

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

JANE DOE; CHRISSY MILLER,	)	
	)	
Plaintiffs/Petitioners,	)	24-0503-III
	)	
vs.	)	Chancellor Myles
	)	
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/Respondents.	)	

**PLAINTIFF'S MOTION FOR EXPEDITED HEARING ON**  
**MOTION TO EXTEND ORDER AUTHORIZING MOVANT TO**  
**PROCEED BY PSEUDONYM**

Pursuant to Local Rule § 26.07, Plaintiff Jane Doe respectfully moves this Court for an expedited hearing on her motion to extend the Court's order permitting Ms. Doe to bring this action pseudonymously to protect her identity from public disclosure.

1. An Order Authorizing Movant to Proceed by Pseudonym was entered in this Matter on April 23, 2024, allowing Plaintiff Jane Doe to initially proceed under a pseudonym pursuant to Local Rule § 6.04. EXHIBIT A.
2. The Order Authorizing Movant to Proceed by Pseudonym was entered by Chancellor Russell T. Perkins, to whom this case was initially assigned.
3. Chancellor Perkins later recused himself by order, entered on April 23, 2024. EXHIBIT B.
4. The Order Authorizing Movant to Proceed by Pseudonym states under its terms that "This is a temporary order that will need to be revisited after all the parties have an opportunity to brief

the issues raised. It will automatically expire, on a self-executing basis, on June 28, 2024 at 3:00 p.m.”

5. On June 11, 2024, Plaintiff Jane Doe filed her Motion to Extend Order Authorizing Movant to Proceed by Pseudonym and Brief in Support.

6. Due to the emergent timeframe of the expiration of this Court’s Order Authorizing Movant to Proceed by Pseudonym on Friday, June 28, 2024 at 3:00 p.m., Plaintiff Jane Doe respectfully moves the Court to set an expedited hearing on her motion.

7. Plaintiff further requests a telephonic hearing if convenient to the Court due to the travel restrictions of her counsel.

8. A proposed Order Setting Expedited Hearing is attached to this motion as EXHIBIT C.

Respectfully submitted,

/s/ Lucas Cameron-Vaughn  
Lucas Cameron-Vaughn (36284)  
Stella Yarbrough (33637)  
Jeff Preptit (38451)  
ACLU FOUNDATION OF TENNESSEE  
P.O. Box 120160  
Nashville, Tennessee 37212  
(615) 320-7142  
lucas@aclu-tn.org  
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/s/ Maureen T. Holland  
Maureen Truax Holland (15202)  
HOLLAND AND ASSOCIATES, PC  
1429 Madison Avenue  
Memphis, Tennessee 38104  
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maureen@hollandattorney.com

*Attorneys for Plaintiffs*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing has been sent by  
U.S. Mail, postage pre-paid, or via electronic mail to the following:

Cody Brandon  
Steven Griffin  
Liz Evan  
Office of the Tennessee  
Attorney General and Reporter  
P. O. Box 20207  
Nashville, TN 37202  
(615) 532-7400  
Cody.Brandon@ag.tn.gov  
Steven.Griffin@ag.tn.gov  
Liz.Evan@ag.tn.gov

DATE: June 26, 2024

/s/ Lucas Cameron-Vaughn  
Lucas Cameron-Vaughn

**EXHIBIT A**

**Order Authorizing Movant to Proceed by Pseudonym**

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

JANE DOE,

Plaintiff/Petitioner,

vs.

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/Respondents.

NF  
Case No. 24-0503-IV

FILED  
2024 APR 23 PM 12:47  
CLERK & MASTER  
DAVIDSON CO. CHANCERY CT  
D.C. SM

**ORDER AUTHORIZING MOVANT TO PROCEED BY PSEUDONYM**

THIS MATTER came before the Court on Plaintiff's Motion for Leave to Proceed by Pseudonym and Brief in Support. Movant moves the Court for permission to proceed in this action under the pseudonym "Jane Doe."

The Court, having considered Movant's motion and supporting memorandum, and the entire record in this case, and having considered Defendants' opposition thereto, finds there is good cause to grant Movant's motion and hereby **ORDERS**:

1. Movant may proceed in this action under the pseudonym "Jane Doe."
2. Movant's counsel shall disclose Movant's true name and, to the extent otherwise discoverable under the Tennessee Rules of Civil Procedure, other information

that identifies Movant, directly or indirectly (“Identifying Information”), upon request to Defendants’ counsel and the Court.

