

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

**MOMS FOR LIBERTY – WILSON
COUNTY, TN; ROBIN LEMONS; and
AMANDA DUNAGAN-PRICE,**

PLAINTIFFS

V.

No. 23-CV-00211

**Wilson County Board of Education,
also known as Wilson County Schools;
Jamie Farough, individually and in her
official capacity as a member of the
Wilson County Board of Education;
Kimberly McGee, in her official capacity
as a member and Vice Chairman of the
Wilson County Board of Education;
Melissa Lynn, in her official capacity
as a member of the Wilson County
Board of Education; Beth Meyers, in her
official capacity as a member of the
Wilson County Board of Education;
Joseph Padilla, in his official capacity
as a member of the Wilson County
Board of Education; Greg Hohman, in
his official capacity as a member of the
Wilson County Board of Education;
and, Donnie Self, in his official
capacity as a member of the
Wilson County Board of Education**

DEFENDANTS.

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Now come Defendants, Wilson County Board of Education, also known as Wilson County Schools; Jamie Farough, individually and in her official capacity as a member of the

Wilson County Board of Education; Kimberly McGee, in her official capacity as a member and Vice Chairman of the Wilson County Board of Education; Melissa Lynn, in her official capacity as a member of the Wilson County Board of Education; Beth Meyers, in her official capacity as a member of the Wilson County Board of Education; Joseph Padilla, in his official capacity as a member of the Wilson County Board of Education; Greg Hohman, in his official capacity as a member of the Wilson County Board of Education; and, Donnie Self, in his official capacity as a member of the Wilson County Board of Education, by and through their undersigned counsel, pursuant to Rule 56 of the *Federal Rules of Civil Procedure* hereby moves this Honorable Court for a summary judgment in their favor on all issues in this cause, and would show that there is no genuine issue as to any material fact and that they are entitled to a judgment as a matter of law.

Movant relies upon the accompanying Memorandum of Law in Support of Summary Judgment, its Statement of Undisputed Material Facts, all supporting exhibits, and the entire record adduced to date.

RESPECTFULLY SUBMITTED,

SELLERS, CRAIG & HAYDEN, INC.

s/Christopher C. Hayden

Christopher C. Hayden (#028220)

Attorneys for Defendants Wilson
County Board of Education, et al.

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was forwarded by electronic means.

s/Christopher C. Hayden

SELLERS, CRAIG & HAYDEN, INC.

Date: July 30, 2026