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

CLATA RENEE BREWER, *et al.*;	
***Petitioners*,**	**Case No. 23-0538-III**
vs.	**CONSOLIDATED**
METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY;	****controlling case****
***Respondent*,**	
PARENTS OF MINOR COVENANT STUDENTS JANE DOE AND JOHN DOE; THE COVENANT SCHOOL; and COVENANT PRESBYTERIAN CHURCH	
***Intervenors*.**	

FILED
2023 JUN 14 PM 3:17
CLERK & MASTER
DAVIDSON CO CHANCERY CT
D.C.&M.

NOTICE OF FILING OF ASSIGNMENT AND TRANSFER OF LEGAL AND EQUITABLE TITLE TO CERTAIN PERSONAL AND INTELLECTUAL PROPERTY CREATED BY AUDREY ELIZABETH HALE

As directed by the Court, Attorney David L. Raybin files with the Court on behalf of Ronald and Norma Hale, parents and successors of Audrey Elizabeth Hale, whose original writings are the subject of this matter, the attached Assignment and Transfer of Legal and Equitable title to Certain Personal and Intellectual Property Created by Audrey Elizabeth Hale.

Respectfully Submitted,

/s/

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Counsel for Ronald and Norma Hale

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served, via the method(s) indicated below, on the following counsel of record, this the 14th day of **June, 2023.**

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Counsel for the Covenant School Parents

/s/
David L. Raybin (#003385)

Assignment and Transfer of Legal and Equitable Title to Certain Personal and Intellectual Property Created by Audrey Elizabeth Hale

FILED
2023 JUN 14 PM 3:
DAVIDSON CO. CHANCERY CT.

Whereas Ronald and Norma Hale (the "Hales") are the parents of Audrey Elizabeth Hale ("Ms. Hale"), and

Whereas, during her lifetime, Ms. Hale created, selected, organized and/or compiled, electronic and/or tangible writings, papers, drawings, photos, graphs, maps, images, impressions, and other media, and further including records, compilations and databases of electronic searches conducted by Ms. Hale that may be stored on various electronic devices and systems, all of which are now in the possession of and/or are accessible by the Metropolitan Government of Nashville and Davidson County and/or other government authorities (collectively the "Writings"), and

Whereas, the Writings constitute copyrighted works and/or confidential information owned by Ms. Hale during her lifetime (collectively the "Intellectual Property Rights")

Whereas Ms. Hale died on March 27, 2023 during the events that took place at the Covenant School, and

Whereas the Hales are not aware of any will or other valid testamentary instrument executed by Ms. Hale that prevents their ability to disposite of the Writings, and

Whereas, in the absence of a valid testamentary instrument executed by Ms. Hale, all of Ms. Hale's property transfers to her closest next-of-kin, and

Whereas, under Tennessee intestate law, with Ms. Hale having no spouse (living or otherwise) or descendants (living or otherwise), the first beneficiaries would be Ms. Hale's parents; and thus, the Hales are Ms. Hale's closest next-of-kin,

Whereas the Hales therefore own equitable title to the Writings and anticipate owning possession and legal title of the Writings following probate of Ms. Hale's estate, and

Whereas evidence from suicides and trauma following past mass murders and scientific research shows that material like the Writings can cause additional psychological trauma to the surviving victims, and

Whereas evidence known to law enforcement and from scientific research shows that material like the Writings can inspire others to commit copycat and other similar mass murders, and

Whereas the Hales desire that no further harm come to any of the children who survived the events that took place on March 27, 2023 at the Covenant School (the "Children"), and

Whereas the Hales desire that no further harm come to any children or adults anywhere in the world because of the Writings, and

Whereas the parents of the Children have organized themselves and intervened in a pending legal dispute to prevent dissemination of the Writings to prevent further harm that may come from dissemination of the Writings to the Children and/or any other person in the world, and

Whereas the Davidson County Chancery Court, Division III, has permitted the Parents of Minor Covenant Students Jane Doe and John Doe (the "Parents") to intervene pseudonymously on behalf of the Children in the matter of *Clata Brewer, et. al. v. Metro*, No. 23-0538-III, and

Whereas the composition and identities of the parents and the Children has been set by order of the Chancery Court and is known only to the Chancellor and the Parents' legal representatives, and

Whereas Counsel for the Hales is satisfied that the "Parents" – and no others – are truly representative of the "Children" the Hales wish to protect, and

Whereas the Hales wish to protect the privacy of the Children by conveying their rights to a trust, and

Whereas the Hales wish to ensure that the trust created by this gift will be used for the purpose of (1) preventing the dissemination of the Writings, (2) preventing the copying, distribution, publication, or unauthorized use of any of the Writings, and (3) for the purpose of seeking damages on behalf of the Children caused by any infringement, misappropriation, or unauthorized use of any of the Intellectual Property Rights, and