3. All publicly-filed documents shall identify Movant only by Movant’s pseudonym.

4. All documents filed with the Court that contain Movant’s name or Identifying Information shall be redacted.

5. Defendants’ counsel may disclose Identifying Information to Defendants, Defendants’ employees, and experts retained in this action, but only to the minimum extent necessary to litigate this action.

6. Individuals to whom Identifying Information is disclosed shall not further disclose that information to any other person without first obtaining written confirmation from Movant’s counsel that such disclosure is necessary to litigate this action.

7. Under no circumstances shall any person disclose Identifying Information to the media without the express written consent of Movant’s counsel.

8. 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 section 6 and 7 of this order, and specifically warn that person that violation of this order may result in sanctions for contempt of court.

9. If any specific issues related to non-disclosure of Identifying Information arise during the course of litigation, the parties shall seek to resolve those issues without

court intervention. If the parties cannot agree, they shall seek further clarification from this Court.

IT IS SO ORDERED.

  
CHANCELLOR

DATE: April 23, 2024

RTP This is a temporary order  
RTP that will need to be revisited  
RTP after all the parties have an  
RTP opportunity to brief the  
RTP issues raised. It will automatically expire, on a self-executing  
basis, on June 28, 2024 at 3:00 p.m. RTP  
Respectfully submitted,

/s/ Lucas Cameron-Vaughn  
Lucas Cameron-Vaughn (36284)  
Stella Yarbrough (33637)  
Jeff Preptit (38451)  
ACLU FOUNDATION OF TENNESSEE  
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/s/ Maureen T. Holland  
Maureen Truax Holland (15202)  
HOLLAND AND ASSOCIATES, PC  
1429 Madison Avenue  
Memphis, Tennessee 38104  
(901) 278-8120  
maureen@hollandattorney.com

*Attorneys for Plaintiff Jane Doe*

## CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Proposed Order Authorizing Movant to Proceed by Pseudonym has been sent by U.S. Mail, postage pre-paid, and via electronic mail to the following:

Lizabeth Hale  
Deputy General Counsel & Director of Legal Services  
Legal Division  
TENNESSEE DEPARTMENT OF SAFETY & HOMELAND SECURITY  
Tennessee Tower, 25<sup>th</sup> Floor  
Nashville, TN 37243  
(615) 251-5349  
Lizabeth.Hale@tn.gov

Attorney General for the State of Tennessee  
Office of the Tennessee Attorney General and Reporter  
500 Dr. Martin Luther King Jr. Blvd  
Nashville, TN 37219

DATE: April 23, 2024

/s/ Lucas Cameron-Vaughn  
Lucas Cameron-Vaughn

 **MAILED**  
4/23/24



**EXHIBIT B**

**Recusal Order**

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

JANE DOE,

Plaintiff/Petitioner,

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 of Tennessee's  
Department of Safety and Homeland  
Security,

Defendants/Respondents.

NF  
No. 24-0503-IV

FILED  
2024 APR 23 PM 3:27  
CLERK & MASTER  
DAVIDSON CO. CHANCERY CT.  
D.C.M.

**RECUSAL ORDER**

For reasons satisfactory to the Court, the undersigned Judge hereby recuses himself in the above-referenced case and requests that the Assignment Judge reassign this case to another judge for all further proceedings as soon as possible. This case should be reassigned as soon as possible.

**IT IS SO ORDERED.**

  
RUSSELL T. PERKINS, CHANCELLOR

cc: Lucas Cameron-Vaughn, Esq.  
Stella Yarbrough, Esq.  
Jeff Preptit, Esq.  
Maureen Traux Holland, Esq.  
Lizabeth Hale, Esq.  
Honorable Jonathan Skrmetti, Attorney General and Reporter  
Honorable Tom Brothers, Assignment Judge

MAILED  
4/23/24

## **EXHIBIT C**

### **Proposed Order Setting Expedited Hearing**

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

JANE DOE; CHRISSY MILLER,	)	
	)	
Plaintiffs/Petitioners,	)	24-0503-III
	)	
vs.	)	Chancellor Myles
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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/Respondents.	)	

**ORDER SETTING EXPEDITED HEARING**

Pursuant to Local Rule § 26.07, special circumstances warrant an expedited hearing on Plaintiff's Motion to Extend Order Authorizing Movant to Proceed by Pseudonym. This motion shall be heard on \_\_\_\_\_ at \_\_\_\_\_ .m.

**IT IS SO ORDERED.**

\_\_\_\_\_  
HON. I'ASHEA L. MYLES  
CHANCELLOR, PART III

DATE: