

STATE OF TENNESSEE  
SUMMONS

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

FAWN ██████████ FENTON  
Plaintiff

vs.

JEFFREY RYAN FENTON  
Defendant

FILED FOR ENTRY

CIVIL ACTION NO. 48419B

Service By:

Sheriff

Attorney

Sec. Of State

Comm. of Insurance

To the above-named Defendant:

Jeffrey Ryan Fenton  
1986 Sunny Side Drive  
Brentwood, TN 37027

You are hereby summoned and required to serve upon Virginia L. Story, Esq., Plaintiff's attorney, whose address is 136 Fourth Avenue South, Franklin, Tennessee 37064, an answer to the complaint which is herewith served upon you within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Witnessed and issued, Elaine B. Beeler, Clerk and Master for said Court at office this 4 day of June, 2019.

Jacqueline Edwards  
Clerk & Master

NOTICE:

To the Defendant(s): Tennessee law provides a ten thousand dollar (\$10,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the terms you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Mail list, including docket number, to: Clerk and Master, P.O. Box 1666, Franklin, TN 37065.

DEFT. / WITNESS COPY

**RETURN ON PERSONAL SERVICE OF SUMMONS**

I hereby certify and return that I served this summons together with the complaint as follows:

Check one: (1) or (2) are for the return of an authorized officer or attorney; an attorney's return must be sworn to; (3) is for the witness who will acknowledge service and requires the witness's signature.

- 1. I certify that on the date indicated below I served a copy of this summons on the witness stated above by \_\_\_\_\_
- 2. I failed to serve a copy of this summons on the witness because \_\_\_\_\_
- 3. I acknowledge being served with this summons on the date indicated below:

DATE OF SERVICE: \_\_\_\_\_

SIGNATURE OF WITNESS, OFFICER OR ATTORNEY: \_\_\_\_\_

ADDRESS OF PROCESS SERVER (TRCP 4.01) \_\_\_\_\_

Signature of Notary Public or Deputy Clerk: \_\_\_\_\_

Commission Expires: \_\_\_\_\_

**RETURN ON SERVICE OF SUMMONS BY MAIL**

I hereby certify and return that on the \_\_\_\_\_ day of \_\_\_\_\_, 2019, I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case no. \_\_\_\_\_ to the defendant \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 2019. I received the return receipt, which had been signed by \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 2019. The return receipt is attached to this original summons to be filed by the Chancery Court Clerk and Master.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Address (TRCP 4.01)

Sworn to and subscribed before me on this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
Signature of Notary Public or Deputy Clerk

Commission Expires: \_\_\_\_\_

**CERTIFICATION (IF APPLICABLE)**

I hereby certify this to be a true and correct copy of the original summons issued in this case.

*Jacqueline Edwards*  
 \_\_\_\_\_  
 CLERK & MASTER



For ADA assistance, please call ADA coordinator: 615-790-5428

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE  
AT FRANKLIN

FAWN [REDACTED] FENTON,  
Plaintiff/Wife,

v.

JEFFREY RYAN FENTON,  
Defendant/Husband.

FILED FOR ENTRY  
JUN -4 PM 3:35

No. 48419 B

**COMPLAINT FOR DIVORCE**

Plaintiff, makes the following complaint for absolute divorce against, Defendant, and states as follows:

**I.**

Pursuant to Tenn. Code Ann. §36-4-106(b), Plaintiff has filed under seal the parties' statistical information, and further provides as follows:

Husband		Wife
Jeffrey Ryan Fenton	Full Name (and Maiden)	Fawn [REDACTED] Fenton ( [REDACTED] )
1986 Sunny Side Drive Brentwood, TN 37027	Mailing Address	[REDACTED] Brentwood, TN 37027
24 years	Length of Residence in TN	20 years
[REDACTED] [REDACTED]	Date and Place of Birth	[REDACTED] [REDACTED]
Caucasian	Race	Caucasian
3	Number of this marriage	2
Divorce	How did prior marriages end	Divorce
12	Years of Education	16
[REDACTED]	Employer Name and Address	[REDACTED] Architects, Inc. 3322 West End Avenue, Suite 103 Nashville, TN 37203

The parties were married on October 16, 2005 in Davidson County, Tennessee.



Plaintiff has resided in the State of Tennessee more than six (6) months preceding the filing of this complaint. The acts complained of were committed while the Plaintiff was a bona fide resident of Tennessee.

**II.**

There are no children born of this marriage.

**III.**

Plaintiff would show that the parties have been experiencing difficulties in their marriage and all attempts at reconciliation have failed, thus rendering the marriage irreconcilably broken. Plaintiff requests that she be granted a divorce based on the grounds of irreconcilable differences, or in the alternative, if the parties are unable to reach an amicable agreement, then Plaintiff requests that she be granted a divorce on grounds of inappropriate marital conduct.

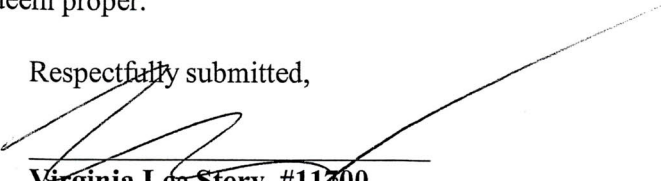
**IV.**

Plaintiff would show that the parties have no assets other than personal property which has been divided with the exception of a few items. Husband and Wife have lived separately since April 2018. Husband refuses to work and has not paid the mortgage payment or assisted with the mortgage payment or the bills of the home. Wife has spoken to Husband and made every attempt to have the house listed and Husband previously agreed in 2018 but then refused. Wife cannot continue to pay the mortgage payment and allow Husband to stay in the house without financial help. Husband has rented two of the bedrooms out and he retains the rent. Husband ran up over \$10,000 in credit card debt in Wife's name. Wife has now had to file bankruptcy to manage the debt accrual which debt all in her name as Husband has not any credit since 2016. Wife requests that the house be sold immediately. Wife requests that she be awarded her attorney's fees.

