ELECTRONICALLY FILED
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Coffee County, Circuit Court

IN THE CIRCUIT COURT FOR THE FOURTEENTH JUDICIAL DISTRICT AT MANCHESTER, COFFEE COUNTY, TENNESSEE

CITY OF MANCHESTER, TENNESSEE, *Plaintiff,* vs. SARAH BRADLEY, *Defendant.*	)	File No. _____ **COMPLAINT**

COMPLAINT FOR INJUNCTIVE RELIEF

COMES NOW the City of Manchester, Tennessee ("Plaintiff"), pursuant to Tenn. Code Ann. § 10-7-503(a)(7)(C), files this verified Complaint against Defendant, Sarah Bradley, and alleges as follows:

PARTIES

1. Plaintiff, the City of Manchester, is a municipal corporation organized and existing under the laws of the State of Tennessee, with its principal place of business located in Manchester, Coffee County, Tennessee.
2. Upon information and belief, the Defendant, Sarah Bradley, is an individual who owns, leases, occupies, or controls the property located at 85 Kenwood Court, Manchester, Coffee County, Tennessee 37355.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to Tenn. Code Ann. § 16-10-101, as this Court is a court of general jurisdiction with authority to hear all cases not specifically assigned to another tribunal, and Tenn. Code Ann. § 10-7-503(a)(7)(C) because the Plaintiff seeks equitable relief under Tennessee law.
4. This Court has personal jurisdiction over the Defendant, Sarah Bradley, as she resides in Coffee County, Tennessee.
5. Venue and subject matter jurisdiction are proper in this Court as all parties reside or are located in Coffee County, Tennessee, and the events giving rise to this action occurred in Coffee County.

FACTUAL ALLEGATIONS

6. Plaintiff is a municipal governmental entity subject to the Tennessee Public Records Act.
7. As a governmental entity, Plaintiff is required to maintain public records and respond to requests for inspection and copying of such records.
8. Over the last three years, Defendant, Sarah Bradley has submitted multiple requests for public records to Plaintiff and has caused significant time, money, and effort to be expended by Plaintiff while attempting to fulfill the requests.
9. Over the course of the last twelve (12) months, the Defendant has filed six (6) or more requests with multiple subparts that require the Plaintiff's public records request coordinator, Mayor's office, Finance Department, Water and Sewer Department, Codes Department, Street Department, Recorder's Office, department directors, and other City employees to search for records, determine whether records exist, review records,

communicate internally regarding the records, prepare responses, calculate costs, and respond to follow-up communications.

10. The Defendant has been repeatedly warned that her actions are significantly disrupting government operations and are running afoul of Tennessee law, specifically Tenn. Code Ann. § 10-7-503(a)(7)(C).

11. Specifically, the Defendant has submitted numerous public records requests to the City over the last three (3) years, including but not limited to, requests propounded on or around August 22, 2023, November 17, 2023, January 19, 2024, March 14, 2024, June 20, 2024, August 8, 2024, September 23, 2024, December 9, 2024, January 27, 2025, March 9, 2025, November 17, 2025, June 15, 2026, and July 6, 2026.

12. Upon information and belief, the Plaintiff believes that the Defendant may be conspiring with others to disrupt city operations.

13. The Defendant's requests are not isolated requests seeking a single identifiable public record. Rather, the Defendant has repeatedly submitted broad, multi-part requests. For example, the November 17, 2023, request sought approximately twenty-six (26) separate categories of records from numerous City departments and offices, including the Water and Sewer Department, Planning and Codes, the Mayor's Office, and the Recorder's Office/Board of Mayor and Aldermen (BOMA).

14. Under the Water and Sewer Department heading, the Defendant requested six (6) records, including but not limited to, monthly operation reports for the wastewater treatment plant, MWSD inventory procedures and capital improvement plan, and maintenance records for the West End Circle Industrial Park pump stations.

