

**IN THE CHANCERY COURT FOR MAURY COUNTY, TENNESSEE
AT COLUMBIA**

CITY OF MOUNT PLEASANT, TENNESSEE,)

Plaintiff,)

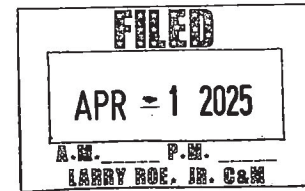
Vs.)

**THE FOLLOWING DELINQUENT
TAXPAYERS AS SHOWN ON THE 2023
REAL PROPERTY DELINQUENT TAX
AND RECORDS OF THE CITY OF
MOUNT PLEASANT,)**

Defendants.)

Case No. _____

25-177



SEE ATTACHED EXHIBIT "A" FOR A LIST OF PROPERTY OWNERS

COMPLAINT

Comes the Plaintiff, City of Mount Pleasant, Tennessee, a municipal corporation, and sues the Defendants, and shows unto the Court as follows:

1. Plaintiff would respectfully state and show the Court that it is a municipal corporation chartered under the Uniform City Manager-Commission Charter as set forth in Tennessee Code Annotated, with its situs in Maury County, Tennessee.

2. That all the Defendants named herein are residents of Maury County, Tennessee, insofar as is known to the Plaintiff or have a place of business or agent in Maury County, Tennessee, except that the residence of the heirs of the estate parties shown in the caption and in the schedule attached as "Exhibit A" are unknown to the Plaintiff, and it is also not known whether they are residents or non-residents of the State of Tennessee.

3. Plaintiff would further state that the Defendants are severally liable and indebted to the City of Mount Pleasant for City Real Property Taxes for the year of 2023, plus any and all prior years that remain unpaid, together with costs, fees and

attorney's fees, penalties and interest as fixed by law, subject, however, to credit for any deposit thereon, upon said properties, and in the amounts as set out in the schedule attached as "Exhibit A" herewith filed, which is asked to be made a part of this Complaint as fully as if copied herein. Said schedule attached as "Exhibit A" shows the name of the owner of the property insofar as it is known by the Plaintiff, the District in which said property is located, the amount of the City Real Property Taxes for the year of 2023, plus any and all prior years that remain unpaid, to which should be added all costs, fees, penalties, interest and attorney's fees as is fixed by the laws and ordinances of the City of Mount Pleasant and the State of Tennessee.

4. Plaintiff is advised that the properties so shown in the schedule attached as "Exhibit A" are owned and possessed by the Defendants to whom they are assessed, and where properties are assessed to an estate they are owned by the respective estates.

5. Plaintiff further states that regular assessments were made against said properties, and that said assessments have been duly passed through all process required by the laws and ordinances and Charter of the City of Mount Pleasant, and are now past due, owing, unpaid and delinquent.

6. That the Board of Commissioners of the City of Mount Pleasant elected to enforce the collection of said delinquent City Real Property Taxes in the Chancery County by its City Attorney. Pursuant thereto, the City Recorder reported to said City Attorney all delinquent City Real Property Taxes for the year of 2023, plus any and all prior years that remain unpaid, setting forth the person to whom said realty is assessed as owner; the book and page where deeds are recorded; the description of the property; the map and parcel number of the property; and the amount of City Real Property Taxes due thereon. Said list was duly certified by the City Recorder, and pursuant thereto notice was given in a newspaper published in Maury County, Tennessee, that said City Real Property Taxes were delinquent and that suit would be filed on April 1, 2025.

7. Plaintiff would further state that the City Real Property Taxes set out in the schedule attached as "Exhibit A" should be added the interest, penalty, costs, and attorney's fees as provided by the laws and ordinances of the City of Mount Pleasant

and the State of Tennessee. In addition, Plaintiff states that said City is entitled under the provisions of its Charter and the laws pertaining to the City, to have a lien on the properties described in said schedule attached as "Exhibit A" to secure the payment of said City Real Property Taxes, together with all interest, penalty, costs and attorney's fees due thereon, or such fees and costs that have, or may accrue thereon, by reason of the filing of this Complaint; that the Plaintiff is entitled to file its Complaint for the purpose of procuring a judgment against each of the Defendants for the amount opposite their respective names in said schedule attached as "Exhibit A", plus interest, penalty, costs and attorney's fees, as provided by law; and to enforce Plaintiff's lien against the respective lands by a sale of said properties for the amount of judgment had thereunder.

Wherefore, Premises Considered, Plaintiff Prays:

1. That all those named in the caption and in the schedule attached as "Exhibit A" of this Complaint as Defendants be made such by the issuance and service of process as to those who are residents of Tennessee, and that any who may appear to be non-residents of the State of Tennessee and the unknown heirs of the Defendant estates as shown in said caption and in said schedule attached as "Exhibit A" be made Defendants by publication as required by law, and that all be required to answer this Complaint, but oaths to any answers are waived.

2. That a Guardian Ad Litem be appointed for any and all minor Defendants, or those in the Armed Services of the United States, that may or shall become parties to this suit.

3. That all necessary references to the Master be made and that judgments be rendered in favor of the Plaintiff against the respective Defendants for the amount of City Real Property Taxes owed by each of them respectively, including interest, penalty, fees, costs and attorney's fees, as provided by law.

4. That the Plaintiff have a Decree declaring the lien in favor of the City of Mount Pleasant on all of the respective property described in said schedule attached as "Exhibit A" to secure the payment of such judgment as may be rendered, and to enforce

said lien on the properties described in said schedule attached as "Exhibit A", and that Plaintiff's judgments be satisfied by sale of the real property.

5. That upon application of the Plaintiff, a receiver be appointed to take charge of any or all of the properties which are the subject matter of this litigation, and which are described in said schedule, for the purpose of collection of any applicable rent and profits. That after paying the receivership costs, any such rents and profits received may be applied to said taxes, interest, penalties, fees, costs and attorney's fees, and that in the event of sale of said property to enforce the liens and judgments obtained, the proceeds shall be applied to the said judgments.

6. Plaintiff prays for all such other, further, and general relief as it may be entitled to in the properties.

The City of Mount Pleasant, Tennessee

By Kori Bledsoe Jones
Kori Bledsoe Jones, City Attorney

**State of Tennessee
County of Maury**

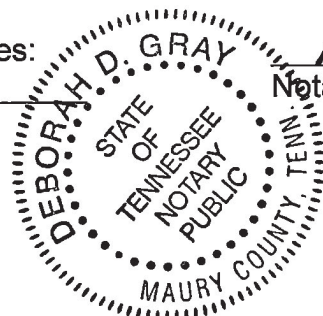
Kori Bledsoe Jones makes oath that she is that attorney for the Plaintiff in the foregoing Complaint, and that the statements made in said Complaint are true to her own knowledge, except those made on information and belief, and those she believes to be true.

Kori Bledsoe Jones
Kori Bledsoe Jones

Sworn to and subscribed before me, a Notary Public, this the 1st day of April, 2025.

My commission expires:

4/26/2027



Deborah D. Gray
Notary Public