

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

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

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

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**MOTION TO INTERVENE**

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Pursuant to *Tennessee Rules of Civil Procedure* 24.01, Covenant Presbyterian Church of Nashville (“Covenant Church”), by and through counsel, moves the Court for an order permitting its intervention to protect its interests relating to the release of records sought in this matter. The records sought in Petitioners’ Complaint and Petition may include and/or relate to information

owned by Covenant Church, including, but not limited to, schematics of church facilities and confidential information pertaining to Covenant Church employees. Covenant Church 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. Therefore, intervention by Covenant Church in this action is warranted.

A proposed order granting this Motion to Intervene is included herewith at **Exhibit A**.

**THIS MOTION IS EXPECTED TO BE HEARD ON MAY 18, 2023 AT 1:00 PM.  
FAILURE TO TIMELY FILE AND SERVE A WRITTEN RESPONSE MAY RESULT IN  
THIS MOTION BEING GRANTED WITHOUT FURTHER HEARING.**

Respectfully Submitted,

**Adams and Reese LLP**

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**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:

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This 12th day of May, 2023.

**Adams and Reese LLP**

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