

**IN THE CIRCUIT COURT OF TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

DAVID YOUNG, as father and Personal
Representative of the Estate of ELLIE
CLAIRE YOUNG, deceased,

Plaintiff,

v.

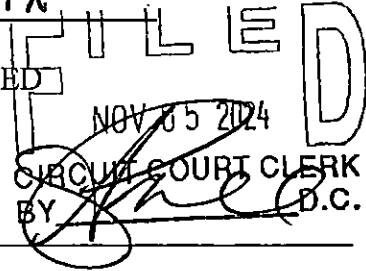
JACKSON HOPPER and MARTHA
HOPPER

Defendants.

Case No. CT 4667-24

Div. No. IX

JURY DEMANDED



**VERIFIED COMPLAINT AND FIRST REQUEST FOR INJUNCTIVE
AND OTHER EQUITABLE RELIEF**

COMES NOW Plaintiff David Young, as father and Personal Representative of the Estate of Ellie Claire Young, deceased, and files this Verified Complaint against Defendants Jackson Hopper and Martha Hopper for the wrongful death of Ellie Claire Young on October 19, 2024, and for other damages on behalf of all wrongful death beneficiaries. Plaintiff also seeks the injunctive relief set forth below. In support of this Complaint, Plaintiff and states as follows:

I. INTRODUCTORY STATEMENT

1. This lawsuit arises out of the senseless death of Ellie Claire Young (hereinafter "Ellie") who was brutally and intentionally killed by her former boyfriend, Jackson Hopper, on or about October 19, 2024.

2. Plaintiff David Young brings this action as Ellie's surviving father and the personal representative of her estate on behalf of all wrongful death beneficiaries, namely he and his wife, Kim Young, who are the wrongful death beneficiaries in this matter.

3. Plaintiff brings this action pursuant to Tennessee's wrongful death statutes, and any other applicable statutory and/or common law authority.

4. Although the family is in early stages of grief for the loss of their remarkable daughter, Plaintiff brings this action on behalf of himself and his wife (and any other wrongful death beneficiaries who may exist) at this time due to concerns that Defendant Jackson Hopper may dissipate, obfuscate, transfer, waste or otherwise conceal assets which may be available to satisfy any wrongful death judgment this family obtains in this matter. Plaintiff is also concerned that Defendant Jackson Hopper may attempt to use funds that he recently inherited to make a bond and flee this country to avoid criminal prosecution for his heinous acts and Plaintiff is before the Court to prevent him from doing anything that will allow him to avoid having to face the charges that have been brought against him.

5. Defendant Jackson Hopper inherited a significant amount of real property in Lake County, Tennessee and perhaps in other counties as well after his grandfather died and Plaintiff has confirmed that Hopper sold part or all of his interest in this inherited property to his uncle for over \$3,000,000 in April of 2024. Plaintiff is asking this Court to enter an order enjoining Defendant Jackson Hopper from dissipating, obfuscating, transferring, concealing or spending these funds for anything other than ordinary living expenses and to the extent that Defendant Jackson Hopper has already transferred some or all of the funds he received from the sale of this inherited property or that he had from other sources to his mother, Defendant Martha Hopper, Plaintiff is asking this Court to likewise enjoin her from dissipating, obfuscating, transferring, concealing or spending these funds for anything other than ordinary living expenses.

6. Upon information and belief, Defendant Jackson Hopper has already utilized some of these funds to retain Leslie Ballin to represent him with regard to the pending criminal charges

that have been filed against him and assuming that Hopper paid Ballin a fair and reasonable amount for Ballin's services, Plaintiff has no objection to Hopper utilizing a portion of these funds to retain Ballin.

7. Plaintiff believes that Defendant Jackson Hopper deposited funds from the sale of the inherited land in an account at Charles Schwab & Co., Inc. and/or another financial institution in Lake County or one of the other counties in Tennessee and Plaintiff is further asking this Court to enjoin any financial institution where Hopper has funds from allowing anyone to transfer or withdraw funds from any such account until further order of this Court.

