

OCT 26, 2022 07:24 PM

IN THE STATE COURT OF BULLOCH COUNTY, STATE OF GEORGIA


Heather Banks McNeal, Clerk
Bulloch County, Georgia

MO FLO LLC
1267 NORTHSIDE DRIVE EAST
STATESBORO, GA 30458
DBA: FLOORS OUTLET

Plaintiff(s)

) State Court: STCV2022000202
) Magistrate Court : 2022-11739CS
)
) Defendant's First Request for Production
) of Documents from Ambiguously Identified
) Client(s) of R. Matthew Shoemaker

VS

WILHELMINA ALEXANDER
204 HIGHLAND RD
STATESBORO, GA 30458

Defendants

EDWIN ALEXANDER
204 HIGHLAND RD
STATESBORO, GA 30458

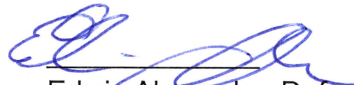
CERTIFICATE OF SERVICE REGARDING DEFENDANTS' FIRST INTERROGATORIES TO
CLIENT(S) OF R. MATTHEW SHOEMAKER AND CHRIS GOHAGAN

Pursuant to Uniform Superior Court Rule 5.2, Defendants give the court notice of discovery. On October 4, 2022, we mailed the attached DEFENDANTS' FIRST INTERROGATORIES TO CLIENT(S) OF R. MATTHEW SHOEMAKER AND CHRIS GOHAGAN to R. Matthew Shoemaker and to Chris Gohagan. R. Matthew Shoemaker received it on October 6, 2022 and the service of process is attached. Chris Gohagan received it on October 6, 2022, but the service of process never returned to us.

This day of October 26, 2022.



Wilhelmina Randtke, Defendant
204 Highland Rd.
Statesboro, GA 30458



Edwin Alexander, Defendant
204 Highland Rd.
Statesboro, GA 30458

IN THE STATE COURT OF BULLOCH COUNTY, STATE OF GEORGIA

MO FLO LLC
1267 NORTHSIDE DRIVE EAST
STATESBORO, GA 30458
DBA: FLOORS OUTLET

Plaintiff(s)

VS

WILHELMINA ALEXANDER EDWIN ALEXANDER)
204 HIGHLAND RD 204 HIGHLAND RD
STATESBORO, GA 30458 STATESBORO, GA 30458
Defendants

) State Court: STCV2022000202
) Magistrate Court : 2022-11739CS
)
) DEFENDANTS' FIRST
) INTERROGATORIES TO CLIENT(S) OF
) R. MATTHEW SHOEMAKER AND CHRIS
) GOHAGAN
)

DEFENDANTS' FIRST INTERROGATORIES TO CLIENT(S) OF R. MATTHEW SHOEMAKER
AND CHRIS GOHAGAN

Pursuant to O.C.G.A. §§ 9-11-26 and 9-11-33, defendants request that plaintiff(s) respond separately, in writing and under oath, to the following interrogatories within thirty (30) days from the date of service as provided by law, with a copy of the responses being served upon the undersigned defendants. If multiple plaintiffs are covered within the scope of representation, each should respond separately. If only a single plaintiff is covered, then that plaintiff should respond.

DEFINITIONS AND INSTRUCTIONS

(A) These interrogatories shall be deemed continuing, to the extent permitted by O.C.G.A. § 9-11-26(e), so as to require plaintiff(s) to serve upon defendants supplemental answers if plaintiff(s) or its/their attorneys obtain further information between the time the answers are served and the time of trial.

(B) The following definitions shall apply to these requests:

(1). The term "persons" shall mean all individuals and entities, including without limiting the generality of the foregoing, all individuals, governmental bodies, sole proprietorships, associations, companies, partnerships, joint ventures, corporations, trusts, and estates.

(2). "Floors Outlet" should be interpreted in the broadest sense possible to encompass the possibility that it is a sole proprietorship operated by Brian McDonald, to encompass the possibility that it is a partnership with many persons acting as partners, and to encompass its owners and principals.

