns, to protect their privacy without needing to redact or seal any full page or document in this lawsuit. In those instances, I appended “**_rd**” to the end of the file names to designate which files I manually added REDACTIONS AFTER FILING. (This was also only done with documents specific to these MISCONDUCT COMPLAINTS.)

These redactions were an AFTERTHOUGHT but were executed out of an ABUNDANCE OF CAUTION for the defendants’ benefit.

My website now contains a mixture of use cases, since the defendants’ concerns were first voiced by the UNITED STATES ATTORNEY’S OFFICE for the WESTERN DISTRICT OF MICHIGAN in MIWD ECF 131, PID 5728-5729 (<https://rico.fentonvstory.com/1-23-cv-01097/ecf/131.pdf>), filed on October 25, 2024, immediately AFTER this lawsuit was transferred from MIWD to TNMD.

Shortly afterward (approximately a year ago), I invested HUNDREDS OF HOURS performing WORD-LEVEL and LINE-LEVEL REDACTIONS to files throughout my website that I had already filed with the court and purchased through PACER (REDACTED AFTER FILING), to protect the defendants' stated concerns, despite this information being PUBLICLY AVAILABLE from multiple sources online. While doing so, I did NOT include the appended designators “_miwd” or “_rd” mentioned above, since my goal then was only to CONCEAL the HOME ADDRESSES of the individual defendants, and specifically the HOME ADDRESS of defendant WALKER. (These “REDACTED AFTER FILING” word-level and line-level redactions were applied using BLACK ink, making them clearly visible; hence, I wasn't aware of any need at that time for providing additional information by appending designators or “FLAGS” to the file name.)

I submitted these “REDACTED AFTER FILING” documents to MIWD for refiling in MIWD ECF 139-1 (<https://rico.fentonvstory.com/1-23-cv-01097/ecf/139-1.pdf>) and 139-2 (<https://rico.fentonvstory.com/1-23-cv-01097/ecf/139-2.pdf>).

MIWD MAGISTRATE JUDGE RAY KENT rejected my request in MIWD ECF 139: <https://rico.fentonvstory.com/1-23-cv-01097/ecf/139.pdf>.

I resubmitted these “REDACTED AFTER FILING” documents to MIWD in ECF 141-1 (<https://rico.fentonvstory.com/1-23-cv-01097/ecf/141-1.pdf>) for consideration by DISTRICT JUDGE PAUL L. MALONEY, along with a FIRST AMENDMENT RIGHT OF ACCESS: OBJECTION, MOTION, AND DECLARATION FOR DISTRICT JUDGE PAUL L. MALONEY TO CORRECT & MINIMIZE OR REMOVE REDACTIONS.

MIWD DISTRICT JUDGE PAUL L. MALONEY rejected both of my requests in MIWD ECF 141: <https://rico.fentonvstory.com/1-23-cv-01097/ecf/141.pdf>.

I also submitted these “REDACTED AFTER FILING” documents to TNMD for refiling in TNMD DOC 211 (<https://rico.fentonvstory.com/3-24-cv-01282/doc/211.pdf>), 212 (<https://rico.fentonvstory.com/3-24-cv-01282/doc/212.pdf>), 212-1 (<https://rico.fentonvstory.com/3-24-cv-01282/doc/212-1.pdf>), and 212-2 (<https://rico.fentonvstory.com/3-24-cv-01282/doc/212-2.pdf>), none of which were ever heard or addressed by the court.

NOTE: I specify “MIWD ECF” for MIWD docket entries between ECF 131-142 because those docket entries are NOT the same in both MIWD and TNMD dockets. This lawsuit began transferring in ECF 127 (in both court dockets) and was completed in TNMD ECF 131. At the time of the transfer, all docket entries (ECF 1-127) were IDENTICAL, with the only difference being the COURT-SPECIFIC ELECTRONIC FILE STAMPS on the HEADERS (MIWD) and FOOTERS (TNMD) of each page.

General Docket
United States Court of Appeals for the Sixth Circuit

Court of Appeals Docket #: 25-5592 Nature of Suit: 2370 Other Fraud Jeffrey Fenton v. Virginia Story, et al Appeal From: Middle District of Tennessee at Nashville Fee Status: pending in 6th Cir	Docketed: 06/24/2025
Case Type Information: 1) Civil 2) United States as party 3) Federal Question	
Originating Court Information: District: 0650-3 : 3:24-cv-01282 Trial Judge: Patricia A. Gaughan, U.S. District Judge Date Filed: 10/25/2024 Date Order/Judgment: 05/19/2025	
Date NOA Filed: 06/20/2025	
Prior Cases: None	
Current Cases: None	

JEFFREY RYAN FENTON Plaintiff - Appellant	Jeffrey Ryan Fenton Direct: (615) 837-1300 [Pro Se] P.O. Box 400 Linden, MI 48451
v.	
VIRGINIA LEE STORY, individually and in their official capacities Defendant - Appellee	Megan Calme Direct: 973-735-5987 [COR LD NTC Retained] Wilson, Elser, Moskowitz, Edelman & Dicker 1801 West End Avenue Suite 920 Nashville, TN 37203 Sarah M. Mathews Direct: 615-324-7840 [COR NTC Retained] Maurice Wutscher Suite 9200 4900 Centennial Avenue Suite 300 Nashville, TN 37209
MICHAEL WEIMAR BINKLEY, individually and in their official capacities Defendant - Appellee	Peako Andrea Jenkins Direct: 615-741-8059 [COR LD NTC Retained] Office of the Attorney General of Tennessee 500 Dr. Martin L. King Jr. Boulevard Suite 3214 Nashville, TN 37243
KATHRYN LYNN YARBROUGH, individually and in their official capacities Defendant - Appellee	
ELAINE BEATY BEELER, individually and in their official capacities Defendant - Appellee	Lisa M. Carson Direct: 615-794-8850 [COR LD NTC Retained]

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MARY ELIZABETH AUSBROOKS, individually and in their official capacities

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Defendant - Appellee

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SAMUEL FORREST ANDERSON, individually and in their official capacities

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ANDY D. BENNETT, individually and in their official capacities

Defendant - Appellee

Peako Andrea Jenkins
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(see above)

WILLIAM NEAL MCBRAYER, individually and in their official capacities

Defendant - Appellee

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JAMES M. HIVNER, individually and in their official capacities

Defendant - Appellee

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JOHN BRANDON COKE, individually and in their official capacities

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SANDRA GARRETT, individually and in their official capacities

Defendant - Appellee

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SPRAGINS, BARNETT & COBB, PLC, also named as Spragins, Barnett & Cobb, PLCNS in complaint

Defendant - Appellee

RUBIN LUBLIN TN, PLLC

Defendant - Appellee

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Defendant - Appellee

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Defendant - Appellee

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Defendant - Appellee

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Defendant - Appellee

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STORY & ABERNATHY, PLLC
Defendant - Appellee

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HOSTETTLER, NEUHOFF & DAVIS, LLC
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Sarah M. Mathews
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Defendant - Appellee

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Defendant - Appellee

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BOARD OF PROFESSIONAL RESPONSIBILITY OF THE
SUPREME COURT OF TENNESSEE
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ROTHSCHILD & AUSBROOKS, PLLC
Defendant - Appellee

Courtney Carolann Williams
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[COR LD NTC Retained]
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Jacquelyne D. Fiala
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Defendant - Appellee

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Bradley Arant Boult Cummings
1221 Broadway
Suite 2400
Nashville, TN 37203

JEFFREY RYAN FENTON

Plaintiff - Appellant

v.

VIRGINIA LEE STORY, individually and in their official capacities; MICHAEL WEIMAR BINKLEY, individually and in their official capacities; KATHRYN LYNN YARBROUGH, individually and in their official capacities; ELAINE BEATY BEEELER, individually and in their official capacities; MARY ELIZABETH AUSBROOKS, individually and in their official capacities; ALEXANDER S. KOVAL, individually and in their official capacities; HENRY E. HILDEBRAND, III, individually and in their official capacities; CHARLES M. WALKER, individually and in their official capacities; ROY PATRICK MARLIN, individually and in their official capacities; THOMAS E. ANDERSON, individually and in their official capacities; SAMUEL FORREST ANDERSON, individually and in their official capacities; FRANK G. CLEMENT, JR., individually and in their official capacities; ANDY D. BENNETT, individually and in their official capacities; WILLIAM NEAL MCBRAYER, individually and in their official capacities; JAMES M. HIVNER, individually and in their official capacities; JOHN BRANDON COKE, individually and in their official capacities; SANDRA GARRETT, individually and in their official capacities; ROTHSCHILD & AUSBROOKS, PLLC; SPRAGINS, BARNETT & COBB, PLC, also named as Spragins, Bartnett & Cobb, PLCNS in complaint; RUBIN LUBLIN TN, PLLC; STATE OF TENNESSEE; WILLIAMSON COUNTY, TN, Tennessee; TENNESSEE ADMINISTRATIVE OFFICE OF THE COURTS; TENNESSEE COURT OF APPEALS MIDDLE DIVISION; CHANCERY COURT FOR WILLIAMSON COUNTY, TN; STORY & ABERNATHY, PLLC; HOSTETTLER, NEUHOFF & DAVIS, LLC; BANKERS TITLE & ESCROW CORPORATION; CADENCE BANK, N.A.; MCARTHUR SANDERS REAL ESTATE; WILLIAMSON COUNTY, TN SHERIFF'S OFFICE; SUPREME COURT OF TENNESSEE; BOARD OF PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF TENNESSEE

Defendants - Appellees

- 06/24/2025 [1](#) Civil Case Docketed. Notice filed by Appellant Mr. Jeffrey Ryan Fenton. Transcript needed: n. (RO) [Entered: 06/24/2025 03:17 PM]
3 pg, 104.89 KB
- 06/24/2025 [3](#) CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Peako Jenkins; Andy D. Bennett* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *NO* 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *NO* Certificate of Service: 06/24/2025. [25-5592] (PAJ) [Entered: 06/24/2025 04:44 PM]
- 06/24/2025 [4](#) CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Peako Jenkins; Michael Weimar Binkley, Board of Professional Responsibility of the Supreme Court of Tennessee, Chancery Court For Williamson County, TN, Frank G. Clement, Jr., Mr. John Brandon Coke, Sandra Garrett, James M. Hivner, William Neal McBrayer, Supreme Court Of Tennessee, Tennessee Administrative Office Of The Courts, Tennessee Court Of Appeals Middle Division, TN and Williamson County, TN* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *NO* 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *NO* Certificate of Service: 06/24/2025. [25-5592] (PAJ) [Entered: 06/24/2025 06:26 PM]
- 06/30/2025 [5](#) APPEARANCE filed for Appellee Charles M. Walker by Anica C. Jones. Certificate of Service: 06/30/2025. [25-5592] (ACJ) [Entered: 06/30/2025 04:18 PM]
1 pg, 249.22 KB
- 07/17/2025 [6](#) APPEARANCE filed for Appellees Ms. Elaine Beaty Beeler, Williamson County, TN and Williamson County, TN Sheriff's Office by Elisabeth M. Carson. Certificate of Service: 07/17/2025. [25-5592] (LMC) [Entered: 07/17/2025 04:44 PM]
1 pg, 101.52 KB
- 07/21/2025 [7](#) APPEARANCE filed for Appellees Andy D. Bennett, Michael Weimar Binkley, Board of Professional Responsibility of the Supreme Court of Tennessee, Chancery Court for Williamson County, TN, Frank G. Clement, Jr., Mr. John Brandon Coke, Sandra Garrett, James M. Hivner, Tennessee Administrative Office of the Courts, Tennessee Court of Appeals Middle Division, Tennessee Supreme Court, TN and William Neal McBrayer by Peako Jenkins. Certificate of Service: 07/21/2025. [25-5592] (PAJ) [Entered: 07/21/2025 12:30 PM]
1 pg, 316.48 KB
- 07/22/2025 [8](#) APPEARANCE filed for Appellees Ms. Virginia Lee Story and Story & Abernathy, PLLC by Sarah M. Mathews. Certificate of Service: 07/22/2025. [25-5592] (SMM) [Entered: 07/22/2025 03:49 PM]
1 pg, 74.99 KB
- 07/23/2025 [9](#) APPEARANCE filed for Appellee Henry E. Hildebrand, III by Anthony M. Noel. Certificate of Service: 07/23/2025. [25-5592] (AMN) [Entered: 07/23/2025 09:05 AM]
1 pg, 188.83 KB
- 07/23/2025 [10](#)  ***LOCKED - COUNSEL KINDLY ADVISED TO REFILE USING OWN PACER ACCOUNT*** APPEARANCE filed for Appellee Henry E. Hildebrand, III by Laura E. Bassett. Certificate of Service: 07/23/2025. [25-5592]--[Edited 07/23/2025 by ALF] (AMN) [Entered: 07/23/2025 09:07 AM]
0 pg, 0 KB
- 07/23/2025 [11](#) APPEARANCE filed for Appellee Bank of America, N.A. by Erik Halvorson. Certificate of Service: 07/23/2025. [25-5592] (EH) [Entered: 07/23/2025 09:53 AM]
1 pg, 241.56 KB
- 07/23/2025 [12](#) DEFICIENCY NOTICE: The appearance form, [9](#), filed by Mr. Anthony M. Noel for Henry E. Hildebrand, III is deficient for the reason noted on the attached checklist. (ALF) [Entered: 07/23/2025 10:21 AM]
2 pg, 16.43 KB
- 07/23/2025 [13](#) APPEARANCE filed for Appellee Henry E. Hildebrand, III by Laura E. Bassett. Certificate of Service: 07/23/2025. [25-5592] (LEB) [Entered: 07/23/2025 10:25 AM]
1 pg, 188.83 KB
- 07/23/2025 [14](#) Appellant MOTION filed by Mr. Jeffrey Ryan Fenton to proceed in forma pauperis. Certificate of service: 07/22/2025. (VLP) [Entered: 07/23/2025 11:03 AM]
2 pg, 916.9 KB
- 07/23/2025 [15](#)  Financial Affidavit filed by Party Mr. Jeffrey Ryan Fenton Certificate of Service: 07/22/2025. (VLP) [Entered: 07/23/2025 11:04 AM]
0 pg, 0 KB
- 07/23/2025 [16](#) CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Sarah M. Mathews; Story & Abernathy, PLLC* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *No*. 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *No*. Certificate of Service: 07/23/2025. [25-5592] (SMM) [Entered: 07/23/2025 12:12 PM]
2 pg, 116.05 KB
- 07/23/2025 [17](#) APPEARANCE filed for Appellees Bankers Title & Escrow Corporation and Mr. Samuel Forrest Anderson by William Scott Hickerson. Certificate of Service: 07/23/2025. [25-5592] (WSH) [Entered: 07/23/2025 02:20 PM]
1 pg, 52.23 KB
- 07/23/2025 [18](#) CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Erik Halvorson; Bank of America, N.A.* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *Bank of America, N.A. is wholly owned by BAC North America Holding Company (BACNAH). BACNAH is a direct, wholly owned subsidiary of NB Holding Corporation (NB Holdings). NB Holdings is a direct, wholly owned subsidiary of Bank of America Corporation. Bank of America Corporation is a publicly held company whose shares are traded on the New York Stock Exchange. Bank of America Corporation has no parent company and no publicly held corporation owns more than 10% of Bank of America Corporation's shares.* 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the
2 pg, 1.21 MB

outcome? *Bank of America, N.A. is wholly owned by BAC North America Holding Company (BACNAH). BACNAH is a direct, wholly owned subsidiary of NB Holding Corporation (NB Holdings). NB Holdings is a direct, wholly owned subsidiary of Bank of America Corporation.* Certificate of Service: 07/23/2025. [25-5592] (EH) [Entered: 07/23/2025 02:20 PM]

- 07/23/2025 19 CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *William Scott Hickerson; Bankers Title & Escrow Corporation* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *NO* 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *NO* Certificate of Service: 07/23/2025. [25-5592] (WSH) [Entered: 07/23/2025 02:24 PM]
- 07/23/2025 [20](#) APPEARANCE filed for Appellee Cadence Bank, N.A. by Kimberly M. Ingram-Hogan. Certificate of Service: 07/23/2025. [25-5592] (KMI) [Entered: 07/23/2025 03:14 PM]
1 pg, 260.7 KB
- 07/23/2025 [21](#) CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Kimberly M. Ingram-Hogan; Cadence Bank, N.A.* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *No* 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *No* Certificate of Service: 07/23/2025. [25-5592] (KMI) [Entered: 07/23/2025 03:17 PM]
2 pg, 1.01 MB
- 07/23/2025 [22](#) APPEARANCE filed for Appellee Cadence Bank, N.A. by George H. Cate, III. Certificate of Service: 07/23/2025. [25-5592] (GHC) [Entered: 07/23/2025 03:29 PM]
1 pg, 254.9 KB
- 07/23/2025 [23](#) DEFICIENCY NOTICE: The appearance form, [\[22\]](#), filed by Mr. George Harrison Cate, III for Cadence Bank, N.A. is deficient for the reason noted on the attached checklist. (ALF) [Entered: 07/23/2025 04:44 PM]
2 pg, 72.8 KB
- 07/23/2025 [24](#) Appellant MOTION filed by Mr. Jeffrey Ryan Fenton to hold case in abeyance, for electronic filing and motion to unseal . Certificate of service: 07/22/2025. (VLP) [Entered: 07/24/2025 11:35 AM]
35 pg, 15.66 MB
- 08/01/2025 [25](#) APPEARANCE filed for Appellee Hostettler, Neuhoff & Davis, LLC by Benjamin E. Goldammer. Certificate of Service: 08/01/2025. [25-5592] (BG) [Entered: 08/01/2025 11:24 AM]
1 pg, 99.73 KB
- 08/01/2025 [26](#) CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Benjamin E. Goldammer; Hostettler, Neuhoff & Davis, LLC* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *No*. 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *No*. Certificate of Service: 08/01/2025. [25-5592] (BG) [Entered: 08/01/2025 11:31 AM]
2 pg, 97 KB
- 08/01/2025 [27](#) APPEARANCE filed for Appellee Rubin Lublin TN, PLLC by Bret Channess. Certificate of Service: 08/01/2025. [25-5592] (BJC) [Entered: 08/01/2025 12:28 PM]
1 pg, 98.65 KB
- 08/01/2025 28 CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Bret Channess; Rubin Lublin TN, PLLC* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *No* 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *No* Certificate of Service: 08/01/2025. [25-5592] (BJC) [Entered: 08/01/2025 12:29 PM]
- 08/01/2025 [29](#) APPEARANCE filed for Appellees Mr. Roy Patrick Marlin and McArthur Sanders Real Estate by Hilary A. Ballentine. Certificate of Service: 08/01/2025. [25-5592] (HAB) [Entered: 08/01/2025 02:38 PM]
1 pg, 8.78 KB
- 08/01/2025 [30](#) CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Hilary Ballentine; Mr. Roy Patrick Marlin and McArthur Sanders Real Estate* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *NO* 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *NO* Certificate of Service: 08/01/2025. [25-5592] (HAB) [Entered: 08/01/2025 04:29 PM]
2 pg, 24.38 KB
- 08/04/2025 [31](#) ORDER filed: The plaintiff seeks an abeyance to document alleged misconduct by the defendants and other parties. However, no briefing schedule will issue unless and until the plaintiff is granted leave to proceed on appeal in forma pauperis or pays the \$605 appellate filing fee. The plaintiff's pauper status motion is currently pending before the court. Grounds for an abeyance having not been shown, the motion [\[24\]](#) is DENIED WITHOUT PREJUDICE. The court does not permit pro se litigants to file directly in CM/ECF. The plaintiff may submit permissible documents containing his written signature to the court's designated pro se email box for electronic filing by the court. 6 Cir. R. 25(b)(2)(A), (d)(3). The email box address is CA06_Pro_Se_Efiling@ca6.uscourts.gov. The court's filing of an emailed pro se document will constitute entry in the docket. Id. at R. 25(e)(1)(B)(ii). He may otherwise continue to submit signed filings in paper. The motion for electronic filing privileges [\[24\]](#) is DENIED. Finally, the plaintiff's motion for public access to all filings [\[24\]](#) is DENIED WITHOUT PREJUDICE. To the extent the plaintiff seeks to unseal documents filed in the district court, he must first move the district court. 6 Cir. R. 11(c)(2). The plaintiff's requests for substantive relief are REFERRED to the ultimate merits panel. (RO) [Entered: 08/04/2025 09:53 AM]
4 pg, 169.29 KB

Document	Description	Pages	Size
<input type="checkbox"/> 1 	clerk order filed	2	89.08 KB