II. PARTIES

8. Plaintiff David Young is an adult resident of Henning, Tennessee, and is before the Court in his capacity as father and Personal Representative of the Estate of Ellie Claire Young, deceased to recover all available damages for the personal injuries and ultimate death of his daughter as a result of the acts of Defendant Jackson Hopper and the acts and/or omissions of Defendant Martha Hopper as set forth herein. Plaintiff brings this action on behalf of all wrongful death beneficiaries of Ellie Claire Young. Ms. Young was unmarried at the time of her death and is survived by her parents and her sister.

9. Defendant Jackson Hopper is an adult resident citizen of Lake County, Tennessee, and may be served at the Shelby County Jail, 201 Poplar Avenue, Memphis, Tennessee 38103 or 975 Lake Drive, Tiptonville, Tennessee 38079.

10. Defendant Martha Hopper is an adult resident citizen of Lake County, Tennessee, and may be served at 975 Lake Drive, Tiptonville, Tennessee 38079. Defendant Martha Hopper is the mother of Jackson Hopper and upon information and belief, she was aware of his prior violent tendencies and lied to Ellie's family when they expressed concerns that Jackson Hopper was

posing a dangerous threat to Ellie. Defendant Martha Hopper, upon information and belief, knew that her son had engaged in similar dangerous conduct with other girlfriends and failed to share this information with Ellie's family when they told her that they were going to get a restraining order against Jackson Hopper because of his assaultive behavior and because of their fear that he would escalate his violence with Ellie. Defendant Martha Hopper urged Ellie's family not to get a restraining order and assured them that her son had never hurt anyone and would never hurt Ellie. Plaintiff believes that Defendant Martha Hopper will assist her son in hiding and/or spending assets at his request and fears that she may have already done so and is asking this Court to likewise enjoin her from transferring any assets of her son. Moreover, Defendant Martha Hopper, upon information and belief, also recently inherited property and/or funds and Plaintiff is before the court to likewise enjoin her from dissipating, obfuscating, transferring, concealing or spending any funds for anything other than ordinary living expenses.

III. JURISDICTION AND VENUE

11. This Court has jurisdiction pursuant to inter alia, T.C.A. § 16-10-101.

12. Venue is proper in this Court pursuant to inter alia, T.C.A. § 20-4-101, because all or part of this cause of action arose within Shelby County, Tennessee.

13. This action is being brought pursuant to Tennessee's Wrongful Death statutes (including but not limited to T.C.A. §§ 20-5-106—107), and all other applicable laws, both statutory and common law.

IV. FACTS AND ALLEGATIONS

14. Ellie Claire Young graduated from the University of Tennessee at Martin (UT-Martin) with honors in May of 2024 and was accepted to start medical school at the University of Tennessee Center for Health Sciences in Memphis in August of this year. While a student at UT-

Martin, Ellie dated Defendant Jackson Hopper.

15. Plaintiff and his family treated Defendant Jackson Hopper as part of their family while he dated Ellie. While the two were dating, Defendant Jackson Hopper's grandfather died and left him a considerable amount of land. Plaintiff knows this information because Defendant Jackson Hopper told Ellie and her family about his inheritance.

16. After Ellie graduated from UT-Martin, Defendant Jackson Hopper made it clear that he did not want Ellie to move to Memphis and their relationship changed. Hopper became aggressive and controlling and engaged in assaultive behavior on more than one occasion in April and May of 2024, which led to Ellie breaking up with him.