(3). The term "and" shall mean and/or.

(4). In these requests, the singular includes the plural; the plural includes the singular; the masculine includes the feminine; the feminine includes the masculine.

(5). The term "identify" when used with reference to a person means such person's name, present home and business addresses, present home and business telephone numbers, and present position of employment.

INTERROGATORIES

1. What is the factual basis for the allegations set forth in the July 12, 2022 Statement of Claim?
2. What is the factual basis for the allegations set forth in the Claim of Lien filed by Mo Flo, LLC on September 13, 2022 (attached)?
3. State any evidence and facts supporting an assertion that Brian McDonald was operating legally under the requirements of OCGA Title 43 Chapter 41 Residential and General Contractors on the date when he signed as "Contractor" on the April 9, 2022 contract to install tile at 204 Highland Rd. This should include any applicable licenses, any required local licenses including the license required by City of Statesboro Code of Ordinances Sec. 18-104, and any evidence and facts to support his having any applicable "special skill and requiring specialized building trades or crafts, including, but not limited to, such activities, work, or services requiring licensure under Chapter 14 of this title" referred to in OCGA 43-41-2(12). This might include experience installing tile flooring, experience installing tile, experience installing flooring, or any other applicable experience to meet requirements in OCGA 43-41-2(12). This might include any evidence and facts regarding the legality of Brian McDonald subcontracting out labor in excess of \$2,500. This might include any agency relationship or other relationship and an explanation of how that relationship allowed Brian McDonald to meet the requirements of OCGA Title 43 Chapter 41.
4. Please identify each person whom you expect to call as an expert witness at trial or in connection with a motion for summary judgment, state the subject matter upon which the expert is expected to testify, state the qualifications of the expert (including resume or other summary of other qualifications), and state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.
5. Please identify each person whom you expect to call as a witness at trial or in connection with a motion for summary judgment, and state the matters upon which the witness is expected to testify.
6. Please identify each person who worked at 204 Highland Rd regarding the April 9, 2022 contract to install tile at 204 Highland Rd., including employees of Floors Outlet, employees of Mo Flo LLC (or variations of that name), employees of any subcontractors, and the dates each person was at 204 Highland Rd.

7. For each person who worked at 204 Highland Rd., provide information about workers compensation insurance coverage which was in place for that person on each date the person worked. This workers compensation insurance information should include for each person a list of every policy providing coverage to that person on any date the person worked at 204 Highland Rd., which might be multiple policies for the same person due to OCGA 34-9-8. For each applicable policy for each worker, information should include the name of the workers compensation insurance company that issued the policy, the employer the policy was issued through, dates the policy was in place between April 9, 2022 to May 31, 2022 inclusive, the workers compensation classification code that was reported for that person regarding that policy on each date worked, and whether that policy or coverage was through the person's immediate employer or through "A principal, intermediate, or subcontractor shall be liable for compensation to any employee injured while in the employ of any of his subcontractors engaged upon the subject matter of the contract to the same extent as the immediate employer." as provided by OCGA 34-9-8. It may be the case that for employees of subcontractors, multiple policies will apply to the same person due to cascading coverage under OCGA 34-9-8, and when that is the case or when multiple policies apply for any other reason all applicable policies should be given for that person.
8. A list of campaign contributions by Floors Outlet, Brian McDonald, Prince Preston, Randy Childs, P3 Flooring, Contractor Wholesale Floors, Mo Flo LCC (or similarly named entity), and any of their subcontractors made to the campaigns for any candidate for judge in the Magistrate Court of Bulloch County, the State Court of Bulloch County, the Superior Court of Bulloch County, and the Ogeechee Circuit District Attorney from January 1, 2017 to present including the candidate contributed to, the dollar amount of the contribution, and the date the contribution was made.
9. Please identify each person who provided information or assisted in preparing your responses to these interrogatories, and state in particular what each person did in that respect. Also state the specific interrogatories with respect to which each person provided information or assistance. Individuals performing only clerical duties need not be identified.