15. Under the Planning and Codes heading, the Defendant requested eight (8) separate records, including Planning Commission packets, Planning Commission training records and written statements of attendance, Planning and Land Use Subcommittee interest disclosures, staff reports or minutes, and proposed plan records for multiple parcels.
16. Under the Mayor's Office heading, the Defendant requested eight (8) separate sewer letters signed by property owners for specific parcels.
17. Under the Recorder's Office/Board of Mayor and Aldermen (BOMA) heading, the Defendant requested four (4) separate requests for BOMA minutes, Planning Commission certification records, and Greater Manchester Economic Development Board minutes.
18. The aforementioned request submitted on November 17, 2023, required City employees from multiple departments to determine which records existed, which records did not exist, which records were available, which department or office had the responsive records in their possession, custody, or control, and what costs would be associated with producing the records.
19. The City responded to the Defendant's November 17, 2023, request and advised that certain records could be supplied, that other records did not exist, and that the estimated cost of producing the records was initially $115.00 for three (3) hours of labor.
20. Later, the City advised the Defendant that additional records had been located or identified, increasing the total estimated cost to $235.00.
21. Instead of simply proceeding with or declining the request, the Defendant continued to send follow-up communications seeking clarification, confirmation of non-existence,

grounds for denial, explanations, and additional information regarding the requested records.

22. The Defendant's follow-up communications required additional review by City employees and City officials, including time spent determining whether records existed, which records have already been provided, which records were not available, and how to respond to the Defendant's additional questions.

23. The Defendant's communications regularly go beyond requests for identifiable existing records, and instead seek to debate legal or procedural conclusions, or responses to collateral issues involving City ordinances, public meetings, and City boards or commissions. The Defendant has exhibited a pattern in this behavior, leading the Plaintiff to believe she intends to disrupt governmental operations.

24. The Tennessee Public Records Act does not require the City to sort through files to compile information into a new record, to create or recreate a record that does not exist, to provide legal analysis, or to engage in debate with a requester.

25. However, the City has repeatedly exhausted significant time and resources attempting to respond to the Defendant's records requests and follow-up communications in good faith, pursuant to the Tennessee Public Records Act.

26. The City has consistently documented staff time and the costs associated with completing the Defendant's records requests. In one instance, the City calculated approximately fifteen (15) total staff labor hours across various departments and offices. This cost calculation identified 182 total copies of the requested records, costing a total of $483.81.

27. Moreover, the cost calculation does not fully encompass the disruption caused by the Defendant's requests because City employees must also shift their focus on ordinary

governmental duties to confer internally, identify the proper record custodian, review the requested records and whether they exist, and prepare the responses.

28. After the Defendant's repeated public records requests, including the all-encompassing November 17, 2023, request and related follow-up communications, the City issued its first written warning to the Defendant on December 28, 2023, pursuant to Tenn. Code Ann. § 10-7-503(a)(7).

29. The first written warning on December 28, 2023, was issued by Lisa Myers, City Recorder, and advised the Defendant that she had made more than five (5) requests for public information from the City of Manchester, Tennessee. The warning advised the defendant that her requests were voluminous in nature and required hours of unjustified and unreimbursed work by the Mayor's Office, department directors, and employees.

30. The first written warning further advised the Defendant that she had not been specific in her requests, sought information with no basis for her specific inquiries, and that, after City employees spent hours searching for records responsive to ambiguous requests, she changed her mind after receiving cost estimates. The warning therefore identified the precise conduct the City believed was disrupting governmental operations: voluminous requests, lack of specificity, requests seeking information rather than identifiable records, and withdrawal or alteration of requests after City staff had already expended substantial time.

31. In calendar year 2024, after receiving the first written warning, the Defendant submitted six (6) public records requests to the City dated January 19, 2024, March 14, 2024, June 20, 2024, August 8, 2024, September 23, 2024, and December 9, 2024.

32. In calendar year 2025, before the City sent its second written statutory warning to the Defendant, the City received at least two (2) additional public records requests from the Defendant on January 27, 2025, and March 9, 2025.