<input type="checkbox"/>	2		U.S. Mail Notice of Docket Activity	2	80.21 KB
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- 08/05/2025 [32](#) NOTIFICATION filed by Mr. Jeffrey Ryan Fenton regarding certificate of service. Certificate of Service: 07/22/2025. (RO) [Entered: 08/05/2025 11:46 AM]
17 pg, 7.61 MB
- 08/06/2025 [33](#) APPEARANCE filed for Appellees Mary Elizabeth Ausbrooks and Rothschild & Ausbrooks, PLLC by Courtney C. Williams. Certificate of Service: 08/06/2025. [25-5592] (CCW) [Entered: 08/06/2025 03:32 PM]
1 pg, 338.45 KB
- 08/06/2025 [34](#) APPEARANCE filed for Appellees Mary Elizabeth Ausbrooks and Rothschild & Ausbrooks, PLLC by Carolina V. Martin. Certificate of Service: 08/06/2025. [25-5592] (CVM) [Entered: 08/06/2025 03:44 PM]
1 pg, 342.73 KB
- 08/06/2025 [35](#) CORPORATE DISCLOSURE STATEMENT. Name of Counsel: *Carolina V. Martin; Rothschild & Ausbrooks, PLLC* makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? *No* No 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? *No* Certificate of Service: 08/06/2025. [25-5592] (CVM) [Entered: 08/06/2025 04:07 PM]
2 pg, 87.97 KB
- 08/27/2025 [36](#) APPEARANCE filed for Appellee Tennessee Court of Appeals Middle Division by Peako Jenkins. Certificate of Service: 08/27/2025. [25-5592] (PAJ) [Entered: 08/27/2025 02:19 PM]
1 pg, 244.3 KB
- 09/09/2025 [37](#) MOTION filed by Ms. Hilary Ann Ballentine for Mr. Roy Patrick Marlin and McArthur Sanders Real Estate to dismiss case for lack of jurisdiction. Certificate of Service: 09/09/2025. [25-5592] (HAB) [Entered: 09/09/2025 03:49 PM]
10 pg, 569.44 KB
- 10/10/2025 [38](#) APPEARANCE filed for Appellees Story & Abernathy, PLLC and Ms. Virginia Lee Story by Megan R. Calme. Certificate of Service: 10/10/2025. [25-5592] (MC) [Entered: 10/10/2025 08:56 AM]
1 pg, 8.53 KB
- 11/05/2025 [39](#) ORDER filed: The motion to dismiss for lack of jurisdiction [\[37\]](#) is therefore DENIED. Decision not for publication. Danny J. Boggs, Circuit Judge; Eugene E. Siler, Jr., Circuit Judge and Raymond M. Kethledge, Circuit Judge. (RO) [Entered: 11/05/2025 10:05 AM]
4 pg, 136.02 KB

Document	Description	Pages	Size
<input type="checkbox"/>	1 	judge order filed	2 59.76 KB
<input type="checkbox"/>	2 	U.S. Mail Notice of Docket Activity	2 76.26 KB

- 12/23/2025 [40](#) APPEARANCE filed for Appellees Mary Elizabeth Ausbrooks and Rothschild & Ausbrooks, PLLC by Jacquelyne D. Fiala. Certificate of Service: 12/23/2025. [25-5592] (JDF) [Entered: 12/23/2025 10:02 AM]
1 pg, 171.11 KB
- 01/02/2026 [41](#) CORRESPONDENCE: change of address by Mr. Jeffrey Ryan Fenton. Address has been updated. (RO) [Entered: 01/02/2026 10:43 AM]
4 pg, 5.51 MB

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UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Kelly L. Stephens
Clerk

100 EAST FIFTH STREET, ROOM 540
POTTER STEWART U.S. COURTHOUSE
CINCINNATI, OHIO 45202-3988

Tel. (513) 564-7000
www.ca6.uscourts.gov

Filed: June 24, 2025

Mr. Jeffrey Ryan Fenton
17195 Silver Parkway
Unit 150
Fenton, MI 48430

Re: Case No. 25-5592, *Jeffrey Fenton v. Virginia Story, et al*
Originating Case No. : 3:24-cv-01282

Dear Sir,

This appeal has been docketed as case number **25-5592** with the caption that is enclosed on a separate page. Please review the caption for accuracy and notify the Clerk's office if any corrections should be made. The appellate case number and caption must appear on all filings submitted to the Court.

As the appellant, when you submit motions, briefs or any other documents to the Clerk's office, send only **1** original, which you have signed. Copies are no longer necessary. **Do not staple, paper clip, tab or bind pro se motions or briefs sent to the Clerk's office -- these documents are scanned and staples etc. create paper jams.** You must mail opposing counsel a copy of every document you send to the Clerk's office for filing.

Opposing counsel will docket pleadings as an ECF filer. Check the ECF page on the court's web site www.ca6.uscourts.gov for additional information about ECF filing if you are not familiar with it. The following case opening items are due by **July 24, 2025**. The Disclosure of Corporate Affiliations is now an automated entry. Filers may still use the form 6CA-1 located on the Court's website if the automated entry does not provide sufficient space.

Appellee: Appearance of Counsel
Disclosure of Corporate Affiliation
Application for Admission to 6th Circuit Bar (if applicable)

The district court has denied or revoked your pauper status. You have until **July 24, 2025** to either pay the full \$605.00 appeal filing fee to the U.S. District Court, or to file a motion in the Sixth Circuit Court of Appeals to waive the filing fee, with a financial affidavit and a copy of your prison trust account statement for the last six months (if applicable). **Failure to do one or the other will result in the dismissal of the appeal without further notice.**

The Clerk's office cannot give you legal advice but if you have questions, please contact the office for assistance.

Sincerely yours,

s/Ryan Orme
Case Manager
Direct Dial No. 513-564-7079

cc: Mr. Gregory Brown
Ms. Lisa M. Carson
Mr. Bret Jacob Chaness
Ms. Sandra J. Densham
Mr. James R. Embrey Jr.
Mr. Benjamin Goldammer
Mr. William Scott Hickerson
Ms. Kimberly Michelle Ingram-Hogan
Ms. Peako Andrea Jenkins
Ms. Anica C. Jones
Ms. Sarah M. Mathews
Mr. Anthony M. Noel
Ms. Courtney Williams

Enclosure

OFFICIAL COURT OF APPEALS CAPTION FOR 25-5592

JEFFREY RYAN FENTON

Plaintiff - Appellant

v.

VIRGINIA LEE STORY, individually and in their official capacities; MICHAEL WEIMAR BINKLEY, individually and in their official capacities; KATHRYN LYNN YARBROUGH, individually and in their official capacities; ELAINE BEATY BEELER, individually and in their official capacities; MARY ELIZABETH AUSBROOKS, individually and in their official capacities; ALEXANDER S. KOVAL, individually and in their official capacities; HENRY E. HILDEBRAND, III, individually and in their official capacities; CHARLES M. WALKER, individually and in their official capacities; ROY PATRICK MARLIN, individually and in their official capacities; THOMAS E. ANDERSON, individually and in their official capacities; SAMUEL FORREST ANDERSON, individually and in their official capacities; FRANK G. CLEMENT, JR., individually and in their official capacities; ANDY D. BENNETT, individually and in their official capacities; WILLIAM NEAL MCBRAYER, individually and in their official capacities; JAMES M. HIVNER, individually and in their official capacities; JOHN BRANDON COKE, individually and in their official capacities; SANDRA GARRETT, individually and in their official capacities; ROTHSCHILD & AUSBROOKS, PLLC; SPRAGINS, BARNETT & COBB, PLC, also named as Spragins, Bartnett & Cobb, PLCNS in complaint; RUBIN LUBLIN TN, PLLC; STATE OF TENNESSEE; WILLIAMSON COUNTY, TN, Tennessee; TENNESSEE ADMINISTRATIVE OFFICE OF THE COURTS; TENNESSEE COURT OF APPEALS MIDDLE DIVISION; CHANCERY COURT FOR WILLIAMSON COUNTY, TN; STORY & ABERNATHY, PLLC; HOSTETTLER, NEUHOFF & DAVIS, LLC; BANKERS TITLE & ESCROW CORPORATION; CADENCE BANK, N.A.; MCARTHUR SANDERS REAL ESTATE; WILLIAMSON COUNTY, TN SHERIFF'S OFFICE; SUPREME COURT OF TENNESSEE; BOARD OF PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF TENNESSEE

Defendants - Appellees

Selected docket entries for case 25–5592

Generated: 08/09/2025 12:44:43

Filed	Document Description	Page	Docket Text
06/24/2025			CORPORATE DISCLOSURE STATEMENT. Name of Counsel: <i>Peako Jenkins; Andy D. Bennett</i> makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? <i>NO</i> 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? <i>NO</i> Certificate of Service: 06/24/2025. [25–5592] (PAJ)

Selected docket entries for case 25–5592

Generated: 08/09/2025 12:45:54

Filed	Document Description	Page	Docket Text
06/24/2025			CORPORATE DISCLOSURE STATEMENT. Name of Counsel: <i>Peako Jenkins; Michael Weimar Binkley, Board of Professional Responsibility of the Supreme Court of Tennessee, Chancery Court For Williamson County, TN, Frank G. Clement, Jr., Mr. John Brandon Coke, Sandra Garrett, James M. Hivner, William Neal McBrayer, Supreme Court Of Tennessee, Tennessee Administrative Office Of The Courts, Tennessee Court Of Appeals Middle Division, TN and Williamson County, TN</i> makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? <i>NO</i> 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? <i>NO</i> Certificate of Service: 06/24/2025. [25–5592] (PAJ)

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: JEFFREY RYAN FENTON vs. VIRGINIA LEE STORY, et al.

List all clients you represent in this appeal:

Honorable Charles Walker (Judge Walker)

Appellant

Petitioner

Amicus Curiae

Criminal Justice Act

Appellee

Respondent

Intervenor

(Appointed)

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Anica C. Jones Signature: s/ Anica C. Jones

Firm Name: United States Attorney's Office

Business Address: 719 Church Street, Suite 3300

City/State/Zip: Nashville, TN 37203

Telephone Number (Area Code): 615-736-5151

Email Address: anica.jones@usdoj.gov

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al

List all clients you represent in this appeal:

Elaine Beaty Beeler
Williamson County, Tennessee
Williamson County, Tennessee Sheriff's Office

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

- Check if a party is represented by more than one attorney.
- Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Elisabeth M. Carson Signature: s/ Lisa M. Carson

Firm Name: Buerger, Moseley & Carson PLC

Business Address: 4068 Rural Plains Circle, Suite 100

City/State/Zip: Franklin, TN 37064

Telephone Number (Area Code): (615) 794-8850

Email Address: lcarson@buergerlaw.com; mparrott@buergerlaw.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

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UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Fenton vs. Story, et al.

List all clients you represent in this appeal:

Andy Bennett; Michael Binkley; Board of Professional Responsibility of the Supreme Court of Tennessee; Chancery Court for Williamson County, TN; Frank Clement; John Coke; Sandra G; James Hivner; William McBrayer; Tennessee Administrative Office of the Courts; Tennessee Supreme Court; State of Tennessee.

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

- Check if a party is represented by more than one attorney.
 Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Peako Jenkins Signature: s/ Peako Jenkins

Firm Name: Tennessee Attorney General's Office

Business Address: P.O. Box 20207

City/State/Zip: Nashville, TN 37202

Telephone Number (Area Code): (615) 741-8059

Email Address: peako.jenkins@ag.tn.gov

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

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UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Fenton vs. Story, et al.

List all clients you represent in this appeal:

Virginia Story and Story & Abernathy, PLLC

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Sarah M. Mathews Signature: s/ Sarah M. Mathews

Firm Name: Wilson Elser Moskowitz Edelman & Dicker LLP

Business Address: 1801 West End Ave., Suite 920

City/State/Zip: Nashville, TN 37203

Telephone Number (Area Code): 615.324.7840

Email Address: sarah.mathews@wilsonelser.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

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UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

Henry Edward Hildebrand, III

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

- Check if a party is represented by more than one attorney.
 Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Anthony M. Noel Signature: s/ Anthony M. Noel

Firm Name: Leitner, Williams, Dooley & Napolitan, PLLC

Business Address: 750 Old Hickory Boulevard, Building One, Suite 200

City/State/Zip: Brentwood, Tennessee 37027

Telephone Number (Area Code): 615-324-2746

Email Address: tony.noel@leitnerfirm.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

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UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al

List all clients you represent in this appeal:

Bank of America, N.A.

Appellant

Petitioner

Amicus Curiae

Criminal Justice Act

Appellee

Respondent

Intervenor

(Appointed)

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Erik Halvorson Signature: s/ Erik Halvorson

Firm Name: Bradley Arant Boult Cummings LLP

Business Address: 1221 Broadway, Suite 2400

City/State/Zip: Nashville, TN 37203

Telephone Number (Area Code): (615) 252-2243

Email Address: ehalvorson@bradley.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

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**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

Kelly L. Stephens
Clerk

100 EAST FIFTH STREET, ROOM 540
POTTER STEWART U.S. COURTHOUSE
CINCINNATI, OHIO 45202-3988

Tel. (513) 564-7000
www.ca6.uscourts.gov

Filed: July 23, 2025

Mr. Anthony M. Noel
Leitner, Williams, Dooley & Napolitan
201 Fourth Avenue, N.
Suite 1100
Nashville, TN 37219

Re: Case No. 25-5592, *Jeffrey Fenton v. Virginia Story, et al*
Originating Case No. : 3:24-cv-01282

Dear Counsel,

The appearance form which you submitted to the court has one or more deficiencies. You are directed to correct these deficiencies as shown on the enclosed checklist. Failure to do so may result in not being designated as counsel of record. **This notice is for informational purposes. It is not necessary to refile the appearance form.**

If you have any questions, please contact the clerk's office for assistance.

Sincerely yours,

s/Kelly Stephens
Appeal Case Manager: Ryan
Direct Dial No. 513-564-7079

Enclosure

APPEARANCE FORM CHECKLIST

Attorneys must use their personal PACER account to file any document. Attorneys are not permitted to use their account to file on behalf of another attorney. Please refile using your own account within 7 days.

The appearance form was not filed on the correct case. Please refile on case number _____ within 7 days.

The appearance form was filed in a case which you are not a participant. Please refile in the appropriate case and deselect any additional case numbers within 7 days.

The contact information (direct phone number) does not match our records. You must update your contact information with PACER or risk not receiving proper notifications in this case. When you update your direct phone number with PACER, be sure you also select this court to receive the updated information. If you have further questions as to whether this court has received the updated information, you may call the Clerk's Office at 513-564-7000.

The appearance form is not signed. Please sign in the signature field, either in electronic format (s/) or handwritten, and refile within 7 days.

The appearance form is in an editable format. This is an indication that the document was not printed to PDF before uploading. After completing the form, select print and print to PDF. This will format the document into a non-modifiable pdf.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

Henry Edward Hildebrand, III

- Appellant Petitioner Amicus Curiae Criminal Justice Act
- Appellee Respondent Intervenor (Appointed)

- Check if a party is represented by more than one attorney.
- Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Laura E. Bassett Signature: s/ Laura E. Bassett

Firm Name: Leitner, Williams, Dooley & Napolitan, PLLC

Business Address: 750 Old Hickory Boulevard, Building One, Suite 200

City/State/Zip: Brentwood, Tennessee 37027

Telephone Number (Area Code): 615-324-2733

Email Address: laura.bassett@leitnerfirm.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

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The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

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JUL 23 2025

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

KELLY L. STEPHENS, Clerk

JEFFREY RYAN FENTON

v.

Case No: 25-5592

VIRGINIA LEE STORY, et al.

MOTION FOR PAUPER STATUS

I move to waive the payment of the appellate filing fee under Fed. R. App. P. 24 because I am a pauper. This motion is supported by the attached financial affidavit.

The issues which I wish to raise on appeal are:

If the essence of this lawsuit could be boiled down to one point, that point would be the right to litigate in a court honestly and fairly, without justice being directly or indirectly defeated by attorney and judicial misconduct, of a fraudulent and biased nature. The Court made itself a party to this lawsuit from the beginning, pre-staging it for a premature dismissal through judicial misconduct, dishonesty, denied due process, and fraud. Writing false statements of fact into the record while misapplying case law. The court is required to accept all allegations in my complaint as true, and construe the complaint liberally in favor of the plaintiff. Violations of 18 U.S. Code §§ 4, 666, 1001, and 1503. Judicial Bias and Misconduct, Attorney Misconduct, Fraud on the Court by Officers of the Court, Due Process Violations, Failed Fiduciary Duties: Duty of Integrity and Independence, Impartiality and Fairness, Loyalty to Public Interest, Honesty, Diligence, Failure to comply with Codes of Conduct for U.S. Judges, FRCP 11(b), 28 USC §§ 453, 455, 530B, and 1746, as well as TN Codes of Judicial/Pro Conduct.

Signed: 
Address: 17195 Silver Parkway, #150
Fenton, MI 48430-3426

Date: 7/22/2025

Please see the note on the bottom of page 5.

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JEFFREY RYAN FENTON
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UNITED STATES US

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CAD: 8994101/SSFE2600

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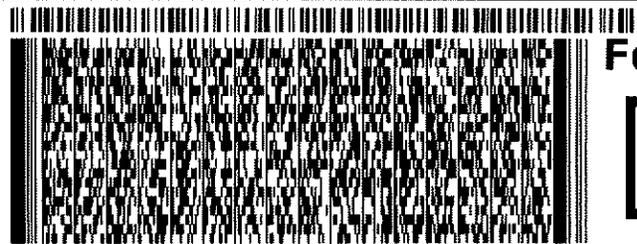
TO **U.S. COURT OF APPEALS
FOR THE SIXTH CIRCUIT
100 E. FIFTH ST. ROOM 540
POTTER STEWART U.S. COURTHOUSE
CINCINNATI OH 45202**

(613) 564-7000
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PO1

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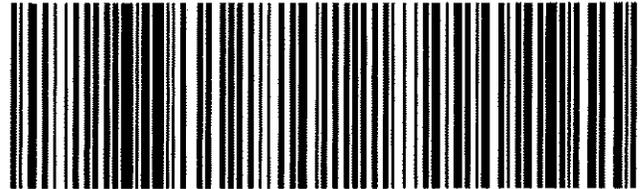
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JUL 23 2025

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STEPHENS, Clerk



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UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Disclosure of Corporate Affiliations and Financial Interest

Sixth Circuit

Case Number: 25-5592

Case Name: Fenton v. Story, et al.

Name of counsel: Sarah Mathews

Pursuant to 6th Cir. R. 26.1, Story & Abernathy, PLLC
Name of Party

makes the following disclosure:

1. Is said party a subsidiary or affiliate of a publicly owned corporation? If Yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party:

No.

2. Is there a publicly owned corporation, not a party to the appeal, that has a financial interest in the outcome? If yes, list the identity of such corporation and the nature of the financial interest:

No.

CERTIFICATE OF SERVICE

I certify that on July 23, 2025, the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.

s/ Sarah M. Mathews

This statement is filed twice: when the appeal is initially opened and later, in the principal briefs, immediately preceding the table of contents. See 6th Cir. R. 26.1 on page 2 of this form.

**6th Cir. R. 26.1
DISCLOSURE OF CORPORATE AFFILIATIONS
AND FINANCIAL INTEREST**

(a) **Parties Required to Make Disclosure.** With the exception of the United States government or agencies thereof or a state government or agencies or political subdivisions thereof, all parties and amici curiae to a civil or bankruptcy case, agency review proceeding, or original proceedings, and all corporate defendants in a criminal case shall file a corporate affiliate/financial interest disclosure statement. A negative report is required except in the case of individual criminal defendants.

(b) **Financial Interest to Be Disclosed.**

(1) Whenever a corporation that is a party to an appeal, or which appears as amicus curiae, is a subsidiary or affiliate of any publicly owned corporation not named in the appeal, counsel for the corporation that is a party or amicus shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the parent corporation or affiliate and the relationship between it and the corporation that is a party or amicus to the appeal. A corporation shall be considered an affiliate of a publicly owned corporation for purposes of this rule if it controls, is controlled by, or is under common control with a publicly owned corporation.

(2) Whenever, by reason of insurance, a franchise agreement, or indemnity agreement, a publicly owned corporation or its affiliate, not a party to the appeal, nor an amicus, has a substantial financial interest in the outcome of litigation, counsel for the party or amicus whose interest is aligned with that of the publicly owned corporation or its affiliate shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the publicly owned corporation and the nature of its or its affiliate's substantial financial interest in the outcome of the litigation.

(c) **Form and Time of Disclosure.** The disclosure statement shall be made on a form provided by the clerk and filed with the brief of a party or amicus or upon filing a motion, response, petition, or answer in this Court, whichever first occurs.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

Samuel Anderson
Bankers Title & Escrow Corporation

Appellant
 Appellee

Petitioner
 Respondent

Amicus Curiae
 Intervenor

Criminal Justice Act
(Appointed)

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: William Scott Hickerson Signature: s/ W. Scott Hickerson

Firm Name: Lowe Yeager & Brown PLLC

Business Address: 920 Volunteer Landing, Suite 200

City/State/Zip: Knoxville/TN/37915

Telephone Number (Area Code): 865-521-6527

Email Address: wsh@lyb.law

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Disclosure of Corporate Affiliations and Financial Interest

Sixth Circuit

Case Number: 25-5592

Case Name: Jeffrey Fenton v. Virginia Story et al.

Name of counsel: Erik Halvorson

Pursuant to 6th Cir. R. 26.1, Bank of America, N.A.

Name of Party

makes the following disclosure:

1. Is said party a subsidiary or affiliate of a publicly owned corporation? If Yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party:

Bank of America, N.A. is wholly owned by BAC North America Holding Company ("BACNAH"). BACNAH is a direct, wholly owned subsidiary of NB Holding Corporation ("NB Holdings"). NB Holdings is a direct, wholly owned subsidiary of Bank of America Corporation. Bank of America Corporation is a publicly held company whose shares are traded on the New York Stock Exchange. Bank of America Corporation has no parent company and no publicly held corporation owns more than 10% of Bank of America Corporation's shares.

2. Is there a publicly owned corporation, not a party to the appeal, that has a financial interest in the outcome? If yes, list the identity of such corporation and the nature of the financial interest:

Bank of America, N.A. is wholly owned by BAC North America Holding Company ("BACNAH"). BACNAH is a direct, wholly owned subsidiary of NB Holding Corporation ("NB Holdings"). NB Holdings is a direct, wholly owned subsidiary of Bank of America Corporation. Bank of America Corporation is a publicly held company whose shares are traded on the New York Stock Exchange. Bank of America Corporation has no parent company and no publicly held corporation owns more than 10% of Bank of America Corporation's shares.

