

IN THE STATE COURT OF BULLOCH COUNTY, STATE OF GEORGIA

*Heather Banks McNeal*  
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  
)  
) Defendants' Objection to Plaintiff(s)'s  
) Entry Upon Land  
)  
)  
)

VS

WILHELMINA ALEXANDER  
204 HIGHLAND RD  
STATESBORO, GA 30458  
Defendants

EDWIN ALEXANDER  
204 HIGHLAND RD  
STATESBORO, GA 30458

DEFENDANTS' OBJECTION TO PLAINTIFF(S)'S ENTRY UPON LAND

1. Defendants object to the Plaintiff(s)'s November 21, 2022 "Plaintiff's Request to Permit Entry Upon Defendants' Land for Inspection and Other purposes" Pursuant to OCGA 9-11-34 on grounds that it is overly broad. The request purports to inspect "the property or any designated object or operation thereon" and doesn't say what Plaintiff(s) intend to do, nor limit entry to issues related to this lawsuit. Defendants object to inspection of areas not relevant to this lawsuit. OCGA 9-11-34 requires, "The request shall set forth the items to be inspected, either by individual item or by category, and describe each item and category with reasonable particularity. The request shall specify a reasonable time, place, and manner of making the inspection and performing the related acts." Plaintiff(s) request for entry doesn't say what will be done, who will do it, nor give the times Plaintiff(s) plan to be there, in that it gives an arrival time, but not a time of leaving.
2. Defendants have conferred with counsel for Plaintiff(s), regarding the nature of the inspection and times of the inspections. Plaintiff(s)'s counsel wrote that the inspection: might last an hour or so (ie. from 1pm to around 2pm), would involve photographing things, would not involve furniture, that all people involved with the inspection will stay in the same room rather than split up, and that one of the owners of Floors Outlet would be there.
3. Defendants object to the entry upon land to the extent that it deviates from those limitations. To the extent that it is within those limits, Defendants do not object.
4. Specifically, Defendants object to moving furniture around. We have been told it won't be done, we don't want people touching our things, and we have not planned to move it for Plaintiff(s).
5. Specifically, Defendants object to multiple people coming in and splitting up rather than staying in one room. Opposing counsel wrote that people involved with the inspection

- would stay in the same room as one another, and Plaintiff(s) have not arranged to be able to watch people in multiple rooms all over the house.
6. Specifically, Defendants object to Prince Preston, Brian McDonald, or Shannon Warren being on the property, if we are unable to arrange for security to supervise them. On June 6, 2022, Brian McDonald, Prince Preston, and Shannon Warren met with Wilhelmina Randtke alone at 204 Highland Rd, ostensibly to inspect the floor. Instead, they initially waved laser levels around, held the laser levels to walls, and claimed the house was too crooked to be able to install tile properly. They later trapped Wilhelmina Randtke in a bedroom while Prince Preston yelled at her that they wouldn't finish the floor, wouldn't fix things they broke, and to write the check right now for the balance. It's fine for the lawyers, an insurance inspector, or a flooring specialist to come in and inspect without security. It's necessary for Brian McDonald, Prince Preston, and Shannon Warren all to leave if security is not available, and to leave by 3pm in order to ensure they are gone before security leaves. That is because they have been violent to Defendant Wilhelmina Randtke in the past at the previous inspection. Additionally, Shannon Warren has a criminal record for violent crimes. In Wayne County, Georgia in SUCR2010000068, he was prosecuted regarding a stabbing. In Monroe County, Florida in 2021MM00733AK he did diversion for disorderly conduct, and got the ankle bracelet off in November 2021 less than a year before assisting Brian McDonald and Prince Preston in assaulting Wilhelmina Randtke. Defendants have arranged for security to supervise the inspection, in case of any of those three showing up. If security is not available, Defendants plan not to let any of those three onto the property. Defendants object to them staying past 3pm regardless of us being able to arrange security. According to opposing counsel that window of time should be plenty of time. Defendants also note that Brian McDonald took photographs of the floor and damaged walls on June 1, 2022, and that Plaintiff(s) inspected the floor on June 1, June 2, and June 6, 2022, so have had an opportunity to inspect and did actually photograph the floor before furniture was moved in.
  7. Specifically, Defendants object to any agent for Plaintiff(s) staying past 4pm. Opposing counsel informed us that the inspection will take about an hour or so, and since it begins at 1pm, our understanding is that a 3 hour window should more than suffice.
  8. Specifically, Defendants object to destructive testing. Opposing counsel wrote that the inspection will involve taking photographs.

This day of December 21, 2022.



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



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

CERTIFICATE OF SERVICE

I certify that I filed a copy of this DEFENDANTS' OBJECTION TO PLAINTIFF(S)'S ENTRY UPON LAND with the State Court of Bulloch County and will mail copies to:

Brian McDonald  
208 Spotted Fawn RD N  
Statesboro, GA 30458

R. Matthew Shoemaker  
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435 Second Street  
Fifth Floor, SunTrust Bank Building  
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Macon, Georgia 31208-6437

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

Shannon Warren  
sole proprietor of S&T Floor Covering  
330 Satilla Church Road  
Jesup, GA, 31545

Signed December 21, 2022



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Wilhelmina Randtke  
204 Highland Rd  
Statesboro, GA 30458