This day of October 4, 2022.



Wilhelmina Randtke, Defendant
204 Highland Rd.
Statesboro, GA 30458
850-345-6123



Edwin Alexander, Defendant
204 Highland Rd.
Statesboro, GA 30458

RETURN RECORDED DOCUMENT TO:
Taulbee, Rushing, Snipes, Marsh & Hodgins, LLC
c/o Christopher R. Gohagan
12 Siebald Street, Statesboro, Georgia 30458

CROSS REFERENCE:
Deed Book 2701, Pages 560-561

FILED IN OFFICE
CLERK OF COURT
09/13/2022 09:10 AM
HEATHER BANKS MCNEAL, CLERK
SUPERIOR COURT
BULLOCH COUNTY, GA

COUNTY OF BULLOCH]
STATE OF GEORGIA]

Heather Banks McNeal

7084685854
PARTICIPANT ID

CLAIM OF LIEN

This claim of lien expires and is void 395 days from the date of filing of the claim of lien if no notice of commencement of lien action is filed in that time period. The owner is hereby further notified that said owner has the right to contest this lien.

MO FLO, LLC, a subcontractor, materialman and mechanic, files this preliminary notice of lien rights in the amount of EIGHT THOUSAND EIGHT HUNDRED SIXTY-NINE DOLLARS AND SEVENTY-TWO CENTS (\$8,869.72) as of JULY 12, 2022, plus interest on the follow described property:

All that tract or parcel of land lying and being in the 1209th G.M. District of Bulloch County, Georgia, and in the City of Statesboro, being known and designated as Lot No. 1, Block F of Orchard Hills Subdivision as shown by a plat of same prepared by Lamar O. Reddick & Associates, Surveyors, dated May 12, 1987, recorded in Plat Book 29, Page 74, Bulloch County, Georgia records.

and improvements thereon. The owners of said property are EDWIN J. ALEXANDER and WILHELMINA RANDTKE, having an address of 204 HIGHLAND ROAD, STATESBORO, GEORGIA 30458.

The lien is claimed for the following labor, material, and services furnished by Lienor for improving said property: PROPERTY located at 204 HIGHLAND ROAD, STATESBORO, GEORGIA 30458, in the amount of EIGHT THOUSAND EIGHT HUNDRED SIXTY-NINE DOLLARS AND SEVENTY-TWO CENTS (\$8,869.72). The last date of delivery of materials and services under this job was JUNE 14, 2022.

This 12th day of SEPTEMBER 2022.

TAULBEE, RUSHING, SNIPES,
MARSH & HODGIN, LLC

/s/ Christopher R. Gohagan
CHRISTOPHER R. GOHAGAN
Georgia Bar No.: 313902
ATTORNEY FOR
MO FLO, LLC

P.O. Box 327
Statesboro, Georgia 30459
P: (912) 764-9055
F: (912) 764-8687

CERTIFICATE OF SERVICE

I certify that I sent a copy of this DEFENDANTS' FIRST INTERROGATORIES TO CLIENT(S)
OF R. MATTHEW SHOEMAKER AND CHRIS GOHAGAN by certified mail to:

R. Matthew Shoemaker
Jones Cork LLP
435 Second Street
Fifth Floor, SunTrust Bank Building
P.O. Box 6437
Macon, Georgia 31208-6437

Chris Gohagan
12 Siebald Street
Post Office Box 327
Statesboro, Georgia 30459

Signed October 4, 2022



Wilhelmina Randtke
204 Highland Rd
Statesboro, GA 30458
850-345-6123

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Macomb, GA 31208

OFFICIAL USE

Certified Mail Fee	\$4.00	0770
Extra Services & Fees (check box, add fee as appropriate)	\$3.75	77
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.84	
Total Postage and Fees	\$8.09	