17. When Ellie's family learned about the assaultive behavior, they inquired about getting a restraining order against him. Prior to asking a court to enter an order of protection against Hopper, one of Ellie's family members contacted Defendant Martha Hopper on Ellie's behalf to tell her about the family's concerns. Defendant Martha Hopper advised Ellie's family member that a restraining order would not be necessary because (a) Jackson had never hurt anyone and would never hurt anyone and (b) Jackson had moved to middle Tennessee and was getting on with his life. Defendant Martha Hopper assured Ellie's family member that her son was not anywhere Ellie and that they did not need to worry about him hurting her. Plaintiff now believes that Martha Hopper was lying when she made these statements and that she was just trying to protect her son from potential criminal charges. Ellie and her family relied on Martha Hopper's statements to their detriment and decided not to ask a judge for an order of protection against Jackson Hopper based on the false assurances of Defendant Martha Hopper.

18. On or about October 19, 2024, Decedent Ellie Claire Young drove to Shelby Farms Park to meet a friend to go for a walk in the park. After parking her vehicle, Defendant Jackson

Hopper, according to court documents, pulled right behind Ellie's vehicle, got out of his car and started shooting a 9 mm weapon multiple times at Ellie. Defendant Jackson Hopper, according to court documents, then got back in his vehicle and fled the scene of this heinous murder.

19. Ellie was found dead on the ground where she fell after being shot multiple times.

20. According to court documents, Defendant Jackson Hopper, after fleeing from the scene, was eventually caught by law enforcement officers and charged with first-degree murder.

21. When Defendant Jackson Hopper was arrested, law enforcement officers found a 9 mm handgun at the scene of his arrest and at the scene of the murder, law enforcement officers found five 9 mm shell casings near Ellie's body.

22. Plaintiff recognizes that Defendant Jackson Hopper is entitled to a trial by jury to determine his guilt in this matter but asserts that given the above facts, there is a strong likelihood that Plaintiff will be successful on the merits of this civil claim and that all of the factors set forth in Rule 65 of the Tennessee Rules of Civil Procedure support the Court granting the injunctive relief sought in this Complaint.

23. Ellie was a kind, loving, friendly, selfless, and caring person with an incredibly bright future ahead of her.

24. Ellie was the valedictorian of her high school class and graduated with honors from the university she attended.

25. At the time of her death, Ellie was a 22-year-old first year medical student at the University of Tennessee Health Science Center.

26. Approximately, two months earlier, Ellie had received her "white coat" at a medical school ceremony, at which time she began the fulfillment of her dream to attend medical school and care for patients as a physician.

27. Upon information and belief, Defendant Martha Hopper was aware that Defendant Jackson Hopper had been physically abusive with at least three prior girlfriends, and they were in fear for their lives after the relationships ended.

28. Ellie had no knowledge of his violent history with multiple other women.

29. Had Defendant Martha Hopper informed Ellie and her family of her son's abhorrent history of verbal and physical violence with multiple young women, Ellie would have insisted on seeking an order of protection and taken other measures to protect herself from Defendant Jackson Hopper.

30. When Martha Hopper assured Ellie's family member that Jackson Hopper would never harm Ellie, she, upon information and belief, knew about her son's past behavior and should have known that her son had the propensity to injure Ellie, both mentally and physically.

31. Despite assuring Ellie and her family that they did not need to worry about Jackson Hopper hurting Ellie, Defendant Martha Hopper, upon information and belief, did not take any action to keep Jackson Hopper away from Ellie.

32. As a foreseeable result of the wrongful conduct of the Defendants including, but not limited to, the acts and omissions described herein, Ellie experienced extreme pain and suffering, emotional distress, loss of future earnings, loss of the enjoyment of life and loss of life.

33. As a foreseeable result of the wrongful conduct of the Defendants including, but not limited to, the acts and omissions described herein, Ellie's parents, David and Kim Young have suffered the loss of their beautiful daughter, and the loss of her love, companionship, relationship, and consortium.

**V. CLAIMS AGAINST DEFENDANT JACKSON HOPPER FOR ASSAULT,
BATTERY, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND
WRONGFUL DEATH**

34. The allegations set forth in the previous paragraphs are incorporated herein by reference.

35. Defendant Jackson Hopper intentionally and knowingly caused Ellie to fear imminent bodily injury in the months leading up to her death and on the day of her death.