33. Due to the continued volume, scope, ambiguity, and repetitive nature of the Defendant's requests after the December 28, 2023, written warning, the City issued a second written warning to the Defendant pursuant to Tenn. Code Ann. § 10-7-503(a)(7)(C). The second written warning advised the Defendant that she had submitted more than five (5) requests for public records from the City since her prior written warning and again identified the same conduct the City believed was disrupting governmental operations.

34. The second written warning specifically identified the six (6) requests received in calendar year 2024 and the two (2) requests received in calendar year 2025. The second written warning similarly advised the Defendant that her requests were ambiguous, voluminous in nature, and that the requests required numerous hours of unjustified and unreimbursed work by the Mayor's Office, Finance Office, other directors, and department employees. The letter also discussed the Defendant's making multiple requests and having City employees search for the records, only to have the Defendant change her mind and withdraw the requests after numerous hours have been expended searching for the requested records.

35. The second written warning notified the Defendant that the City believed her requests, made after the first written warning, were intended to and did disrupt government operations within the city. The Defendant also was notified that the City Attorney had been instructed to initiate a petition seeking an injunction pursuant to Tenn. Code Ann. §10-7-503(a)(7)(C).

36. Despite receiving two (2) written warnings from the records custodian, the Defendant on or around November 17, 2025, submitted another extremely broad public records request to the City.

37. The November 17, 2025, request was properly submitted on a records request form, but the request form contained approximately fifty (50) separate categories of requested records.

38. The November 17, 2025, request sought records from at least five (5) City departments or offices: Water and Sewer, Codes, Street, Finance, and the Mayor's Office.

39. Under the Water and Sewer Department heading, the Defendant requested WWTP monthly operation reports for August 2025, September 2025, and October 2025; complete standard specifications for sewer and water; a maintenance agreement for private lines; and testing or inspection records for Walnut Grove Phase I.

40. Under the Codes Department heading, the Defendant requested multiple disturbance permits, stormwater audio, stormwater brochures, Planning Commission minutes, Planning Commission documents for multiple sites, a directors annexation summary or report, and TDEC sewer plan approval records.

41. Under the Street Department heading, the Defendant requested a street list, paving lists for 2025 and 2026, sidewalk documentation, protected species documentation, flood study and FEMA approval documentation, a work order, and Street Committee agendas and minutes.

42. Under the Finance Department heading, the Defendant requested pay grade records, resolutions, ordinances, multiple BOMA agendas and minutes, and Finance Committee minutes.

43. Under the Mayor's Office heading, the Defendant requested EDA grant proposals, EDA selection documents, inflow and infiltration reduction data, flow addition data, emails regarding the Water and Sewer Commission, a resignation letter, monthly director reports for all departments, long-term capital plans for all departments, Public Building Authority minutes, Greater Manchester Economic Development Board minutes, and Tourism and Community Development Commission minutes.

44. Several items in the November 17, 2025, request were broad categories rather than identifiable records, including "emails regarding" a public body, "monthly director reports for all departments," "long-term capital plans for all departments," and "any/all 2025 meetings" for certain boards or commissions.

45. There were multiple records in the November 17, 2025, request that the Defendant requested be published to the City's Document Center or applicable department pages "for the benefit of all citizens." By requesting the selected records to be published, however, the Defendant sought to impose additional work on City employees beyond the production of responsive records to the requester.

46. The November 17, 2025, request repeated the exact type of conduct identified in the City's prior warnings: the request was broad, contained multiple parts, and was directed to multiple departments and required the City to search across numerous subject areas and time periods.

47. The Defendant's continued submission of substantially similar, voluminous requests after two (2) written statutory warnings demonstrates that the warnings did not alter her conduct and supports the inference that the Defendant knowingly continued engaging in conduct she had been expressly advised was disrupting governmental operations.

48. Despite receiving two (2) written warnings, and despite the City's repeated attempts to respond to the Defendant's public records requests in good faith, the Defendant again submitted another broad and voluminous request on or around June 15, 2026.

49. The June 15, 2026, request was submitted on the proper public records request form and requested inspection and electronic delivery of the records.

