

IN THE STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA


Heather Banks McNeal, Clerk
Bulloch County, Georgia

MO FLO, LLC)
d/b/a FLOORS OUTLET,)
)
Plaintiff,)
)
v.)
)
WILHELMINA RANDTKE and)
EDWIN ALEXANDER)
Defendants,)
)
AND)
)
MO FLO, LLC)
d/b/a FLOORS OUTLET,)
)
Plaintiff / Third-Party)
Plaintiff,)
)
v.)
)
S&T FLOOR COVERING, LLC,)
)
Third-Party Defendant.)

CIVIL ACTION FILE
NO. STCV2022000202

PLAINTIFF'S MOTION TO EXTEND DISCOVERY

COMES NOW MO FLO, LLC d/b/a FLOORS OUTLET ("Plaintiff"), and hereby moves this Court for an order extending the period of time for which the parties have to conduct discovery in this case, showing the Court as follows:

1.

Plaintiff filed this lawsuit on July 12, 2022.

2.

Defendants Wilhelmina Randkte and Edwin Alexander filed their Answer and Counterclaims on August 8, 2022.

3.

Therefore, pursuant to Uniform Superior/State Court Rule 5.1, discovery is set to close in this case on February 8, 2023.

4.

Defendants served on Plaintiff their Requests for Production of Documents on September 12, 2022, their Request for Admissions to Plaintiff on September 14, 2022, and their Interrogatories on October 6, 2022.

5.

Plaintiff served its responses and objections to Defendants' Request for Admissions on October 14, 2022, served its responses and objections to Defendants' Requests for Production of Documents on October 5, 2022, and served its responses and objections to Defendants' Interrogatories on October 28, 2022.

6.

In response to the new counterclaims brought by Defendants, Plaintiff served its first discovery requests on Defendants on November 21, 2022. However, Defendants did not respond to these requests until December 21, 2022.

7.

During this time, Plaintiff has filed Third-Party Complaint joining S&T Floor Covering, LLC to this action. In response, S&T Floor Covering, LLC filed a counterclaim against Plaintiff. Neither party has had the opportunity to begin discovery.

8.

As a result of the previously-mentioned issues, Plaintiff needs additional time to take depositions of Defendants and Third-Party Defendant and serve additional discovery requests upon the opposing parties to this action.

9.

This Motion to Extend Discovery is being submitted prior to the close of discovery, and is not being submitted for unnecessary delay or any improper purpose. This is also the first request by any party for an extension of the discovery period.¹

8.

Pursuant to the foregoing, Plaintiff respectfully requests that discovery in this case be extended four (4) months – through and including June 8, 2023.

9.

A proposed order is attached hereto as Exhibit “A”.

WHEREFORE, Plaintiff requests that the Court GRANT its Motion to Extend Discovery.

Respectfully submitted this 19th day of January, 2023.

/s/ S. Meghan Pittman
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State Bar No. 616791
R. MATTHEW SHOEMAKER
State Bar No. 339367
Attorneys for Plaintiff

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¹ Plaintiff's additional counsel, Chris Gohagan, has consented this Motion as well.

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Plaintiff,)	
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WILHELMINA RANDTKE and)	CIVIL ACTION FILE
EDWIN ALEXANDER)	NO. STCV2022000202
Defendants,)	
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AND)	
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MO FLO, LLC)	
d/b/a FLOORS OUTLET,)	
)	
Plaintiff / Third-Party)	
Plaintiff,)	
)	
v.)	
)	
S&T FLOOR COVERING, LLC,)	
)	
Third-Party Defendant.)	

ORDER EXTENDING DISCOVERY

Upon motion by Plaintiff Mo Flo, LLC d/b/a Floors Outlet for an extension of time to conduct discovery and good cause having been shown, IT IS HEREBY ORDERED that the time for conducting discovery as to all parties is extended through and including June 8, 2023.

This ____ day of _____, 2023.

JUDGE, STATE COURT OF BULLOCH COUNTY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing **PLAINTIFF'S MOTION TO EXTEND DISCOVERY** upon all parties to this matter by depositing a true and correct copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows:

Wilhelmina Randtke
Edwin Alexander
204 Highland Road
Statesboro, Georgia 30458

Christopher R. Gohagan
12 Siebald Street
Statesboro, GA 30458
cgoagan@statesborolawgroup.com

Shannon Warren
S&T Floor Covering, LLC
330 Satilla Church Road
Jesup, GA 31545

This 19th day of January, 2023.

/s/ S. Meghan Pittman _____
S. MEGHAN PITTMAN
State Bar No. 616791
Attorney for Plaintiff

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