

**IN THE CHANCERY COURT OF HENRY COUNTY, TENNESSEE  
TWENTY-FOURTH JUDICIAL DISTRICT**

**HENRY COUNTY, TENNESSEE,**

ON ITS OWN BEHALF AND FOR THE USE AND BENEFIT OF:

**THE CITY OF COTTAGE GROVE,  
THE CITY OF HENRY,  
THE CITY OF PARIS,  
THE CITY OF PURYEAR, AND  
THE PARIS SPECIAL SCHOOL DISTRICT,**

PLAINTIFF,

CONSOLIDATED DOCKET NO. \_\_\_\_\_

VS.

**DELINQUENT TAXPAYERS** AS SHOWN ON THE \_\_\_\_\_  
TAX RECORDS OF THE CITY OF COTTAGE GROVE, THE CITY OF  
HENRY, THE CITY OF PARIS, THE CITY OF PURYEAR, AND THE PARIS  
SPECIAL SCHOOL DISTRICT (SEE EXHIBIT A OF THE COMPLAINT),

DEFENDANTS.

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**RESPONSE TO MOTION TO REDEEM**

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Real Estate: Map \_\_\_\_\_ Group \_\_\_\_\_ Control Map \_\_\_\_\_ Parcel \_\_\_\_\_ S/I \_\_\_\_\_

Comes now the undersigned Tax Sale Purchaser of the above-referenced Real Estate, and in response to the Motion to Redeem filed regarding said Real Estate states as follows:

[Initial **only one** of the following three options:]

1. \_\_\_\_\_ I do **not** oppose the redemption, I do not request a hearing on the redemption motion, I irrevocably waive my right to receive additional interest (i.e., interest accruing after the date the redemption motion was filed) or any other additional sums from the proposed redeemer, I irrevocably waive my right to appeal the order granting the motion to redeem, and I request that the Clerk & Master disburse to me the purchase price plus interest collected from the proposed redeemer as soon as possible
  
2. \_\_\_\_\_ I **do** oppose the redemption on the following basis, and I request a hearing on the redemption motion and my objection [explain factual and legal basis for objection in detail and attach additional pages if necessary]:

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3. \_\_\_\_\_ I do not oppose the redemption, but **I request reimbursement** of the following expenses as a condition of the redemption [*check all that apply and complete the \$ blank*]:

- Additional ad valorem taxes, penalty, interest and court costs I paid which were a lien against the Real Estate in the total amount of \$\_\_\_\_\_, plus interest accruing from the date of payment [*attach receipts*];
- Reasonable payments I made for insurance on the Real Estate and any improvements in the total amount of \$\_\_\_\_\_ [*attach receipts and list of improvements*];
- Reasonable cost I paid to avoid permissive waste of the Real Estate in the total amount of \$\_\_\_\_\_ [*attach receipts and detailed explanation*];
- Reasonable expenses I paid as a result of a judicial or administrative order or other official notice requiring me to immediately bring the property into compliance with applicable building code or zoning regulations in the total amount of \$\_\_\_\_\_ [*attach receipts and detailed explanation*];
- Reasonable payments I made for homeowner's association dues or obligations resulting from covenants running with the land which are secured by a lien against the parcel in the total amount of \$\_\_\_\_\_ [*attach receipts and detailed explanation*];
- Additional interest on the purchase price accruing after the date the redemption motion was filed as authorized by statute.

Respectfully submitted,

Sign Name: \_\_\_\_\_

Print Name: \_\_\_\_\_

Print Mailing Address: \_\_\_\_\_

Print Telephone Number: \_\_\_\_\_

**VERIFICATION**

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

Personally appeared before me, a Notary Public in and for said County and State, \_\_\_\_\_, whose identity is known to me or proven on the basis of satisfactory evidence, and who swore or affirmed under penalty of perjury that the contents of the foregoing Response are true and correct based on information and belief.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_

## **IMPORTANT NOTICES**

1. **IF THE TAX SALE PURCHASER IS A LEGAL ENTITY:** The Tennessee Court of Appeals has held that entities (for example, corporations, limited liability companies, trusts, etc.) may not represent themselves in redemption proceedings and may only participate in a redemption period through a licensed attorney. *See State of Tennessee vs. Delinquent Taxpayers of Benton County*, No. W2021-01050-COA-R3-CV (Tenn. Ct. App. Dec. 7, 2022). **If the tax sale purchaser is an entity, the owner(s) and/or manager(s) of the entity should consult a licensed attorney for assistance with redemption proceedings.**

2. **IF THE TAX SALE PURCHASER IS A NATURAL PERSON:** This blank Response to Motion to Redeem form is provided for convenience only; it does not constitute and is not a substitute for legal advice from an attorney. The Clerk & Master and the Delinquent Tax Attorney cannot assist with completing this form or give any legal advice. **Questions or requests for assistance with the redemption process should be directed to a licensed attorney.**

3. A Response to Motion to Redeem must be filed with the Clerk & Master by the statutory deadline, along with a signed, dated Certificate of Service certifying that a copy of the Response (along with any attachments) was mailed to all interested parties.

4. A person who files a Response to Motion to Redeem is required to mail copies of it (along with all attachments/supporting documents) via USPS mail to all other interested persons. Interested persons include all persons/entities listed on the Certificate of Service attached to the Notice of Redemption sent by the Clerk & Master).

5. After the filing of a Response to Motion to Redeem, the redemption motion will be set for hearing and all interested persons will be notified of the hearing date via USPS mail.