

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  
)  
) CERTIFICATE OF SERVICE  
) REGARDING DEFENDANTS' FIRST  
) REQUEST FOR PRODUCTION OF  
) DOCUMENTS FROM AMBIGUOUSLY  
) IDENTIFIED CLIENT(S) OF R. MATTHEW  
) SHOEMAKER

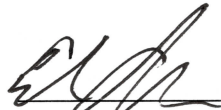
CERTIFICATE OF SERVICE REGARDING DEFENDANTS' FIRST REQUEST FOR  
ADMISSIONS FROM AMBIGUOUSLY IDENTIFIED CLIENT(S) OF R. MATTHEW  
SHOEMAKER

Pursuant to Uniform Superior Court Rule 5.2, Defendants give the court notice of discovery. On September 7, we mailed the attached DEFENDANTS' FIRST REQUEST FOR ADMISSIONS FROM AMBIGUOUSLY IDENTIFIED CLIENT(S) OF R. MATTHEW SHOEMAKER to R. Matthew Shoemaker. We sent it September 13, 2022 and it was signed for and picked up September 14, 2022.


This day of September 26, 2022



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



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

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input checked="" type="checkbox"/> Agent  <input checked="" type="checkbox"/> Addressee</p>																
<p>1. Article Addressed to:  R. Matthew Shoemaker  Jones Crk LLP  435 second street  Fifth Floor Suntra Bank Building  PO Box 6437  Macon, GA 31208 -6437</p>	<p>B. Received by (Printed Name) <i>M. Lord</i> C. Date of Delivery <i>9/14/22</i></p>																
 9590 9402 5294 9154 7863 65	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="font-size: 2em; text-align: center;"><i>6437</i></p>																
<p>2. Article Number (Transfer from service label)  7022 0410 0003 4865 2712</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Mail Restricted Delivery</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Mail Restricted Delivery	
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PS Form 3811, July 2015 PSN 7530-02-000-9053

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Sent To: <i>R. Matthew Shoemaker Jones Crk LLP</i> Street and Apt. No., or PO Box No.: <i>435 second street FFL Floor Suntra Bank Bldg</i> City, State, ZIP+4: <i>Macon GA 31208-6437</i> PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	
Tracking #: 70220410000348652712 Return Receipt # 9590 9402 5294 9154 7863 65 Total \$9.17 Grand Total: \$9.17	EDWIN ALEXANDER 204 HIGHLAND RD STATESBORO, GA 304
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ST FOR ADMISSIONS FR (S) OF R. MATTHEW SHC the Georgia Civil Practice inner required by law to th est for production mean whether "Mo Flo LLC", o noemaker as of his Sep notice of appearance.	

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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  
204 HIGHLAND RD  
STATESBORO, GA 30458

Defendants

EDWIN ALEXANDER  
204 HIGHLAND RD  
STATESBORO, GA 30458

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

DEFENDANTS' FIRST REQUEST FOR ADMISSIONS FROM AMBIGUOUSLY IDENTIFIED  
CLIENT(S) OF R. MATTHEW SHOEMAKER

Pursuant to O.C.G.A. § 9-11-36 of the Georgia Civil Practice Act, defendant requests that plaintiff(s) respond in time and manner required by law to the following requests for admissions.

Plaintiff(s) for purposes of this request for production means any client of R. Matthew Shoemaker in STCV2022000202, whether "Mo Flo LLC", or "Mo Flo, LLC", or other party to the case represented by R. Matthew Shoemaker as of his September 2, 2022 notice of appearance even if not accurately named in the notice of appearance.

FIRST REQUEST FOR ADMISSIONS

Answers should specifically deny the matter or set forth in detail and the reasons why plaintiff cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that plaintiff qualify an answer or deny only a part of the matter of which an admission is requested, plaintiff shall specify so much of it as is true and qualify or deny the remainder. Plaintiff may not give lack of information or knowledge as a reason for failure to admit or deny unless plaintiff states that he has made reasonable inquiry and that the information known or readily obtainable is insufficient to enable the party to admit or deny.

"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.

Plaintiff is advised that if he fails to admit the truth of any matter as requested, and if defendant thereafter proves the truth of the matter, defendant will apply to the Court for an order requiring plaintiff to pay the reasonable expenses incurred in making that proof, including reasonable attorneys fees.

REQUESTS TO ADMIT DIRECTED TO PLAINTIFF:

1. Admit that Mo Flo LLC ratified the April 9, 2022 contract to install tile at 204 Highland Rd.
2. Admit that Mo Flo, LLC ratified the April 9, 2022 contract to install tile at 204 Highland Rd.
3. Admit that MoFlo, LLC (GA Corporations Division control number 19113366) ratified the April 9, 2022 contract to install tile at 204 Highland Rd.
4. Admit that P3 Flooring, LLC (GA Corporations Division control number 15011444) ratified the April 9, 2022 contract to install tile at 204 Highland Rd.
5. Admit that within this case, Plaintiff(s) have used "Mo Flo LLC" and "Mo Flo, LLC" to refer to MoFlo, LLC (GA Corporations Division control number 19113366) and represent a single entity.
6. Admit that in Plaintiff(s) July 12, 2022 Statement of Claim, "Mo Flo LLC" is ambiguous in that "Mo Flo LLC" was not the name of any registered corporation in Georgia either before July 12, 2022 or on July 12, 2022.
7. Admit that in Plaintiff(s) July 12, 2022 Statement of Claim, "Mo Flo LLC" refers to an undisclosed principal of the April 9, 2022 contract to install tile at 204 Highland Rd.
8. Admit that the September 2, 2022 Notice of Appearance for representing client "Mo Flo, LLC" and listing the parties in the header as "Mo Flo, LLC" and "DBA Floors Outlet" indicates representation of "Mo Flo, LLC" only but not representation of "DBA Floors Outlet".
9. Admit that the September 2, 2022 Notice of Appearance for representing client "Mo Flo, LLC" and listing the parties in the header as "Mo Flo, LLC" and "DBA Floors Outlet" does not indicate representation of MoFlo, LLC (GA Corporations Division control number 19113366).
10. Admit that on July 12, 2022, Brian McDonald signed a Statement of Claim filed in the Magistrate Court of Bulloch County.
11. Admit that on July 12, 2022, Brian McDonald signed a Statement of Claim filed in the Magistrate Court of Bulloch County in his capacity as owner of Floors Outlet.
12. Admit that on July 12, 2022, Brian McDonald signed a Statement of Claim filed in the Magistrate Court of Bulloch County in his capacity as partner owning Floors Outlet.
13. Admit that on July 12, 2022, Brian McDonald signed a Statement of Claim filed in the Magistrate Court of Bulloch County in his capacity as employee of MoFlo, LLC (GA Corporations Division control number 19113366).
14. Admit that on July 12, 2022, Brian McDonald signed a Statement of Claim filed in the Magistrate Court of Bulloch County in his capacity as employee of P3 Flooring, LLC (GA Corporations Division control number 15011444).
15. Admit that Brian McDonald did not file any document in Magistrate Court to meet requirements of Magistrate Court Rule 31 stating, "Any officer or full-time employee of a

corporation, sole proprietorship, partnership or unincorporated association may be designated by such entity as agent for purposes of representing it in civil actions to which it is a party in magistrate court. An action on behalf of a corporation, sole proprietorship, partnership, or unincorporated association, except affidavits in attachment, may be filed and presented by such designated agent. Said individual claiming to represent one of the aforementioned entities as its agent shall file with the court a sworn affidavit or otherwise provide supporting documents sufficient to establish to the court that said individual is in fact a bona fide officer or full-time employee of the entity that is a party to the action.” (emphasis added).

16. Admit that on April 9, 2022, Floors Outlet was a sole proprietorship owned by Brian McDonald.
17. Admit that on April 9, 2022, Floors Outlet was a common law partnership.
18. Admit that on April 9, 2022, Floors Outlet was a common law partnership with Brian McDonald and Prince Preston as partners (whether inclusive or exclusive of other partners).
19. Admit that on April 9, 2022, Floors Outlet was a common law partnership with Brian McDonald, Prince Preston, and Randy Childs as partners (whether inclusive or exclusive of other partners).
20. Admit that on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) was domiciled within the City of Statesboro.
21. Admit that on April 9, 2022, Floors Outlet was an unrecorded fictitious name for MoFlo, LLC (GA Corporations Division control number 19113366). For this request for admission, recorded means recorded with the Superior Court of Bulloch County.
22. Admit that on April 9, 2022, Floors Outlet was a recorded fictitious name for MoFlo, LLC (GA Corporations Division control number 19113366). For this request for admission, recorded means recorded with the Superior Court of Bulloch County.
23. Admit that on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) was domiciled within the City of Statesboro.
24. Admit that on April 9, 2022, Floors Outlet was an unrecorded fictitious name for P3 Flooring, LLC (GA Corporations Division control number 15011444). For this request for admission, recorded means recorded with the Superior Court of Bulloch County.
25. Admit that on April 9, 2022, Floors Outlet was a recorded fictitious name for P3 Flooring, LLC (GA Corporations Division control number 15011444). For this request for admission, recorded means recorded with the Superior Court of Bulloch County.
26. Admit that Wilhelmina Randtke and Edwin Alexander entered a contract with Brian McDonald as Contractor on April 9, 2022 for flooring installation at 204 Highland Rd. and supplies.
27. Admit that Wilhelmina Randtke and Edwin Alexander entered a contract with Brian McDonald as Contractor on April 9, 2022 for flooring installation at 204 Highland Rd. and supplies at a full price of \$16,716.44 with a discount bringing the price to \$16,319.44.
28. Admit that on April 30, 2022, Defendant(s) met with Brian McDonald at the Floors Outlet store at 1267 Northside Drive East and signed or initialed a change to the April 9, 2022 contract to install tile at 204 Highland Rd. changing the grout color.

