

COPY

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE  
AT FRANKLIN

FILED  
WILLIAMSON COUNTY  
CLERK

2019 SEP 26 PM 12:37

FAWN [REDACTED] FENTON, )  
Plaintiff/Wife, )  
v. )  
JEFFREY RYAN FENTON, )  
Defendant/Husband. )

No. 48419B

FILED FOR ENTRY \_\_\_\_\_

**MOTION TO SELL REMAINING CONTENTS OF MARITAL RESIDENCE**

COMES NOW the Plaintiff/Wife, Fawn [REDACTED] Fenton (hereinafter "Wife"), by and through her attorney of record, Virginia Lee Story, and files this Motion to Sell the Contents of Marital Residence and in support of her Motion, would state as follows:

1. This Court entered an Order on August 29, 2019, in which Husband was ordered to vacate the marital residence on or before September 3, 2019 at noon in order for the house to be prepared for auction. The Court entered an Order on August 6, 2019 to auction the property however Husband was dragging his feet in getting packed although he had over thirty (30) days and is not employed outside the home to move and pack his items.
2. As stated above, Husband had the between August 1-29 to pack and move all of the items that he wished to retain from the marital residence. However, because Husband continued to delay the process, this Court entered the August 29, 2019 Order setting Husband's move out date to September 3, 2019 and restricted what items he was able to remove from the home. Pursuant to that Order, Husband was to remove only his personal items (i.e. clothing, toiletries, jewelry and medication) and was to tag any remaining items that he wished to be awarded at the Final Hearing. However, instead of complying with the Court Order he again delayed and continued to write lengthy

emails about why he could not pack his items and addressing wild animals on the property and conditions of the home that were irrelevant to the process of his packing and vacating.

3. Despite having five (5) days following the August 29, 2019 hearing to get his personal items packed and tag any other items he wished to retain, Husband left the home in a state of disarray after having to be forcibly removed by the Sheriff's Department on September 3, 2019. Husband continued to send lengthy emails without addressing what was to be done with all the furnishings that he said that he wanted but did not tag as requested. Wife has had to work tirelessly at the property to get it in condition for the auction on September 28, 2019.
4. Thereafter, Husband sent numerous e-mails to counsel for Wife with extensive lists of items that he wished to retain from the marital residence that he did not tag as he was ordered to do per the August 29, 2019 Order. Furthermore, Husband had not paid the utilities at the home as he stated from the rent money he was receiving and on September 2, 2019, he notified Wife through counsel that he was in arrears utilities and that he had received a cut off notice. Wife later learned that Husband had called all three (3) utility companies (NES Electric, Piedmont Natural Gas and HVUD water) on or before September 22, 2019 and requested that each utility in his name be shut off. Husband did not make Wife's counsel aware that he had had these utilities shut off. In order to have the utilities turned back on, so that the house could be ready for auction, Wife had to set up new accounts in her own name. To date, Wife has paid \$293.47 to NES to prevent the electric from being disconnected pending the closing on the home.
5. Counsel for Wife sent a letter to Husband on September 16, 2019 requesting funds to

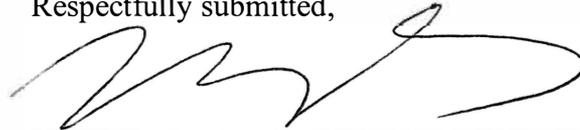
help pack and move the property he tagged. Counsel requested that a storage facility be secured if Husband wanted his items stored. At this point, Wife has no choice but to move the items to the basement that Husband has tagged so that the house is presentable for auction. However, after the auction on September 28, 2019, Husband needs to either send funds for the movers to move his items to storage and pay the storage facility fee or the items need to be sold or discarded. In correspondence to Husband dated September 26, 2019, counsel for Wife provided a firm date of October 2, 2019 for Husband to produce the funds to pay for the packing, moving and storage of the items he wishes to retain. It is anticipated that Husband will have funds from the closing to pay for his items to be shipped to Michigan if he so chooses, but he needs to decide if he wants everything shipped or a portion thereof as soon as possible. In the interim, Wife has lost her job and she has no funds to advance to pay the movers and does not have the funds to secure a storage unit for Husband nor would she feel comfortable signing a rental agreement for a storage facility for Husband. Wife is amenable to managing the removal of the remaining items either by selling, donating, giving away or discarding anything remaining in the home. Wife would keep an inventory of any items sold and deposit any funds received into the Clerk's office if the Court directs her to do so.

