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IN THE CIRCUIT COURT OF SUMNER COUNTY, TENNESSEE
AT GALLATIN

DEIRDRA RANSOM, AMANDA RANSOM)
and AMELIA RANSOM,)

Plaintiffs,)

v.)

LEGENDS BANK,)

Defendant.)

Civil Action No. 83CC1-2018-CV-589

FILED
3:58 P.M.

JUN 15 2018

PLAINTIFFS' NOTICE OF LIEN LIS PENDENS KATHRYN STRONG, CLERK
BY MB D.C.

In furtherance of the claims of an equitable lien against the property described below, based upon the facts described in the Complaint filed in the above-numbered civil action in the Circuit Court of Sumner County, Tennessee, on alternative theories of constructive or resulting trust, Plaintiff Deirdra Ransom herewith provides notice of her assertion of that lien on the house and lot located at 931 Red River Road, Gallatin, Sumner County, Tennessee 37066, which is more specifically described in the following technical description:

Land situated in the 9th Civil District of Sumner County, Tennessee, as follows:

Beginning at an iron pin in the center of Station Camp Creek at the south edge of Highway No. 25 right of way, this being the northeast corner of the within described property; thence North 67 deg. West, 270 feet to an iron pin; thence North 71 deg. 15' West, 92 feet to an iron pin; thence South 18 deg. 45' West, 555 feet to an iron pin; thence South 71 deg. 15' East 140 feet, more or less, to the center of Station Camp Creek; thence North 40 deg. 45' East, 150 feet, more or less, to an iron pin; thence North 43 deg. 00' East, 430 feet to the point of beginning.

Said land in bounded on the north by Highway No. 25; on the east by Station Camp Creek; on the South by Sam Belote (Hale) and on the west by Sam Belote (Hale).

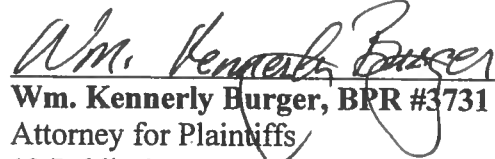
Being the same property conveyed to Plaintiff Deirdra L. Ransom by warranty deed from Edwin Fernando Padilla-Perez and wife, Rebecca Padilla, dated October 9, 2015, and filed for record in the Register's Office of Wilson County, Tennessee, by

instrument appearing of record in Record Book 4195, p. 703 of the Register's Office of Sumner County, Tennessee.

Respectfully submitted,

BURGER, SCOTT & McFARLIN

**By Max D. Fagan
with express permission**



Wm. Kennerly Burger, BPR #3731

Attorney for Plaintiffs

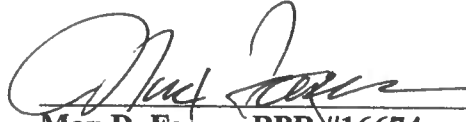
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PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF KATHRYN STRONG, CLERK
BY MB D.C.

Pursuant to the provisions of Rule 65 of the Tennessee Rules of Civil Procedure, Plaintiffs Deirdra Ransom, Amanda Ransom and Amelia Ransom seek pre-hearing injunctive relief, based upon the sworn allegations set forth in the Complaint, with attached documentation (Exhibits "A" through "K"), alleging fraudulent conduct by Defendant Legends Bank in the matters described in the Complaint. It is asserted by Plaintiffs, on the sworn facts set forth in the Complaint, that the Defendant has relied upon contrived and fraudulently manufactured evidence in attempting to procure a "detainer warrant" demanding possession of the house and lot occupied by the Plaintiff and her two adult daughters. Plaintiffs assert that irreparable harm will result unless the Court restrains the Defendant from its attempts to oust the Plaintiff and her children, both of whom suffer from a medical disability, pending a hearing on the merits of the Plaintiffs' claims.

Concisely summarized, Plaintiffs assert that there is clear and convincing evidence that agents and representatives of Defendant Legends Bank falsified, forged, and materially altered loan-related documents which, through the course of action described in the sworn Complaint, proximately and directly provided the factual foundation upon which Defendant has attempted to

effect a foreclosure against the property described, and the ensuing detainer warrant proceedings to oust the Ms. Ransom and her daughters from the residence.


Upon the foregoing motion, and its incorporation by reference of the facts and documents set forth in the Complaint, Plaintiffs seek the entry of a temporary restraining order which will afford a brief respite in the present legal proceedings, subject to the immediate scheduling of a T.R.C.P. Rule 65 temporary injunction hearing. Ms. Ransom has no other place to reside at this time with her daughters, and submits, under penalty of perjury, her sworn affirmation that the documents relied upon by Defendant Legends Bank have been materially altered by agents of Legends Bank, to the prejudice of the Plaintiff and her adult children.

Conversely, no prejudice will result to Defendant Legends Bank through the affording of a brief opportunity for the Court to consider the parties' competing positions on the urgent, meritorious issues.

Respectfully submitted,

BURGER, SCOTT & McFARLIN

**By Max D. Fagan
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