50. The June 15, 2026, request contained approximately forty-five (45) separate categories of records. The request sought records from at least four (4) City departments or offices, including the Mayor's Office, Finance Department, Codes Department, and Water and Sewer Department.

51. Under the Mayor's Office heading, the Defendant requested approximately eleven (11) separate categories of records, including a project list for bond issuance, any and all capital plans, the Fire Department Annual Report for 2025, a traffic/pedestrian study for Highway 41 and Kimberly Lane/Roberts Boulevard, correspondence with MTAS regarding the number of Water and Sewer Commissioners, correspondence with MTAS regarding the number of Aldermen on the Water and Sewer Commission, correspondence with TBOUR regarding the number of Water and Sewer Commissioners, correspondence with TBOUR regarding the number of Aldermen on the Water and Sewer Commission, correspondence with TDEC regarding Bonnaroo dumping, signatory authority delegation letters to TDEC, and inflow and infiltration reduction/removal data and summaries.

52. Under the Finance Department heading, the Defendant requested approximately eight (8) separate categories of records, including the public records policy, classification and compensation plan, payment summaries related to St. John Engineering, Craig Johnson, and conference center renovations, procurement documentation for conference center

projects, and BOMA approval for conference center building air conditioning and parking lot repair.

53. Under the Codes Department heading, the Defendant requested approximately nine (9) separate categories of records, including inspection reports, enforcement records, correspondence with TDEC, and correspondence with FEMA regarding unpermitted fill sites on Roberts Boulevard and Madison Street, along with proof of CGP coverage submitted to the City for permit issuance for Northridge Subdivision Phases II and III.

54. Under the Water and Sewer Department heading, the Defendant requested approximately seventeen (17) separate categories of records, including pretreatment sampling results, tap lists, an organizational chart, SSO monitoring policies and procedures, SSO reporting policies and procedures, SSO manhole inspection checklists, SSO tracking data, directors' reports for the Mayor and Water and Sewer Commission, wholesale contracts, Bonnaroo-related agreements, maintenance agreements, sewer specifications including pump and lift stations, policies regarding private grinder pumps, lists of grinder pumps on private property, and correspondence with TBOUR regarding rate studies and rural water rates.

55. Like the prior requests, the June 15, 2026, request again required the City to conduct searches across multiple departments, multiple department heads, multiple subject areas, and multiple time periods. The Plaintiff believes this request was submitted as a retaliatory act intended to disrupt government operations.

56. Also, the Defendant requested certain records in the June 15, 2026, request to be published on the City's website because the requested records were "reasonably believed to be of general public interest." Like the November 17, 2025, request, the Defendant

again sought to impose additional work on City employees beyond simply making responsive public records available to the requester.

57. This most recent request is just the latest example of the same voluminous, multi-part, multi-department request pattern that the City has repeatedly warned is disruptive to its government operations.

58. Despite the City's prior written warnings and continued efforts to comply with the Tennessee Public Records Act, the Defendant submitted another public records request on or around July 6, 2026. Again, the Plaintiff believes this was intended as a retaliatory attack, intended to disrupt City government.

59. The July 6, 2026, request was directed at Anthony Burrows, the City's Records Custodian, and requested copies or duplicates and requested electronic delivery of the documents.

60. The July 6, 2026 request was directed to the Mayor's office and sought six (6) categories of records: (1) all videos taken by Sage Keele at City Hall on July 3, 2026; (2) any photos or photographs taken by Sage Keele at City Hall on July 3, 2026; (3) any emails or texts regarding the incident with Sage Keele at City Hall on July 3, 2026; (4) disciplinary reports or write-ups for Lonnie Foley from hiring date to present; (5) written notice to all staff regarding raises in June/July 2026; and (6) written instructions to department heads regarding distribution of raises in June/July 2026.

61. Although the July 6, 2026, request contained fewer categories than some of the Defendant's prior requests, it is significant because it was submitted after multiple written warnings and continued the pattern of seeking records related to City personnel, City Hall incidents, internal communications, disciplinary matters, and City administration.

