

**IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE  
AT NASHVILLE**

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HENRY HODGES,

*Plaintiff,*

v.

LISA HELTON, *et al.*,

*Defendants.*

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Case No. 22-1440-III

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**MOTION OF THE NASHVILLE BANNER TO INTERVENE FOR THE  
LIMITED PURPOSE OF UNSEALING SEALED RECORD DOCUMENTS**

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Comes now The Nashville Banner, and pursuant to Tenn. R. Civ. P. Rule 24.02(2), Tenn. Code Ann. § 1-3-121, and 42 U.S.C. § 1983, respectfully moves this Court to order that the sealed documents filed in this action be unsealed.

A *Memorandum of Law* in support of the relief sought accompanies this motion and is being filed contemporaneously.

Respectfully submitted,

By: /s/ Daniel A. Horwitz  
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**NOTICE OF HEARING ON MOTION**

A hearing on the above motion will be held on the 12<sup>th</sup> day of December, 2022, in the Chancery Court for Davidson County, Tennessee, 1 Public Square, Nashville, TN 37201, at 9:00 AM CST, or at any later date the Court orders. IF NO RESPONSE IS TIMELY FILED AND PERSONALLY SERVED, THE MOTION SHALL BE GRANTED AND COUNSEL OR PRO SE LITIGANT NEED NOT APPEAR IN COURT AT THE TIME AND DATE SCHEDULED FOR THE HEARING.

**CERTIFICATE OF SERVICE**

I certify that on this the 9th day of December, 2022, a copy of the foregoing was served via the Court's e-filing system, via email, or via USPS mail, postage prepaid, upon:

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