6. Husband's actions have left Wife in a position to have to deal with packing, moving and storing items remaining in the marital residence so that it will show well at auction and bring in an optimal sales price. Husband should be required to pay all of Wife's attorney's fees for having to file this Motion and deal with the aftermath of his failing to follow the Court Order.

7. Wife obtained a quote from Fox Moving and Storage of Nashville (attached hereto as **Exhibit 1**) for packing, storing and moving all of the items that Husband wishes to retain. The cost of moving these items to Michigan, where Husband is currently residing, would be in excess of \$6,000.00 which is not financially feasible for the parties at this time. Further, the cost to pack, move and store the items in a storage facility in Nashville would be over \$3,000.00, with a monthly storage fee of \$495.00. The entire remaining contents of the home are not even valued at more than \$3,000.00.
8. Wife requests that she be allowed to sell, donate, give away or discard any remaining items not tagged in the marital residence. Any proceeds from the sale of said items will be placed in escrow with the Clerk & Masters Office for distribution at the Final Hearing of this matter which is currently scheduled for October 21, 2019.

WHEREFORE, premises considered, Wife respectfully requests that this Court grant her Motion and that she be awarded her attorney fees for having to bring this Motion.

Respectfully submitted,



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**VIRGINIA LEE STORY; BPR #11700**

*Attorney for Plaintiff/Wife*

136 Fourth Avenue, South

Franklin, Tennessee 37064

(615) 790-1778

[virginia@tnlaw.org](mailto:virginia@tnlaw.org)

**THIS MOTION IS SET TO BE HEARD ON OCTOBER 10, 2019 AT 9:00 A.M. ON THE CHANCERY COURT MOTION DOCKET HEARD AT THE WILLIAMSON COUNTY COURTHOUSE. IF NO WRITTEN RESPONSE TO THIS MOTION IS FILED AND SERVED IN THE TIME SET BY THE LOCAL RULES OF PRACTICE, THE MOTION MAY BE GRANTED WITHOUT A HEARING.  
TESTIMONY EXPECTED**

**From:** Amanda Smith <info@foxmoving.com>  
**Sent:** Monday, September 23, 2019 5:56 PM  
**To:** [REDACTED]  
**Subject:** Your Moving Estimate!

**Fox Moving and Storage**  
5030 Harding Place  
Nashville, TN 37211  
DOT: 1670280, MC: 613943  
[www.foxmoving.net](http://www.foxmoving.net)  
Ph: 615-770-3000  
Fax: 615-835-3865  
**Amanda Smith**  
9/23/2019  
Reference #: **1475587**

**Fox Moving and Storage - Your Moving Estimate!**

Dear **Fawn Fenton**:

My name is **Amanda Smith** and I have been assigned as your Certified Moving Consultant. My email is [amanda@foxmoving.com](mailto:amanda@foxmoving.com) and my phone number is **615-770-3000**.

**Please see below for your moving estimate:**

**Quote**

Based on the information you provided, cost is as follows:

**Custom Charges:**

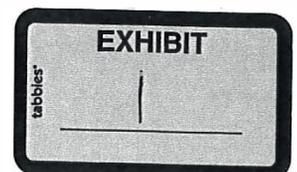
- \* 1/2 Roll of Shrink ..... 1 x \$60.00 ea = \$60.00
- \* Small box / Packed ..... 3 x \$10.00 ea = \$30.00
- \* Medium box / Packed ..... 25 x \$11.00 ea = \$275.00
- \* Large box / Packed ..... 1 x \$12.00 ea = \$12.00
- \* Dishpack / Packed ..... 2 x \$24.00 ea = \$48.00
- \* Large Picture / Packed ..... 5 x \$30.00 ea = \$150.00
- \* LG Flat screen ..... 1 x \$40.00 ea = \$40.00
- \* Wardrobe / Packed ..... 1 x \$24.00 ea = \$24.00

