

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE

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2015 OCT 16 AM 11:26

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W/D OF TN MEMPHIS

Earley Story  
Plaintiff,  
vs

Civil Action No. 15-2540-JDT tmp

Tre Hargett, Secretary of the State of Tennessee  
Richard Holden, Shelby County Election Commission  
Mark Goins, Tennessee Election Coordinator  
Cara Harr, Tennessee HAVA Attorney

REQUEST TO DENY THE STATE'S MOTION TO DISMISS THIS CASE

This plaintiff respectfully request this court to deny the motion of the State of Tennessee to dismiss for the following reasons;  
This plaintiff retained the services of Memphis process server Djenada M. Dunlap, Mid-America Training Center and Nashville  
process server Ricky Cooper of Just In Case Process Service Co.

The proper court summons was delivered to both servers and were paid their service fee.

Both servers returned defective proof of service documents to this writer and served correct summons to the Tennessee  
Attorney General's Office.

A complaint has been filed with the United States Department of Justice, Attorney General Loretta Lynch. ( assigned ID #  
309872).

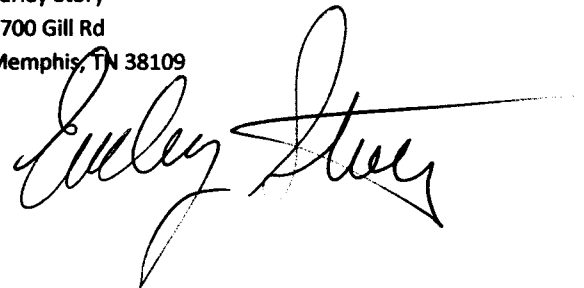
Process server Ricky Cooper signed the federal proof of service form and declared under the penalty of perjury that no fee was  
given to him his service.

Enclosed is a copy of the payments made to both servers.

Enclosed also are the summons that were returned to this plaintiff.

I have paid the required \$400. 00 filing fee and I pray that this court will not dismiss this case prior to a possible investigation by  
the USDOJ.

Earley Story  
4700 Gill Rd  
Memphis, TN 38109



cc: United States Department of Justice  
cc: Racheal Davis, Tennessee Attorney General's Office