

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

JANE LUNA, as Administratrix of the Estate of)	
Charles Jason Toll, deceased,)	
)	
Plaintiff,)	
v.)	CASE: 3:11-0093
)	JURY DEMAND
)	Judge Campbell
)	Magistrate Judge Knowles
RICKY J. BELL, Warden of Riverbend Prison;)	<u>ORAL ARGUMENT REQUESTED</u>
GAELAN DOSS, Correctional Officer; and)	
CAPTAIN JAMES HORTON,)	
all individually,)	
)	
Defendants.)	

PLAINTIFF’S RENEWED MOTION FOR SANCTIONS

Comes now the Plaintiff, Jane Luna, as Administratrix to the Estate of Charles Jason Toll, deceased, (“Plaintiff”) by and through undersigned counsel, and files this Renewed Motion for Sanctions, pursuant to the Court’s inherent authority, and moves for imposition of appropriate sanctions, including an award of attorneys’ fees and costs, for the reasons set forth in the accompanying memorandum of law.

Respectfully submitted,

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document through the Court's Electronic Filing System to:

ARTHUR CROWNOVER, II
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MADLINE BROUGH
Tennessee Attorney General's Office
P.O. Box 20207
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On this 19th day of October, 2015.

s/ David J. Weissman
David J. Weissman