Whereas the Hales wish to make an irrevocable gift of the Writings for the purpose of helping protect the Children and indeed all children and persons in the world,

Now, therefore, the Hales hereby:

1. Irrevocably assign and transfer all of their equitable, legal, and other rights in the Writings and Intellectual Property Rights (including all tangible copies thereof) as a gift to the Parents in trust for the benefit of the Children, including all rights to and claims for damages, restitution, and injunctive and other legal and equitable relief for past, present, and future infringement or misappropriation of any of the

Intellectual Property Rights, for the express purpose of preventing harm to the Children including preventing dissemination of the writings and to pursue all legal rights and remedies available at law to recover damages on behalf of the Children for the harm they will suffer.

2. State that the name of the trust created by this assignment and transfer shall be the "Covenant Children's Trust,"

3. Appoint Brent Leatherwood as the representative of the Parents in the legal proceedings as the initial trustee of the Covenant Children's Trust.

4. Establish that Mr. Leatherwood shall serve as trustee until such time as he shall voluntarily resign and appoint a successor trustee or be replaced as trustee by a writing signed by a majority of the Parents.

5. Provide assurances that they will take all steps necessary to effectuate full and complete transfer of the Writings, including executing such other documents as beneficiaries or executors of the estate that may reasonably be necessary to transfer, register, and/or record any of the Intellectual Property Rights conveyed herein.

6. Assign and license (or upon probate of the estate will assign and license) to the Covenant Children's Trust such rights under the Tennessee Personal Rights Protection Act, (T.C.A. Section 47-25-1101 – 1108) that may be needed by the trust to prevent and remedy the unauthorized use of Ms. Hale's name, image, or likeness for commercial purposes in relation to the events that took place at the Covenant School.

Signature Page To
Assignment and Transfer of Legal and Equitable title to Certain Personal and Intellectual Property Created by Audrey Elizabeth Hale

IN WITNESS WHEREOF, Assignors and Assignee have caused this Assignment Agreement to be executed on the day and year first above written.

Assignors:

By: Ronald Hale

By: Norma Hale

By: **David Raybin, Esq.**
Counsel to Assignors Ronald and Norma Hale

Assignee:

By: **Brent Leatherwood**
On behalf of the Parents of Minor Covenant Students Jane Doe and John Doe

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF Davidson)

I hereby swear or affirm that the foregoing Assignment and Transfer of Legal and Equitable Title to Certain Personal and Intellectual Property Created by Audrey Elizabeth Hale was executed by me on this 13th day of June, 2023.

Name: Ronald Hale

Title: PARENT OF AUDREY HALE

Sworn to and subscribed before me on this the 13th day of June, 2023.

Notary Public

My Commission Expires: 1-8-2024

SHARON L. WILCOX
STATE OF TENNESSEE NOTARY PUBLIC
DAVIDSON COUNTY
MY COMMISSION EXPIRES 1-8-2024

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF Davidson)

I hereby swear or affirm that the foregoing Assignment and Transfer of Legal and Equitable Title to Certain Personal and Intellectual Property Created by Audrey Elizabeth Hale was executed by me on this 13th day of June, 2023.

Norma Hale

Name: Norma Hale

Title: Parent of Audrey Hale

Sworn to and subscribed before me on this the 13th day of June, 2023.

Sharon L. Wilcox
Notary Public

My Commission Expires: 1-8-2024

SHARON L. WILCOX
STATE OF TENNESSEE
NOTARY PUBLIC
DAVIDSON COUNTY
MY COMMISSION EXPIRES 1-8-2024

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF Davidson)

I hereby swear or affirm that the foregoing Assignment and Transfer of Legal and Equitable Title to Certain Personal and Intellectual Property Created by Audrey Elizabeth Hale was executed by me on this 13th day of June, 2023.

Name: David L. Raybin, Esq.

Title: attorney for Mr. + Mrs. Hale.

Sworn to and subscribed before me on this the 13th day of June, 2023.

Sharon L. Wilcox
Notary Public

My Commission Expires: 1-8-2024

SHARON L. WILCOX
STATE OF TENNESSEE
NOTARY PUBLIC
DAVIDSON COUNTY
MY COMMISSION EXPIRES 1-8-2024

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

I hereby swear or affirm that the foregoing Assignment and Transfer of Legal and Equitable Title to Certain Personal and Intellectual Property Created by Audrey Elizabeth Hale was executed by me on this 14th day of June, 2023.

Frederick Brent Leatherwood

Name: Brent Leatherwood.

Title: Parent Representative

Sworn to and subscribed before me on this the 14th day of JUNE, 2023.

#146513

Notary Public

My Commission Expires: Upon death

END