IN THE CRIMINAL COURT FOR HAMILTON COUNTY, TENNESSEE
SECOND DIVISION

STATE OF TENNESSEE, EX. REL.	)	
COTY WAMP	)	
DISTRICT ATTORNEY GENERAL	)	
	)	
v.	)	**Case No: 314758**
	)	
THE LODGE OF CHATTANOOGA, LLC	)	
DBA BUDGETEL INN AND SUITES	)	
1410 MACK SMITH ROAD	)	
EAST RIDGE, TENNESSEE	)	

MOTION FOR EAST RIDGE POLICE DEPARTMENT and the HAMILTON COUNTY DISTRICT ATTORNEY GENERAL'S OFFICE TO ADEQUATELY DOCUMENT THE REMOVAL OF PERSONAL PROPERTY ITEMS FROM ROOM 4216

Comes now Ruby Williamson (Williamson) and Emmanuel Wells (Wells), by and through undersigned counsel, and would ask this Honorable Court for an order requiring the East Ridge Police Department (ERPD) and the Hamilton County District Attorney General's Office (HCDA) to adequately document via video, audio, and documents to record the removal of items from Room 4216. Said items are the sole personal property of Williamson and Wells and said items are unrelated to the Verified Petition for Nuisance Abatement. Williamson and Wells would show more specifically as follows:

1. That Williamson and Wells have filed a motion to enter the residence located at Budgetel Room and Suites, 1410 Mack Smith Road, East Ridge, Tennessee 37412 to retrieve numerous personal property items from Room 4216.

2. That if this Honorable Court grants the motion to enter the residence and retrieve personal property items, that an additional order be entered requiring ERPD and HCSO to

capture the removal of items from Room 4216 via audio, visual, and property transfer documents.

3. That requiring ERPD and HCDA to capture the removal of items from Room 4216 via audio, visual, and property transfer documents will preserve this Honorable Court's temporary order until a final hearing can be had on the issue of a permanent injunction.

Wherefore premises considered, Williamson and Wells ask the following:

1. That this Honorable Court accept this motion,

2. That at the December 5, 2022 hearing date, this Honorable Court order representatives of ERPD and HCDA at a reasonable date and time to escort Williamson and Wells to Room 4216 and allow them an adequate time to retrieve all their personal property items within their residence and that ERPD and HCDA capture the removal of items from Room 4216 via audio, visual, and property transfer documents.

3. That after retrieval of all personal items from Room 4216, that ERPD and HCDA file copies of the audio, visual, and property transfer documentation with this Honorable Court to prove compliance with this Honorable Court's previous order and also to maintain the integrity of the temporary injunction.

4. That this Honorable Court grant other general relief as truth and justice demands.

Respectfully submitted this the 30th day of November, 2022.

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CERTIFICATE OF SERVICE

I certify that a true and exact copy of this pleading has been served via hand delivery on this the 30th day of November, 2022 to:

Coty Wamp, District Attorney General
600 Market Street, Suite 310
Chattanooga, TN 37402

Neal Pinkston