

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

STACY JACOBSON,

Petitioner,

v.

TENNESSEE DEPARTMENT OF
CHILDREN'S SERVICES,

Respondent.

No. 22-0662-I

PETITIONER'S MOTION TO ALTER OR AMEND THE JUDGMENT

Pursuant to Tennessee Rule of Civil Procedure 59.04 or, in the alternative, Tennessee Rule of Civil Procedure 54.02(1), Petitioner Stacy Jacobson submits this Motion to Alter or Amend the Judgment entered by this Court on June 23, 2022. The Court's Memorandum and Final Order on Show Cause Hearing (the "Order") did not address Petitioner's second claim seeking access to records from prior investigations related to Case File No. 2020-008. For the reasons set forth in the Memorandum of Law filed in support of the Petition, in the accompanying Memorandum of Law filed in support of this Motion, and at the show cause hearing (the hearing transcript is attached as Exhibit A), Petitioner requests that the Court alter or amend its Order to address Petitioner's second claim and find that Respondent's records from its prior investigations involving the deceased child in Case File No. 2020-008 are part of the full case file and must be disclosed, with redactions, pursuant to both the Tennessee Public Records Act and Tenn. Code Ann. § 37-5-107(c)(4)(C). If such relief is granted, Petitioner further requests that the

Court alter or amend the Order to award reasonable costs, including attorneys' fees, for her second claim pursuant to Tenn. Code Ann. § 10-7-505(g).

Respectfully submitted,

s/ Paul R. McAdoo
Paul R. McAdoo (BPR No. 034066)
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
6688 Nolensville Rd., Suite 108-20
Brentwood, TN 37027
Phone: 615.823.3633
Facsimile: 202.795.9310
pmcadoo@rcfp.org

Counsel for Petitioner

THIS MATTER IS EXPECTED TO BE HEARD ON THE 26TH DAY OF AUGUST, 2022 AT 9:00 A.M. FAILURE TO FILE AND SERVE A TIMELY WRITTEN RESPONSE TO THIS MOTION MAY RESULT IN THE MOTION BEING GRANTED WITHOUT FURTHER HEARING.

CERTIFICATE OF SERVICE

The undersigned certifies that on July 22, 2022, a true and correct copy of the foregoing was served by email, as agreed by the parties:

Janet M. Kleinfelter, BPR No. 13889
P.O. Box 20207
Nashville, TN 37202
Tel: (615) 741-7403
Janet.kleinfelter@ag.tn.gov

s/ Paul R. McAdoo
Counsel for Petitioner