Sent To
 R. Matthew Shoemaker
 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 R. Matthew Shoemaker
 Jones Cork LLP
 435 Second Street
 Fifth Floor, Sun Trust Bank Building
 P.O. Box 6437
 Macomb, GA 31208-6437

2. Article Number (Transfer from sender label)
 7022 1670 0002 0116 0702

3. Service Type
 Adult Signature
 Adult Signature Restricted Delivery
 Certified Mail®
 Certified Mail Restricted Delivery
 Collect on Delivery
 Collect on Delivery Restricted Delivery
 Priority Mail Express®
 Registered Mail™
 Registered Mail Restricted Delivery
 Signature Confirmation™
 Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 Agent
 Addressee

B. Received by (Printed Name)
 R. Shoemaker

C. Date of Delivery
 OCT 06 2022
 6437

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

Domestic Return Receipt

PS Form 3811, July 2020 PSN 7530-02-000-9053

IN THE STATE COURT OF BULLOCH COUNTY, STATE OF GEORGIA

MO FLO LLC
1267 NORTHSIDE DRIVE EAST
STATESBORO, GA 30458
DBA: FLOORS OUTLET

Plaintiff(s)

VS

WILHELMINA ALEXANDER EDWIN ALEXANDER)
204 HIGHLAND RD 204 HIGHLAND RD
STATESBORO, GA 30458 STATESBORO, GA 30458
Defendants

) State Court: STCV2022000202
) Magistrate Court : 2022-11739CS
)
) DEFENDANTS' FIRST
) INTERROGATORIES TO CLIENT(S) OF
) R. MATTHEW SHOEMAKER AND CHRIS
) GOHAGAN
)

DEFENDANTS' FIRST INTERROGATORIES TO CLIENT(S) OF R. MATTHEW SHOEMAKER
AND CHRIS GOHAGAN

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INTERROGATORIES

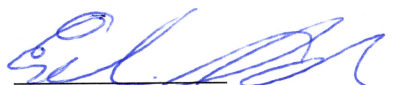
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4. Please identify each person whom you expect to call as an expert witness at trial or in connection with a motion for summary judgment, state the subject matter upon which the expert is expected to testify, state the qualifications of the expert (including resume or other summary of other qualifications), and state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.
5. Please identify each person whom you expect to call as a witness at trial or in connection with a motion for summary judgment, and state the matters upon which the witness is expected to testify.
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8. A list of campaign contributions by Floors Outlet, Brian McDonald, Prince Preston, Randy Childs, P3 Flooring, Contractor Wholesale Floors, Mo Flo LCC (or similarly named entity), and any of their subcontractors made to the campaigns for any candidate for judge in the Magistrate Court of Bulloch County, the State Court of Bulloch County, the Superior Court of Bulloch County, and the Ogeechee Circuit District Attorney from January 1, 2017 to present including the candidate contributed to, the dollar amount of the contribution, and the date the contribution was made.
9. Please identify each person who provided information or assisted in preparing your responses to these interrogatories, and state in particular what each person did in that respect. Also state the specific interrogatories with respect to which each person provided information or assistance. Individuals performing only clerical duties need not be identified.

This day of October 4, 2022.



Wilhelmina Randtke, Defendant
204 Highland Rd.
Statesboro, GA 30458
850-345-6123



Edwin Alexander, Defendant
204 Highland Rd.
Statesboro, GA 30458

RETURN RECORDED DOCUMENT TO:
Taulbee, Rushing, Snipes, Marsh & Hodgins, LLC
c/o Christopher R. Gohagan
12 Siebald Street, Statesboro, Georgia 30458

CROSS REFERENCE:
Deed Book 2701, Pages 560-561

FILED IN OFFICE
CLERK OF COURT
09/13/2022 09:10 AM
HEATHER BANKS MCNEAL, CLERK
SUPERIOR COURT
BULLOCH COUNTY, GA

COUNTY OF BULLOCH]
STATE OF GEORGIA]

Heather Banks McNeal

7084685854
PARTICIPANT ID

CLAIM OF LIEN

This claim of lien expires and is void 395 days from the date of filing of the claim of lien if no notice of commencement of lien action is filed in that time period. The owner is hereby further notified that said owner has the right to contest this lien.