CERTIFICATE OF SERVICE

I certify that on July 23, 2025 the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.

s/ Erik Halvorson

This statement is filed twice: when the appeal is initially opened and later, in the principal briefs, immediately preceding the table of contents. See 6th Cir. R. 26.1 on page 2 of this form.

**6th Cir. R. 26.1
DISCLOSURE OF CORPORATE AFFILIATIONS
AND FINANCIAL INTEREST**

(a) **Parties Required to Make Disclosure.** With the exception of the United States government or agencies thereof or a state government or agencies or political subdivisions thereof, all parties and amici curiae to a civil or bankruptcy case, agency review proceeding, or original proceedings, and all corporate defendants in a criminal case shall file a corporate affiliate/financial interest disclosure statement. A negative report is required except in the case of individual criminal defendants.

(b) **Financial Interest to Be Disclosed.**

(1) Whenever a corporation that is a party to an appeal, or which appears as amicus curiae, is a subsidiary or affiliate of any publicly owned corporation not named in the appeal, counsel for the corporation that is a party or amicus shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the parent corporation or affiliate and the relationship between it and the corporation that is a party or amicus to the appeal. A corporation shall be considered an affiliate of a publicly owned corporation for purposes of this rule if it controls, is controlled by, or is under common control with a publicly owned corporation.

(2) Whenever, by reason of insurance, a franchise agreement, or indemnity agreement, a publicly owned corporation or its affiliate, not a party to the appeal, nor an amicus, has a substantial financial interest in the outcome of litigation, counsel for the party or amicus whose interest is aligned with that of the publicly owned corporation or its affiliate shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the publicly owned corporation and the nature of its or its affiliate's substantial financial interest in the outcome of the litigation.

(c) **Form and Time of Disclosure.** The disclosure statement shall be made on a form provided by the clerk and filed with the brief of a party or amicus or upon filing a motion, response, petition, or answer in this Court, whichever first occurs.

Selected docket entries for case 25–5592

Generated: 08/09/2025 12:47:29

Filed	Document Description	Page	Docket Text
07/23/2025			CORPORATE DISCLOSURE STATEMENT. Name of Counsel: <i>William Scott Hickerson; Bankers Title & Escrow Corporation</i> makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? <i>NO</i> 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? <i>NO</i> Certificate of Service: 07/23/2025. [25–5592] (WSH)

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

Cadence Bank, N.A.

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Kimberly M. Ingram-Hogan Signature: s/ Kimberly M. Ingram-Hogan

Firm Name: Bradley Arant Boult Cummings LLP

Business Address: 1221 Broadway, Suite 2400

City/State/Zip: Nashville, TN 37203

Telephone Number (Area Code): (615) 252-3592

Email Address: kingram@bradley.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

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UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Disclosure of Corporate Affiliations and Financial Interest

Sixth Circuit

Case Number: 25-5592

Case Name: Jeffrey Fenton v. Virginia Story, et al.

Name of counsel: George H. Cate, III and Kimberly M. Ingram-Hogan

Pursuant to 6th Cir. R. 26.1, Cadence Bank, N.A.
Name of Party

makes the following disclosure:

1. Is said party a subsidiary or affiliate of a publicly owned corporation? If Yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party:

No, Cadence Bank, N.A., is a publicly traded company with no corporate parent.

2. Is there a publicly owned corporation, not a party to the appeal, that has a financial interest in the outcome? If yes, list the identity of such corporation and the nature of the financial interest:

No

CERTIFICATE OF SERVICE

I certify that on July 23, 2025 the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.

s/ Kimberly M. Ingram-Hogan

This statement is filed twice: when the appeal is initially opened and later, in the principal briefs, immediately preceding the table of contents. See 6th Cir. R. 26.1 on page 2 of this form.

**6th Cir. R. 26.1
DISCLOSURE OF CORPORATE AFFILIATIONS
AND FINANCIAL INTEREST**

(a) **Parties Required to Make Disclosure.** With the exception of the United States government or agencies thereof or a state government or agencies or political subdivisions thereof, all parties and amici curiae to a civil or bankruptcy case, agency review proceeding, or original proceedings, and all corporate defendants in a criminal case shall file a corporate affiliate/financial interest disclosure statement. A negative report is required except in the case of individual criminal defendants.

(b) **Financial Interest to Be Disclosed.**

(1) Whenever a corporation that is a party to an appeal, or which appears as amicus curiae, is a subsidiary or affiliate of any publicly owned corporation not named in the appeal, counsel for the corporation that is a party or amicus shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the parent corporation or affiliate and the relationship between it and the corporation that is a party or amicus to the appeal. A corporation shall be considered an affiliate of a publicly owned corporation for purposes of this rule if it controls, is controlled by, or is under common control with a publicly owned corporation.

(2) Whenever, by reason of insurance, a franchise agreement, or indemnity agreement, a publicly owned corporation or its affiliate, not a party to the appeal, nor an amicus, has a substantial financial interest in the outcome of litigation, counsel for the party or amicus whose interest is aligned with that of the publicly owned corporation or its affiliate shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the publicly owned corporation and the nature of its or its affiliate's substantial financial interest in the outcome of the litigation.

(c) **Form and Time of Disclosure.** The disclosure statement shall be made on a form provided by the clerk and filed with the brief of a party or amicus or upon filing a motion, response, petition, or answer in this Court, whichever first occurs.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

Cadence Bank, N.A.

- Appellant
- Appellee
- Petitioner
- Respondent
- Amicus Curiae
- Intervenor
- Criminal Justice Act (Appointed)

- Check if a party is represented by more than one attorney.
- Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: George H. Cate, III Signature: s/ George H. Cate, III

Firm Name: Bradley Arant Boult Cummings LLP

Business Address: 1221 Broadway, Suite 2400

City/State/Zip: Nashville, TN 37203

Telephone Number (Area Code): (615) 252-2347

Email Address: gcate@bradley.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

Kelly L. Stephens
Clerk

100 EAST FIFTH STREET, ROOM 540
POTTER STEWART U.S. COURTHOUSE
CINCINNATI, OHIO 45202-3988

Tel. (513) 564-7000
www.ca6.uscourts.gov

Filed: July 23, 2025

Mr. George Harrison Cate III
Neal & Harwell
1201 Demonbreun Street
Suite 1000
Nashville, TN 37203

Ms. Kimberly Michelle Ingram-Hogan
Bradley Arant Boult Cummings
1221 Broadway
Suite 2400
Nashville, TN 37203

Re: Case No. 25-5592, *Jeffrey Fenton v. Virginia Story, et al*
Originating Case No. : 3:24-cv-01282

Dear Counsel,

The appearance form which you submitted to the court has one or more deficiencies. You are directed to correct these deficiencies as shown on the enclosed checklist. Failure to do so may result in not being designated as counsel of record.

If you have any questions, please contact the clerk's office for assistance.

Sincerely yours,

s/Kelly Stephens
Appeal Case Manager: Angela for Ryan
Direct Dial No. 513-564-7079

Enclosure

APPEARANCE FORM CHECKLIST

Attorneys must use their personal PACER account to file any document. Attorneys are not permitted to use their account to file on behalf of another attorney. Please refile using your own account within 7 days.

The appearance form was not filed on the correct case. Please refile on case number _____ within 7 days.

The appearance form was filed in a case which you are not a participant. Please refile in the appropriate case and deselect any additional case numbers within 7 days.

The contact information (address - email – direct phone number) does not match our records. You must update your contact information with PACER or risk not receiving proper notifications in this case. When you update your contact information with PACER, be sure you also select this court to receive the updated information. If you have further questions as to whether this court has received the updated information, you may call the Clerk's Office at 513-564-7000.

The appearance form is not signed. Please sign in the signature field, either in electronic format (s/) or handwritten, and refile within 7 days.

The appearance form is in an editable format. This is an indication that the document was not printed to PDF before uploading. After completing the form, select print and print to PDF. This will format the document into a non-modifiable pdf.

IN THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

JEFFREY RYAN FENTON,

PLAINTIFF

v.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

RECEIVED
JUL 23 2025
KELLY L. STEPHENS, Clerk
CASE NO. 25-5592

**MOTION FOR CONTINUANCE TO PREPARE CRIMINAL AND ETHICS FILINGS,
WITH NOTICE OF JUDICIAL AND PROFESSIONAL MISCONDUCT, AND
FAILURE TO ENFORCE CODES OF CONDUCT AS REQUIRED,
TO MAINTAIN A FAIR AND IMPARTIAL TRIBUNAL**

This notice and testimony is respectfully brought pursuant to 18 U.S. Code §§ 4, 666, 1001, 1503; 28 U.S. Code §§ 530B, 1746; F.R.Civ.P. 6(b) and 11(b); the Tennessee Code of Judicial Conduct, the Codes of Conduct for United States Judges, and the Tennessee Rules of Professional Conduct.

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

1. If the essence of this lawsuit could be boiled down to **one point**, that point would be **the right to litigate in a court honestly and fairly, without justice being directly or indirectly defeated by attorney and judicial misconduct, of a fraudulent and biased nature.**

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.

PRIMA FACIE EVIDENCE OF JUDICIAL BIAS AND MISCONDUCT

2. While I believe that the court's failure and unwillingness to honestly and openly address this misconduct, especially in lawsuits involving disadvantaged *pro se* litigants, and even more especially after the misconduct has been documented and brought to the court's attention²,

² **NOTICES ABOUT TENNESSEE STATE COURT MISCONDUCT, OBSTRUCTION, AND FELONY FRAUD:**

ECF 1-1, PID 34-47 | https://rico.jefffenton.com/evidence/2022-02-01_fenton-affidavit-of-story-binkley-fraud-on-court.pdf
ECF 53, PID 4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf
ECF 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf
ECF 23, PID 2863-2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
ECF 23-4, PID 2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3
ECF 24, PID 2921-2947 | https://rico.jefffenton.com/evidence/2019-08-29_authentic-chancery-transcript-and-audio.pdf
ECF 52, PID 4174-4179 | https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf
ECF 54-1, PID 4368 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4
ECF 58-4, PID 4712-4716 | https://rico.jefffenton.com/evidence/2024-02-16_tnsc-manookian-disbarment-opinion-justice-lee.pdf
ECF 58-5, PID 4718-4722 | https://rico.jefffenton.com/evidence/2024-05-02_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf
ECF 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

NOTICES TO MICHIGAN FEDERAL COURT ABOUT MISCONDUCT, OBSTRUCTION, AND FELONY FRAUD:

ECF 14, PID 2181-2187 | https://rico.jefffenton.com/evidence/2024-01-09_objection-to-wdm-report-recommendation.pdf
ECF 62, PID 4744-4760 | https://rico.jefffenton.com/evidence/2024-08-09_objection-to-wdm-order-regarding-service.pdf
ECF 60, PID 4736-4739 | https://rico.jefffenton.com/evidence/2024-08-10_motion-to-recuse-wdm-magistrate-judge-kent.pdf
ECF 101, PID 5375-5390 | https://rico.jefffenton.com/evidence/2024-10-08_counter-affidavit-correcting-storys-false-claims.pdf
ECF 99, PID 5328-5342 | https://rico.jefffenton.com/evidence/2024-10-08_motion-for-sanctions-against-story-for-lying.pdf
ECF 100, PID 5343-5374 | https://rico.jefffenton.com/evidence/2024-10-08_motion-all-filings-be-under-penalty-of-perjury.pdf
ECF 102, PID 5391-5468 | https://rico.jefffenton.com/evidence/2024-10-09_concerns-about-transferring-to-tennessee.pdf
ECF 140-1, PID 5949-5988 | Documents Filed Under Seal Regarding Defendant Walkers Claimed Privacy & Safety Concerns
ECF 141-1, PID 5991-6096 | https://rico.jefffenton.com/evidence/2025-04-08_miwd-first-amendment-right-of-access.pdf

NOTICES TO TENNESSEE FEDERAL COURT ABOUT MISCONDUCT, OBSTRUCTION, AND FELONY FRAUD:

DOC 176, PID 225-233 | https://rico.jefffenton.com/evidence/2024-11-08_fenton-reply-to-storys-opposition-to-sanctions.pdf
DOC 177, PID 234-250 | https://rico.jefffenton.com/evidence/2024-11-18_fenton-motion-for-alternative-service.pdf
DOC 197, PID 445-486 | https://rico.jefffenton.com/evidence/2025-01-10_motion-for-ecf-and-remote-participation.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 214, PID 911-975 | <https://rico.jefffenton.com/evidence/fenton-finances-roles-property-education-support-fraud.pdf>
DOC 216, PID 984-1015 | https://rico.jefffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf

is *prima facie* evidence of **judicial bias** sufficient to disqualify³ any judge and void⁴ any subsequent orders. I also believe this is evidence of judicial malfeasance and obstruction of justice⁵.

3. Furthermore, I believe that this is *often* evidence of “fraud on the court by officers of the court”, indicative of judicial misconduct and willful participation by the presiding judge, because they allowed the misconduct to **falsely stand as though proper**, and inappropriately impact, mislead, interfere, and color the court record; despite being the judge’s responsibility to prevent this from happening, **to protect the rights of all litigants involved in the matter.**

4. Only a partial sampling of the sworn testimony, evidence, and notices I have provided to this court regarding falsified court records, fraud on the court, obstruction of justice, coupled with serious and egregious professional and judicial misconduct has been cited in this document. Reference my extensive filings and declarations on docket in this case, most of which have been ignored to date by every court involved, for a far more comprehensive itemization of the

DOC 217, 218, 219 | 2025-02-18 Documents Filed Under Seal Regarding Defendant Walkers Claimed Privacy & Safety Concerns
 DOC 222, PID 1164-1214 | https://rico.jeffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf
 DOC 223, PID 1215-1320 | https://rico.jeffenton.com/evidence/2025-03-05_second-motion-to-extend-time-for-service.pdf
 DOC 224, PID 1321-1423 | https://rico.jeffenton.com/evidence/2025-03-09_second-motion-to-stay-all-dispositive-motions.pdf
 DOC 238-2, PID 1707-1750 | https://rico.jeffenton.com/evidence/2025-04-08_miwd-first-amendment-right-of-access.pdf
 DOC 238-2, PID 1751-1752 | https://rico.jeffenton.com/evidence/2024-07-20_repeating-patterns-of-court-racketerring.mp3
 DOC 238-3, PID 1753-1798 | <https://rico.jeffenton.com/evidence/declaration-of-destruction-oppression-ada-interference.pdf>
 DOC 238, PID 1505-1568 | https://rico.jeffenton.com/evidence/2025-04-22_objection-to-memorandum-opinion-and-order.pdf

³ Tenn. R. Sup. Ct. 2.11(a)(1) | <https://www.tncourts.gov/rules/supreme-court/10#CANON%202>

28 U.S. Code §§ 455(a), (b)(1) Disqualification of justice, judge, or magistrate judge | <https://www.law.cornell.edu/uscode/text/28/455>

⁴ WILLIAMSON v. BERRY, 8 HOW. 945, 540 12 L. Ed. 1170, 1189 (1850); Norton v. Shelby County, 118 U.S. 425 p. 442; Liteky v. U.S., 114 S.Ct. 1147, 1162 (1994); Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847, 108 S.Ct. 2194 (1988); Taylor v. O’Grady, 888 F.2d 1189 (7th Cir. 1989); 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); United States v. Sciuto, 521 F.2d 842, 845 (7th Cir. 1996); 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); 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.); Cadenasso v. Bank of Italy, p. 569; Estate of Pusey, 180 Cal. 368, 374 [181 P. 648]; People v. Massengale and In re Sandel; Long v. Shorebank Development Corp., 182 F.3d 548 (C.A. 7 Ill. 1999); Omer. V. Shalala, 30 F.3d 1307 (Colo. 1994); Kenner v. C.I.R., 387 F.3d 689 (1968); 7 Moore’s Federal Practice, 2d ed., p. 512, ¶ 60.23; Conley v. Gibson, 355 U.S. 41 at 48 (1957); Geiler v. Commission on Judicial Qualifications, (1973)

⁵ 18 U.S.C. §§ 1001 & 1503 | <https://www.law.cornell.edu/uscode/text/18/1001> | <https://www.law.cornell.edu/uscode/text/18/1503>

criminal misconduct taking place in this docket by the defendants, their counsel, along with each court, district judge, and magistrate judge who has participated in this matter.

5. I have been advocating throughout this lawsuit that **misconduct cannot produce justice**⁶ while providing numerous documented examples of judicial and professional misconduct by the defendants in this lawsuit, their counsel, and the Federal District Courts, first in Michigan and now in Tennessee.

6. I have filed substantial sworn testimony⁷ clarifying that I do not bring this lawsuit to disparage the courts or the bar members therein. The courts are only disparaged by the dishonest, unethical, and fraudulent **actions** of their officers. Including in the recent order by this court⁸ to dismiss this lawsuit without a single hearing to date, where the court falsely claimed⁹ that my lawsuit is “totally implausible, devoid of merit, and no longer open to discussion.”

7. **That is simply not true**, at least regarding plausibility and merit.

8. Similarly, on the order (DOC 245¹⁰) denying my Rule 59 Motion to Alter Judgement or for a new Trial¹¹ (DOC 238 through 238-3), the Court stated, “Plaintiff’s 64-page Objection and Motion is **virtually incomprehensible** and does not demonstrate any circumstance warranting relief from the Court’s judgment under Rule 59(e), and nothing in his Objection and Motion alters the Court’s conclusion that this action was properly dismissed” (emphasis added).

⁶ DOC 207, PID 596 | https://rico.jeffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

⁷ DOC 207, PID 583-685 | https://rico.jeffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

⁸ DOC 236, PID 1491-1503 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>

⁹ DOC 236, PID 1498 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>

¹⁰ DOC 245 | <https://rico.jeffenton.com/3-24-cv-01282/doc/245.pdf>

¹¹ DOC 238, PID 1505-1568 | https://rico.jeffenton.com/evidence/2025-04-22_objection-to-memorandum-opinion-and-order.pdf
DOC 238-3, PID 1753-1798 | <https://rico.jeffenton.com/evidence/declaration-of-destruction-oppression-ada-interference.pdf>

9. I believe that the court's statement claiming that any of my filings are "**virtually incomprehensible**¹²" is materially false and misleading, but even if it were true, my filings have been logically organized and presented to the best of my ability, while I have operated honestly, diligently, transparently, and in good faith with every paper I have filed in this federal lawsuit, satisfying the criteria established in *Haines v. Kerner* for *pro se* litigants.

HAINES V. KERNER, 404 U.S. 519 (1972)

10. In *Haines v. Kerner*, the Supreme Court established that *pro se* litigants should be held to less stringent pleading standards than those drafted by lawyers. The court's decision in this case emphasized the importance of liberally reviewing *pro se* complaints, **seeking the substance of their claims** even if they are not formally perfect. This case ensures that individuals representing themselves in court are not penalized for a lack of formal legal knowledge.

11. *Haines v. Kerner* also held that a **complainant must be offered the opportunity to present evidence of their claims**, which this court has repeatedly denied me any opportunity to do in this case. Furthermore, *Haines v. Kerner* remains binding and controlling law on all courts in this nation.

12. Upon information and belief, this is another situation where the officers of the court are **construing the sworn testimony and facts in my pleadings contrary to the honest interests of justice**.

¹² One of the primary factors causing my pleadings to be expansive, long-winded, repetitive, complicated, and possibly confusing, which might cause them to *feel* "overwhelming" (I believe this is being misrepresented as "incomprehensible"), is the fact that this court has refused to acknowledge or respond to the bulk of my filings in this lawsuit, while making materially false claims and levying the power of this court contrary to my critical interests, as well as the honest interests of justice in the matters before this court. This forces me to devote significant time, resources, and page count to **restating the truth again**, in hopes of preventing another manifest injustice. At the same time, my disabilities are such that I will unconsciously repeat important facts **until I become convinced that someone has heard me**. Until someone in a position of power is willing to honestly **hear the truth of my testimony**, while fairly applying the law to that truth, to provide me some ethical and lawful relief, I know of no other way for me to successfully proceed in this matter.

F.R. CIV. P. RULE 8(E)¹³

(e) Construing Pleadings. Pleadings must be construed so as to do justice.

13. This aspect of my pleadings is not *discretionary*. This is a core principle of pleading which the courts have repeatedly ignored, causing me repeated and prolonged injury, rather than giving me the “benefit of the doubt” in any substantive matter. This is another clear indicator of the *judicial bias¹⁴* and *impropriety* which I have been forced to contend with in this case.

14. As I have stated repeatedly in this lawsuit, in slightly different ways, with my high school education, lack of financial resources (which is largely the defendant’s fault), and the realistic limitations caused by my substantial legitimate, documented and disclosed, ADA disabilities¹⁵, I cannot and should never need to, fight and defend myself against **both the court** and the powerful **defendants** in this matter, concurrently¹⁶. This is an egregious violation of my constitutional rights, a misappropriation of state and federal tax dollars and other resources, a violation of multiple offices of public trust, and a violation of the fiduciary duties of this court and the presiding judge. This is a clear and fundamental abuse of this court’s discretion, resources, and power, for the protection, coverup, and advancement of private criminal interests, working in conjunction with the State of Tennessee, their agents and assigns, to the significant detriment of public welfare, health, and safety, for egregious, oppressive, unconstitutional, and unlawful purposes, in polar opposition to each officers sworn oath.