36. Defendant Jackson Hopper intentionally attempted to do harm to Ellie in the months leading up to her death and on the day of her death.

37. Defendant Jackson Hopper intentionally shot and killed Ellie on October 19, 2024, without any provocation and/or justifiable basis to do so.

38. Defendant Jackson Hopper's verbal and physical conduct towards Ellie prior to her death was so outrageous that it cannot be tolerated by civilized society and his actions on October 19, 2024, shocked the collective conscious of this community.

39. Defendant Jackson Hopper's conduct was so outrageous in character and so extreme in degree as to go beyond all bounds of decency.

40. Defendant Jackson Hopper's conduct was in all respects atrocious and utterly intolerable.

41. Defendant Jackson Hopper intentionally caused Ellie to suffer extreme fear, emotional distress and mental harm.

42. Ellie's death was directly and proximately caused by Defendant Hopper's wrongful, unlawful, tortious, dangerous, and deadly conduct.

43. In light of the foregoing, Defendant Jackson Hopper is liable for the following torts and causes of action:

- a. Assault;

- b. Battery;
- c. Intentional infliction of emotional distress; and
- d. Wrongful death.

44. All of Ellie's harms, damages, injuries, and ultimately her death was directly, factually, proximately, and foreseeably caused by the wrongful acts which have been specifically and generally described herein.

45. Defendant Jackson Hopper's actions warrant an award of both compensatory and punitive damages in this case.

VI. CLAIMS AGAINST DEFENDANT MARTHA HOPPER FOR NEGLIGENCE, NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS, INTENTIONAL MISREPRESENTATION, NEGLIGENT MISREPRESENTATION AND WRONGFUL DEATH

46. The allegations set forth in the previous paragraphs are incorporated herein by reference.

47. Martha Hopper owed a duty of care to Ellie and breached that duty directly and proximately causing great harm.

48. Martha Hopper had a duty to use reasonable care to protect Ellie from her son, Defendant Jackson Hopper.

49. At all applicable times, Martha Hopper stood in a special relationship with her son.

50. At all applicable times, Martha Hopper likewise stood in a special relationship with Ellie Claire Young.

51. At all applicable times, Martha Hopper had the authority, means and ability to control the actions of her son, Defendant Jackson Hopper.

52. At all applicable times, Defendant Jackson Hopper was dependent upon Martha

Hopper for financial, emotional, and residential support despite the fact that he had just inherited millions of dollars in property prior to engaging in the conduct that is the subject of this complaint.

53. At all applicable times, Martha Hopper, upon information and belief, was aware that Defendant Jackson Hopper had a violent past, particularly towards young women with whom he had relationships. Moreover, upon information and belief, she knew he had access to a firearm.

54. At all applicable times Martha Hopper, upon information and belief, was aware that Defendant Jackson Hopper was unwilling to accept the breakup between him and Ellie and that he continued to pose a threat to her in the weeks and months leading up to her murder.

55. Martha Hopper undertook and assumed this responsibility, in exchange for Ellie's agreement not to take legal action against her son, to take reasonable steps to ensure that her son would not harm Ellie.

56. By way of alternative pleading, Martha Hopper gratuitously undertook and assumed the responsibility to take reasonable actions to protect Ellie from her son.

57. At the time she stated to Ellie and her family that there was "no way" her son would harm Ellie, or words to that effect, Martha Hopper knew or should have known that statement was false in light of her knowledge of violent past towards young women and considering her knowledge about his unwillingness to accept that his relationship with Ellie was over.

58. Martha Hopper was in a superior position to know and understand the extent to which her son was violent and how enraged he was over the breakup of his relationship with Ellie.

59. Martha Hopper failed to take reasonable measures to protect Ellie from her son.

60. Martha Hopper was aware of should have been aware that Ellie was facing danger at the hands of Defendant Jackson Hopper, yet Ms. Hopper failed to warn Ellie of such danger.