**Miscellaneous Items:**

- \* Relocation service 1 truck 3 men to Fox Storage ..... = \$2,256.00
- \* Optional full value protection \$1074 (not included in price) ..... =

**Total Price: ..... \$2,895.00**

**TOTAL ESTIMATE: ..... \$2,895.00**



<b>Origin</b>	<u>1986 Sunnyside Drive, Brentwood, TENNESSEE 37027</u> <b>1255.94Cf - 8797Lbs</b>
<b>Destination</b>	<u>5030 Harding Place, Nashville, TENNESSEE 37211</u>

<b>Reference #</b>	<b>Customer:</b>	<b>Move Date:</b>
1475587	Fawn Fenton, 615-████-7377	9/26/2019

<b>Garage</b>			
Totes	Qty: 11	66 Cuft	462 Lbs
PBO, Box	Qty: 11	47.19 Cuft	330 Lbs
Box, Medium	Qty: 7	21 Cuft	147 Lbs
Metal Shelves	Qty: 5	25 Cuft	175 Lbs
Trash Can	Qty: 1	7 Cuft	49 Lbs
Misc	Qty: 1	10 Cuft	70 Lbs
<b>Kitchen</b>			
Microwave	Qty: 1	4 Cuft	28 Lbs
Box, Medium	Qty: 3	9 Cuft	63 Lbs
Box, Dish-Pack	Qty: 1	6 Cuft	42 Lbs
<b>Living Room</b>			
Glass top table	Qty: 1	5 Cuft	35 Lbs
Picture	Qty: 1	0.71 Cuft	5 Lbs
Cabinet	Qty: 1	20 Cuft	140 Lbs
Tv	Qty: 1	20 Cuft	140 Lbs
Box, Dish-Pack	Qty: 1	6 Cuft	42 Lbs
Table, end	Qty: 1	5 Cuft	35 Lbs
Sofa	Qty: 2	80 Cuft	560 Lbs
Sofa Section	Qty: 1	20 Cuft	140 Lbs
Rug or Pad, Large	Qty: 1	10 Cuft	70 Lbs
Misc	Qty: 1	10 Cuft	70 Lbs
Box, medium	Qty: 1	3 Cuft	21 Lbs
<b>Dining Room</b>			
Picture	Qty: 1	0.71 Cuft	5 Lbs
Dining Chair	Qty: 6	30 Cuft	210 Lbs
Dining table	Qty: 1	30 Cuft	210 Lbs
Pedestal	Qty: 1	10 Cuft	70 Lbs
<b>Bedroom</b>			
Box, Medium	Qty: 1	3 Cuft	21 Lbs
Desk Chair	Qty: 1	5 Cuft	35 Lbs
Ottoman	Qty: 1	5 Cuft	35 Lbs
<b>Office</b>			
Desk, Computer	Qty: 4	88 Cuft	616 Lbs
Picture	Qty: 4	2.84 Cuft	20 Lbs
Desk Chair	Qty: 1	5 Cuft	35 Lbs
Lamp, Floor	Qty: 1	3 Cuft	21 Lbs
Box, medium	Qty: 5	15 Cuft	105 Lbs
Bookshelf	Qty: 1	5 Cuft	35 Lbs

Printer	Qty: 1	4 Cuft	28 Lbs
Printer	Qty: 1	6 Cuft	60 Lbs
Lateral File	Qty: 1	20 Cuft	140 Lbs
<b>Bedroom #2</b>			
Bed, Queen	Qty: 1	65 Cuft	455 Lbs
Box, large	Qty: 1	5 Cuft	35 Lbs
Vacuum Cleaner	Qty: 1	5 Cuft	35 Lbs
Box, Medium	Qty: 1	3 Cuft	21 Lbs
<b>Bathroom</b>			
Box, Medium	Qty: 2	6 Cuft	42 Lbs
Bookshelf	Qty: 1	5 Cuft	35 Lbs
<b>Master Bedroom</b>			
Box, Wardrobe Lrg	Qty: 1	15 Cuft	105 Lbs
Box, Medium	Qty: 4	12 Cuft	84 Lbs
Chair, Occasional	Qty: 1	15 Cuft	105 Lbs
Bed, Queen	Qty: 1	65 Cuft	455 Lbs
Lamp, Floor	Qty: 1	3 Cuft	21 Lbs
Totes	Qty: 2	12 Cuft	84 Lbs
Clothes Hamper	Qty: 1	5 Cuft	35 Lbs
<b>Family Room</b>			
Bookcase	Qty: 1	20 Cuft	140 Lbs
Totes	Qty: 11	66 Cuft	462 Lbs
Table, small	Qty: 1	2 Cuft	14 Lbs
File Cabinet 4-5 Dr	Qty: 2	40 Cuft	280 Lbs
Box, medium	Qty: 1	3 Cuft	21 Lbs
Box, small	Qty: 3	6 Cuft	

