

COPY

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

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

Plaintiff,)

v.)

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.)

No. 14-102-II

CLERK & MASTER
DAVIDSON COUNTY CHANCERY COURT
J.C. & M.

2015 NOV 18 PM 3:16

FILED

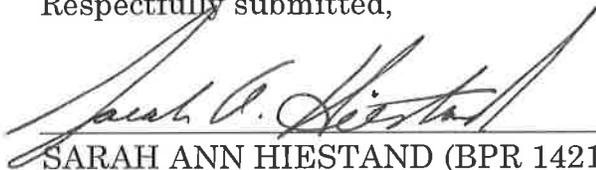
UPDATED INFORMATION ON THE BURIAL of MS. LUCILLE WADE TALLEY
IN GALILEE MEMORIAL GARDENS

Julie Mix McPeak, Commissioner of the Department of Commerce & Insurance, as Receiver for Galilee Memorial Gardens, through her counsel, hereby updates the Court on the location used for burial of Ms. Lucille Wade Talley, on October 31, 2015.

After the Court's order permitting burial, the Receiver proceeded to implement the intended burial of Ms. Talley in the Garden of Everlasting Life, Lot 25, Section C, Space 3. On October 30, 2015, it was determined in the process of

opening the grave that the space already contained a vault, and consequently was not available for interment. Ms. Talley's family was offered a different, vacant burial space in a different garden that was opened under the supervision of the Receiver's representative, Garden of Hope, Lot 9-1, Section D, Space 2. An updated map of Lot 9-1 has been attached as Exhibit A. A copy of the map of the Garden of Hope generated by Special Deputy Receiver Receivership Management, Inc., highlighted to show the location of the Lot within the garden is attached as Exhibit B. On October 31, 2015, the M.J. Edwards Funeral Home buried Ms. Talley there and closed the grave. Given this, the Receiver expects to present supplemental findings to the Court as soon as practicable regarding the grave space information contained in the most recent report.

Respectfully submitted,



SARAH ANN HIESTAND (BPR 14217)
Senior Counsel, Financial Division
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202
(615) 741-6035; fax (615) 532-8223

ROBERT E. MOORE, JR. (BPR 13600)
Special Deputy Receiver,
Galilee Memorial
Receivership Management, Inc.
783 Old Hickory Blvd., Suite 255
Brentwood, TN 37027
615-370-0051, 615-373-4336 Fax

JEF FEIBELMAN (BPR 7677)
Burch, Porter and Johnson
130 North Court Avenue
Memphis, TN 38103
(901) 524-5109; fax 901-524-5024
Special Counsel to the Receiver

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Updated Information on Burial has been mailed First Class Postage prepaid to the following interested parties and transmitted via email this 18th day of November, 2015:

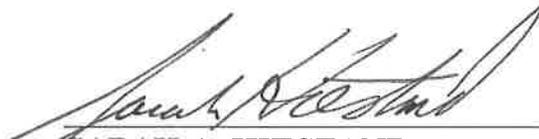
Attorney for Defendants

William J. Haynes, III
Bone McAllester Norton PLLC
511 Union Street, Suite 1600
Nashville, TN 37219
Via email to whaynes@bonelaw.com

DAVID F. KUSTOFF (15516)
Special Deputy Receiver,
Galilee Memorial
22 N. Front St., Suite 660
Memphis, TN 38103
(901) 527-0255
dkustoff@KustoffandStrickland.com

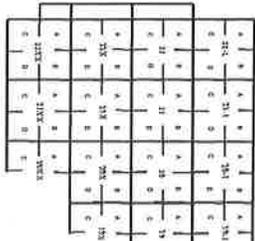
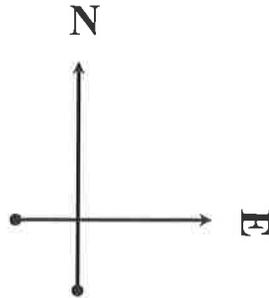
Next of Kin of Ms. Doris Williams

Kathryn Barnett, Esq.
Morgan & Morgan – Nashville, PLLC
810 Broadway, Suite 105
Nashville, TN 37203
615-490-0943
KBarnett@ForThePeople.com

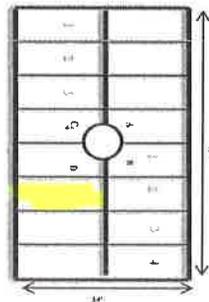

SARAH A. HIESTAND

8263 ELLIS ROAD

GALILEE MEMORIAL GARDENS GARDEN OF HOPE



DRIVEWAY



9-1 D 2

Ditch Line



EXHIBIT
B
to update
Blumberg No. 5178