61. The representations made by Martha Hopper to Ellie and her family:

- a. Related to existing and/or past facts;
- b. Related to one or more material facts;
- c. Were made knowingly or without belief in their truth; and/or
- d. Were made recklessly.

62. By way of alternative pleading, the representations made by Martha Hopper were made negligently in violation of a duty of care owed to Ellie and her family.

63. Ellie and her family reasonably relied upon the assurances and representations of Martha Hopper.

64. Ellie and her family have suffered immensely by the misrepresentations of Martha Hopper and their reliance thereon.

65. It was reasonably foreseeable that Ellie would endure all of the harms and damages she suffered including but not limited to significant pain and suffering, severe emotional distress, and loss of life, as a result of this Defendant's intentional, careless, and reckless acts and omissions.

66. In light of the foregoing, Defendant Martha Hopper is liable for the following torts and causes of action:

- a. Common law negligence;
- b. Gross negligence;
- c. Negligent infliction of emotional distress;
- d. Intentional misrepresentation;
- e. Negligent misrepresentation; and
- f. Wrongful death.

67. All of Ellie's harms, damages, injuries, and ultimately her death was directly, factually, proximately, and foreseeably caused by the wrongful acts which have been specifically

and generally described herein. As with her son, Defendant Martha Hopper's actions in this case likewise warrant an award of both compensatory damages and punitive damages.

VII. DAMAGES

68. The allegations set forth in the previous paragraphs are incorporated herein by reference.

69. As a direct and proximate result of the wrongful and tortious conduct on the part of the Defendants, Plaintiff seeks all available damages under Tennessee Law and any other applicable law, including those available under the Tennessee's wrongful death statutes. Plaintiff seeks damages for Ellie's harms and losses including, but not limited to the following:

- a. Pain and suffering;
- b. Emotional distress and mental anguish;
- c. Loss of future earnings;
- d. Loss of the pecuniary value of her life;
- e. Medical and ambulance expenses;
- f. Funeral expenses
- g. Loss of the enjoyment of life;
- h. Loss of life;
- i. Loss of consortium; and
- j. Punitive damages.

70. Plaintiff is seeking all pecuniary damages allowable under Tennessee's Wrongful Death Statutes, Tennessee common law, Tennessee statutory law and all other applicable laws for Ellie Claire Young's harms, damages and losses as well as her parents' harms, damages and losses for the loss of consortium.

VIII. LOSS OF CONSORTIUM

71. The allegations set forth in the previous paragraphs are incorporated herein by reference.

72. As a direct and proximate result of the actions and inactions leading to Ellie's senseless and violent death, her parents, sister, and other family members have suffered the loss of the love, affection, guidance, services, and companionship they had and would have continued to have with Ellie. Accordingly, Plaintiff seeks all available damages under Tennessee law for their loss of consortium.

IX. PUNITIVE DAMAGES

73. The allegations set forth in the previous paragraphs are incorporated herein by reference.

74. Defendant Jackson Hopper acted intentionally, maliciously, recklessly, criminally, reprehensibly, and egregiously. Defendant Jackson Hopper's gross and wanton conduct shows he intended the result he obtained. The facts and circumstances of this case mandate the imposition of punitive damages in an amount to be determined by the jury in this case. Further, exemplary damages are necessary to deter and hopefully prevent Defendant Jackson Hopper and others from committing such atrocious acts in the future. For the reasons set forth in this Complaint, Plaintiff also seeks punitive damages against Defendant Martha Hopper in an amount to be determined by the jury in this case.

X. GROUNDS FOR EQUITABLE RELIEF

75. The allegations set forth in the previous paragraphs are incorporated herein by reference.

76. Pursuant to T. C. A. §§ 29- 26-101 et seq., 66-3-301 et seq. and Rules 64 and 65 of

the Tennessee Rule of Civil Procedure, Plaintiff is entitled to a temporary restraining order, temporary injunction and other equitable relief for numerous reasons including, but not limited to, the following sworn information and allegations.

