

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY

JANE DOE; CHRISSY MILLER;)

Plaintiff-Petitioners,)

v.)

TENNESSEE DEPARTMENT OF)

SAFETY AND HOMELAND)

SECURITY; JEFF LONG, in his official)

capacity as the Commissioner of)

Tennessee's Department of Safety and)

Homeland Security; and MICHAEL)

HOGAN, in his official capacity as the)

Assistant Commissioner of the Driver)

Services Division for Tennessee's)

Department of Safety and Homeland)

Security,)

Defendants.)

Case No. 24-0503-III

Chancellor Myles

DEFENDANTS' MOTION TO DISSOLVE THE TEMPORARY INJUNCTION

Defendants Tennessee Department of Safety and Homeland Security, Commissioner Jeff Long, and Assistant Commissioner Michael Hogan respectfully move for an order from this Court dissolving its preliminary injunction entered in the above styled case. As argued in the accompanying brief,¹ this Court imposed a temporary injunction on behalf of Petitioner Miller at a time it lacked jurisdiction, rendering that order void.

Moreover, Petitioner Miller failed to meet the four factors necessary for such extraordinary relief. Miller could not show any likelihood of success on the merits because Miller's claims

¹ In the interest of judicial economy, the memorandum for the Defendants' motion to dissolve is combined with the response to the motion to stay because both requests turn on consideration of the same factors.

conflict with Tenn. Code Ann. § 1-3-105(c)'s clear definition of "sex" and the Department's statutory authority to enforce it. Miller failed to show irreparable harm, as a license that complies with Tennessee law is available to Miller without penalty. And the equitable considerations do not weigh in Miller's favor because the Department's statutory duties and the public interest in consistent enforcement of state law outweigh Miller's preferences.

The Court should grant the motion and dissolve the injunction.

Respectfully submitted,

JONATHAN SKRMETTI
Attorney General and Reporter

/s/ Brian Enright
BRIAN ENRIGHT (BPR# 041742)
Assistant Attorney General
HOLLIE R. PARRISH (BPR# 037888)
Assistant Attorney General
STEVEN J. GRIFFIN (BPR# 040708)
Senior Counsel for Strategic Litigation
Office of the Tennessee
Attorney General and Reporter
P. O. Box 20207
Nashville, TN 37202
(615) 532-7400
Brian.Enright@ag.tn.gov
Hollie.Parrish@ag.tn.gov
Steven.Griffin@ag.tn.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion has been filed and served upon the following by operation of the court's electronic filing system, with courtesy copies provided by email, on this the 1st day of July, 2025:

Stella Yarbrough
Lucas Cameron-Vaughn
Jeff Preptit
P.O. Box 120160
Nashville, TN 37212

Maureen Truax Holland
Holland and Associates, PC
1429 Madison Avenue
Memphis, Tennessee 38104

/s/ Brian Enright