¹³ https://www.law.cornell.edu/rules/frcp/rule_8

¹⁴ DOC 207, PID 598 | https://rico.jefffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf
DOC 238, PID 1534 | https://rico.jefffenton.com/evidence/2025-04-22_objection-to-memorandum-opinion-and-order.pdf

¹⁵ ECF 1-38, PID 2032-2045 | https://rico.jefffenton.com/evidence/2020-07-08_tnsc-coa-ada-request-for-modification.pdf
ECF 52, PID 4254-4257 | <https://rico.jefffenton.com/evidence/tn-ada-disabilities-exploited-for-advantage-ocpd-merck.pdf>
ECF 32, PID 3296-3309 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-declaration-of-disabilities.pdf

¹⁶ ECF 11, PID 2128-2129 | <https://rico.jefffenton.com/1-23-cv-01097/ecf/11.pdf>
ECF 60, PID 4737-4738 | <https://rico.jefffenton.com/1-23-cv-01097/ecf/60.pdf>
ECF 62, PID 4748-4749, 4758-4760 | <https://rico.jefffenton.com/1-23-cv-01097/ecf/62.pdf>
DOC 222, PID 1176, 1194 | https://rico.jefffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

FAILING TO MEET BASIC FEDERAL PLEADING REQUIREMENTS

15. This court has accused me¹⁷ of “fail[ing] to meet basic federal pleading requirements necessary to state a plausible claim in federal court”, when in truth the court and counsel in this matter have repeatedly refused to construe my pleadings in compliance with Rule 8(e) of the Federal Rules of Civil Procedure, whereas “Pleadings must be construed so as to do justice.”

16. This court is holding my *pro se* pleadings to a **higher standard** than it has held the pleadings by the multitude of bar attorneys, who have repeatedly filed false, fraudulent, and misleading papers, while violating F.R.Civ.P. Rule 11(b) almost non-stop, as I have documented for this court, time and time again¹⁸—without any acknowledgement, accommodations, preventative measures, correction, discipline, sanctions, or **any** proper supervisory response, by which to maintain an **impartial** atmosphere in this tribunal, **where the truth is welcome**, rather than hidden, lied about, and ridiculed, so it can be **easily heard**, that justice might be honestly and realistically **possible** in the matters before this court.

17. Moreover, this court has allowed the influential bar defendants and their counsel to repeatedly lie, file documents for malicious, obstructive, and improper purposes, while misapplying case law, ignoring the critical constitutional merits of this lawsuit, and my damages which continue to exponentially compound each day that justice is delayed or denied—without executing and filing the statutory certification mandated by 28 U.S. Code § 1746.

¹⁷ DOC 236, PID 1494 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>

¹⁸ ECF 100, PID 5343-5374 | https://rico.jeffenton.com/evidence/2024-10-08_motion-all-filings-be-under-penalty-of-perjury.pdf
DOC 211, PID 710-711 | https://rico.jeffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf
DOC 216, PID 1001-1003 | https://rico.jeffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf

FALSE AND FRAUDULENT STATEMENTS IN COURT ORDERS

18. I pointed out repeatedly in my Rule 59 Motion¹⁹, along with in other prior filings, that this court is seriously **misrepresenting the facts**, with **false and materially misleading statements**, which meet the Tennessee Supreme Court's definition for "**fraud**²⁰".

TENN. R. SUP. CT. 1.0 (TERMINOLOGY: FRAUD)

"(d) "Fraud" or "fraudulent" denotes an intentionally **false or misleading statement of material fact**, an intentional **omission** from a statement of fact of **such additional information as would be necessary to make the statements made not materially misleading**, and such other conduct by a person intended to **deceive** a person or tribunal with respect to a **material issue** in a proceeding or other matter" (emphasis added).

FRAUDULENTLY AND DECEPTIVELY MISAPPLYING CASE LAW

19. Similarly, in the most recent order (DOC 245²¹), this court **deceptively** stated²², "The disposition of a motion to alter or amend a judgment under Fed. R. Civ. P. 59(e) is entrusted to the discretion of the district court. *Huff v. Metropolitan Life Ins. Co.*, 675 F.2d 119, 122 (6th Cir. 1982). Such motions are generally only granted when there is: (1) a clear error of law; (2) newly discovered evidence; (3) an intervening change in controlling law; or (4) a need to prevent manifest injustice. *Intera Corp. v. Henderson*, 428 F.3d 605, 620 (6th Cir. 2005)."

¹⁹ DOC 238, PID 1505-1568 | https://rico.jeffenton.com/evidence/2025-04-22_objection-to-memorandum-opinion-and-order.pdf

²⁰ <https://www.tncourts.gov/courts/supreme-court/rules/supreme-court-rules/rule-8-rules-professional-conduct>

²¹ DOC 245, PID 1824-1825 | <https://rico.jeffenton.com/3-24-cv-01282/doc/245.pdf>

²² DOC 245, PID 1824 | <https://rico.jeffenton.com/3-24-cv-01282/doc/245.pdf>

20. Although this case law is likely accurate, the **deception** perpetrated by the judge who wrote this was by **implying** that my lawsuit fails to satisfy this criteria, while wrongly denying my Rule 59 Motion, despite this very same case law **requiring** that my Rule 59 Motion be granted.

21. This is another example, like that of the Michigan Magistrate Judge²³, where **false statements** were written into the court record **as if true**, when they were completely **false**, and even nonsensical (once the truth is known), while using *case law* completely **out of context**, and/or **misapplying case law** to strategically and intentionally obstruct justice by disregarding, ignoring, and dismissing my complaint, along with the substantive, critical, constitutional claims throughout my lawsuit.

22. I don't know what more I can say to convince this court that only through **honestly and openly hearing and weighing the truth**, while applying applicable state and federal laws, along with both constitutions **to that truth**, can this court render a ruling in this matter which does not cause further wrongful deprivation of my most basic natural unalienable and constitutional rights, as well as cause criminal injustice to continue to compound. This is all common sense in my mind, while I have repeatedly documented the fraud and misconduct continuing to be committed by the law firms and attorneys representing the defendants in this case, while petitioning this court to uphold their fiduciary duties. The extent which this court has and continues to allow attorney misconduct, while joining it with judicial misconduct²⁴, pretending as if their motions and pleadings are proper and lawful, **proves this court's bias** and complicity in the crimes continuing to be committed against me, under the fraudulent *color of law* in this matter.

²³ DOC 222, PID 1164-1214 | https://rico.jeffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

²⁴ DOC 211, PID 702, 707-708 | https://rico.jeffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf

RACKETEERING BY THE COURT ENTERPRISE

23. As I have previously notified the court and evidenced on the record²⁵ in this case, this is one of the predominant deceptive characteristics of *racketeering* by and through the *court enterprise*, often seen practiced by the presiding judge. These small (in size) unlawful interjections with *fraudulent narratives* look legitimate at a distance, giving them the *appearance* of “legal work”, but they are unethical and dishonest in nature, seeking not to do justice but injustice, while the **case law** cited by the court **fails to apply** to the honest **truthful facts**. (At least in the manner presented by the judge who executes the orders.)

WHY MY RULE 59 MOTION SHOULD HAVE BEEN GRANTED

24. Of the four qualifying criteria stated by this court (see paragraph nineteen above) for granting a Rule 59 Motion, this lawsuit honestly satisfies and qualifies for at least two of those:

25. “Such motions are generally only granted when there is: **(1) a clear error of law**” and “**(4) a need to prevent manifest injustice**. *Intera Corp. v. Henderson*, 428 F.3d 605, 620 (6th Cir. 2005)” (emphasis added).

26. Any honest and competent person familiar with the court’s codes of conduct (especially a bar member), who is acting in **good faith** and has read the majority of my pleadings in this lawsuit, **reasonably should know that**.

²⁵ DOC 238-2, PID 1751-1752 | https://rico.jeffenton.com/evidence/2024-07-20_repeating-patterns-of-court-racketerring.mp3

TENN. R. SUP. CT. 1.0
(TERMINOLOGY: KNOWINGLY, REASONABLY SHOULD KNOW)

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

(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** (emphasis added).

"COLORING" THE COURT RECORD WITH A FRAUDULENT NARRATIVE

27. This is **evidence** of the court acting under "*color of law*", while "*coloring*" the court's records **fraudulently**, violating their oaths of office and the court's codes of conduct, while obstructing justice, committing fraud on the court, egregiously violating the litigants' constitutional rights to due process and equal protection under the law. To be clear, this is **evidence** that the presiding judge is engaged in egregious **impropriety** and **felony fraud**.

**JUDICIAL MISCONDUCT, OVERREACH, AND CIVIL RIGHTS INTIMIDATION,
VIRTUE SIGNALING TO THE COURT OF APPEALS NOT TO OVERTURN THIS**

28. I also need to address the fact that this court has stated in the past couple of orders²⁶, "The Court further certifies, pursuant to 28 U.S.C. §1915(a)(3), that an appeal from this decision could not be taken in good faith."

29. **That is wholly inappropriate for a judge to say in this matter!** This court has egregiously and unethically (if not illegally) ignored the majority of my sworn testimony, verifiable

²⁶ DOC 236, PID 1503 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>
DOC 245, PID 1825 | <https://rico.jeffenton.com/3-24-cv-01282/doc/245.pdf>

evidence, and clear court transcripts **proving** my claims are **true** and **accurate** in this matter, denying me even a single hearing, in stark violation of *Haines v. Kerner*, along with every accommodation I have requested to provide me with better and more affordable access to the court (such as ECF²⁷).

30. I should have been granted ECF filing privileges at the very beginning of my lawsuit, almost two years ago. Then when this lawsuit was transferred from a court which I had physical access to, in the State of Michigan, to a court 600 miles away in the State of Tennessee, which I clearly don't have physical access to, the court should have immediately granted me ECF access and remote participation as requested.

31. Instead, upon information and belief, the court has acted to make litigation as **difficult** and **expensive** for me as possible, to break me down, wear me out, and exhaust my resources, prior to ever reaching a remedy for the crimes which the defendants have clearly committed against myself and my family.

32. I believe under the circumstances that this is a direct violation of the participating judge's **fiduciary duties**, including the **Duty of Care**, the **Duty of Loyalty**, the **Duty of Obedience**, and the **Duty of Disclosure**.

²⁷ ECF 14, PID 2181-2187 | https://rico.jeffenton.com/evidence/2024-01-09_objection-to-wdm-report-recommendation.pdf
ECF 62, PID 4744-4760 | https://rico.jeffenton.com/evidence/2024-08-09_objection-to-wdm-order-regarding-service.pdf
ECF 60, PID 4736-4739 | https://rico.jeffenton.com/evidence/2024-08-10_motion-to-recuse-wdm-magistrate-judge-kent.pdf
ECF 102, PID 5391-5468 | https://rico.jeffenton.com/evidence/2024-10-09_concerns-about-transferring-to-tennessee.pdf
DOC 197, PID 445-486 | https://rico.jeffenton.com/evidence/2025-01-10_motion-for-ecf-and-remote-participation.pdf
DOC 222, PID 1164-1214 | https://rico.jeffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

33. **Thousands of pages of my lawsuit are sealed or redacted in this matter currently between two different federal district courts (TNMD and MIWD), in direct contravention of 18 U.S. Code § 4²⁸, and this court has chosen to call the truth “totally implausible²⁹” and simultaneously, “no longer open to discussion³⁰”. While refusing to even allow me a single hearing, to present the court with **evidence of my claims³¹**. Despite this court having been candidly noticed about the **ongoing threat** to the lives, property, health, and safety of the **general public** throughout Middle Tennessee³². While also being noticed about the active harm currently being caused by bad actors (named in this lawsuit) holding powerful positions of public trust in Tennessee. Some who are literally charged and trusted with the **oversight of the “practice of law”** throughout the entire state, while providing clear evidence of how their offices have been illegally leveraged to **protect some of the most unethical, dishonest, and abusive actors the state.****

34. At the same time, these same bad actors have leveraged their office(s) and public funds to unlawfully retaliate against, harass, sanction, suspend, and even disbar some of the most honest, ethical, fearless, patriotic attorneys³³ that Tennessee has known in recent years. Attorneys who have laid down their lives and their practices, to do what almost every other law firm in Middle Tennessee has been afraid or refused to do, defending the people’s liberties over state and private

²⁸ 18 U.S. Code § 4 - Misprision of felony | U.S. Code | US Law | LII / Legal Information Institute

²⁹ DOC 236, PID 1498 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>

³⁰ DOC 236, PID 1498 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>

³¹ Substantial evidence is also on court record in this lawsuit, proving the honest voracity of my claims, leaving this court no honest, “good faith”, ethical, or lawful excuse or escape for failing or refusing to exercise the court’s authority toward the interests of justice.

³² ECF 102, PID 5391-5468 | https://rico.jeffenton.com/evidence/2024-10-09_concerns-about-transferring-to-tennessee.pdf

³³ ECF 58-3, PID 4632-4710 | https://rico.jeffenton.com/evidence/2024-02-16_tnsc-disbarred-whistleblower-brian-manookian.pdf

ECF 58-4, PID 4712-4716 | https://rico.jeffenton.com/evidence/2024-02-16_tnsc-manookian-disbarment-opinion-justice-lee.pdf

ECF 58-5, PID 4718-4722 | https://rico.jeffenton.com/evidence/2024-05-02_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf

criminal interests, who have dared to report, stand-up against, and challenge court corruption, judicial fraud and misconduct in Middle Tennessee's courts.

35. Now this court appears to be acting in lock step with the dishonest agenda³⁴ of the MIWD Magistrate Judge, where they appear to want nothing more than to **dismiss this lawsuit** while **burying the evidence** of a multitude of egregious felony crimes, committed by many powerful and influential, yet unconscionably dishonest and unethical officers of Tennessee's Court System, while further claiming that "an appeal from this decision could not be taken in good faith³⁵."

36. It is highly improper for ANY Judge to claim that my lawsuit is "implausible" without providing any cogent specific factual allegations, contentions, objections, disbeliefs, evidence, or examples from my pleadings, which substantiate that conclusion. Especially while continuing to **hide** thousands of pages of my lawsuit and pleadings from the **public**, claiming it is "no longer open to discussion", without saying **why** or providing any "good faith" lawful justification for that determination either. Even more especially while denying me any opportunity to present the court with evidence of my claims, as required for *pro se* litigants according to Supreme Court case law in *Haines v. Kerner*, 404 U.S. 519 (1972). Further improperly demanding, "that an appeal of this decision could not be taken in good faith."

37. That is a preposterous overreach of authority, spanning at least three offices!

38. Besides which it is the **jury's** role to determine what the **facts** of the case are, essentially deciding **what the truth is**, based on the evidence presented. The judge instructs the

³⁴ DOC 222, PID 1164-1214 | https://rico.jeffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf
DOC 238-2, PID 1707-1750 | https://rico.jeffenton.com/evidence/2025-04-08_miwd-first-amendment-right-of-access.pdf

³⁵ DOC 236, PID 1503 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>
DOC 245, PID 1825 | <https://rico.jeffenton.com/3-24-cv-01282/doc/245.pdf>

jury on the law, and the jury applies that law to the facts **they have determined**. It is the jury's role, not that of a judge, to decide what version of the facts is most credible and accurate.

39. **Judges are not allowed to play dictatorial roles of judge, jury, executioner, coverup administrator, and the appeals court all in one.**

40. That screams of "judicial misconduct" to anyone who takes the time to read this lawsuit and the wealth of honest, detailed declarations I have filed in it, while evaluating the reams of clear and convincing evidence filed alongside my declarations, to further substantiate my claims—to know the truth about what has transpired against my family in Tennessee, both in the precipitating matters, as well as the crimes which continue to take place in this federal lawsuit.

41. Upon information and belief, any pretense of the "practice of law" absent honesty, integrity, and ethical conduct is a "*color of law*" crime against the public!

**18 U.S. CODE § 666 - THEFT OR BRIBERY CONCERNING PROGRAMS³⁶
RECEIVING FEDERAL FUNDS (HOPEFULLY LIKE THE COURTS)**

**COURT'S INSTRUCTION NO. 40
FRAUD – GOOD FAITH DEFENSE**

- 1) The good faith of a defendant is a complete defense to the charges contained in Counts Two and Five through Ten because good faith on the part of a defendant is, simply, inconsistent with an intent to defraud.
- 2) A person who acts, or causes another person to act, on a belief or an opinion honestly held is not punishable under this statute merely because the belief or opinion turns out to be inaccurate, incorrect, or wrong. An honest mistake in judgment or an honest error in management does not rise to the level of criminal conduct.
- 3) But a defendant does not act in good faith if, for example, even though he honestly holds a certain opinion or belief, he also knowingly makes materially false or fraudulent pretenses, representations, or promises to others.
- 4) While the term "good faith" has no precise definition, it encompasses, among other things, a belief or opinion honestly held, an absence of malice or ill will, and an intention to avoid taking unfair advantage of another.

³⁶ <https://www.law.cornell.edu/uscode/text/18/666>

**FORMER TENNESSEE HOUSE SPEAKER AND HIS CHIEF OF STAFF³⁷
CONVICTED OF BRIBERY AND KICKBACK CHARGES**

42. Upon information and belief, the illustration on the prior page is an excerpt from the jury instructions from the recent Glen Casada and Cade Cothren corruption, bribery, and kickback trial brought by the FBI in Nashville, which concluded roughly a month ago. These instructions give some of the **required** elements and some of the **prohibited** elements for claiming a **good faith defense**. Importantly, a **dishonest act is never done in “good faith”**.

43. Former Tennessee House Speaker Glen Casada was found guilty on 17 counts, and Cade Cothren was found guilty on all 19 counts.

A GOOD FAITH DEFENSE

44. Upon information and belief, according to the Department of Justice in this illustration, a **good faith defense** only applies where the official acts **honestly**.

45. In the third paragraph of this illustration it specifically states, “While the term “good faith” has no precise definition, it encompasses, among other things, a **belief or opinion honestly held, an absence of malice or ill will, and an intention to avoid taking unfair advantage of another.**”

46. Please note in that last paragraph, it says “**an intention to avoid**”, this is saying that just because something is done absent of malice, does **not** satisfy the responsibilities for an official to have acted “in good faith”. Due to their oath of office, employment by the people, and the critical need for public trust, officials **also** have a **duty of active and intentional care**.

³⁷ <https://www.justice.gov/usao-mdtn/pr/former-tennessee-state-representative-and-his-chief-staff-convicted-bribery-and-kickback-charges>
<https://www.newschannel5.com/news/house-speaker-glen-casada-found-guilty-on-17-of-19-counts-cothren-guilty-on-all-charges>
<https://www.wsmv.com/2025/05/16/corruption-trial-former-tn-house-speaker-chief-staff-found-guilty/>

It's not just a matter of avoiding getting caught "doing something wrong", but also whether or not the official is **operating honestly, ethically, and lawfully**, fulfilling the fiduciary duties required of their office. (Such as honesty, fairness, impartiality, supervising others, correcting, disciplining, and/or reporting attorney and judicial misconduct to the proper authorities, etc.³⁸)

CONCLUSIONS ABOUT GOOD FAITH

47. Upon information and belief, as long as this court continues to leave **false statements**³⁹ and material misrepresentations standing in the court records as if actual **true facts**, this court, along with the defendants and their counsel, **are operating in bad faith**, misdirecting⁴⁰ public resources to strategically and intentionally benefit private criminal interests, wholly repugnant of the rule of law, our state and federal constitutions, and every office of justice.

48. Certainly, a court and judge who have operated *biasedly* in **bad faith** (as is obvious in this case by the **false statements**⁴¹ written by this court into the **record**, which remain uncorrected to date), denying my critical constitutional rights to due process and equal protection under the law, especially when wrongfully deprived of "constitutionally protected", highly valuable, and needed essential property interests, to have any realistic chance at survival without becoming a significant liability upon government and/or extended family, contrary to the judge's

³⁸ Tenn. R. Sup. Ct. 2.11(A)(1), Tenn. R. Sup. Ct. 2.12, Tenn. R. Sup. Ct. 2.15, Tenn. R. Sup. Ct. 2.6, Tenn. R. Sup. Ct. 8.3, Tenn. R. Sup. Ct. 8.4

³⁹ DOC 238, PID 1505-1568 | https://rico.jeffenton.com/evidence/2025-04-22_objection-to-memorandum-opinion-and-order.pdf

⁴⁰ 18 U.S. CODE § 666 - Theft or Bribery Concerning Programs Receiving Federal Funds (If for nothing else, for their government funded counsel to deprive my family of justice, refusing me even ECF filing, which I have repeatedly told the court I need and the only logical reason I can think of for the court to deny my request for ECF filing, is to intentionally making filing as difficult, time consuming, and expensive (unaffordable) for me as possible, obstructing my ability to timely file (due to my disabilities and poverty). Instead helping the defendants get away with multiple felony crimes while a number of federal offices have been involved in misconduct in this lawsuit, contributing to the coverup with defendant Walker's fraudulent—or at least materially misrepresented—concerns for his alleged safety.)

⁴¹ DOC 238, PID 1505-1568 | https://rico.jeffenton.com/evidence/2025-04-22_objection-to-memorandum-opinion-and-order.pdf

oath of office⁴² and the court's ethical canons⁴³, as I have proven herein and in my Rule 59 Motion⁴⁴, has no ethical business declaring in their order⁴⁵, “an appeal from this decision could not be taken in good faith.”