62. The July 6, 2026, request also sought emails and text messages regarding a specific incident at City Hall, which required or would require City employees to identify custodians, search communications, review potentially responsive records, determine whether exemptions would apply, and prepare a response under the Tennessee Public Records Act.

63. The Defendant's July 6, 2026, request further demonstrates that the prior written warnings did not stop the Defendant's conduct, and supports Plaintiff's allegation that the Defendant is likely to continue making requests in a manner that requires City employees to divert time and resources away from ordinary governmental duties.

64. The Defendant's continued submission of materially similar public records requests after two (2) written warnings supports an inference that the disruption is not accidental, isolated or incidental. The Defendant was expressly advised that her conduct was disrupting City operations, and that continued conduct could result in an injunction, yet she continued submitting the same type of voluminous and multi-part requests.

65. Intent may be inferred from the Defendant's course of conduct, including the repeated submission of materially similar requests after express written warnings, the continued use of broad categories rather than discrete identifiable records, the inclusion of requests seeking explanations, or information rather than existing records, and the repeated demand that City employees search across multiple departments, and require City employees to publish the requested records on the city website, making substantially more work for City employees and department heads.

66. The City does not contend that requesting public records, standing alone, constitutes disruptive conduct. Rather, Plaintiff alleges that Defendant's repeated pattern of

submitting exceptionally broad, multi-department requests, requesting publication of records to the City's website, requesting explanations rather than identifiable records, repeatedly changing or abandoning requests after substantial staff work had been performed, and continuing the same conduct after multiple written warnings collectively demonstrates an intent to disrupt governmental operations.

67. Upon information and belief, the City understands that the Defendant has also exhibited disruptive and aggressive behavior at other governmental institutions and public organizations, and has been banned from several such locations or organizations. Plaintiff does not offer this allegation to restrict the Defendant's lawful right of access to public records, but to demonstrate the broader course of conduct and the context in which the Defendant's public records requests have been made.

68. Upon information and belief, the Defendant has also engaged in hostile and disruptive conduct toward City officials and employees, including verbally abusive conduct directed at a Former Mayor, and other City employees, and has been removed from public meetings for disruptive conduct. This hostile and verbally abusive conduct has contributed to the disruption of City operations and provides additional context for Plaintiff's allegation that the Defendant's continued public records activity, after repeated warnings, is intended to disrupt governmental operations rather than merely obtain identifiable public records.

69. Plaintiff intends to present admissible evidence at the evidentiary hearing supporting the allegations contained in the preceding two (2) paragraphs to the extent such evidence is admitted by the Court.

70. The Defendant's course of conduct has disrupted the City's governmental operations, and the disruption is not merely limited to the records custodian. The Mayor's Office, Finance Department, Water and Sewer Department, Codes Department, and many other City departments have all had their operations disrupted.

71. As stated before, Defendant's requests disrupt government operations because they require government employees to divert their time and attention away from their ordinary public duties to search for records, communicate internally to determine where the records are maintained, review the records to determine if an exemption applies, determine which records, if any, require redactions, prepare cost calculations, and prepare responses to the requester.

72. These departments' operations have been disrupted as a result of the Defendant's repeated requests and follow-up communications interfering with the City's ability to efficiently conduct governmental business and serve the public as a whole.

73. The City has no adequate remedy at law because the imposition of monetary damages will likely not prevent the Defendant from continuing to submit these voluminous and extremely disruptive requests.

74. Without injunctive relief, the Defendant is likely to continue submitting public records requests in a manner that is disruptive and exhausts substantial unreimbursable government labor, time, and taxpayer money.

CLAIM FOR RELIEF:

INJUNCTION FOR DISRUPTIVE PUBLIC RECORDS REQUESTS IN VIOLATION OF TENN. CODE ANN. § 10-7-503

75. Plaintiff realleges and incorporates by reference paragraphs (1) through (74) and further alleges as follows:

76. Defendant made requests for public records to Plaintiff.

77. Defendant submitted multiple requests for public records with multiple subparts to Plaintiff, a governmental entity subject to the Tennessee Public Records Act.

