

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY

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MEMORANDUM

TO: Vice Mayor Angie Henderson
Metropolitan Council

FROM: Allison Bussell, Associate Director of Law

DATE: April 28, 2025

SUBJECT: M.C.L. § 2.40.115; 2025 1st Quarter Report of Significant Litigation

ATTACHMENT: (1) 2025 1st Quarter Report of Significant Litigation: Damages Amount Specified
(2) 2025 1st Quarter Report of Significant Litigation: Damages Amount Not Specified

1. The "2025 1st Quarter Report of Significant Litigation: Damages Amount Specified" lists new cases filed in this quarter in which the *ad damnum* clauses in the complaints request damages greater than \$300,000. (Attachment 1)

2. The "2025 1st Quarter Report of Significant Litigation: Damages Amount Not Specified" lists newly-identified cases in which potential liability is not necessarily limited to \$300,000 by a statutory cap. (Attachment 2)

3. Acronyms that may be used in the Attachment:

ADA: Americans With Disabilities Act, as amended, 42 U.S.C. §§ 12101, *et seq.*

FMLA: Family and Medical Leave Act, 29 U.S.C. §§ 2601, *et seq.*

IDEA: Individuals With Disabilities Education Act, 20 U.S.C. §§ 1400, *et seq.*

IIED: Intentional Infliction of Emotional Distress

NIED: Negligent Infliction of Emotional Distress

PLRA: Prison Litigation Reform Act, 28 U.S.C. § 1915, 42 U.S.C. § 1997e

RLUIPA:	Religious Land Use and Institutionalized Persons Act, 2 U.S.C. §§ 2000cc, <i>et seq.</i>
SEC. 504:	Section 504 of the Rehabilitation Act, 29 U.S.C. §§ 794, <i>et seq.</i>
STRUA:	Short-Term Rental Unit Act, Tenn. Code Ann. §§ 13-7-601, <i>et seq.</i>
TCPA:	Tennessee Consumer Protection Act, Tenn. Code Ann. § 47-18-101
TDA:	Tennessee Disability Act, Tenn. Code Ann. §§ 8-50-103, -104
TGTLA:	Tennessee Governmental Tort Liability Act, Tenn. Code Ann. §§ 29-20-101, <i>et seq.</i>
THRA:	Tennessee Human Rights Act, Tenn. Code Ann. §§ 4-21-101, <i>et seq.</i>
TITDA:	Tennessee Identity Theft Deterrence Act, Tenn. Code Ann. §§ 47-18-2101, <i>et seq.</i>
Title VI:	Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d, <i>et seq.</i>
Title VII:	Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, <i>et seq.</i>
Title IX:	Title IX, Education Amendments of 1972 to the Civil Rights Act of 1964, 20 U.S.C. §§ 1681, <i>et seq.</i>
TPPA:	Tennessee Public Protection Act, Tenn. Code Ann. § 50-1-304
TRFRA:	Tennessee Religious Freedom Restoration Act, Tenn. Code Ann. § 4-1-407

ATTACHMENT 1

2025 1st Quarter Report of Significant Litigation: Damages Amount Specified

Case Name	Court	Docket #	Initial Demand
<i>Lorenzo F. Candelaria as guardian & parent of G.C. (a Minor) v. Metro Gov't, et al.</i>	Circuit Court - Sixth	25C270	\$500,000.00
Damages: Plaintiff seeks damages arising out of an alleged attack on her daughter, a Hillsboro High School student, by another student at the school.			
Plaintiff	Candelaria, Lorenzo F.		
Defendant	Metropolitan Government of Nashville and Davidson County		
Defendant	Keeling, Beau T.		
Defendant	Molina Paez, Maria E.		
Opposing Counsel	Kaul, Spencer F.		
Opposing Counsel	Russell, Thomas B.		
Opposing Counsel	Cardwell, Christopher		
<i>Jackie Taylor v. Metro Gov't, et al.</i>	Circuit Court - Second	25C117	\$500,000.00
Damages: Plaintiff seeks damages arising from a vehicle accident involving a Metro Water Services employee.			
Plaintiff	Taylor, Jackie		
Defendant	Metropolitan Government of Nashville and Davidson County		
Opposing Counsel	Krout, Dale		

ATTACHMENT 2

2025 1st Quarter Report of Significant Litigation: Damages Amount Not Specified

Case Name	Court	Docket #
<i>Lonesome Ten Miles, LLC v. Metro Gov't</i>	U.S.Dist.Ct. M.D.Tenn.	3:24-cv-01139
Damages: Plaintiff seeks compensation under the unconstitutional conditions doctrine, arguing that Metro Nashville unlawfully required Plaintiff to replace and upsize an existing water line as a condition on granting Plaintiff a renovation permit.		
Plaintiff	Lonesome Ten Miles, LLC	
Defendant	Metropolitan Government of Nashville and Davidson County	
Opposing Counsel	Carver, Mark Alexander	
Opposing Counsel	Panther, Todd	