MY INVESTMENT IN SEEKING JUSTICE THROUGH THIS LAWSUIT TO DATE⁴⁶

49. As of June 1, 2025, the MIWD docket consisted of 141 primary docket entries, containing 6,096 pages. As of that same date, the TNMD docket contained roughly 114 additional primary docket entries, containing another 1825 pages, for an aggregated total of approximately 255 primary docket entries, containing 7,921 pages filed in this lawsuit, the majority of which have been drafted, substantiated, evidenced, executed, and filed by me.

50. I began working full-time on this lawsuit, a little over a year before filing it on October 13, 2023. That first year, I worked a minimum of *twelve hours* per day, *six days* per week, often seven. That was a minimum of *three thousand, seven hundred and forty-four* (3,744) hours of work prior to filing on October 13, 2023.

51. “I maintained that pace for most of the second year also, and I have never worked on it less than *ten hours per day, six days per week* since.^{*47}”

52. From October 13, 2023, to April 22, 2025, (when I calculated this) is *five hundred and fifty-seven* (557) days in total. Which divided by seven days per week equals a little over *seventy-nine*

⁴² <https://www.law.cornell.edu/uscode/text/28/453>

⁴³ <https://www.uscourts.gov/administration-policies/judiciary-policies/ethics-policies/code-conduct-united-states-judges>

⁴⁴ DOC 238, PID 1505-1568 | https://rico.jeffenton.com/evidence/2025-04-22_objection-to-memorandum-opinion-and-order.pdf

⁴⁵ DOC 236, PID 1491-1503 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>

DOC 237, PID 1504 | <https://rico.jeffenton.com/3-24-cv-01282/doc/237.pdf>

DOC 245, PID 1824-1825 | <https://rico.jeffenton.com/3-24-cv-01282/doc/245.pdf>

⁴⁶ DOC 207, PID 583-685 | https://rico.jeffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

⁴⁷ DOC 238-3, PID 1791 | <https://rico.jeffenton.com/3-24-cv-01282/doc/238-3.pdf> | *This statement was true at the time of writing, which was on April 22, 2025, though I took some time off to clear my head after this court wrongfully dismissed my lawsuit.

weeks. Multiplied by a minimum of *sixty hours* of work per week, equals another *four thousand, seven hundred, and forty* (4,740) hours of work.

53. Finally, by adding the *three thousand, seven hundred and forty-four* hours of work prior to filing on October 13, 2023, and the *four thousand, seven hundred, and forty* hours of work since that date, equals a minimum of *eight thousand, four hundred and eighty-four* (8,484) hours of work I have invested into this lawsuit, to date⁴⁸.

54. To provide some perspective regarding the economic equivalent of my time and work invested into this lawsuit so far, calculated based upon an average pay rate of *thirty dollars* per hour for my labor, this has been a total investment of *two hundred and fifty-four thousand, five hundred and twenty* dollars (\$254,520) in my **time and labor** invested into this lawsuit, plus over *ten thousand dollars* (\$10,000) in cash that I borrowed from family for supplies, software subscriptions, and service, which cost me over six thousand (\$6,000) dollars in cash alone.

55. Completely and entirely wasted by one single careless court order, calling it all “**implausible**” and “**devoid of merit**”, without substantiating that claim or conducting a single hearing, despite thousands of pages of evidence and sworn testimony, already filed on court record, **proving** beyond any reasonable doubt that **many** if not the **majority** of my claims are in fact **true**, and cannot be honestly denied or defended by the defendants or their counsel, yet this court chose to intervene on their behalf, claiming that this lawsuit is “**no longer open to discussion.**”

56. I believe that the court’s *bias* and *impropriety* in this matter speaks for itself.

⁴⁸ As of April 22, 2025, when I researched and calculated this.

**HOW MUCH MORE WORK IS REASONABLY REQUIRED
TO BE TREATED WITH BASIC HUMAN DIGNITY?**

57. **How much more work *should* the average member of our constitutional republic need to do in order to reasonably receive basic protection of their most fundamental natural human rights and constitutional rights in this great nation? (Like not having my home wrongfully seized and liquidated without one dollar to my benefit⁴⁹, with only a five-day notice⁵⁰ over a holiday weekend, by two known bad actors who honestly should **never** have been allowed to work in the same court together. Especially under any presumption or guise that either would uphold their ethical and lawful duties to act honesty, impartiality, and fairly, to reasonably protect the public's health, safety, and property from lawless criminal deprivation.)**

58. Now the Court has fraudulently dismissed my lawsuit (writing materially false statements in the court orders, while misapplying case law), literally wasting years' worth of painstaking work and the last funds which I have access to for seeking a remedy in the foreseeable future.

59. This has been the height of absurdity in judicial misconduct and overreach, which in my view should be directly sanctionable and prima facie evidence of egregious judicial malfeasance, requiring the Court of Appeals and/or the Department of Justice to intervene, in the interests of justice.

⁴⁹ ECF 1-12, PID 479-596 | https://rico.jefffenton.com/evidence/2019-10-29__tn-wilco-deed-fraud-ada-financial-exploitation.pdf

⁵⁰ ECF 66, PID 4896 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf

DOC 207, PID 601 | https://rico.jefffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

DOC 214, PID 928-929 | <https://rico.jefffenton.com/evidence/fenton-finances-roles-property-education-support-fraud.pdf>

DOC 222, PID 1169 | https://rico.jefffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

DOC 238-1, PID 1595 | <https://rico.jefffenton.com/3-24-cv-01282/doc/238-1.pdf>

SEEKING JUSTICE AT ANY LAWFUL AND PEACEFUL COST

60. I'm filing this motion for a 90-day leave of the court, to provide me the time needed to document the crimes committed by the defendants, their counsel in this lawsuit, and the court actors who have actively participated in obstructing justice, fraud on the court, falsifying court records, misappropriating public funds, and hiding evidence of felony crimes in this case.

61. I need this leave to have time to complete this documentation as well as to reach out to the DOJ and FBI leadership responsible for investigating and convicting Glen Casada and Cade Cothren, since I expect they are familiar with the conduct currently being practiced by corrupt state actors in Middle Tennessee.

62. I also need time to file ethics complaints against several bad actors in this case, specifically including most if not every judge who has participated in this matter to date, while refusing to leverage their discretion toward the honest interests of justice in this case.

63. My goal is for **justice**⁵¹, whether through a civil action, state, federal, court, or bar intervention, or criminal charges, arrests, and convictions.

64. Serious felony crimes are being committed in this lawsuit by judges and attorneys alike, state and federal, who have and continue to commit fraud on the court, with false claims of fact combined with material misrepresentations, while misapplying case law, filing documents for improper purposes, falsifying and obfuscating the court records with the technical equivalent of substantially inapplicable, but legal "sounding" gibberish.

⁵¹ DOC 207, PID 583-685 | https://rico.jeffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

THE PRIMARY SUBSTANCE OF THE DEFENDANT'S PLEADINGS

65. Bear in mind that I still haven't had time to read every motion filed by the powerful defendants against me, since this court has refused to allow me an opportunity to do so before dismissing my lawsuit, certainly without due care. However, of the filings which I have read so far by the defendants and their counsel, I have not seen any which appear to have been **honestly** and **thoroughly** filed in **good-faith**, while satisfying the general purpose of pleadings outlined in case law⁵² (on the next page), except for the very first round where most defendants sought an extension of time to respond to my complaint, which I graciously granted to all who asked, without delay.

THE PURPOSE OF PLEADINGS

“Pleadings are intended to serve as a means of arriving at fair and just settlements of controversies between litigants. They should not raise barriers which prevent the achievement of that end. Proper pleading is important, but its importance consists in its effectiveness as a means to accomplish the end of a just judgment.” *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938) (emphasis added).

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

⁵² DOC 211, PID 704 | https://rico.jefffenton.com/evidence/2025-02-08_objection-to-dispositive-defendant-motions.pdf

TECHNICALITIES CAN'T LAWFULLY GOVERN PRO SE PLEADINGS

“Pro se pleadings are to be considered without regard to technicality; pro se litigants’ pleadings are not to be held to the same high standards of perfection as lawyers.” *Jenkins v. McKeithen*, 395 U.S. 411, 421 (1959); *Picking v. Pennsylvania R. Co.*, 151 Fed 2nd 240; *Pucket v. Cox*, 456 2nd 233 (emphasis added).

66. Upon information and belief, after the initial extensions of time were granted to the defendants, most of the documents filed by the defendants and their counsel have been peppered with fraud, material misrepresentations, deception, inapplicable case law, and the likes.

67. I have yet to see **any pleading** filed by a defendant or their counsel seeking to honestly **“serve as a means of arriving at fair and just settlements of controversies between litigants⁵³”**, or **“accomplish the end of a just judgment⁵⁴”**, or to **“facilitate a proper decision on the merits⁵⁵”**.

68. Upon information and belief, this is an ethical violation of misconduct, and I believe also felony crimes of fraud on the court, falsifying court and government records, obstruction of justice, misprision of felony, and racketeering through the court enterprise⁵⁶, by most if not every attorney and law firm participating in the defense of the defendants in this lawsuit to date⁵⁷.

⁵³ *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938)

⁵⁴ *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938)

⁵⁵ *Conley v. Gibson*, 355 U.S. 41 at 48 (1957)

⁵⁶ 18 U.S.C. §§ 4, 666, 1001, 1506, 1519, 1951, 1962, etc...

⁵⁷ DOC 216, PID 984-1015 | https://rico.jefffenton.com/evidence/2025-02-24_notice-to-all-bar-members.pdf

PURSING JUSTICE THROUGH THE DOJ AND FBI

69. In the docket of this lawsuit⁵⁸, I have created an *administrative record* documenting much of this misconduct as it happened in real time (or as quickly as I could thereafter), in both federal courts. **The truth and evidence is immortalized in the court records of this lawsuit⁵⁹**, even if the courts continue to hide it from the public, lie about what it says, and refuse to act honestly, ethically, and lawfully regarding it. **The truth and evidence** I have filed should remain accessible to the DOJ and the FBI, which is where my focus must shift soon in order to try to file **criminal charges** with the FBI again.

70. Hopefully with the recent changes in leadership at both the DOJ and the FBI, coupled by the publicly disclosed corruption our federal government has recently been able to root out, I will be able to find someone interested in **upholding the law to protect the people** from powerful and corrupt state actors, committing crimes against the public through compromised courts. Hopefully this time I will find someone willing to assist me in filing criminal charges against the elite and unethical court predators, party to this case, to help protect the public good, health and safety, from the lawless racketeering common in Middle Tennessee's courts⁶⁰.

⁵⁸ Citations are provided on pages two and three of this document.

⁵⁹ DOC 177, PID 240 | https://rico.jeffenton.com/evidence/2024-11-18_fenton-motion-for-alternative-service.pdf
DOC 238-3, PID 1784 | <https://rico.jeffenton.com/evidence/declaration-of-destruction-oppression-ada-interference.pdf>

⁶⁰ ECF 102, PID 5391-5468 | https://rico.jeffenton.com/evidence/2024-10-09_concerns-about-transferring-to-tennessee.pdf

TWO PRINCIPAL BAD ACTORS — MADE THIS ALL POSSIBLE

71. Upon information and belief, this is a case where **two principal bad actors**, former Williamson County Chancery Court judge **Michael W. Binkley** (known to have been arrested in a prostitution sting⁶¹, having his charges dismissed and expunged the same day by corrupt⁶² judge Casey Moreland⁶³, favoring his friends in cases he heard, abusing his office to promote his own private interests—judges and attorneys partying⁶⁴ and vacationing⁶⁵ together—much like Moreland, threatening and lying to the public⁶⁶, and rumored/suspected to have a drug problem⁶⁷) and **Attorney Virginia Lee Story** (the infamous hostess of lake parties/vacations⁶⁸ for powerful Tennessee judges, attorneys, and decision makers).

72. For the record, no state court or judge in Tennessee ever wrote a word during my appeal to the Tennessee Court of Appeals, or thereafter to the Tennessee Supreme Court, to **validate, defend, or justify any action or word** by defendants Binkley or Story in Williamson County Chancery Court docket #48419B. They simply refused to lawfully and ethically intervene, to help the injured party, or to correct and/or report their fraudulent criminal misconduct which I repeatedly reported and evidenced on the record. Thereby becoming joinders in defendant Binkley's and Story's crimes against my family, while using their publicly funded offices to inappropriately deny me a remedy while covering for their misconduct.

⁶¹ ECF 43, PID 3694-3695 | https://rico.jeffenton.com/evidence/2017-02-01_scene-ethics-complaint-against-two-judges.pdf

⁶² ECF 52, PID 4180-4201 | https://rico.jeffenton.com/evidence/2018-02-28_tn-judge-cason-moreland-fbi-criminal-complaint.pdf

⁶³ ECF 54-1, PID 4358 | https://rico.jeffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.mp4

⁶⁴ ECF 52, PID 4174-4179 | https://rico.jeffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf

⁶⁵ ECF 44, PID 3740-3741 | https://rico.jeffenton.com/evidence/2018-09-24_tenn-binkley-defends-partying-with-lawyers.pdf

⁶⁶ ECF 54-1, PID 4368 | https://rico.jeffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4

⁶⁷ <https://www.facebook.com/judgebinkley>

⁶⁸ ECF 43, PID 3726-3729 | https://rico.jeffenton.com/evidence/2018-08-30_tennessean-story-hosts-vacations-with-judges.pdf

ECF 44, PID 3740-3741 | https://rico.jeffenton.com/evidence/2018-09-24_tenn-binkley-defends-partying-with-lawyers.pdf

73. The reason I point this out is because I have been **attacked** and **fraudulently discredited/obstructed** by at least two different federal judges at this point, one Michigan magistrate judge⁶⁹ and one Ohio district judge⁷⁰. Where the clearly **false statements** written by both are now immortalized on the record, along with the **self-evidentiary truth**⁷¹ to be discovered one day. Causing the credibility of at least two different federal district courts to be called into question, because they chose to lend the credibility of their offices and the federal courts to protect **known bad state court actors**, with unethical, perverted, and repulsive character traits, practices, and histories, **when even their friends and colleagues in Tennessee's state courts refused to do the same.**

74. Much of the damage in this case, which continues to exponentially multiply, could have been mitigated **many times over**, if anyone trusted with the administration of justice in this matter, had acted *honestly, ethically, and lawfully*, in compliance with the court's **codes of conduct**, and each judge's **oath of office**, "without respect to persons", while "do[ing] equal right to the poor and the rich." That's all that I have **ever** hoped for or expected from **any** court which I have submitted to, interacted with, and attempted to defend my rights while seeking justice through; but unfortunately I have yet to ever honestly experience in any meaningful capacity.

⁶⁹ ECF 8, PID 2101-2106 | <https://rico.jeffenton.com/1-23-cv-01097/ecf/8.pdf>

ECF 55, PID 4378-4384 | <https://rico.jeffenton.com/1-23-cv-01097/ecf/55.pdf>

⁷⁰ DOC 236, PID 1491-1503 | <https://rico.jeffenton.com/3-24-cv-01282/doc/236.pdf>

DOC 245, PID 1824-1825 | <https://rico.jeffenton.com/3-24-cv-01282/doc/245.pdf>

⁷¹ DOC 222, PID 1164-1214 | https://rico.jeffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

DOC 238, PID 1505-1568 | https://rico.jeffenton.com/evidence/2025-04-22_objection-to-memorandum-opinion-and-order.pdf

“Each justice or judge of the United States shall take the following oath or affirmation before performing the duties of his office: “I, _____, do solemnly swear (or affirm) that I will administer justice without respect to persons, and do equal right to the poor and to the rich, and that I will faithfully and impartially discharge and perform all the duties incumbent upon me as _____ under the Constitution and laws of the United States. So help me God.”⁷²”

75. Public tax dollars in this case are being gravely misallocated to the benefit of bad actors, and the substantial detriment of honest, ethical, and lawful people. **That’s a crime!**

CONCLUSION

76. This lawsuit meets the *plausibility standard* by alleging **specific facts** tied to **misconduct**.

“When considering a motion to dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, the district court **must** accept all of the allegations in the complaint as **true**, and construe the complaint **liberally** in **favor** of the **plaintiff**” (emphasis added). — *Lawrence v. Chancery Court of Tennessee*, 188 F.3d 687, 691 (6th Cir. 1999). See also *Scheuer v. Rhodes*, 416 U.S. 232, 236 (1974).

77. In both this case⁷³ and the precipitating Tennessee matters⁷⁴, the courts have allowed bar members to engage in deception and exploit legal proceedings for unethical, dishonest,

⁷² <https://www.law.cornell.edu/uscode/text/28/453>

⁷³ DOC 222, PID 1164-1214 | https://rico.jeffenton.com/evidence/2025-03-03_objection-judicial-misconduct-in-michigan.pdf

⁷⁴ ECF 1-1, PID 34-47 | https://rico.jeffenton.com/evidence/2022-02-01_fenton-affidavit-of-story-binkley-fraud-on-court.pdf
ECF 33, PID 3310-3391 | https://rico.jeffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf

and predatory purposes, in direct violation of the court's codes of conduct⁷⁵. As a result, my family has suffered financial losses exceeding one million dollars, possibly twice that when considering damages. I was **wrongfully and abruptly evicted** from my cherished Brentwood home⁷⁶, leaving me destitute and homeless—without **just cause, fair process, lawful justification, or any compensation whatsoever**. (No defendant has even been willing to argue this fact, so far to date.)

78. Moreover, the individuals responsible for executing this action did so through a state court, despite federal law (28 U.S. Code § 1334(e)(1)) explicitly **prohibiting** state courts from exercising jurisdiction over my property⁷⁷. Under the circumstances—**which were unknowingly created by my ex-wife and her counsel**⁷⁸—the federal courts had **both original and exclusive jurisdiction** over our assets⁷⁹, a fact which every bar member involved should have reasonably known. (No defendant has been willing to argue this fact either, so far to date.)

79. The continued misconduct and improper filings by the defendants and their counsel in this matter, further compound my damage while wrongfully depriving me of any assistance or a remedy, without investigating the abusive fraudulent misuse of our courts or the felony crimes grotesquely committed under “color of law” by the compromised courts, judges, law firms, attorneys, and officials party to this lawsuit, **as the evidence filed in this case unquestionably proves**.

⁷⁵ <https://www.uscourts.gov/administration-policies/judiciary-policies/ethics-policies/code-conduct-united-states-judges>
<https://www.tncourts.gov/courts/supreme-court/rules/supreme-court-rules/rule-10-code-judicial-conduct>
<https://www.tncourts.gov/courts/supreme-court/rules/supreme-court-rules/rule-8-rules-professional-conduct>

⁷⁶ ECF 1-12, PID 479-596 | https://rico.jeffenton.com/evidence/2019-10-29_tn-wilco-deed-fraud-ada-financial-exploitation.pdf
 ECF 59, PID 4724 | https://rico.jeffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4

⁷⁷ ECF 53, PID 4258-4349 | https://rico.jeffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf

⁷⁸ ECF 19-2, PID 2632-2646 | https://rico.jeffenton.com/evidence/2019-04-26_ausbrooks-story-fraudulent-bk-petition.pdf

⁷⁹ ECF 38, PID 3445-3496 | https://rico.jeffenton.com/evidence/2019-04-26_bankruptcy-crimes-rules-and-laws-violated.pdf

80. Instead Williamson County, the State of Tennessee, the Tennessee Court System, the United States District Courts, and the United States Attorney's Offices in both Michigan and Tennessee, have and/or are misdirecting critical public resources (18 U.S. Code § 666) to defend this elite class of corrupted Tennessee officials and attorneys, who have exploited public trust and resources for private criminal gain, as thoroughly evidenced throughout the record of this lawsuit. Which is being illegally and unethically facilitated by the Federal District Courts in Michigan, Ohio, and Tennessee, in direct contravention of 18 U.S. Code §§ 4, 1001 and 1503, along with the Codes of Conduct for United States Judges⁸⁰, the Tennessee Code of Judicial Conduct⁸¹, and the Tennessee Supreme Court's Rules of Professional Conduct⁸². The courts are, in effect, treating the ethical **codes of conduct** as optional and **irrelevant** to the administration of justice, when **nothing could be further from the truth.**

81. Absent strict adherence to the court's ethical codes of conduct, there is no institution in our nation more capable of causing **substantial harm** to our **republic** and the **people** of the United States of America, than this nation's state and federal court systems.

82. Anyone choosing to exercise power over the lives, rights, and property of the people, does so with both the **responsibility** and the **liability** to do so honestly, ethically, and lawfully. There is no power to exercise outside those limits, while any attempt to do so is a perverse violation of the oaths of office and trust bestowed upon any public office.

83. What the courts have done in this matter is not only unconstitutional, but it is dishonest, deceptive, discriminatory, unfair, unjust, defiant of sound reason, historically

⁸⁰ <https://www.uscourts.gov/administration-policies/judiciary-policies/ethics-policies/code-conduct-united-states-judges>

⁸¹ <https://www.tncourts.gov/courts/supreme-court/rules/supreme-court-rules/rule-10-code-judicial-conduct>

⁸² <https://www.tncourts.gov/courts/supreme-court/rules/supreme-court-rules/rule-8-rules-professional-conduct>

irresponsible and negligent, as well as careless regarding the well-known flaws common to human nature, witnessed on every continent around the globe, throughout thousands of years, where without exception power exercised without robust systems of transparency and accountability has caused crime and corruption to exponentially grow, while trampling the lives and liberties of the bulk of the people.

84. No state has the lawful jurisdiction and authority to randomly injure their citizens at will, without consequence. All sovereignty began with **God**, was given to the **people**, who in turn gave a **portion** of their sovereignty to the **state**, who in turn gave a **portion** of each state's sovereignty to our **federal** government.

