

IN THE CHANCERY COURT OF THE STATE OF TENNESSEE
ELEVENTH JUDICIAL DISTRICT

RHEUBIN M. TAYLOR,)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 22-0788
)	
WESTON WAMP, as Mayor of)	Part: 2
Hamilton County, Tennessee,)	
)	
Defendant.)	

**MOTION FOR JUDGMENT ON THE PLEADINGS OR,
IN THE ALTERNATIVE, TO DISMISS FOR
FAILURE TO JOIN AN INDISPENSIBLE PARTY**

Pursuant to Rule 12.02(3) of the Tennessee Rules of Civil Procedure, Plaintiff moves this Court for judgment on the pleadings (the complaint , the countercomplaint and the answer to the countercomplaint) and all exhibits to each and, specifically, to the following: (1) the contract between Hamilton County, Tennessee, and Rheubin McGee Taylor, dated June 30, 2021, attached to the complaint as Exhibit A; (2) the resolutions numbered 1022-341 and 1122-25, which affirmed the contract referred to as Exhibit A and the overrode the veto of the former by Mayor Weston. As grounds for the motion, Plaintiff asserts that the Defendant-Counter-Plaintiff lacks standing to make the claims alleged in the

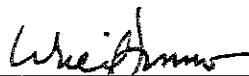
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Counterclaim for the reason set forth in the Fourth Affirmative Defense of the Plaintiff to the Counterclaim. A Memorandum is submitted in support of the Motion.

In the alternative Plaintiff moves to dismiss the counterclaim pursuant to Rule 12.07 of the Tennessee Rules of Civil Procedure for failure to join in indispensable party pursuant to this Court's order.

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All Part 2 Motions will be heard either in person or via WebEx beginning at 1:30 pm on February 13, 2023. To participate by WebEx, the meeting ID # is 286561663.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Motion electronically and by mail on the following on January 16, 2023.

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