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

JANE DOE; CHRISSY MILLER;	)
Plaintiffs,	)
v.	) ) Case No. 24-0503-III
TENNESSEE DEPARTMENT OF	) Chancellor Myles
SAFETY AND HOMELAND	)
<b>SECURITY</b> ; <b>JEFF LONG</b> , 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	)
<b>Assistant Commissioner of the Driver</b>	)
<b>Services Division for Tennessee's</b>	)
<b>Department of Safety and Homeland</b>	)
Security,	)
	)
Defendants.	)

## AGREED ORDER AUTHORIZING MOVANT TO PROCEED BY PSEUDONYM

This matter came before the Court on Plaintiff Jane Doe's Motion to Extend this Court's prior Order authorizing Doe to proceed by pseudonym. Local Rule 6.04 requires court authorization for a plaintiff to proceed under a pseudonym. On April 23, 2024, this Court entered a temporary order authorizing Jane Doe to proceed under a pseudonym that expires on June 28, 2024 at 3:00 p.m. Doe asks this Court to extend that order under the conditions outlined below, and Defendants do not oppose.

In light of Doe's Motion and the parties' agreement, the Court hereby ORDERS:

1. Plaintiff Jane Doe may proceed in this action under the pseudonym "Jane Doe."

- 2. Doe's counsel shall disclose Doe's true name and, to the extent otherwise discoverable under the Tennessee Rules of Civil Procedure, other information that identifies Doe, directly or indirectly ("Identifying Information"), upon request to Defendants' counsel and the Court.
- 3. All documents filed with the Court that contain Identifying Information shall be redacted.
- 4. Defendants' counsel may disclose Identifying Information to Defendants, Defendants' employees, and experts retained in this action to the extent necessary to litigate this action.
- 5. Individuals to whom Identifying Information is disclosed shall not further disclose that information to any other person without first obtaining written confirmation from Defendants' counsel that such disclosure is necessary to litigate this action.
- 6. Before disclosing Identifying Information to any person for purposes of litigating this action, Defendants' counsel shall give that person a copy of this order, require that person to read this order, specifically point out to that person the provisions of paragraphs 5 and 7 of this order, and specifically warn that person that violation of this order may result in sanctions for contempt of court.
- 7. Under no circumstances shall any person disclose Identifying Information to the media without the written consent of Doe's counsel.
- 8. During this litigation, Plaintiffs and Defendants, as well as their respective counsel, shall not publicly disclose Doe's true identity as a party to this case for any purpose, including publicity.

9.	If any disputes unde	this Order arise, the parties shall seek to resolve those issues
withou	t court intervention.	If the parties cannot agree, they shall seek resolution by the
Court a	and state to the Court	their attempts at resolution.

10.	This Agreed Order does not provide any independent support for any of Plaintiff	s'
alaima	Commaliant	
ciaims	for relief.	

Entered this	28th	day of	June	. 2024.
Entered this	Zötn	gay of	June	. 2024.

S/I'Ashea L. Myles
HON. I'ASHEA L. MYLES
CHANCELLOR, PART III

#### AGREED FOR ENTRY:

## JONATHAN SKRMETTI Attorney General and Reporter

/s/ Cody N. Brandon

CODY N. BRANDON (BPR# 037504) Managing Attorney Senior Assistant Attorney General

STEVEN J. GRIFFIN (BPR# 040708) Senior Counsel for Strategic Litigation

LIZ EVAN (BPR# 037770) Assistant Attorney General

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## /s/ Lucas Cameron-Vaughn

Stella Yarbrough (BPR# 033637) Lucas Cameron-Vaughn (BPR# 036284) Jeff Preptit (BPR# 038451) P.O. Box 120160 Nashville, TN 37212 syarbrough@aclu-tn.org lucas@aclu-tn.org jpreptit@aclu-tn.org

## <u>/s/ Maureen T. Holland</u>

Maureen Truax Holland, (BPR# 015202) Holland and Associates, PC 1429 Madison Avenue Memphis, Tennessee 38104 maureen@hollandattorney.com

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Order 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 28th day of June, 2024:

Stella Yarbrough Lucas Cameron-Vaughn Jeff Preptit P.O. Box 120160 Nashville, TN 37212 syarbrough@aclu-tn.org lucas@aclu-tn.org jpreptit@aclu-tn.org

Maureen Truax Holland Holland and Associates, PC 1429 Madison Avenue Memphis, Tennessee 38104 maureen@hollandattorney.com

/s/ Cody N. Brandon CODY N. BRANDON