85. Today both state and federal governments in this nation act as if all sovereignty began with them and never trickled down to the people. **That is both blasphemy and treason, while ALL officials must be held accountable for their crimes against our country.**

86. This case is not about technicalities—it is about truth, accountability, and the rule of law. The record before this Court contains sworn declarations, documentary evidence, and legal authority that establish a pattern of misconduct, obstruction, and systemic bias that no honest tribunal can ignore. I have acted in good faith, under oath, and with relentless diligence to expose these violations—not only to seek justice for myself, but to uphold the integrity of the judicial system itself. The Court now stands at a crossroads: to either correct the record and restore due process, or to allow injustice to calcify into precedent. I respectfully urge this Court to choose the former.

87. Therefore, I respectfully move this Court for a 90-day continuance in this appeal, prior to the issuance of a case schedule, so I can document material criminal misconduct by the defendants and court officers, and pursue appropriate filings with the DOJ, the FBI, and relevant ethics authorities.

PRAYER FOR RELIEF

Plaintiff respectfully prays that this Honorable Court:

I. IMMEDIATE PROCEDURAL RELIEF

1. **Grant a 90-day continuance** in this appeal before entering a scheduling order, in order to:
 - Complete documentation of criminal misconduct and ethical violations.
 - Submit complaints and referrals to oversight agencies, including the DOJ and FBI.
 - Prepare ethics filings regarding the conduct of attorneys and judicial officers involved in this matter.
2. **Permit remote participation and electronic case access** for Plaintiff, including CM/ECF filing privileges, consistent with ADA accommodation standards and F.R.Civ.P. Rule 5.
3. **Ensure public access to all filings**, including unsealing of any records withheld without procedural justification, to maintain transparency and preserve judicial integrity. (This request includes both MIWD case number: 1:23-cv-01097 and TNMD case number: 3:24-cv-01282.)

II. SUBSTANTIVE RELIEF PRESERVED FOR FURTHER REVIEW

Should the Court determine it appropriate upon further briefing and consideration, Plaintiff further prays:

1. That this Court **vacate prior dismissal orders**, including DOC 236, 237, and 245, on the grounds of procedural irregularity, judicial bias, and deprivation of rights under *Haines v. Kerner*, 404 U.S. 519 (1972).

2. That this action be **restored to the active docket** of the U.S. District Court for the Middle District of Tennessee and pending motions adjudicated on their merits, including those filed under Rule 59(e), 28 U.S.C. §§ 1746 and 455, and F.R.Civ.P. Rules 8(e) and 11(b).

3. That the Court **issue appropriate sanctions or disciplinary referrals** against any officer of the court found to have obstructed justice, committed fraud on the court, or knowingly filed materially false or misleading statements.

4. That all prior filings by Defendants not sworn under penalty of perjury be **stricken or compelled for resubmission**, certified per 28 U.S.C. § 1746 and F.R.Civ.P. Rule 11(b).

5. That Plaintiff be awarded:

- **Compensatory damages** for deprivation of rights, property loss, and obstruction of access to justice.
- **Punitive damages** for willful, malicious, or reckless disregard of Plaintiff's federally protected rights.
- **Reasonable costs, expenses, and attorney's fees**, under 42 U.S.C. § 1988 or other applicable statutes (if counsel is later retained).

6. That such other and further relief be granted as this Court deems just, equitable, and necessary to preserve the rule of law and protect the public interest.

“The exposure and punishment of public corruption is an honor to a nation, not a disgrace. **The shame lies in toleration, not in correction.**”

— *Theodore Roosevelt*

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 July 22, 2025.



JEFFREY RYAN FENTON, PRO SE

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#TNinjustice

#iAMhuman

The biggest threat to the freedom and prosperity of the American people, are state and federal government employees, who are willing to write **lies** into court and government records, as if the **truth**, while hiding from accountability behind government **immunity**.

—*Jeffrey Ryan Fenton*

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

JEFFREY RYAN FENTON,
Plaintiff

v.

VIRGINIA LEE STORY,
KATHRYN LYNN YARBROUGH,
MARY ELIZABETH MANEY AUSBROOKS,
ALEXANDER SERGEY KOVAL,
THOMAS E. ANDERSON,
ROY PATRICK MARLIN,
SAMUEL FORREST ANDERSON,
Individually,

MICHAEL WEIMAR BINKLEY,
ELAINE BEATY BEELER,
HENRY EDWARD HILDEBRAND III,
CHARLES M. WALKER,
JAMES MICHAEL HIVNER,
JOHN BRANDON COKE,
SANDRA JANE LEACH GARRETT,
Individually and in their official capacities,

FRANK GOAD CLEMENT JR.,
ANDY DWANE BENNETT,
WILLIAM NEAL MCBRAYER,
In their official capacities,

STORY AND ABERNATHY, PLLP,
ROTHSCHILD & AUSBROOKS, PLLC,
BANKERS TITLE & ESCROW CORPORATION,
HOSTETTLER, NEUHOFF & DAVIS, LLC,
MCARTHUR SANDERS REAL ESTATE, INC.,

SPRAGINS, BARNETT & COBB, PLC,
RUBIN LUBLIN TN, PLLC,
BANK OF AMERICA, N.A.,
CADENCE BANK,

STATE OF TENNESSEE,
COUNTY OF WILLIAMSON TENNESSEE,
WILLIAMSON COUNTY SHERIFF'S OFFICE,
CHANCERY COURT FOR
WILLIAMSON COUNTY TENNESSEE,
TENNESSEE COURT OF APPEALS
MIDDLE DIVISION,
SUPREME COURT OF THE STATE OF TENNESSEE,
BOARD OF PROFESSIONAL RESPONSIBILITY
OF THE SUPREME COURT OF TENNESSEE,
TENNESSEE ADMINISTRATIVE OFFICE
OF THE COURTS,

Defendants

APPEAL NO. 25-5592

CASE NO. 3:24-cv-01282

TRANSFERRED FROM:
MIWD CASE NO. 1:23-cv-01097

VERIFIED COMPLAINT

JURY TRIAL DEMANDED

CORRECTED AS OF
7/18/2025

Initials: 

OFFICIAL COURT OF APPEALS CAPTION FOR 25-5592

(WITH CORRECTIONS APPLIED)

JEFFREY RYAN FENTON

Plaintiff - Appellant

v.

VIRGINIA LEE STORY, individually; KATHRYN LYNN YARBROUGH, individually; MARY ELIZABETH MANEY AUSBROOKS, individually; ALEXANDER SERGEY KOVAL, individually; THOMAS E. ANDERSON¹, individually; ROY PATRICK MARLIN, individually; SAMUEL FORREST ANDERSON, individually; MICHAEL WEIMAR BINKLEY, individually and in their official capacities; ELAINE BEATY BEELER, individually and in their official capacities; HENRY EDWARD HILDEBRAND III, individually and in their official capacities; CHARLES M. WALKER, individually and in their official capacities; JAMES MICHAEL HIVNER, individually and in their official capacities; JOHN BRANDON COKE, individually and in their official capacities; SANDRA JANE LEACH GARRETT, individually and in their official capacities; FRANK GOAD CLEMENT JR., in their official capacities; ANDY DWANE BENNETT, in their official capacities; WILLIAM NEAL MCBRAYER, in their official capacities; STORY AND ABERNATHY, PLLP; ROTHSCHILD & AUSBROOKS, PLLC; BANKERS TITLE & ESCROW CORPORATION; HOSTETTTLER, NEUHOFF & DAVIS, LLC; MCARTHUR SANDERS REAL ESTATE, INC.; SPRAGINS, BARNETT & COBB, PLC²; RUBIN LUBLIN TN, PLLC; BANK OF AMERICA, N.A.³; CADENCE BANK; STATE OF TENNESSEE; COUNTY OF WILLIAMSON TENNESSEE; WILLIAMSON COUNTY SHERIFF'S OFFICE; CHANCERY COURT FOR WILLIAMSON COUNTY TENNESSEE; TENNESSEE COURT OF APPEALS MIDDLE DIVISION; SUPREME COURT OF THE STATE OF TENNESSEE; BOARD OF PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF TENNESSEE; TENNESSEE ADMINISTRATIVE OFFICE OF THE COURTS

Defendants - Appellees



¹ <https://rico.jefffenton.com/3-24-cv-01282/89.htm> | <https://rico.jefffenton.com/3-24-cv-01282/doc/89.pdf>

² <https://rico.jefffenton.com/3-24-cv-01282/221.htm> | <https://rico.jefffenton.com/3-24-cv-01282/doc/221.pdf>

³ <https://rico.jefffenton.com/3-24-cv-01282/90.htm> | <https://rico.jefffenton.com/3-24-cv-01282/doc/90.pdf>

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

Hostettler, Neuhoff & Davis, LLC

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Benjamin E. Goldammer Signature: s/ Benjamin E. Goldammer

Firm Name: Kay Griffin, PLLC

Business Address: 222 Second Avenue North, Suite 340M

City/State/Zip: Nashville, TN 37201

Telephone Number (Area Code): 615-742-4800

Email Address: bg@kaygriffin.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Disclosure of Corporate Affiliations and Financial Interest

Sixth Circuit

Case Number: 25-5592

Case Name: Jeffrey Fenton v. Virginia Story, et al.

Name of counsel: Benjamin E. Goldammer

Pursuant to 6th Cir. R. 26.1, Hostettler, Neuhoff & Davis, LLC
Name of Party

makes the following disclosure:

1. Is said party a subsidiary or affiliate of a publicly owned corporation? If Yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party:

No.

2. Is there a publicly owned corporation, not a party to the appeal, that has a financial interest in the outcome? If yes, list the identity of such corporation and the nature of the financial interest:

No.

CERTIFICATE OF SERVICE

I certify that on August 1st, 2025 the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.

s/ Benjamin E. Goldammer

This statement is filed twice: when the appeal is initially opened and later, in the principal briefs, immediately preceding the table of contents. See 6th Cir. R. 26.1 on page 2 of this form.

**6th Cir. R. 26.1
DISCLOSURE OF CORPORATE AFFILIATIONS
AND FINANCIAL INTEREST**

(a) **Parties Required to Make Disclosure.** With the exception of the United States government or agencies thereof or a state government or agencies or political subdivisions thereof, all parties and amici curiae to a civil or bankruptcy case, agency review proceeding, or original proceedings, and all corporate defendants in a criminal case shall file a corporate affiliate/financial interest disclosure statement. A negative report is required except in the case of individual criminal defendants.

(b) **Financial Interest to Be Disclosed.**

(1) Whenever a corporation that is a party to an appeal, or which appears as amicus curiae, is a subsidiary or affiliate of any publicly owned corporation not named in the appeal, counsel for the corporation that is a party or amicus shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the parent corporation or affiliate and the relationship between it and the corporation that is a party or amicus to the appeal. A corporation shall be considered an affiliate of a publicly owned corporation for purposes of this rule if it controls, is controlled by, or is under common control with a publicly owned corporation.

(2) Whenever, by reason of insurance, a franchise agreement, or indemnity agreement, a publicly owned corporation or its affiliate, not a party to the appeal, nor an amicus, has a substantial financial interest in the outcome of litigation, counsel for the party or amicus whose interest is aligned with that of the publicly owned corporation or its affiliate shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the publicly owned corporation and the nature of its or its affiliate's substantial financial interest in the outcome of the litigation.

(c) **Form and Time of Disclosure.** The disclosure statement shall be made on a form provided by the clerk and filed with the brief of a party or amicus or upon filing a motion, response, petition, or answer in this Court, whichever first occurs.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story et al.

List all clients you represent in this appeal:

Rubin Lublin TN, PLLC

- Appellant Petitioner Amicus Curiae Criminal Justice Act
- Appellee Respondent Intervenor (Appointed)

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Bret Channess Signature: s/ Bret Channess

Firm Name: Rubin Lublin, LLC

Business Address: 3145 Avalon Ridge Place, Suite 100

City/State/Zip: Peachtree Corners, GA 30071

Telephone Number (Area Code): (678) 281-2730

Email Address: bchanness@rlselaw.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

Selected docket entries for case 25–5592

Generated: 08/09/2025 12:48:27

Filed	Document Description	Page	Docket Text
08/01/2025			CORPORATE DISCLOSURE STATEMENT. Name of Counsel: <i>Bret Chaness; Rubin Lublin TN, PLLC</i> makes the following disclosure: 1. Is said party a subsidiary or affiliate of a publicly owned corporation? <i>No</i> 2. Is there a publicly owned corporation, not a party to the appeal, with a financial interest in the outcome? <i>No</i> Certificate of Service: 08/01/2025. [25–5592] (BJC)

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Lee Story et al.

List all clients you represent in this appeal:

Roy Patrick Marlin and McArthur Sanders Real Estate

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Hilary A. Ballentine Signature: s/ Hilary A. Ballentine

Firm Name: Plunkett Cooney

Business Address: 38505 Woodward Avenue, Suite 100

City/State/Zip: Bloomfield Hills, MI 48304

Telephone Number (Area Code): 313-983-4419

Email Address: hballentine@plunkettcooney.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Disclosure of Corporate Affiliations and Financial Interest

Sixth Circuit

Case Number: 25-5592

Case Name: Jeffrey Fenton v Virginia Lee Story et al.

Name of counsel: Hilary A. Ballentine

Pursuant to 6th Cir. R. 26.1, Roy Patrick Marlin and McArthur Sanders Real Estate
Name of Party

makes the following disclosure:

1. Is said party a subsidiary or affiliate of a publicly owned corporation? If Yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party:

No.

2. Is there a publicly owned corporation, not a party to the appeal, that has a financial interest in the outcome? If yes, list the identity of such corporation and the nature of the financial interest:

No.

CERTIFICATE OF SERVICE

I certify that on August 1, 2025 the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.

s/ Hilary A. Ballentine

38505 Woodward Avenue, Suite 100

Bloomfield Hills, MI 48304

This statement is filed twice: when the appeal is initially opened and later, in the principal briefs, immediately preceding the table of contents. See 6th Cir. R. 26.1 on page 2 of this form.

**6th Cir. R. 26.1
DISCLOSURE OF CORPORATE AFFILIATIONS
AND FINANCIAL INTEREST**

(a) **Parties Required to Make Disclosure.** With the exception of the United States government or agencies thereof or a state government or agencies or political subdivisions thereof, all parties and amici curiae to a civil or bankruptcy case, agency review proceeding, or original proceedings, and all corporate defendants in a criminal case shall file a corporate affiliate/financial interest disclosure statement. A negative report is required except in the case of individual criminal defendants.

(b) **Financial Interest to Be Disclosed.**

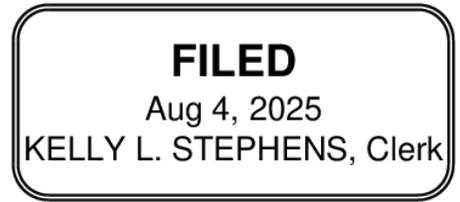
(1) Whenever a corporation that is a party to an appeal, or which appears as amicus curiae, is a subsidiary or affiliate of any publicly owned corporation not named in the appeal, counsel for the corporation that is a party or amicus shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the parent corporation or affiliate and the relationship between it and the corporation that is a party or amicus to the appeal. A corporation shall be considered an affiliate of a publicly owned corporation for purposes of this rule if it controls, is controlled by, or is under common control with a publicly owned corporation.

(2) Whenever, by reason of insurance, a franchise agreement, or indemnity agreement, a publicly owned corporation or its affiliate, not a party to the appeal, nor an amicus, has a substantial financial interest in the outcome of litigation, counsel for the party or amicus whose interest is aligned with that of the publicly owned corporation or its affiliate shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the publicly owned corporation and the nature of its or its affiliate's substantial financial interest in the outcome of the litigation.

(c) **Form and Time of Disclosure.** The disclosure statement shall be made on a form provided by the clerk and filed with the brief of a party or amicus or upon filing a motion, response, petition, or answer in this Court, whichever first occurs.

No. 25-5592

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT



JEFFREY RYAN FENTON,)
)
 Plaintiff-Appellant,)
)
 v.)
)
 VIRGINIA LEE STORY, individually and in)
 their official capacities, et al.,)
)
 Defendants-Appellees.)

O R D E R

Proceeding without counsel, the plaintiff appeals the district court’s dismissal of his complaint against various Tennessee and Massachusetts defendants relating to his Tennessee divorce proceedings and related bankruptcy proceedings in the United States Bankruptcy Court for the Middle District of Tennessee. The plaintiff now moves for a 90-day abeyance, electronic filing privileges, and public access to filings.

The plaintiff seeks an abeyance to document alleged misconduct by the defendants and other parties. However, no briefing schedule will issue unless and until the plaintiff is granted leave to proceed on appeal in forma pauperis or pays the \$605 appellate filing fee. The plaintiff’s pauper status motion is currently pending before the court. Grounds for an abeyance having not been shown, the motion is DENIED WITHOUT PREJUDICE.

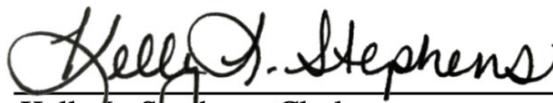
The court does not permit pro se litigants to file directly in CM/ECF. The plaintiff may submit permissible documents containing his written signature to the court’s designated pro se email box for electronic filing by the court. 6 Cir. R. 25(b)(2)(A), (d)(3). The email box address is CA06_Pro_Se_Efiling@ca6.uscourts.gov. The court’s filing of an emailed pro se document

will constitute entry in the docket. *Id.* at R. 25(e)(1)(B)(ii). He may otherwise continue to submit signed filings in paper. The motion for electronic filing privileges is DENIED.

Finally, the plaintiff's motion for public access to all filings is DENIED WITHOUT PREJUDICE. To the extent the plaintiff seeks to unseal documents filed in the district court, he must first move the district court. 6 Cir. R. 11(c)(2).

The plaintiff's requests for substantive relief are REFERRED to the ultimate merits panel.

ENTERED PURSUANT TO RULE 45(a)
RULES OF THE SIXTH CIRCUIT



Kelly L. Stephens, Clerk

United States Court of Appeals for the Sixth Circuit

U.S. Mail Notice of Docket Activity

The following transaction was filed on 08/04/2025.

Case Name: Jeffrey Fenton v. Virginia Story, et al
Case Number: 25-5592

Docket Text:

ORDER filed: The plaintiff seeks an abeyance to document alleged misconduct by the defendants and other parties. However, no briefing schedule will issue unless and until the plaintiff is granted leave to proceed on appeal in forma pauperis or pays the \$605 appellate filing fee. The plaintiff's pauper status motion is currently pending before the court. Grounds for an abeyance having not been shown, the motion [7384941-2] is DENIED WITHOUT PREJUDICE. The court does not permit pro se litigants to file directly in CM/ECF. The plaintiff may submit permissible documents containing his written signature to the court's designated pro se email box for electronic filing by the court. 6 Cir. R. 25(b)(2)(A), (d)(3). The email box address is CA06_Pro_Se_Efiling@ca6.uscourts.gov. The court's filing of an emailed pro se document will constitute entry in the docket. Id. at R. 25(e)(1)(B)(ii). He may otherwise continue to submit signed filings in paper. The motion for electronic filing privileges [7384941-3] is DENIED. Finally, the plaintiff's motion for public access to all filings [7384941-3] is DENIED WITHOUT PREJUDICE. To the extent the plaintiff seeks to unseal documents filed in the district court, he must first move the district court. 6 Cir. R. 11(c)(2). The plaintiff's requests for substantive relief are REFERRED to the ultimate merits panel.

The following document(s) are associated with this transaction:

Document Description: Order

Notice will be sent to:

Mr. Thomas E. Anderson
1187 Old Hickory Boulevard
Suite 125
Brentwood, TN 37027

Mr. Jeffrey Ryan Fenton
17195 Silver Parkway
Unit 150
Fenton, MI 48430

A copy of this notice will be issued to:

Ms. Hilary Ann Ballentine
Ms. Laura Ellen Bassett
Mr. Gregory Brown
Ms. Lisa M. Carson
Mr. George Harrison Cate III
Mr. Bret Jacob Chaness
Mr. James R. Embrey Jr.
Mr. Benjamin Goldammer
Mr. Erik Halvorson
Mr. William Scott Hickerson
Ms. Lynda M. Hill
Ms. Kimberly Michelle Ingram-Hogan
Ms. Peako Andrea Jenkins
Ms. Anica C. Jones
Ms. Sarah M. Mathews
Mr. Anthony M. Noel
Ms. Courtney Williams
Ms. Dawn Williams

RECEIVED

DOCUMENTS REGARDING (CASE: 25-5592):

AUG 05 2025

KELLY L. STEPHENS, Clerk

1. Case Opening Items¹:

- Motion for Pauper Status (DOC 14, PP 1-2)
- Affidavit in Support of Motion for Pauper Status
- Court of Appeals Caption for 25-5592 with Corrections Applied (DOC 24, PP 34-35)

2. Motion for Continuance to Prepare Criminal and Ethics Filings, with Notice of Judicial and Professional Misconduct, and Failure to Enforce Codes of Conduct as Required to Maintain a Fair and Impartial Tribunal² (DOC 24, PP 1-33)

- Email Notice of Motions in DOC 14 & DOC 24

**CERTIFICATE OF SERVICE AND
NOTICE REGARDING FUTURE FILING NOTICES**

I hereby certify that on **July 22, 2025**, I submitted the foregoing (or above-captioned) documents to the United States Court of Appeals for the Sixth Circuit, at the address listed below, for filing in Case No. **25-5592**. The Court filed these documents on **July 23, 2025**, under Docket Entries ('DOC') **14³** and **24⁴**.

