EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

JEFFREY RYAN FENTON

Plaintiff,

CASE NO. 1:23-cv-01097
HON. PAUL L. MALONEY

vs.

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

https://rico.jefffenton.com/evidence/2024-09-16_affidavit-of-virginia-lee-story.pdf Case 1:23-cv-01097-PLM-RSK (FENTON v. STORY et al.)

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

Defendants,

JEFFREY RYAN FENTON
IN PRO PER
17195 Silver Parkway #150
Fenton, MI 48430-3426
Tel: (615) 837-1300
contact@jefffenton.com

VALERIE HENNING MOCK (P55572)
NICOLE L. GETTLER (P76130)
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP
Attorneys for Defendants, Virginia Lee Story, and Story and Abernathy, PLLP
Laurel Office Park III
17197 N. Laurel Park Drive, Suite 201
Livonia, MI 48152
Tel: (313) 327-3100
valerie.mock@wilsonelser.com
nicole.gettler@wilsonelser.com

AFFIDAVIT OF VIRGINIA LEE STORY

STATE OF TENNESSEE)
) ss:
COUNTY OF WILLIAMSON)

Virginia Lee Story, being duly sworn deposes and states:

1. My name is Virginia Lee Story.

2. I am over 18 years of age, of sound mind, and am otherwise capable of executing this Affidavit.

3. My home address is in Franklin, Tennessee.

4. I am a resident of the State of Tennessee.

5. I am a partner at the law firm, Story and Abernathy, PLLP, which is located in Franklin, Tennessee.

6. I am a licensed attorney in the State of Tennessee.

7. I have never lived in the State of Michigan.

8. I am not a licensed attorney in the State of Michigan.

9. I have never practiced law in the State of Michigan *pro hac vicci*, or otherwise.

10. None of the attorneys at my law firm, Story and Abernathy, PLLP, are licensed in the State of Michigan, nor have any practiced law in the State of Michigan *pro hac vicci*, or otherwise.

11. I have never conducted any activity in Michigan related to Plaintiff.

12. Story and Abernathy, PLLP has never conducted any activity in Michigan related to Plaintiff.

13. I represented Plaintiff's ex-wife in a 2019 divorce proceeding that was adjudicated in the State of Tennessee.

14. Accordingly, the substantial part of the events giving rise to the Complaint did not occur in Michigan.

Further affiant sayeth not.

Virginia Lee Story

Sworn to and subscribed before me
this 16th day of September, 2024.

Notary Public
My Commission Expires: 12/21/24

LEAH A DANIELSON
STATE OF TENNESSEE NOTARY PUBLIC
COUNTY OF WILLIAMSON

302123661v.1

https://rico.jefffenton.com/evidence/2024-09-16_affidavit-of-virginia-lee-story.pdf Case 1:23-cv-01097-PLM-RSK (FENTON v. STORY et al.)