

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

| | | |
|---------------------------|---|----------------------|
| CLATA RENEE BREWER, |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| v. |) | Case No. 23-0538-III |
| |) | |
| METROPOLITAN GOVERNMENT |) | |
| OF NASHVILLE AND DAVIDSON |) | |
| COUNTY, |) | CONSOLIDATED |
| |) | **controlling case** |
| |) | |
| Respondent. |) | |
| |) | |

| | | |
|---------------------------------|---|----------------------|
| JAMES HAMMOND and |) | |
| TENNESSEE FIREARMS ASSOCIATION, |) | |
| INC., |) | |
| |) | |
| Petitioners, |) | |
| |) | |
| v. |) | Case No. 23-0542-III |
| |) | |
| METROPOLITAN GOVERNMENT |) | |
| OF NASHVILLE AND DAVIDSON |) | |
| COUNTY, |) | |
| |) | |
| Respondent. |) | |
| |) | |

THE COVENANT SCHOOL'S EXPEDITED MOTION TO INTERVENE

Pursuant to *Tennessee Rules of Civil Procedure* 24.01, The Covenant School, by and through counsel, moves the Court for an order permitting it to intervene in this matter in order to protect its interests relating to the release of records sought in this matter. The records sought in Petitioners' Complaint and Petitions may include and/or relate to sensitive information owned by The Covenant School, including, but not limited to the schematics of school facilities,

and confidential information pertaining to The Covenant School employees and students. As a result, The Covenant School is so situated that the disposition of this action may impair or impede its ability to protect its interests and the privacy of its employees and students. Further, the release of such information could cause security and safety issues for the school, its employees and students. Therefore, intervention by The Covenant School in this action is warranted.

A proposed order granting this Expedited Motion to Intervene is attached hereto as **Exhibit 1**.

WHEREFORE, The Covenant School respectfully requests that the Court grant its motion and enter an Order permitting its intervention in this matter.

Respectfully Submitted,

/s/ Peter F. Klett

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Counsel for The Covenant School

NOTICE OF HEARING

THIS MOTION IS EXPECTED TO BE HEARD ON MAY 18, 2023 AT 1:00 P.M. IF NO RESPONSE IS TIMELY FILED AND PERSONALLY SERVED, THE MOTION SHALL BE GRANTED AND COUNSEL NEED NOT APPEAR IN COURT AT THE TIME AND DATE SCHEDULED FOR THE HEARING.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing document was served upon the following recipients via electronic mail and/or email:

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Counsel for Respondent

This 15th day of May, 2023.

/s/ Peter F. Klett
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