**Tommy Anderson, Broker/Realtor/Auctioneer**  
**HND Realty**  
[www.HNDREALTY.COM](http://www.HNDREALTY.COM)  
**(615) 969-5819**

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE  
AT FRANKLIN

FAWN [REDACTED] FENTON,	)	
Plaintiff/Wife,	)	
	)	
v.	)	No. 48419B
	)	
JEFFREY RYAN FENTON,	)	
Defendant/Husband.	)	

**NOTICE OF ELECTRONICALLY TRANSMITTED DOCUMENT**  
**PURSUANT TO T.R.C.P RULE 5.02**

Pursuant to Rule 5.02(2)(a) of the Tennessee Rules of Civil Procedure, Plaintiff, Fawn [REDACTED] Fenton, by and through her attorney of record, Virginia Lee Story, hereby serves this Notice of Electronically Transmitted Documents upon Defendant, Jeffrey Ryan Fenton as follows:

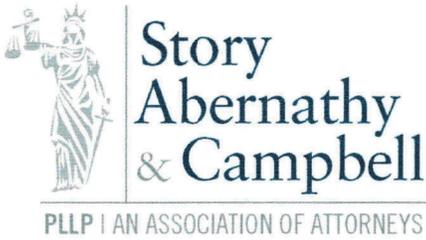
**Document(s) Transmitted:** MOTION TO SELL REMAINING  
CONTENTS OF MARITAL  
RESIDENCE

**Number of pages:** 8

**Sender's Name and  
Email Address:** Kathryn L. Yarbrough  
[kyarbrough@tnlaw.org](mailto:kyarbrough@tnlaw.org)  
on behalf of Virginia Lee Story

**Name/ E-mail Address  
of Recipient(s):** Jeffrey Ryan Fenton  
[REDACTED]

*If you did not receive the above listed document(s), please notify the sender immediately to receive an electronic or physical copy of this document.*



Virginia Lee Story\*  
virginia@tnlaw.org

Joanie L. Abernathy  
joanie@tnlaw.org

Neil Campbell\*  
neil@tnlaw.org

Kathryn L. Yarbrough  
kyarbrough@tnlaw.org

Of Counsel:  
James E. Story,\*  
Attorney at Law

Marissa L. Walters  
marissa@tnlaw.org

HISTORIC DOWNTOWN  
FRANKLIN, TENNESSEE  
136 Fourth Avenue South  
Franklin, TN 37064

OFFICE (615) 790-1778  
FAX (615) 790-7468

\*Licensed in Kentucky

September 26, 2019

Via First Class Mail and E-Mail

Mr. Jeffrey Fenton  
17195 Silver Parkway, #150  
Fenton, MI 48430

Re: Fawn [REDACTED] Fenton vs. Jeffrey Ryan Fenton  
Williamson County Chancery Court No. 48419B

Dear Mr. Fenton:

**OH WOW!!!** This just doesn't STOP! **Judge Michael W. Binkley refused to perform his JUDICIAL DUTY** to equality, impartiality, fairness, due process, mitigating loss, and stopping CRUEL MISCONDUCT by a FRIEND! (This was a DIVORCE, can I possibly LIVE through this?)

