

No. \_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES

CATHRIN FUNK-VAUGHN AKA REBECCA A. MCNIEL, JOHN W. VAUGHN, RONALD M.  
KOEHLER AND KEVIN L. JOHNSON  
**PETITIONER(S)**

VS.

TENNESSEE DEPARTMENT OF CHILDRENS SERVICES, MURFREESBORO POLICE  
DEPARTMENT OF RUTHERFORD COUNTY, RUTHERFORD COUNTY TENNESSEE, THE CITY  
OF MURFREESBORO TENNESSEE AND RUTHERFORD COUNTY JUVENILE COURT OF  
MURFREESBORO TENNESSEE  
**RESPONDENT(S)**

**PROOF OF SERVICE**

I, Cathrin Funk-Vaughn aka Rebecca McNeil, do swear or declare that on this date,  
June 17th, 2019, as required by Supreme Court Rule 29 I have  
served the enclosed MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*  
and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding  
or that party's counsel, and on every other person required to be served, by depositing  
an envelope containing the above documents in the United States mail properly addressed  
to each of them and with first-class postage prepaid, or by delivery to a third-party  
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Department of Childrens Services of Tennessee AS the  
Official Attorney of DCS Torry Samson Tennessee Attorney Generals  
Office PO Box 20207 Nashville, TN 37202

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17th, 2019

Cathrin Funk-Vaughn aka Rebecca McNeil  
(Signature)

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PETITIONER(S)

VS.

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OF MURFREESBORO TENNESSEE AND RUTHERFORD COUNTY JUVENILE COURT OF  
MURFREESBORO TENNESSEE  
RESPONDENT(S)

PROOF OF SERVICE

I, Cathrin Funk-Vaughn aka Rebecca A. McNiel, do swear or declare that on this date,  
June 17th, 2019, as required by Supreme Court Rule 29 I have  
served the enclosed MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS  
and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding  
or that party's counsel, and on every other person required to be served, by depositing  
an envelope containing the above documents in the United States mail properly addressed  
to each of them and with first-class postage prepaid, or by delivery to a third-party  
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Solicitor General of the United States "Nowell Francisco"  
Room 5616 Department of Justice 950 Pennsylvania  
Ave N.W. Washington DC 20530

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17th, 2019

Cathrin Funk-Vaughn aka Rebecca A. McNiel  
(Signature)

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**RESPONDENT(S)**

**PROOF OF SERVICE**

I, Cathrin Funk-Vaughn aka Rebecca McNiel, do swear or declare that on this date,  
June 17th, 2019, as required by Supreme Court Rule 29 I have  
served the enclosed MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*  
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or that party's counsel, and on every other person required to be served, by depositing  
an envelope containing the above documents in the United States mail properly addressed  
to each of them and with first-class postage prepaid, or by delivery to a third-party  
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Rutherford County Juvenile Court in her official capacity as  
the Juvenile Court Judge of Rutherford County Donna S. Davenport  
1701 South Church St Murfreesboro, TN 37130

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17th, 2019

Cathrin Funk-Vaughn aka Rebecca A. McNiel  
(Signature)

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MURFREESBORO TENNESSEE  
**RESPONDENT(S)**

**PROOF OF SERVICE**

I, Cathrin Funk-Vaughn aka Rebecca A. McNiel, do swear or declare that on this date,  
June 17th, 2014, as required by Supreme Court Rule 29 I have  
served the enclosed MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*  
and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding  
or that party's counsel, and on every other person required to be served, by depositing  
an envelope containing the above documents in the United States mail properly addressed  
to each of them and with first-class postage prepaid, or by delivery to a third-party  
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

The city of Murfreesboro Tennessee in her official capacity  
as the attorney for Murfreesboro, TN Torrey E. Samson  
PO Box 20907 Nashville, TN 37202

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17th, 2014

Cathrin Funk-Vaughn aka Rebecca A. McNiel  
(Signature)

No. \_\_\_\_\_

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SUPREME COURT OF THE UNITED STATES

CATHRIN FUNK-VAUGHN AKA REBECCA A. MCNIEL, JOHN W. VAUGHN, RONALD M.  
KOEHLER AND KEVIN L. JOHNSON  
**PETITIONER(S)**

**VS.**

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OF MURFREESBORO TENNESSEE AND RUTHERFORD COUNTY JUVENILE COURT OF  
MURFREESBORO TENNESSEE  
**RESPONDENT(S)**

**PROOF OF SERVICE**

I, Cathrin Funk-Vaughn aka Rebecca McNiel, do swear or declare that on this date,  
June 17th, 2019, as required by Supreme Court Rule 29 I have  
served the enclosed MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS  
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an envelope containing the above documents in the United States mail properly addressed  
to each of them and with first-class postage prepaid, or by delivery to a third-party  
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Rutherford County, Tennessee, in their official capacity as their  
attorney "Nicholas C. Christiansen 16 Public Square North  
Murfreesboro, TN 37130

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17th, 2019

Cathrin Funk-Vaughn aka Rebecca McNiel  
(Signature)

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OF MURFREESBORO TENNESSEE AND RUTHERFORD COUNTY JUVENILE COURT OF  
MURFREESBORO TENNESSEE  
**RESPONDENT(S)**

**PROOF OF SERVICE**

I, Cathrin Funk-Vaughn aka Rebecca A. McNiel do swear or declare that on this date,  
June 17th, 2019, as required by Supreme Court Rule 29 I have  
served the enclosed MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*  
and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding  
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an envelope containing the above documents in the United States mail properly addressed  
to each of them and with first-class postage prepaid, or by delivery to a third-party  
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Murfreesboro Police Department of Rutherford County  
IN HIS OFFICIAL CAPACITY as their attorney "Mark Bradley Gilmore"  
201 Fourth Ave N Suite 1700 Nashville, TN 37219

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17th, 2019.

Cathrin Funk-Vaughn aka Rebecca A. McNiel  
(Signature)

**CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

CATHRIN FUNK-VAUGHN AKA REBECCA A. MCNIEL, JOHN W. VAUGHN,  
RONALD M. KOEHLER AND KEVIN L. JOHNSON

**PETITIONER(S)**

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MURFREESBORO TENNESSEE

**RESPONDENT(S)**

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As required by Supreme Court under Rule 33.1(h). I certify that the petition for a writ of certiorari contains 8558 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1 (d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17<sup>th</sup>, 2019

Cathrin Funk-Vaughn aka Rebecca A. McNiel