78. The Defendant has submitted numerous public records requests to the City over the last three (3) years, including but not limited to, requests propounded on or around August 22, 2023, November 17, 2023, January 19, 2024, March 14, 2024, June 20, 2024, August 8, 2024, September 23, 2024, December 9, 2024, January 27, 2025, March 9, 2025, November 17, 2025, June 15, 2026, and July 6, 2026.

79. The Defendant's requests are not isolated requests seeking a single identifiable public record. Rather, the Defendant has repeatedly submitted broad, multi-part requests. For example, the November 17, 2023, request sought approximately twenty-six (26) separate categories of records from numerous City departments and offices, including the Water and Sewer Department, Planning and Codes, the Mayor's Office, and the Recorder's Office/Board of Mayor and Aldermen (BOMA).

80. The Defendant's November 17, 2025, request was properly submitted on a records request form, but the request form contained approximately fifty (50) separate categories of requested records.

81. The November 17, 2025, request sought records from at least five (5) City departments or offices: Water and Sewer, Codes, Street, Finance, and the Mayor's Office.

82. The Defendant's June 15, 2026, request was also submitted on a public records request form and continued the same pattern of broad, multi-part, and multi-department requests after the City had issued two (2) written warnings to the Defendant.

83. The June 15, 2026, request contained approximately forty-five (45) separate categories of requested records and sought records from at least four (4) City departments or offices, including the Mayor's Office, Finance Department, Codes Department, and Water and Sewer Department.

84. The Defendant's July 6, 2026, request continued the same course of conduct after the City's written warnings. Although narrower than some prior requests, the July 6, 2026 request sought records concerning a City Hall incident, internal communications, personnel disciplinary records, and internal raise-related communications, further requiring City employees to divert time from ordinary duties to identify custodians, search records, review communications, and determine whether exemptions or redactions apply.

85. Defendant's requests, viewed individually and collectively, are voluminous, multi-part, multi-department, ambiguous, repetitive, and burdensome.

86. Defendant's requests have caused Plaintiff to expend substantial unreimbursable staff time and resources across departments.

87. The Defendant's intent to disrupt government operations may be inferred from the totality of her conduct, including her continued submission of materially similar requests after two (2) written warnings, the repeated use of multi-part requests which included up to fifty (50) requests on one (1) form, and the repeated imposition of staff time and resources after the City specifically identified these same issues as disruptive. This inference is further supported by Defendant's continuation of the same course of conduct through her July 6, 2026, request after receiving multiple written warnings that specifically identify the disruptive nature of her requests.

88. Defendant's continued submission of broad, multi-part, multi-department requests after receiving two (2) written warnings, including the November 17, 2025 request, the June 15, 2026 request, and the recent July 6, 2026 request, supports a finding by clear and convincing evidence that the Defendant acted with the intent to disrupt government operations because she continued the same course of conduct after being specifically warned that the conduct was disrupting City operations.

89. Tenn. Code Ann. § 10-7-503(a)(7)(C)(iv) authorizes this Honorable Court, upon a finding by clear and convincing evidence that a public records request was made with the intent to disrupt government operations, to enjoin the Defendant from making public records requests for a period of up to one (1) year.

90. The Plaintiff believes that injunctive relief is wholly necessary and appropriate to prevent the continuing disruption to Plaintiff's governmental operations.

91. The Plaintiff acknowledges that the requested injunction is narrowly tailored because Tenn. Code Ann. § 10-7-503(a)(7)(C)(iv) permits Defendant, while subject to the injunction, to petition this Court for permission to make a public records request upon a showing that the request is not made with intent to disrupt government operations.

92. The Plaintiff also acknowledges that Tenn. Code Ann. § 10-7-503(a)(7)(C)(iii) provides that after a petition is filed and while the case is pending, the records custodian shall continue to comply with the Tennessee Public Records Act, subject to any interim Court order.