MO FLO, LLC, a subcontractor, materialman and mechanic, files this preliminary notice of lien rights in the amount of EIGHT THOUSAND EIGHT HUNDRED SIXTY-NINE DOLLARS AND SEVENTY-TWO CENTS (\$8,869.72) as of JULY 12, 2022, plus interest on the follow described property:

All that tract or parcel of land lying and being in the 1209th G.M. District of Bulloch County, Georgia, and in the City of Statesboro, being known and designated as Lot No. 1, Block F of Orchard Hills Subdivision as shown by a plat of same prepared by Lamar O. Reddick & Associates, Surveyors, dated May 12, 1987, recorded in Plat Book 29, Page 74, Bulloch County, Georgia records.

and improvements thereon. The owners of said property are EDWIN J. ALEXANDER and WILHELMINA RANDTKE, having an address of 204 HIGHLAND ROAD, STATESBORO, GEORGIA 30458.

The lien is claimed for the following labor, material, and services furnished by Lienor for improving said property: PROPERTY located at 204 HIGHLAND ROAD, STATESBORO, GEORGIA 30458, in the amount of EIGHT THOUSAND EIGHT HUNDRED SIXTY-NINE DOLLARS AND SEVENTY-TWO CENTS (\$8,869.72). The last date of delivery of materials and services under this job was JUNE 14, 2022.

This 12th day of SEPTEMBER 2022.

TAULBEE, RUSHING, SNIPES,
MARSH & HODGIN, LLC

/s/ Christopher R. Gohagan
CHRISTOPHER R. GOHAGAN
Georgia Bar No.: 313902
ATTORNEY FOR
MO FLO, LLC

P.O. Box 327
Statesboro, Georgia 30459
P: (912) 764-9055
F: (912) 764-8687

CERTIFICATE OF SERVICE

I certify that I sent a copy of this DEFENDANTS' FIRST INTERROGATORIES TO CLIENT(S)
OF R. MATTHEW SHOEMAKER AND CHRIS GOHAGAN by certified mail to:

R. Matthew Shoemaker
Jones Cork LLP
435 Second Street
Fifth Floor, SunTrust Bank Building
P.O. Box 6437
Macon, Georgia 31208-6437

Chris Gohagan
12 Siebald Street
Post Office Box 327
Statesboro, Georgia 30459

Signed October 4, 2022



Wilhelmina Randtke
204 Highland Rd
Statesboro, GA 30458
850-345-6123

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Statesboro, GA 30458

OFFICIAL USE

Certified Mail Fee	\$4.00
Extra Services & Fees (check box, add fee as appropriate)	\$3.25
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.84

Total Postage and Fees \$8.09

STATESBORO GA 30458 0770
OCT 4 2022
Postmark Here
10/04/2022
USPS

Sent To
Chris Gehagan
Street and Apt. No., or PO Box No. *Box 327*
City, State, ZIP+4®

7022 1670 0002 0116 0740

USPS Tracking®

[FAQs >](#)

Tracking Number:

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Latest Update

Your item was delivered to an individual at the address at 1:06 pm on October 6, 2022 in STATESBORO, GA 30458.

Delivered

Delivered, Left with Individual

STATESBORO, GA 30458

October 6, 2022, 1:06 pm

Departed USPS Regional Facility

MACON GA DISTRIBUTION CENTER ANNEX

October 5, 2022, 5:09 pm

Arrived at USPS Regional Facility

MACON GA DISTRIBUTION CENTER ANNEX

October 4, 2022, 10:45 pm

USPS in possession of item

STATESBORO, GA 30458

October 4, 2022, 1:20 pm

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Product Information



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FAQs