77. As set forth above, Defendant Jackson Hopper brutally and intentionally killed Plaintiff's 22-year-old daughter, Ellie Claire Young.

78. In the months leading up to and shortly following the separation and breakup of the relationship between Ellie and Defendant Jackson Hopper, Defendant Jackson Hopper frequently discussed with Ellie and her family the fact that his grandfather left him millions of dollars worth of property upon his grandfather's passing and Plaintiff has been able to confirm that Defendant Jackson Hopper sold this inherited property to his uncle for over \$3,000,000 in April of 2024.

79. Upon information and belief, Defendant Jackson Hopper has substantial cash in one or more financial institutions including but not limited to an account with Charles Schwab Company, Inc.

80. Because of Defendant Hopper's current incarceration which could be for a prolonged period of time, the ability to secure satisfaction of a judgment from Defendant Hopper's future earnings alone is extremely unlikely.

81. Upon information and belief, Defendant Hopper has already transferred large sums of money to his criminal defense attorneys for the purpose of paying them for their services in the criminal matter pending in Shelby County and Plaintiff is not seeking to set aside that payment as a fraudulent transfer at this time, assuming that the funds paid were reasonable in light of the charges filed in this matter.

82. If Defendant Hopper is permitted to make additional transfers, however, or is

permitted to dissipate, deplete, reduce or encumber his current assets, it will likely be impossible for Plaintiff to satisfy any judgment that is ultimately entered against him.

83. Based upon his behavior set forth above in this Complaint, including his extraordinary efforts to avoid arrest, it is clear that Defendant Jackson Hopper will do virtually anything to avoid accountability in this matter and Plaintiff is fearful that Hopper will attempt to use the funds he inherited to make bond and flee this country to avoid criminal prosecution for his heinous acts, which is another reason Plaintiff is seeking the requested injunctive relief.

84. Plaintiff, on behalf of the wrongful death beneficiaries of his deceased daughter will suffer immediate and irreparable injury if a restraining order is not granted upon the filing of this Complaint.

85. Plaintiff respectfully submits that notice to the Defendants should not be required because if either of them is given advance notice, there is a strong likelihood that Defendants will transfer assets or otherwise render their assets unavailable for a future execution of judgment.

86. Following the issuance of a restraining order, Plaintiff respectfully submits that his rights and the rights of all wrongful death beneficiaries will be violated by Defendant Hopper should a temporary injunction not issue upon notice to the opposing parties.

87. Plaintiff seeks to limit Defendant Hopper's use of his personal assets or any assets to which he has a beneficial interest to his normal and reasonable living expenses. Currently Defendant Hopper is incarcerated and no bond has been set for his release so such expenditures should be minimal at this time.

88. Defendants should be prohibited, by way of a restraining order and injunction, to the fullest extent possible, from taking any action which would prevent or hinder Plaintiff from executing on a judgment he may obtain in this case.

89. This is the first application for relief of this nature or any equitable relief in this cause.

XI. PRAYER FOR RELIEF

90. The allegations set forth in the previous paragraphs are incorporated herein by reference.

91. Plaintiff prays for relief including, but not limited to, the following:

a. That proper process issue and be served upon the Defendants and that they be required to appear and answer this Complaint within the time required by law;

b. That Plaintiff David Young, in his representative capacity as Personal Representative of the estate of Ellie Claire Young be awarded compensatory damages from Defendants in the amount of \$10,000,000 for the wrongful death of Ellie Claire Young;

c. That Plaintiff David Young, on behalf of all wrongful death beneficiaries, be further awarded punitive damages in an appropriate amount to be determined by a jury in this cause.

d. That if and when Plaintiff learns of personal and/or real property owned by Defendants or to which Defendants have a beneficiary interest, Plaintiff be entitled to place an attachment, lien, seizure or other restriction on such property

e. That this Honorable Court grant a temporary restraining order and temporary injunction as follows:

i. Defendant Jackson Hopper is prohibited from dissipating, absconding, selling, pledging, transferring, encumbering, or spending any money and any asset he owns or to which he has a beneficial interest, with the exception of reasonable and ordinary living expenses and is prohibited

