

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MOM FOR LIBERTY –
WILSON COUNTY, TN, *et al.*,

Plaintiffs,

v.

WILSON COUNTY BOARD OF
EDUCATION, *et al.*

Defendants.

Case No: 3:23-cv-211

Judge Eli Richardson

Magistrate Judge Luke A. Evans

PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56, the plaintiffs move for summary judgment on all remaining claims. There are no genuine disputes over material facts and the plaintiffs are entitled to judgment as a matter of law. In support of their motion, the plaintiffs rely on their memorandum of law, statement of undisputed material facts, and exhibits contemporaneously filed with their motion, along with other record evidence cited throughout their papers.

The plaintiffs request that the Court grant their motion and: (1) permanently enjoin the defendants from requiring that individuals giving public comments at Wilson County Board of Education board meetings publicly state their address, (2) permanently enjoin the defendants from prohibiting individuals giving public comments at Wilson County Board of Education board meetings from making “abusive” comments; (3) declare that the Wilson County Board of Education, including all official-capacity parties, and Jamie Farough, individually, violated Lemons’s First Amendment rights on October 3, 2022, when it prevented her from speaking; (4)

declare that the Wilson County Board of Education, and all official-capacity defendants, and Jamie Farough, individually, violated the plaintiffs' First Amendment rights by requiring speakers giving public comments during the Board's meetings to state their address and instructing them not to make "abusive" comments, which chilled the plaintiffs' speech; (5) enter judgment against the defendants and in favor of the plaintiffs; (6) and order that the defendants shall pay each plaintiff \$17.91 in monetary damages.

Dated: July 30, 2026.

Respectfully submitted,

/s/ Brett R. Nolan

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Counsel for plaintiffs

CERTIFICATE OF SERVICE

I certify that the above document was served electronically through the Court's CM/ECF system upon counsel for the defendants identified below on July 30, 2026.

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