I further certify that at **10:25 PM EDT** on **July 24, 2025**, I transmitted the filing notices⁵ by email to the addresses listed on the PACER docket in the **Middle District of Tennessee** for the underlying action in Case No. **3:24-cv-01282**, as shown in attached **Exhibit A: Email Filing Notices**. This appeal involves the same parties as the trial court action. While the PACER docket for **3:24-cv-01282** shows the email addresses to be "NOTICED," the **Sixth Circuit** docket in

¹ https://rico.jefffenton.com/evidence/2025-07-22_motion-to-appeal-in-forma-pauperis.pdf

² https://rico.jefffenton.com/evidence/2025-07-22_motion-for-continuance-notice-about-misconduct.pdf

³ <https://rico.jefffenton.com/25-5592/doc/14.pdf>

⁴ <https://rico.jefffenton.com/25-5592/doc/24.pdf>

⁵ https://rico.jefffenton.com/notices/2025-07-24_fenton-filing-notice-emailed-to-defendants.pdf

25-5592 does not display the email addresses for the defendant's counsel.

I further certify that on or before **August 1, 2025**, I will transmit this filing notice via United States Mail, with postage prepaid, to the defendants or their counsel at the addresses listed below. If, for reasons beyond my control, mailing cannot be completed by that date, I will do so on the next available business day.

IMPORTANT NOTICE REGARDING FUTURE FILING NOTICES

Due to the excessive cost and logistical burden of serving filing notices to more than a dozen law firms via USPS, this notice constitutes my final physical mailing. **Going forward, all filing notices will be delivered via email and publicly published on my website.**

To ensure timely and reliable access, my website now hosts a dedicated section that compiles, displays, and archives all filing notices I've emailed in this matter. This section includes direct links to the exact documents transmitted to opposing counsel by email. If a defendant does not receive an emailed notice due to circumstances beyond my control, the same documents remain accessible on the following publicly available webpage:

- **Shortcut URL:** <https://notices.jefffenton.com>
- **Full URL:** <https://jefffenton.com/defendant-notices/>
- **Link location:** "Defendant Notices" link near the center of the top navigation bar/menu (see attached Exhibit B: website navigation screenshot).

RULE 5(B) COMPLIANCE NOTE

Pursuant to Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure—and with informal approval from the Sixth Circuit Court of Appeals—I **shall transmit all filing notices and updates to the defendants and/or their counsel via email**. Although the District Court has not granted CM/ECF access, the Court of Appeals has authorized email-based notice for filings related to my appeal. This process is adopted in good faith and aligns with the principles of timely, cost-effective service under applicable federal and district court rules. Consent-based delivery is documented through archived emails, delivery logs, and publication of notices on my designated website. To request changes to my email distribution list (**add, update, or remove an address**), please send your request to: contact@jeffenton.com.

As an additional resource for the defendants, their counsel, and the public at large, **my website maintains three separate electronic court dockets**—one for each of the Federal Courts involved to date (**6th Cir.⁶, TNMD⁷, and MIWD⁸**). Each electronic docket includes links to view and download the accessible court filings therein. This section can be reached via the **“Court Docket”** link, located in the **drop-down menu**, near the center of the top navigation bar (see attached Exhibit C: website navigation screenshot).

On March 3, 2025, I filed a **“NOTICE REGARDING FUTURE FILING NOTICES FOR THE DEFENDANTS”** in TNMD DOC 220, PID 1120–1128. **That notice is now rescinded and may be disregarded**. I will no longer bundle filing notices for monthly mailing.

⁶ <https://rico.jeffenton.com/25-5592/>

⁷ <https://rico.jeffenton.com/3-24-cv-01282/>

⁸ <https://rico.jeffenton.com/1-23-cv-01097/>

⁹ <https://rico.jeffenton.com/3-24-cv-01282/doc/220.pdf>

Note: I attempted sending monthly bulk mailing notices to reduce costs, but it led to timing challenges, shipping delays, logistical confusion, and added administrative burdens—all while remaining financially unsustainable.

Please direct questions or concerns regarding these matters to: contact@jeffenton.com for prompt handling.

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT
100 EAST FIFTH STREET, ROOM 540
POTTER STEWART U.S. COURTHOUSE
CINCINNATI, OHIO 45202-3988**

MEGAN CALME & SARAH MATHEWS
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3102 WEST END AVE STE 400
NASHVILLE, TN 37203-1623
megan.calme@wilsonelser.com
sarah.mathews@wilsonelser.com

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TENNESSEE ATTORNEY GENERAL'S OFFICE
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dgrosko@kaygriffin.com

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NASHVILLE, TN 37203-7238
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kingram@bradley.com

DAWN WILLIAMS
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LANSING MI 48933-1529
dwilliams@dykema.com

ERIK HALVORSON
BRADLEY ARANT BOULT CUMMINGS
1221 BROADWAY STE 2400
NASHVILLE, TN 37203-7238
ehalvorson@bradley.com

ADDITIONAL ELECTRONIC SERVICE OPTIONS

According to guidance from the Sixth Circuit Court of Appeals, *pro se* litigants are required to include a **wet signature** with every filing—**electronic signatures are not permitted**—even when documents are submitted via email. To meet this requirement, source documents must be **printed, manually signed, and scanned** prior to filing. Unfortunately, this process diminishes several advanced features inherent in “true” digitally created PDF files, including Optical Character Recognition (‘OCR’) with embedded fonts, internal navigation, and search optimization.

To help compensate for the diminished functionality of these “flat” scanned PDFs, many of my filings in this matter have also been **digitally optimized** for improved public access, readability, and navigation. These enhanced versions are generated from the **same source documents** but retain smart features by **using electronic signatures** instead of manual execution. As a result, they preserve native PDF capabilities such as **OCR functionality, full-text search, clickable hyperlinks, bookmarks**, and—in my most significant filings, such as my Amended Complaint¹⁰—a **hyperlinked table of contents**.

This collection includes my most important filings in this matter since the release of my **lawsuit service package**¹¹ and is located on a page titled “FENTON FILINGS SINCE SERVICE¹².” This section can be reached through the “Defendant Notices” **drop-down menu** near the center of the top navigation bar, using the abbreviated link “**Filings Since Service**” (see attached Exhibit B: website navigation screenshot). These documents are curated in **reverse chronological order**, with my most recent filings listed first for quick and easy discovery.

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

¹¹ <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

¹² <https://jefffenton.com/defendant-notice/fenton-filings-since-service/>

I generally aim to optimize and publish these documents promptly after filing them in court and serving notice to the defendants. However, not every filing merits digital enhancement or public release in this format. Given my time constraints, I cannot guarantee which filings will be digitally optimized for publication—but **I prioritize enhancing my most substantive documents** for improved public access, readability, and navigation.

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 and remedies available under applicable law, equity, and procedural rules are expressly reserved.

Executed on July 31, 2025.


JEFFREY RYAN FENTON, PRO SE

17195 SILVER PARKWAY, #150
FENTON, MI, 48430-3426
CONTACT@JEFFFENTON.COM
HTTPS://JEFFFENTON.COM
(P) 615.837.1300
#TNinjustice
#iAMhuman

Jeff Fenton



From: Jeff Fenton <jeff.fenton@live.com>
Sent: Thursday, July 24, 2025 10:25 PM
To: Alexander Sergey Koval (akoval@cw13.com); Anica Clarissa Jones (anica.jones@usdoj.gov); Anthony M. Noel (tony.noel@leitnerfirm.com); Barnett & Cobb PLC Spragins (cbarnett@spraginslaw.com); Benjamin E. Goldammer (bg@kaygriffin.com); Bret Chaness (bchaness@rinselaw.com); Carolina V. Martin (cvmartin@grsm.com); Courtney C. Williams (CCWILLIAMS@GRSM.COM); Danica G Suedekum (dgrosko@kaygriffin.com); Dawn Nicole Williams (dwilliams@dykema.com); Erik Halvorson (ehalvorson@bradley.com); George H. Cate III (gcate@bradley.com); Gregory Brown (gb@lyb.law); James R. Embrey Jr. (jembrey@grsm.com); Kathryn Yarbrough (kyarbrough@tnlaw.org); Kimberly Michelle Ingram-Hogan (kingram@bradley.com); Laura C. Baucus (lbaucus@dykema.com); Laura Ellen Bassett (laura.bassett@leitnerfirm.com); Lisa M. Carson (lcarson@buergerlaw.com); Megan R. Calme (megan.calme@wilsonelser.com); Peako Andrea Jenkins (peako.jenkins@ag.tn.gov); Sandra J. Densham (sdensham@plunkettcooney.com); Sarah M. Mathews (sarah.mathews@wilsonelser.com); Tommy Anderson (Tommy@AuctionZeppelin.com); William S. Hickerson (wsh@lyblaw.net)
Subject: FENTON v. STORY et al. | 6TH CIR CASE: 25-5592 | NOTICE of MOTIONS in DOC 14 & DOC 24
Attachments: 14.pdf; 24.pdf; 2025-07-22_motion-to-appeal-in-forma-pauperis.pdf; 2025-07-22_motion-for-continuance-notice-about-misconduct.pdf; 2025-07-22 COURT CAPTION WITH CORRECTIONS (25-5592).pdf
Importance: High

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• LAST SOLD ON FEB 14, 2024 FOR \$846,000

1886 Sunny Side Dr, Brentwood, TN 37027

\$889,718	4	2.5	2,640
Bed in Estimate	Beds	Baths	Sq Ft

Estimated sale price: **\$846,000 - \$1,011,000**

LOCATED AT THE NEXUS OF GREEN HILLS, BRENTWOOD, GRASSLAND, FRANKLIN! SURROUNDED BY HUNDREDS OF ACRES OF PROTECTED WOODLANDS!!!

Please find attached notice of the following documents I have filed in the Sixth Circuit Court of Appeals:

1. Motion to Appeal in Forma Pauperis (DOC 14)
2. Affidavit Accompanying Motion for Permission to Appeal in Forma Pauperis
3. Case Caption with Corrections
4. Motion for Continuance to Prepare Criminal and Ethics Filings, with Notice of Judicial and Professional Misconduct, and Failure to Enforce Codes of Conduct as Required to Maintain a Fair and Impartial Tribunal (DOC 24).
5. I included both the version in PACER as scanned by the court (24.pdf), and the DIGITALLY CREATED SOURCE which is easier to navigate.

https://rico.jeffenton.com/evidence/2025-07-22_motion-for-continuance-notice-about-misconduct.pdf

Please let me know if you are unable to view any of the PDF documents attached.

Thanks.
Jeff Fenton

x.com/@tninjustice
jeff.fenton@live.com
(615) 837-1300

17195 SILVER PKWY, #150
FENTON, MI 48430-3426

3-MIN Video Intro about my Federal Lawsuit: <https://www.youtube.com/watch?v=AaYb-f8ux4o>

FENTON v. STORY (1:23-cv-1097) <http://rico.jeffenton.com/discovery/>
<https://casetext.com/case/fenton-v-story>

Fraud on the Court by Officers of the Court: Williamson County Chancery Court Docket #48419B

SLAM the GAVEL Podcast Interview from 8/4/2024 about my RICO Lawsuit with Authors Brian Vukadinovich and Maryann Petri: <https://www.youtube.com/watch?v=plg5eEEnVuU>

Brian Vukadinovich is the author of MOTION for JUSTICE (I Rest My Case), and Rogues in Black Robes (Destroying Lives and Committing Crimes with No True Accountability).

Maryann Petri is the author of RAISED BY THESE WOLVES (How Family and Federal Courts are Failing our Children), Dismantling Family Court Corruption (Why Taking the Kids Was Not Enough). Maryann is also the host of SLAM the GAVEL Podcast, focused on all family court topics, trauma, and healing.

Defendant Notices - FENTON v. STORY et al.

jeffenton.com/defendant-notices/

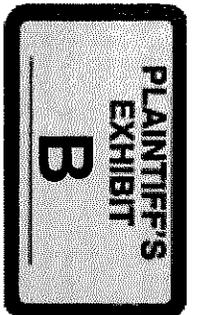
FENTON v. STORY et al.

Federal Civil Rights, Public Corruption, Conspiracy, Fraud, and Racketeering Lawsuit (Case 3:24-cv-01282)

Home Intro Video v Lawsuit Service Package Defendant Notices v Court Docket v Blog Evidence Exhibit Index Discovery v

- Filings Since Service
- Claims Statuses

Defendant Notices





Address 4455 LINDEN CREEK
 PARKWAY
 FLINT
 MI 48507
 Location: FNTA
 Device ID -BTC01
 Transaction: 940406961541

FedEx Priority Overnight

Tracking Number
 391316461390 0 85 1b (S) 58 30
 Declared Value 100

Recipient Address
 U S COURT OF APPEALS
 FOR THE SIXTH CIRCUIT
 100 E FIFTH ST. ROOM 540
 POTTER STEWART U S COURTHOUSE
 Cincinnati, OH 45202
 5135647000

Scheduled Delivery Date 7/23/2025

Pricing option
 ONE RATE

Package Information
 FedEx Envelope

Shipment subtotal \$58 30

Total Due \$58 30

H = Weight entered manually
 S = Weight read from scale
 T = Taxable item

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Jul 22, 2025 8 00 24 PM



July 31, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 391316461390

Delivery Information:

Status:	Delivered	Delivered To:	Shipping/Receiving
Signed for by:	M.Doke	Delivery Location:	
Service type:	FedEx Priority Overnight		
Special Handling:	Deliver Weekday		Cincinnati, OH,
		Delivery date:	Jul 23, 2025 10:29

Shipping Information:

Tracking number:	391316461390	Ship Date:	Jul 22, 2025
		Weight:	1.0 LB/0.45 KG
Recipient:		Shipper:	
CINCINNATI, OH, US,		Linden, MI, US,	

FedEx Express proof-of-delivery details appear below; however, no signature is currently available for this shipment. Please check again later for a signature.

Thank you for choosing FedEx



← Tracking ID: 391316461390 ☐ <

Travel history

Sort by: Ascending ▾

Tuesday, 7/22/25

- 6:59 PM
Shipment information sent to FedEx
- 8:00 PM
Shipment arriving On-Time
FLINT, MI
- 8:00 PM
Picked up
FLINT, MI
- 8:02 PM
Left FedEx origin facility
FLINT, MI
- 10:44 PM
Arrived at FedEx hub
MEMPHIS, TN

Wednesday, 7/23/25

- 4:07 AM
Departed FedEx hub
MEMPHIS, TN
- 7:24 AM
At local FedEx facility
HEBRON, KY
- ➔ 10:29 AM
Delivered
Cincinnati, OH



Shipment overview

TRACKING NUMBER 391316461390

DELIVERED TO Shipping/Receiving

SHIP DATE  7/22/25

STANDARD TRANSIT  7/23/25 before 10:30 AM

DELIVERED 7/23/25 at 10:29 AM



Services

SERVICE FedEx Priority Overnight

TERMS Shipper

SPECIAL HANDLING SECTION Deliver Weekday



Package details

WEIGHT 1 lbs / 0.45 kgs

TOTAL PIECES 1

TOTAL SHIPMENT WEIGHT 1 lbs / 0.45 kgs

PACKAGING FedEx Envelope

17195 SILVER PINE
PMB #150
FENTON, MI 48430-3426



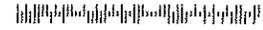
U.S. POSTAGE PAID
FCM LG ENV
LINDEN, MI 48461
AUG 01, 2025
\$10.84
S2324P501528-0

RECEIVED

AUG 05 2025

KELLY L. STEPHENS, Clerk

U.S. COURT OF APPEALS 6TH CIR
ATTN: CLERK OF THE COURT
100 E. FIFTH STREET, RM 540
CINCINNATI, OH 45202-3988



UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

Mary Beth Ausbrooks
Rothschild & Ausbrooks, PLLC

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Courtney C. Williams Signature: s/ Courtney C. Williams

Firm Name: Gordon Rees Scully Mansukhani LLP

Business Address: 4020 Aspen Grove Drive, Suite 500

City/State/Zip: Franklin, TN 37067

Telephone Number (Area Code): (615) 772-9000

Email Address: ccwilliams@grsm.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

**Mary Beth Ausbrooks
Rothschild & Ausbrooks, PLLC**

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Carolina V. Martin Signature: s/ Carolina V. Martin

Firm Name: Gordon Rees Scully Mansukhani LLP

Business Address: 4020 Aspen Grove Drive, Suite 500

City/State/Zip: Franklin, TN 37067

Telephone Number (Area Code): (615) 772-9000

Email Address: cvmartin@grsm.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

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The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Disclosure of Corporate Affiliations and Financial Interest

Sixth Circuit

Case Number: 25-5592

Case Name: Jeffrey Fenton v. Virginia Story, et al.

Name of counsel: Carolina V. Martin

Pursuant to 6th Cir. R. 26.1, Rothschild & Ausbrooks, PLLC

Name of Party

makes the following disclosure:

1. Is said party a subsidiary or affiliate of a publicly owned corporation? If Yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party:

No.

2. Is there a publicly owned corporation, not a party to the appeal, that has a financial interest in the outcome? If yes, list the identity of such corporation and the nature of the financial interest:

No.

CERTIFICATE OF SERVICE

I certify that on August 6, 2025 the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.

s/ Carolina V. Martin

This statement is filed twice: when the appeal is initially opened and later, in the principal briefs, immediately preceding the table of contents. See 6th Cir. R. 26.1 on page 2 of this form.

**6th Cir. R. 26.1
DISCLOSURE OF CORPORATE AFFILIATIONS
AND FINANCIAL INTEREST**

(a) **Parties Required to Make Disclosure.** With the exception of the United States government or agencies thereof or a state government or agencies or political subdivisions thereof, all parties and amici curiae to a civil or bankruptcy case, agency review proceeding, or original proceedings, and all corporate defendants in a criminal case shall file a corporate affiliate/financial interest disclosure statement. A negative report is required except in the case of individual criminal defendants.

(b) **Financial Interest to Be Disclosed.**

(1) Whenever a corporation that is a party to an appeal, or which appears as amicus curiae, is a subsidiary or affiliate of any publicly owned corporation not named in the appeal, counsel for the corporation that is a party or amicus shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the parent corporation or affiliate and the relationship between it and the corporation that is a party or amicus to the appeal. A corporation shall be considered an affiliate of a publicly owned corporation for purposes of this rule if it controls, is controlled by, or is under common control with a publicly owned corporation.

(2) Whenever, by reason of insurance, a franchise agreement, or indemnity agreement, a publicly owned corporation or its affiliate, not a party to the appeal, nor an amicus, has a substantial financial interest in the outcome of litigation, counsel for the party or amicus whose interest is aligned with that of the publicly owned corporation or its affiliate shall advise the clerk in the manner provided by subdivision (c) of this rule of the identity of the publicly owned corporation and the nature of its or its affiliate's substantial financial interest in the outcome of the litigation.

(c) **Form and Time of Disclosure.** The disclosure statement shall be made on a form provided by the clerk and filed with the brief of a party or amicus or upon filing a motion, response, petition, or answer in this Court, whichever first occurs.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al.

List all clients you represent in this appeal:

Tennessee Court of Appeals Middle Division

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Peako Jenkins Signature: s/ Peako Jenkins

Firm Name: Tennessee Attorney General's Office

Business Address: P.O. Box 20207

City/State/Zip: Nashville, TN 37202

Telephone Number (Area Code): 615-741-8059

Email Address: peako.jenkins@ag.tn.gov

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

No. 25-5592

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

JEFFREY RYAN FENTON,

Plaintiff-Appellant,

v.

VIRGINIA LEE STORY, individually; KATHRYN LYNN YARBROUGH, individually; MARY ELIZABETH MANEY AUSBROOKS, individually; ALEXANDER SERGEY KOVAL, individually; THOMAS E. ANDERSON, individually; ROY PATRICK MARLIN, individually; SAMUEL FORREST ANDERSON, individually; MICHAEL WEIMAR BINKLEY, individually and in their official capacities; ELAINE BEATY BEELER, individually and in their official capacities; HENRY EDWAERD HILDEBRAND, III, individually and in their official capacities; CHARLES M. WALKER, individually and in their official capacities; JAMES MICHAEL HIVNER, individually and in their official capacities; JOHN BRANDON COKE, individually and in their official capacities; SANDRA JANE LEACH GARRETT, individually and in their official capacities; FRANK GOAD CLEMENT JR., individually and in their official capacities; ANDY DWANE BENNETT, in their official capacities; WILLIAM NEAL MCBRAYER, in their official capacities; STORY AND ABERNATHY, PLLP; ROTHSCHILD & AUSBROOKS, PLLC; BANKERS TITLE & ESCROW CORPORATION; HOSTETTLER, NEUHOFF & DAVIS, LLC; MCARTHUR SANDERS REAL ESTATE, INC.; SPRAGINS, BARNETT & COBB, PLC; RUBIN LUBLIN TN, PLLC; BANK OF AMERICA, N.A.; CADENCE BANK; STATE OF TENNESSEE; COUNTY OF WILLIAMSON TENNESSEE; WILLIAMSON COUNTY SHERIFF'S OFFICE; CHANCERY COURT FOR WILLIAMSON COUNTY

TENNESSEE; TENNESSEE COURT OF APPEALS MIDDLE DIVISION;
SUPREME COURT OF THE STATE OF TENNESSEE; BOARD OF
PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF
TENNESSEE; TENNESSEE ADMINISTRATIVE OFFICE OF THE
COURTS,

Defendants-Appellees.

