

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)
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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
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Nashville, TN 37243
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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