To follow up on correspondence sent to you on September 16, 2019, we never received any information on a storage unit you would like to use to store the extensive list of items you wish to retain from the Sunnyside residence. Therefore, Ms. Fenton took it upon herself to obtain a quote from Fox Moving and Storing to have these items packed, moved and stored. **The quote is attached hereto.** As you can see, the cost for packing only your personal items (i.e. remaining clothing, photos, etc.) is \$639.00. The cost for moving the larger items and your personal items is \$2,895.00. This would include moving the items to Fox's storage facility in Nashville. The cost to store these items in their storage facility would be approximately \$495.00 per month. Finally, to have all of these items packed and moved to Michigan, the cost would be over **\$6,000.00.**

At this point, it is our position that moving the items to Michigan is not financially responsible but that is up to you if you want to use any proceeds you received to have your items shipped. It is our position and that of Mr. Anderson's that the entire value of the remaining contents of the home is only approximately **\$3,000.00**, therefore the cost to move and store these items far outweighs their worth. However, if you would like for the items to be packed and stored in the Fox storage facility in Nashville then you will need to send a check to my office in the amount of **\$3,534.00** no later than next Wednesday, **October 2, 2019**, made payable to Fawn Fenton and she will schedule the movers and the storage facility for one month until you decide if you want to have the items moved to Michigan. **The only other option is to have the remaining property sold and any proceeds will be placed in the Clerk & Masters office for distribution at a later date. We will go ahead and file a Motion with the Court to sell or otherwise get rid of all remaining items in the home in the event that you do not agree to pay the cost for packing, moving and storing the items that you wish to retain.**

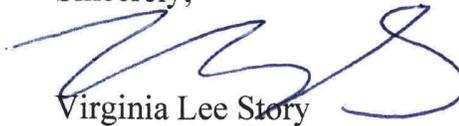
Then it doesn't SOUND like you FORCED me to LEAVE my Personal Property behind so that you can SELL it for any quasi-legitimate reason, but rather just to CRUELY HARM the disabled and financially disadvantaged party, EVEN MORE! PURELY for the DOMINATING POWER-TRIP, and FUN! That's WORSE than being GREEDY! **That is SICK and SADISTIC!** (Yet there's more still to come...) Is there any INTEGRITY at all within the Williamson County Chancery Court??? I can't see HOW on EARTH this is remotely JUSTIFIABLE!

Jeffrey Fenton  
September 26, 2019  
Page 2

Finally, you still have not disclosed where all of your guns are located. Please advise where they are located with the contact information or whether you have taken them with you to Michigan. If you have any guns in your possession, please provide an itemized list of all guns that you removed, manufacturers, and models.

I thank you in advance for your prompt response to these time sensitive matters.

Sincerely,



Virginia Lee Story  
Attorney at Law

Enclosure  
cc: Ms. Fawn Fenton

**The most LAWLESS person I have ever met, on EITHER side of the LAW! Attorney Virginia Lee Story believes that I'll endlessly allow her to BULLY, ABUSE, ROB, RAPE, and TERRORIZE me and my family "under color of law"! SORRY! NO COURT OF LAW has the AUTHORITY or JURISDICTION for what you have DONE! EVERYTHING IS VOID IN #48419B and I'm pressing CRIMINAL CHARGES for at least a HALF-DOZEN State, Federal, and CONSTITUTIONAL FELONIES, which YOU committed along with the "help" of SEVERAL of your "FRIENDS"! You and Judge Michael W. Binkley can KILL me if you want, while the WHOLE WORLD WATCHES! I've already had extensive communications with the DOJ. I tracked down the same Nashville FBI "Special Agent" who Arrested Corrupt Nashville Judge Casey Moreland, after getting tired of being rejected by their call centers. You have MISJUDGED my courage! I will EXPOSE your crimes to every member of State and Federal Law Enforcement, local government, and Courts throughout the Country, until somebody cuts this CANCER out of the Williamson County Chancery Court! I know that I'm risking my own LIFE, but I'd rather die as a FREE man than live as your SLAVE! (Peaceful Protests!) I just hope the FBI/DOJ catches you in any further harm you try to cause me and my family, because I KNOW you will!**

JUDGE MICHAEL W. BINKLEY & ATTORNEY VIRGINIA LEE STORY vs JEFFREY RYAN FENTON  
WILLIAMSON COUNTY CHANCERY COURT | 08/29/2019 | #48419B | M2019-02059 | R.v4 (502:20 - 503:9)

20 MS. STORY: If he will tag the items that  
21 he wants, like my client tagged the items per your  
22 order, if he'll just put a tag on items he wants,  
23 we'll make sure that those get stored, and then we can  
24 use the proceeds from the sale. We're going to  
25 deposit those into the clerk's office. And we can use  
1 those to pay the next storage unit and then when he  
2 gets ready to come here and get his things, or maybe  
3 he wants to use some of his proceeds to have them  
4 shipped to him...