93. Plaintiff will continue to comply with the Tennessee Public Records Act during the pendency of this action, subject to all applicable rights, procedures, exemptions, cost provisions, and limitations under Tennessee law.

94. If Plaintiff prevails, Tenn. Code Ann. § 10-7-503(a)(7)(C)(iii) provides that Defendant shall reimburse the records custodian for labor costs incurred by the records custodian in producing records during the pendency of the case.

95. Plaintiff also seeks all other relief necessary and appropriate to abate the disruptive nature of the public records requests and conduct its governmental duties efficiently.

PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, the Plaintiff respectfully requests that this Honorable Court enter judgment in favor of the Plaintiff and against the Defendant, Sarah Bradley, as follows:

1. Issue a preliminary injunction pursuant to Tenn. Code Ann. § 10-7-503(a)(7)(C), enjoining the Defendant from making further disruptive public records requests to Plaintiff pending the final resolution of this action, or, in the alternative, set this matter for an expedited hearing on Plaintiff's request for such statutory injunctive relief.
2. That this Court finds by clear and convincing evidence that the Defendant has made public records requests with the intent to disrupt government operations.
3. That this Court enter a permanent injunction pursuant to Tenn. Code Ann. § 10-7-503(a)(7)(C), enjoining Defendant from making public records requests to the City of Manchester for a period of up to one (1) year.
4. That the injunction provides that Defendant may petition this Court for permission to make a public records request during the injunction period, and that the Court may approve such a request if Defendant shows that the request is not made with intent to disrupt government operations.

5. In the alternative, or in addition, that this Court impose reasonable conditions during the injunction period, including that any proposed request by Defendant must be submitted to the Court for approval before submission to the City, must identify specific existing records, must be limited to a reasonable number of discrete record categories, must not require the City to compile information or create records, and must not include argument, debate, commentary, or requests for explanations instead of records.
6. That, if Plaintiff prevails, Defendant be ordered to reimburse the records custodian for labor costs incurred in producing records during the pendency of this action pursuant to Tenn. Code Ann. § 10-7-503(a)(7)(C)(iii).
7. That Plaintiff recovers its costs as allowed by law; and that Plaintiff receive such other, further, and general relief as this Court deems just and proper.

[Remainder of this page left intentionally blank. Signature block and verification on next page.]

I HEREBY DECLARE UNDER THE PENALTIES OF PERJURY THAT THE ALLEGATIONS CONTAINED IN THE FOREGOING VERIFIED COMPLAINT ARE TRUE AND CORRECT TO THE BEST OF MY PERSONAL KNOWLEDGE AND INFORMATION MADE KNOWN TO ME IN MY OFFICIAL CAPACITY.

Anthony Burrows
City of Manchester, TN Records Custodian
200 W Fort Street
Manchester, TN 37355

STATE OF TENNESSEE

COUNTY OF COFFEE

On this 16th day of July, 2026, before me personally appeared Anthony Burrows, to me known to be the person(s) described in and who executed the foregoing instrument, and acknowledged that such person(s) executed the same as such person's free act and deed.

WITNESS my hand and seal, at office in Manchester, Tennessee this 16th day of 2026, 2026.

Notary Public

My Commission Expires: 03.18.28

DAWN E. ADAMS STATE OF TENNESSEE NOTARY PUBLIC COFFEE COUNTY

Respectfully submitted,

/s/ L. Craig Johnson
L. Craig Johnson, BPR No. 014370
Law Offices of L. Craig Johnson, PLLC
224 West Fort Street
Manchester, Tennessee 37355
lcjjudge@aol.com
931-728-2847
Attorney for Plaintiff City of Manchester, TN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff's Complaint for Injunctive Relief has been served upon Defendant Sarah Bradley by [personal service / certified mail / email] at 85 Kenwood Court, Manchester, Tennessee 37355, or at losbradley@gmail.com on this _____ day of _____ 2026.

Respectfully submitted,

/s/ _____

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