

SHELBY COUNTY CHANCERY COURT
MAY 22 2024
W. AARON HALL, C&M
TIME: 8:30 BY: [Signature]

1 Gregory E Naussany
2 Naussany Investments & Private Lending
3 Jacksonville Florida 32208
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IN THE CHAUNCERY COURT FOR
SHELBY COUNTY, TENNESSEE

7 DANIELLE RILEY KEOUGH,
8 AS TRUSTEE OF THE PROMENADE TRUST
9 Plaintiff,
10 vs.
11 NAUSSANY INVESTMENTS & PRIVATE LENDING
12 GREGORY E NAUSSANY, LENDER
13 Defendant

Case No.: CH-24-0632-3

MOTION OF DENIAL FOR DECLARATORY
INJUNCTION AND TEMPORARY RESTRAINING
ORDER AND MOTION TO CONTINUE OR
EXTEND TIME TO PRODUCE

14 I, GREGORY E. NAUSSANY, LENDER, NAUSSANY INVESTMENTS & PRIVATE
15 LENDING, JACKSONVILLE FLORIDA submit this Motion of Denial for the request for a Declaratory Injunction
16 and Temporary Restraining Order filed by Danielle Riley Keough, trustee of the Promenade Trust.

17 I respectfully deny the allegations made by Danielle Riley Keough, Trustee of the Promenade
18 Trust and oppose the granting of the requested relief. I believe the claims made against Naussany Investments &
19 Private Lending are unfounded and do not warrant the issuance of a Declaratory Injunction or Temporary
20 Restraining Order

21 I request that the Court deny the requested relief and allow Naussany Investments & Private
22 Lending the opportunity to present defense against the allegations made by Danielle Riley Keough, Trustee of the
23 Promenade Trust. Naussany Investments & Private Lending is prepared to provide evidence and arguments to
24 demonstrate the relief sought is not justified in this case.

25 I respectfully request that the Court consider Motion of Denial and rule in my favor.

RESPECTFULLY SUBMITTED,
[Signature]

26 Dated this 21ST day of MAY, 2024

27 MOTION OF DENIAL FOR DECLARATORY INJUNCTION AND TEMPORARY RESTRAINING ORDER
28 AND MOTION TO CONTINUE OR EXTEND TIME TO PRODUCE - 1