6 So I'm trying my best to be as  
7 accommodating to him...  
8 this is going to be a simple process for him.



Charles M. Walker  
U.S. Bankruptcy Judge  
Dated: 9/27/2019



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

IN RE:	)		
	)		
FAWN ██████████ FENTON	)	CHAPTER	13
██████████	)	CASE NO:	19-02693
BRENTWOOD, TN 37027	)	JUDGE	WALKER
SSN: XXX-XX-████65	)		
	)		
DEBTOR	)		

**ORDER GRANTING EXPEDITED MOTION TO SELL REAL ESTATE AND PERSONAL PROPERTY**

This matter came before the Court on September 25, 2019 upon the Debtor’s Expedited Motion to Sell Real Estate and Personal Property with notice given to all parties pursuant to Local Rule 9075-1. There being no objections raised at the call of the docket, the Motion is found to be well taken and it is therefore ORDERED as follows:

Debtor shall be allowed to sell real property located at 1986 Sunnyside Drive, Brentwood, Tennessee and items of personal property remaining in the house at auction pursuant to an Order Granting Motion to Sell Marital Residence by Auction entered in the Chancery Court for Williamson County, Tennessee on August 6, 2019 . The Debtor will sell the real estate under Section 363(f)(3) subject to the liens of Bank of America, N.A. and Bancorp South. This transaction shall be conditioned on the Debtor providing the auction report to the Trustee once the sale has taken place. All net proceeds from the sale of the property shall be deposited into the Chancery Court Clerk’s Office and placed in an interest bearing account on behalf of the parties pending further orders of the Chancery Court for Williamson County, Tennessee.

IT IS SO ORDERED.

*THIS ORDER WAS SIGNED AND ENTERED ELECTRONICALLY AS INDICATED AT THE TOP OF THE FIRST PAGE.*

APPROVED FOR ENTRY:

/s/ Alex Koval

Alex Koval  
ROTHSCHILD & AUSBROOKS, PLLC  
Attorney for Debtor(s)  
1222 16<sup>th</sup> Avenue South, Suite 12  
Nashville, TN 37212-2926  
(615) 242-3996 (telephone)  
(615) 242-2003 (facsimile)  
[notice@rothschildbklaw.com](mailto:notice@rothschildbklaw.com)

This Order has been electronically signed. The Judge's signature and Court's seal appear at the top of the first page.  
United States Bankruptcy Court.

Case 3:19-bk-02693 Doc 66 Filed 09/27/19 Entered 09/27/19 11:34:45 Desc Main Document Page 2 of 2

**COPY**

**IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE  
AT FRANKLIN**

FILED  
WILLIAMSON COUNTY  
CLERK & MASTER

**FAWN [REDACTED] FENTON,**  
Plaintiff/Wife,

)  
)  
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)

vs.

**No. 48419B**

**JEFFREY RYAN FENTON,**  
Defendant/Husband.

2019 OCT 10 PM 2:34

FILED FOR ENTRY \_\_\_\_\_

**NOTICE OF FILING**

COMES NOW Virginia Lee Story, on behalf of Plaintiff, Fawn [REDACTED] Fenton, as her Attorney of Record in this matter, and hereby files the attached Order Granting Expedited Motion to Sell Real Estate and Personal Property entered by the United States Bankruptcy Court for the Middle District of Tennessee on September 27, 2019.

Respectfully submitted,



**VIRGINIA LEE STORY; BPR #11700**  
Attorney for Plaintiff  
136 Fourth Avenue South  
Franklin, TN 37064  
(615) 790-1778  
virginia@tnlaw.org

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was forwarded via U.S. first-class mail to:

Mr. Jeffrey Fenton  
17195 Silver Parkway, #150  
Fenton, MI 48430

on this the 10 day of October, 2019.



**VIRGINIA LEE STORY**