WHEREFORE, Plaintiff prays for the following relief:

1. That Defendant be served and required to answer within the time allowed by law, his oath being waived.
2. That Plaintiff be awarded an absolute divorce from Defendant and be restored to all the rights and privileges of an unmarried person.
3. That the Court approve a Marital Dissolution Agreement, if entered into between the parties; or, in the alternative if the parties cannot reach an agreement, that the Court make an equitable distribution of the parties' real and personal property and the parties' debts.
4. That the Plaintiff be awarded reasonable attorneys fees; and that costs be taxed to Defendant.
5. For all other relief this Court may deem proper.

Respectfully submitted,



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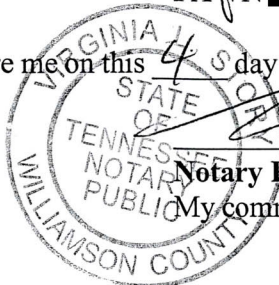
**Virginia Lee Story, #11700**  
**Kathryn L Yarbrough, #32789**  
*Attorneys for Plaintiff*  
136 Fourth Avenue South  
Franklin, TN 37064  
(615)-790-1778  
[virginia@tnlaw.org](mailto:virginia@tnlaw.org)  
[kyarbrough@tnlaw.org](mailto:kyarbrough@tnlaw.org)

STATE OF TENNESSEE )  
COUNTY OF WILLIAMSON )

I, **Fawn [REDACTED] Fenton**, after first being duly sworn in accordance with the law make oath that I am the Complainant in the foregoing Complaint for Absolute Divorce and that the facts stated therein are true and correct to the best of my knowledge, information and belief and that the Complaint is not made out of levity or by collusion with the Defendant, but out of sincerity and truth for the causes alleged in the Complaint.

*Fawn [REDACTED] Fenton*  
FAWN [REDACTED] FENTON

Sworn to and subscribed before me on this 4 day of June, 2019.



*[Signature]*  
Notary Public  
My commission expires: 9-24-22

**FAWN [REDACTED] FENTON v. JEFFREY RYAN FENTON**

**STATISTICAL INFORMATION FOR DIVORCING PARTIES  
FILED UNDER SEAL**

The following statistical information is provided under seal pursuant to T.C.A. Section 36-

04-106(b):

48419B

<b>Husband</b>		<b>Wife</b>
<b>Jeffrey Ryan Fenton</b>	<b>Full Name (and Maiden)</b>	<b>Fawn [REDACTED] Fenton</b> [REDACTED]
<b>1986 Sunny Side Drive Brentwood, TN 37027</b>	<b>Mailing Address</b>	[REDACTED] <b>Brentwood, TN 37027</b>
[REDACTED]	<b>Date of Birth</b>	[REDACTED]
[REDACTED]	<b>Social Security Number</b>	[REDACTED]

**There are no children born of this marriage.**

FILED FOR ENTRY  
2019 JUN -4 PM 3:35  
WILLIAMSON COUNTY  
CLERK & MASTER

**DEFT. / WITNESS COPY**

IN THE CHANCERY COURT OF WILLIAMSON COUNTY, TENNESSEE

Fawn [redacted] Fenton )  
WILLIAMSON COUNTY  
CLERK & MASTER

2019 JUN -4 ) PM 3: 35

vs. Jeffrey Ryan Fenton )

NO. 48419 B

FILED FOR ENTRY 6/4/19

**TEMPORARY RESTRAINING ORDER**

Pursuant to T.C.A. § 36-4-106 (d), it is hereby ORDERED as follows:

1. Each party is hereby restrained and enjoined from transferring, assigning, borrowing against, concealing or in any way dissipating or disposing of any marital property without permission of the Court or by consent order.
2. Expenditures from current income to maintain the marital standard of living and usual and ordinary costs of operating a business are not restricted by this injunction. Each party shall maintain records of all such expenditures and provide copies to the other party upon request.
3. Each party is restrained and enjoined from voluntarily canceling, modifying, terminating, assigning or allowing to lapse for non-payment of premiums any insurance policy of a party or in which a party or child of the parties has an interest without permission of the Court or by consent order.
4. Each party is restrained and enjoined from harassing, threatening, assaulting or abusing the other party and from making disparaging remarks about the other party to or in the presence of any children of the parties or to an employer of a party.
5. Each party is restrained and enjoined from hiding, destroying or spoiling, in whole or in part, any evidence electronically stored or on computer hard drives or other memory storage devices
6. Each party is restrained and enjoined from relocating any children of the parties outside the State of Tennessee or for more than 50 miles from the marital home without permission of the Court or by consent order, except in the case of a removal based upon a well-founded fear of physical abuse against either the fleeing parent or the child. In such latter case, upon the request of the non-relocating parent, the Court will conduct an expedited hearing to determine the reasonableness of the relocation and to make such other orders as appropriate. Nothing herein shall preclude the Court from revising, modifying or expanding the terms of this order pursuant to T.R.C.P. 65.07.

Entered this 4 day of June, 20 19.

*Deanna B. Johnson*  
Chancellor

**Clerk's Certificate of Service**

I hereby certify that a true and exact copy of the foregoing Order has been mailed or delivered to all parties and/or counsel of record.

This the 4 day of June, 20 19.

*Jacqueline Edwards*  
Clerk and Master

DEFT. / WITNESS COPY