

COPY

IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE
20TH JUDICIAL DISTRICT
AT NASHVILLE
PART II

RECEIVED
JAN 24 2014
DAV. CO. CHANCERY COURT

STATE OF TENNESSEE,)
ex rel. JULIE MIX MCPEAK, solely)
in her official capacity as)
Commissioner of)
Commerce & Insurance,)
Plaintiff,)

v.)

No. 14-162-II

GALILEE MEMORIAL GARDENS,)
JM&M SERVICES, INC.,)
LAMBERT MEMORIAL CO., aka)
LAMBERT MEMORIALS, INC.)
LAMBERT & SONS, INC.)
JEMAR LAMBERT,)
MARJE LAMBERT,)
and MARY H. LAMBERT, and ALL)
PERSONS ACTING IN CONCERT)
WITH THEM,)
Defendants.)

FILED
2014 JAN 24 PM 2:12
CLERK AND MASTER
DAVIDSON CO. CHANCERY CT.
DC&M

ORDER TO SHOW CAUSE SETTING HEARING ON PETITION
FOR APPOINTMENT OF THE COMMISSIONER
AS RECEIVER FOR GALILEE MEMORIAL GARDENS AND
FOR TEMPORARY AND PERMANENT INJUNCTIVE RELIEF

The State of Tennessee, on relation of Julie Mix McPeak, solely in her official capacity as Commissioner of the Department of Commerce & Insurance of the State of Tennessee (Commissioner), through her counsel, the Attorney General and Reporter, pursuant to Tenn. Code Ann. §§ 46-1-301 and 46-1-312, has filed a

Verified Petition applying to this Court for an Order appointing the Commissioner as receiver for the Defendant cemetery, Galilee Memorial Gardens (Galilee) and applying for temporary injunction pursuant to Rule 65.04, Tenn. R. Civ. P, with supporting Affidavits, pursuant to the Application for Restraining Order and Temporary Injunctive Relief. Pursuant to Tenn. Code Ann. § 46-1-312(a), the provision governing procedures concerning the receivership of a cemetery, the Court finds that the Defendants named therein should be ordered to show cause why the Commissioner should not have the relief prayed for in the application.

ACCORDINGLY, Defendants are ORDERED to appear at a full hearing on February 6, 2014, at 2:00 P.m. in Part II of this Court, to respond and SHOW CAUSE why the Commissioner should not have the relief prayed for in the application for receiver of Galilee and for injunctive relief. Defendants may have up until _____ m on _____, 2014 to file with the Court and cause the counsel for the State to receive a service copy, any responsive evidentiary or legal material in opposition to the applications, to which the State may reply up and until the time of the hearing. The hearing shall be a full hearing with oral testimony.

An Order of this Court is entered separately to restrain Defendants from specified activities in connection with Galilee, pending the outcome of this hearing.

IT IS SO ORDERED.



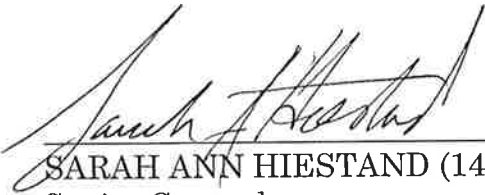
CHANCELLOR

Submitted for Entry by,

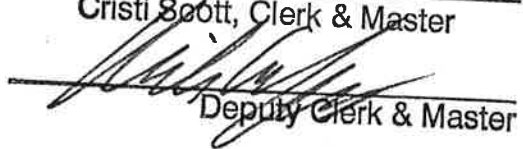
ROBERT E. COOPER, JR. (10934)
Attorney General and Reporter



MICHAEL A. MEYER (9230)
Deputy Attorney General
Special Litigation Division
(615) 741-4082



SARAH ANN HIESTAND (14217)
Senior Counsel
Financial Division
P.O. Box 20207
Nashville, TN 37202
(615) 741-6035; fax 532-8223

Date Issued JAN 26 2006
Cristi Scott, Clerk & Master

Deputy Clerk & Master

CERTIFICATE OF SERVICE

The undersigned certifies that this Pleading will be served on the below listed Defendants at the same time and in the same manner as the Summonses and the Petition for Appointment of Receiver that has been filed in this cause on the 24th day of January, 2014:

Galilee Memorial Gardens
8283 Ellis Road
Memphis, TN 38133

JM&M Services, Inc.
8283 Ellis Road
Memphis, TN 38133

Lambert Memorial Co, aka Lambert Memorials Inc.
Lambert & Sons, Inc.
8283 Ellis Road
Memphis, TN 38133

Jemar Lambert
8283 Ellis Road
Memphis, TN 38133

Marje Lambert
8283 Ellis Road
Memphis, TN 38133

Mary H. Lambert
8283 Ellis Road
Memphis, TN 38133


MICHAEL A. MEYER