- from allowing others to do so on his behalf.
- ii. Defendant Jackson Hopper is prohibited from spending any additional funds from assets he owns or to which he has a beneficial interest for his criminal defense without seeking authorization and an Order of this Court permitting him to do so.
 - iii. Financial institutions that are holding funds for the benefit of Defendant Jackson Hopper shall also be prohibited from allowing withdrawals and/or transfers of funds from any such account; and financial institutions that are holding funds for the benefit of Defendant Martha Hopper for any funds deposited into such account after Defendant Jackson Hopper sold his interest in inherited land on April 8, 2024, shall also be prohibited from allowing any funds to be withdrawn or transferred from such account.
 - iv. Defendant Martha Hopper is likewise prohibited from dissipating, absconding, selling, pledging, transferring, encumbering, or spending any money and any asset she owns or to which she has a beneficial interest, with the exception of reasonable and ordinary living expenses.
 - v. To the extent that Defendant Martha Hopper is holding funds that she received from Defendant Jackson Hopper in the last 12 months, Defendant Martha Hopper is also prohibited from dissipating, absconding, selling, pledging, transferring, encumbering, or spending such funds or assets.
 - f. That at the conclusion of this matter, the temporary injunction be converted

to a permanent injunction until such time as any judgment entered in this matter is fully satisfied or when the case is dismissed if Defendants prevail in this matter.

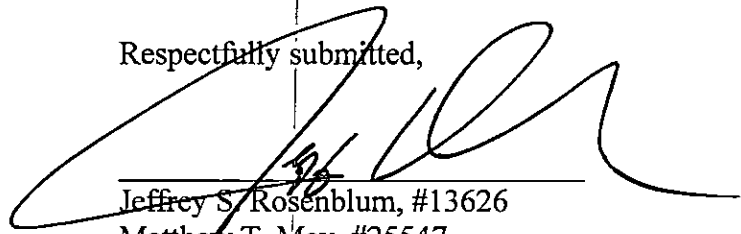
g. This is the first application for equitable relief in this case.

h. That under the unique circumstances of this case, bond be waived at this time for the requested equitable relief; or if not waived bond be set at a nominal amount.

i. That Plaintiff be awarded such further relief to which he and Ellie's estate may be entitled.

PLAINTIFF HEREBY DEMANDS A JURY FOR THOSE CAUSES OF ACTION WHERE THE LAW PERMITS A TRIAL BY JURY.

Respectfully submitted,



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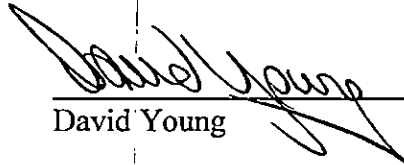
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VERIFICATION

STATE OF TENNESSEE

COUNTY OF SHELBY

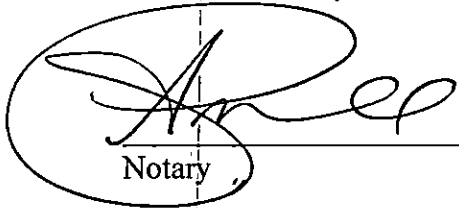
I, DAVID YOUNG, make oath and hereby state that the facts set forth in the foregoing document are true to the best of my knowledge and belief.



David Young

BEFORE ME, a Notary Public, in and for said County and State, duly commissioned and qualified, personally appeared David Young known to me to be the person who executed the foregoing instrument and who acknowledges that he executed the same for the purposes and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 5th day of November, 2024.



Notary

01/03/2028
My Commission Expires



FIAT

Issue the temporary restraining order prayed for in this Complaint upon Bond being given an amount of \$ _____ and issue notice setting this matter for hearing on the _____ day of _____, 2024, at ___ o'clock __ . m.

Judge

Date