On Appeal from the United States District Court
for the Middle District of Tennessee
Case No. 3:24-cv-01282, Hon. Patricia A. Gaughan

**MOTION TO DISMISS APPEAL FOR LACK OF JURISDICTION BY
DEFENDANTS-APPELLEES ROY PATRICK MARLIN AND MCARTHUR
SANDERS REAL ESTATE, INC.**

Defendants-Appellees Roy Patrick Marlin and McArthur Sanders Real Estate, Inc., by and through their undersigned counsel, and pursuant to Rule 27 of the Federal Rules of Appellate Procedure and United States Court of Appeals for the Sixth Circuit Rule 27(d), file with the Court their Motion to Dismiss Appeal for Lack of Jurisdiction as follows:

1. This appeal stems from a civil action brought by *pro se* Plaintiff-Appellant Jeffrey Fenton, who named 34 Defendants, including lawyers, law firms, judges, the State of Tennessee, state agencies and courts, and financial institutions, all arising from a divorce proceeding initiated in 2019 by his ex-

wife in Tennessee and a related bankruptcy proceeding. (R.E. 66, “Amended Complaint for Tortious Conduct & Injunctive Relief”).

2. The United States District Court for the Middle District of Tennessee issued a Memorandum of Opinion and Order on March 26, 2025 dismissing Plaintiff’s Complaint pursuant to Fed. R. Civ. P. 12(b)(1) and (b)(6) and certifying that “an appeal of this decision could not be taken in good faith.” (R.E. 236).

3. Plaintiff subsequently filed an “Objection” to the district court’s Memorandum of Opinion and Order and a Rule 59 motion to alter judgment or for a new trial, which was denied via Order issued on May 19, 2025. (R.E. 238, 245). Again, the district court certified, pursuant to 28 U.S.C. § 1915(a)(3), “that an appeal from this decision could not be taken in good faith.” (*Id.*).

4. Pursuant to 4(a)(1)(A) of the Federal Rules of Appellate Procedure, “the notice of appeal required...must be *filed* with the district court within 30 days after entry of the judgment or order appealed from.” [emphasis added]. Plaintiff-Appellant thus had thirty (30) days from May 19, 2025 to file a notice of appeal with the district court. Thus, Plaintiff-Appellant’s notice of appeal was required to be filed by June 18, 2025.

5. Plaintiff-Appellant did not file a notice of appeal with the district court by June 18, 2025. As indicated on the Certificate of Service of Plaintiff-

Appellant's Notice of Appeal, Plaintiff-Appellant stated that he "sent" (or deposited) the notice of appeal to the district court via mail on June 17, 2025. (R.E. 246).

6. The clerk of the district court received Plaintiff-Appellant's notice of appeal on June 20, 2025 – two days after the June 18, 2025 deadline. (R.E. 246). The notice of appeal was thus filed on June 20, 2025.

7. Plaintiff-Appellant's appeal was untimely. Per Fed. R. App. P. 4(a)(1)(A) and 28 U.S.C. § 2107(a), a notice of appeal must be ***filed*** within 30 days after the judgment or order appealed from is entered.

8. Sixth Circuit case law is clear that "[e]xcept for appeals filed by pro se prisoners, a notice of appeal is not considered filed until it is received by the clerk, not when it is deposited in the mail." *VanHooser v. Grundy County, TN*, at *1, 2024 WL 5165064 (6th Cir. Aug. 19, 2024) (Order) (**Exhibit A**) (internal citation omitted). Plaintiff-Appellant is not a prisoner and thus any exception for pro se prisoners is inapplicable.

9. In *Kahler-Ellis Co. v. Ohio Tpk. Comm'n*, 225 F.2d 922, 922 (6th Cir. 1955), this Court dismissed an appeal for lack of jurisdiction because the notice of appeal was untimely where the notice of appeal was due on July 2, 2025, but the notice, although placed in the mail timely, was not received until July 5, 2025. As this Court explained: "Here, only the act of depositing the

notice in the mails occurred within thirty days. This is not a filing; only when the clerk acquires custody has it been filed.” *Id.* at 922.

10. In this case, the district court did not acquire custody of Plaintiff-Appellant’s notice of appeal until June 20, 2025 – two days after the June 18, 2025 deadline. His act of depositing the notice in the mail on June 17, 2025 did not constitute a filing. *VanHooser, supra; Kahler-Ellis, supra.* And there was no impediment to Plaintiff-Appellant placing his notice of appeal in the mail with sufficient time for it to be timely received and filed by the court by June 18, 2025.¹

11. Since the notice of appeal is jurisdictional, this Court must grant Defendants’ motion to dismiss the appeal. *VanHooser, supra; Kahler-Ellis, supra*, at 922, citing *Marten v. Hess*, 176 F.2d 834 (1949); *Bowles v. Russell*, 551 U.S. 205, 215 (2007) (“[T]he timely filing of a notice of appeal in a civil case is a jurisdictional requirement.”).

WHEREFORE, Defendants-Appellees respectfully request that this Court grant the instant Motion and that Plaintiff’s appeal be dismissed for lack of jurisdiction due to the untimely filing of the notice of appeal. Defendants

¹ The only known date that there was no U.S. Mail Delivery in June 2025 was on June 19, 2025 – which was *after* Plaintiff-Appellant’s notice of appeal was due and thus had no impact on the timely filing of his notice.

further request any other relief in their favor this Court deems proper in law and equity.

Respectfully submitted,

PLUNKETT COONEY

By: /s/Hilary A. Ballentine
HILARY A. BALLENTINE (P69979)
Attorney for Defendant L'Anse
Creuse Public Schools
38505 Woodward Avenue, Suite100
Bloomfield Hills, MI 48304
(313) 983-4419
hballentine@plunkettcooney.com

Date: September 9, 2025

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EXHIBIT A

2024 WL 5165064

2024 WL 5165064

Only the Westlaw citation is currently available.
United States Court of Appeals, Sixth Circuit.

Tara VANHOOSER, Plaintiff-Appellant,

v.

GRUNDY COUNTY, TN, Defendant,

and

Clint Shrum, individually and in his
official capacity as Sheriff of Grundy
County, TN, et al., Defendants-Appellees.

No. 24-5567

|

FILED August 19, 2024

ON APPEAL FROM THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT OF TENNESSEE

Attorneys and Law Firms

Tara VanHooser, Altamont, TN, Pro Se.

Ben Thomas Hickey, Jr., Spicer Rudstrom, Chattanooga, TN,
for Defendants-Appellees.

Before: GRIFFIN, LARSEN, and NALBANDIAN, Circuit
Judges.

ORDER

*1 This matter is before the court upon a motion to dismiss
by the appellees.

Generally, in a civil case where the United States, a United
States agency, or a United States officer or employee is not
a party, a notice of appeal must be filed within 30 days after
the judgment or order appealed from is entered. 28 U.S.C. §
2107(a); Fed. R. App. P. 4(a)(1)(A).

The district court entered its judgment denying Tara
VanHooser's civil action on April 24, 2024. Absent any
authorized extension of time, a notice of appeal from the
judgment was due to be filed on or before May 24, 2024. See
28 U.S.C. § 2107(a); Fed. R. App. P. 4(a)(1)(A), 26(a). Except
for appeals filed by pro se prisoners, see *Houston v. Lack*, 487
U.S. 266, 276 (1988), a notice of appeal is not considered filed

until it is received by the clerk, not when it is deposited in
the mail. *Pryor v. Marshall*, 711 F.2d 63, 65 (6th Cir. 1983);
Kahler-Ellis Co. v. Ohio Tpk. Comm'n, 225 F.2d 922, 922
(6th Cir. 1955); see also *Berry v. Specialized Loan Servicing,
LLC*, 2020 WL 9171223, at *1 (6th Cir. Dec. 1, 2020) (order)
("Depositing the notice in the mail, even with a reasonable
expectation of timely delivery, is not the same as filing it.").
Although VanHooser mailed her notice of appeal on May 24,
2024 (the filing deadline), that notice was not received—and
thus not filed—until June 14, 2024. (R. 57, PageID 436; R.
57-1, PageID 437.) On June 7, 2024, she mailed a motion
for extension of time to file her notice of appeal, which was
received and filed on June 10, 2024. (R. 55, PageID 399; R.
55-1, PageID 434.)

The district court concluded that VanHooser was not eligible
for an extension because she failed to demonstrate excusable
neglect or good cause. (R. 61, Order, PageID 466–69.) See
28 U.S.C. § 2107(c); Fed. R. App. P. 4(a)(5)(A). Even with
no delays in delivery, her notice of appeal was scheduled to
arrive after the deadline, and she failed to demonstrate that
circumstances beyond her control prevented timely filing. (R.
61, PageID 467–69.) Accordingly, the district court denied
her motion for an extension. (*Id.* at PageID 469.) In light of
the district court's denial, the appellees move to dismiss the
appeal for lack of jurisdiction. (Dkt. 8.) VanHooser responds,
reasserting that she mailed her notice of appeal on the filing
deadline. (Dkt. 9 at 5.)

VanHooser's failure to file a timely notice of appeal deprives
this court of jurisdiction. Compliance with the statutory
deadline in § 2107(a) is a jurisdictional prerequisite that this
court may not waive. *Bowles v. Russell*, 551 U.S. 205, 214
(2007) ("Today we make clear that the timely filing of a notice
of appeal in a civil case is a jurisdictional requirement."); see
also *Hamer v. Neighborhood Hous. Servs. of Chi.*, 583 U.S.
17, 19–20 (2017) (explaining that "[i]f a time prescription
governing the transfer of adjudicatory authority from one
Article III court to another appears in a statute, the limitation
is jurisdictional").

We therefore **GRANT** the motion to dismiss and **DISMISS**
the appeal.

All Citations

Not Reported in Fed. Rptr., 2024 WL 5165064

End of Document

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CERTIFICATE OF SERVICE

HILARY A. BALLENTINE, attorney with the law firm of Plunkett Cooney, hereby certifies that on the 9TH day of September, 2025, she caused a copy of this document to be served upon all parties of record, and that such service was made electronically upon each counsel of record so registered with the United States Court of Appeals for the Sixth Circuit and via U.S. Mail to any counsel not registered to receive electronic copies from the court, by enclosing same in a sealed envelope with first class postage fully prepaid, addressed to the above, and depositing said envelope and its contents in a receptacle for the U.S. Mail.

PLUNKETT COONEY

By: */s/Hilary A. Ballentine*
HILARY A. BALLENTINE (P69979)

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Fenton vs. Story, et al

List all clients you represent in this appeal:

Virginia Story and Story & Abernathy, PLLC

- | | | | |
|--|-------------------------------------|--|---|
| <input type="checkbox"/> Appellant | <input type="checkbox"/> Petitioner | <input type="checkbox"/> Amicus Curiae | <input type="checkbox"/> Criminal Justice Act |
| <input checked="" type="checkbox"/> Appellee | <input type="checkbox"/> Respondent | <input type="checkbox"/> Intervenor | (Appointed) |

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Megan R. Calme Signature: s/ Megan R. Calme

Firm Name: Wilson Elser Moskowitz Edelman & Dicker, LLP

Business Address: 1801 West End Ave. Suite 920

City/State/Zip: Nashville, TN 37203

Telephone Number (Area Code): 615. 324.7840

Email Address: megan.calme@wilsonelser.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

NOT RECOMMENDED FOR PUBLICATION

No. 25-5592

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

FILED
Nov 5, 2025
KELLY L. STEPHENS, Clerk

JEFFREY RYAN FENTON,)	
)	
Plaintiff-Appellant,)	
)	
v.)	ON APPEAL FROM THE UNITED
)	STATES DISTRICT COURT FOR
VIRGINIA LEE STORY, individually and in their)	THE MIDDLE DISTRICT OF
official capacities,)	TENNESSEE
)	
Defendants-Appellees.)	

ORDER

Before: BOGGS, SILER, and KETHLEDGE, Circuit Judges.

This matter is before the court upon a motion to dismiss by defendants-appellees.

Jeffrey Ryan Fenton filed a civil action relating to his state-court divorce proceedings and a proceeding in the United States Bankruptcy Court. The district court granted motions to dismiss by the defendants-appellees on March 26, 2025, and entered a final judgment. Fenton moved for reconsideration; the district court denied that motion on May 19, 2025. On June 20, 2025, Fenton filed a notice of appeal.

Defendants-appellees Roy Patrick Marlin and McArther Sanders Real Estate, Inc., move to dismiss the appeal for lack of jurisdiction due to a late notice of appeal. They argue that Fenton had 30 days from the denial of his motion for reconsideration on May 19, 2025—or until June 18, 2025, within which to file his notice of appeal. They assert that the notice of appeal filed on June 20, 2025, is late and deprives this court of jurisdiction.

In general, in a civil case where neither the United States, a United States agency, nor a United States officer or employee is a party, a notice of appeal must be filed within 30 days after

No. 25-5592

- 2 -

the judgment or order appealed from is entered. 28 U.S.C. § 2107(a); Fed. R. App. P. 4(a)(1)(A). If, however, the United States, a United States agency, or a United States officer or employee is a party, an appellant must file a notice of appeal within 60 days. *See* 28 U.S.C. § 2107(b); Fed. R. App. P. 4(a)(1)(B).

Fenton sued numerous defendants. One of those defendants was United States Bankruptcy Court Judge Charles Walker. Because Judge Walker is an officer or employee of the United States, Fenton had 60 days within which to timely file his notice of appeal. Accordingly, his notice of appeal is timely.

The motion to dismiss for lack of jurisdiction is therefore **DENIED**.

ENTERED BY ORDER OF THE COURT



Kelly L. Stephens, Clerk

United States Court of Appeals for the Sixth Circuit

U.S. Mail Notice of Docket Activity

The following transaction was filed on 11/05/2025.

Case Name: Jeffrey Fenton v. Virginia Story, et al

Case Number: 25-5592

Docket Text:

ORDER filed: The motion to dismiss for lack of jurisdiction [7408233-2] is therefore DENIED. Decision not for publication. Danny J. Boggs, Circuit Judge; Eugene E. Siler, Jr., Circuit Judge and Raymond M. Kethledge, Circuit Judge.

The following document(s) are associated with this transaction:

Document Description: Order

Notice will be sent to:

Mr. Thomas E. Anderson
1187 Old Hickory Boulevard
Suite 125
Brentwood, TN 37027

Mr. Jeffrey Ryan Fenton
17195 Silver Parkway
Unit 150
Fenton, MI 48430

A copy of this notice will be issued to:

Ms. Hilary Ann Ballentine
Ms. Laura Ellen Bassett
Ms. Megan Calme
Ms. Lisa M. Carson
Mr. George Harrison Cate III
Mr. Bret Jacob Chaness
Mr. Benjamin Goldammer
Mr. Erik Halvorson
Mr. William Scott Hickerson
Ms. Kimberly Michelle Ingram-Hogan
Ms. Peako Andrea Jenkins
Ms. Anica C. Jones
Ms. Carolina V. Martin

Ms. Sarah M. Mathews
Mr. Anthony M. Noel
Ms. Courtney Carolann Williams

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

Appearance of Counsel

Appeal No.: 25-5592

Case Title: Jeffrey Fenton vs. Virginia Story, et al

List all clients you represent in this appeal:

Mary Beth Ausbrooks
Rothschilds & Ausbrooks, PLLC

- Appellant Petitioner Amicus Curiae Criminal Justice Act
- Appellee Respondent Intervenor (Appointed)

Check if a party is represented by more than one attorney.

Check if you are lead counsel.

If you are substituting for another counsel, include that attorney's name here:

Carolina V. Martin

By filing this form, I certify my admission and/or eligibility to file in this court.

Attorney Name: Jacquelyne D. Fiala Signature: 

Firm Name: Gordon Rees Scully Mansukhani LLP

Business Address: 4020 Aspen Grove Drive, Suite 500

City/State/Zip: Franklin, TN 37067

Telephone Number (Area Code): 615 772-9000

Email Address: jfiala@grsm.com

Please ensure your contact information above matches your PACER contact information. If necessary, update your PACER account.

CERTIFICATE OF SERVICE

The electronic signature above certifies that all parties or their counsel of record have been electronically served with this document as of the date of filing.

RECEIVED

01/02/2026

KELLY L. STEPHENS, Clerk

**IN THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

JEFFREY RYAN FENTON,

PLAINTIFF

v.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

APPEAL NO. 25-5592

TNMD CASE NO. 3:24-cv-01282¹

TRANSFERRED FROM:

MIWD CASE NO. 1:23-cv-01097

**NOTICE OF PLAINTIFF/APPELLANT ADDRESS CHANGE,
CONTACT INFORMATION UPDATE, AND WEBSITE MIGRATION**

To the Clerks of the Courts for the 6TH-CIR, TNMD, and MIWD, along with all parties of record in both current and precipitating matters:

Please take notice that the mailing address, email address, and website address (primary domain name), for Jeffrey Ryan Fenton, Plaintiff/Appellant in the above-captioned matters, has changed.

My updated information is as follows:

Jeffrey Ryan Fenton
P.O. Box 400
Linden, MI 48451-0400

Phone: (615) 837-1300

Email: notice@fentonvstory.com

Suit Website: <https://fentonvstory.com>, <https://rico.fentonvstory.com>

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.

DOMAIN NAME CHANGE & WEBSITE MIGRATION

I am currently in the process of changing the primary domain name for my website related to this lawsuit (jefffenton.com and rico.jefffenton.com), to move away from using my *personal name*, to use the *case name* instead, in short form (fentonvstory.com and rico.fentonvstory.com).

Redirects have already been created so that both domain naming syntaxes should currently work without issue; however, moving forward I am phasing out the use of jefffenton.com (and all related subdomains) in favor of using fentonvstory.com (and related subdomains).

URL/LINK MIGRATION EXAMPLES

OLD DOMAIN NAME URLS/LINKS	NEW DOMAIN NAME URLS/LINKS
https://jefffenton.com	https://fentonvstory.com
https://service.jefffenton.com	https://service.fentonvstory.com
https://jefffenton.com/digital-service-package-for-lawsuit/	https://fentonvstory.com/digital-service-package-for-lawsuit/
https://notices.jefffenton.com	https://notices.fentonvstory.com
https://jefffenton.com/defendant-notices	https://fentonvstory.com/defendant-notices
https://jefffenton.com/defendant-notices/fenton-filings-since-service/	https://fentonvstory.com/defendant-notices/fenton-filings-since-service/
https://claims.jefffenton.com	https://claims.fentonvstory.com
https://jefffenton.com/defendant-notices/claims-statuses/	https://fentonvstory.com/defendant-notices/claims-statuses/
https://rico.jefffenton.com/...	https://rico.fentonvstory.com/...
https://rico.jefffenton.com/1-23-cv-01097/...	https://rico.fentonvstory.com/1-23-cv-01097/...
https://rico.jefffenton.com/3-24-cv-01282/...	https://rico.fentonvstory.com/3-24-cv-01282/...
https://rico.jefffenton.com/25-5592/...	https://rico.fentonvstory.com/25-5592/...

OLD DOMAIN NAME URLS/LINKS	NEW DOMAIN NAME URLS/LINKS
https://rico.jefffenton.com/discovery/...	https://rico.fentonvstory.com/discovery/...
https://rico.jefffenton.com/evidence/...	https://rico.fentonvstory.com/evidence/...
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-declaration-of-disabilities.pdf	https://rico.fentonvstory.com/evidence/1-23-cv-01097_fenton-declaration-of-disabilities.pdf
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-digital-media-exhibits.pdf	https://rico.fentonvstory.com/evidence/1-23-cv-01097_fenton-vs-story-digital-media-exhibits.pdf
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf	https://rico.fentonvstory.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-document-index.pdf	https://rico.fentonvstory.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-document-index.pdf
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf	https://rico.fentonvstory.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-website-instructional-video.mp4	https://rico.fentonvstory.com/evidence/1-23-cv-01097_fenton-vs-story-website-instructional-video.mp4
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4	https://rico.fentonvstory.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-video-declaration.pdf	https://rico.fentonvstory.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-video-declaration.pdf
https://rico.jefffenton.com/evidence/1-23-cv-01097_plaintiff-flash-drive-1.zip	https://rico.fentonvstory.com/evidence/1-23-cv-01097_plaintiff-flash-drive-1.zip
https://rico.jefffenton.com/evidence/1-23-cv-01097_plaintiff-flash-drive-1-info.pdf	https://rico.fentonvstory.com/evidence/1-23-cv-01097_plaintiff-flash-drive-1-info.pdf

I've tried to structure this migration so that any interested party can simply replace "jefffenton.com" in any URL (link) I have provided or cited throughout this lawsuit; with "fentonvstory.com", and that link should continue to work correctly. If for any reason this does not work or fails to link to the document or resources expected, please notify me immediately at **notice@fentonvstory.com**, so that I can make any needed corrections.

Moving forward, I also plan to *email filing notices* and *communications* to the court and all parties using this new primary email address: "**notice@fentonvstory.com**", to help separate, distinguish, and preserve these communications apart from most of the email and spam I receive.

Please *white-list* this new address (notice@fentonvstory.com) in your email client or spam software, so that you will continue receiving important notices related to the claims in this lawsuit without disruption.

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 to the best of my knowledge and belief.

Executed on December 29, 2025



JEFFREY RYAN FENTON, PRO SE

P.O. Box 400
LINDEN, MI, 48451-0400
NOTICE@FENTONVSTORY.COM
HTTPS://FENTONVSTORY.COM
(P) 615.837.1300
#TNinjustice
#iAMhuman

I'm a natural man, not a corporation or property. Please treat my case accordingly.