

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

JANE DOE; CHRISSY MILLER; )

Plaintiffs, )

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' SUPPLEMENTAL MOTION TO DISMISS  
SECOND AMENDED COMPLAINT

---

Defendants Tennessee Department of Safety and Homeland Security ("Department"), Commissioner Jeff Long, and Assistant Commissioner Michael Hogan move to dismiss the second amended complaint in its entirety. As set out in Defendants' original motion-to-dismiss memorandum and the accompanying memorandum, dismissal is required because this Court lacks jurisdiction over both UAPA claims, and the UAPA claim for declaratory judgment fails to state a claim. Additionally, the UAPA claims should be dismissed as to Commissioner Long and Assistant Commissioner Hogan, who are not proper defendants. Finally, the new claim for writ of certiorari should be dismissed because other adequate remedies are available, implementation

of a policy is a legislative function not subject to review under the writ, and Defendants' actions withstand deferential review under the writ.

Respectfully submitted,

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

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

#### **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 22nd day of August, 2024:

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/ Cody N. Brandon  
CODY N. BRANDON