29. Admit that the change to grout color was at the request of Brian McDonald or Josh White who requested the change by explaining that the originally selected grout color was backordered and a similar color was in stock.
30. Admit that Brian McDonald signed the April 9, 2022 contract to install tile flooring at 204 Highland Rd and signed as "Contractor".
31. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd gave the name of the business as "Floors Outlet".
32. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd did not indicate "Mo Flo LLC", "Mo Flo, LLC", nor "MoFlo, LLC" as parties to the contract.
33. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd did not indicate "P3 Flooring, LCC" as a party to the contract.
34. Admit that under the April 9, 2022 contract to install tile at 204 Highland Rd, half the money was due at signing and half was due two days after contract completion.
35. Admit that Floors Outlet took a down payment of \$8,159.72 by check from Wilhelmina Randtke made out to Floors Outlet endorsed by Wilhelmina Randtke on April 9, 2022 and posted April 11, 2022.
36. Admit that MoFlo, LLC (GA Corporations Division control number 19113366) took a down payment of \$8,159.72 by check from Wilhelmina Randtke made out to Floors Outlet endorsed by Wilhelmina Randtke on April 9, 2022 and posted April 11, 2022.
37. Admit that P3 Flooring, LLC (GA Corporations Division control number 15011444) took a down payment of \$8,159.72 by check from Wilhelmina Randtke made out to Floors Outlet endorsed by Wilhelmina Randtke on April 9, 2022 and posted April 11, 2022.
38. Admit that MoFlo, LLC (GA Corporations Division control number 19113366) is a materialman for Floors Outlet.
39. Admit that MoFlo, LLC (GA Corporations Division control number 19113366) is a subcontractor of Floors Outlet for labor.
40. Admit that P3 Flooring, LLC (GA Corporations Division control number 15011444) is a materialman for Floors Outlet.
41. Admit that P3 Flooring, LLC (GA Corporations Division control number 15011444) is a subcontractor of Floors Outlet for labor.
42. Admit that on April 9, 2022, Brian McDonald was covered by workers compensation insurance under a policy issued to Floors Outlet.
43. Admit that on April 9, 2022, Brian McDonald was covered by workers compensation insurance under a policy issued to MoFlo, LLC (GA Corporations Division control number 19113366).
44. Admit that on April 9, 2022, Brian McDonald was covered by workers compensation insurance under a policy issued to P3 Flooring, LLC (GA Corporations Division control number 15011444).
45. Admit that on April 9, 2022, Brian McDonald was not covered by workers compensation insurance.
46. Admit that Brian McDonald was a licensed general contractor on April 9, 2022, according to licensing requirements in OCGA Title 43, Chapter 41, Residential and General Contractors.

47. Admit that Brian McDonald was a licensed residential contractor on April 9, 2022, according to licensing requirements in OCGA Title 43, Chapter 41, Residential and General Contractors.
48. Admit that Brian McDonald was operating as a contractor under the specialty contractor exemption on April 9, 2022, according to licensing requirements in OCGA Title 43, Chapter 41, Residential and General Contractors.
49. Admit that Brian McDonald was an unlicensed contractor (not a licensed general contractor, not a licensed residential contractor, and not under the specialty contractor exemption) on April 9, 2022, according to licensing requirements in OCGA Title 43, Chapter 41, Residential and General Contractors.
50. Admit that no employee, partner, or officer of Floors Outlet or its principals was a licensed general contractor on April 9, 2022, according to licensing requirements in OCGA Title 43, Chapter 41, Residential and General Contractors.
51. Admit that no employee, partner, or officer of Floors Outlet or its principals was a licensed residential contractor on April 9, 2022, according to licensing requirements in OCGA Title 43, Chapter 41, Residential and General Contractors.
52. Admit that no employee, partner, or officer of Floors Outlet or its principals was a licensed specialty contractor on April 9, 2022, according to licensing requirements in OCGA Title 43, Chapter 41, Residential and General Contractors.
53. Admit that the City of Statesboro Code of Ordinances Sec. 18-104. - Occupation tax levied; computation of full-time employees; occupation tax schedule; limitations available at [https://library.municode.com/ga/statesboro/codes/code\\_of\\_ordinances?nodeId=PTIICOR\\_CH18BU\\_ARTVADFEREFEOCTA\\_S18-104OCTALECOFUMEEMOCTASCLI](https://library.municode.com/ga/statesboro/codes/code_of_ordinances?nodeId=PTIICOR_CH18BU_ARTVADFEREFEOCTA_S18-104OCTALECOFUMEEMOCTASCLI) and attached to this Request for Admissions is a true and correct copy of the Statesboro Code of Ordinances, section 18-104 and was effective and in force April 9, 2022.
54. Admit that on April 9, 2022, Floors Outlet was required to have a local business license according to the City of Statesboro Code of Ordinances Sec. 18-104. - Occupation tax levied; computation of full-time employees; occupation tax schedule; limitations available at [https://library.municode.com/ga/statesboro/codes/code\\_of\\_ordinances?nodeId=PTIICOR\\_CH18BU\\_ARTVADFEREFEOCTA\\_S18-104OCTALECOFUMEEMOCTASCLI](https://library.municode.com/ga/statesboro/codes/code_of_ordinances?nodeId=PTIICOR_CH18BU_ARTVADFEREFEOCTA_S18-104OCTALECOFUMEEMOCTASCLI) . Attached to this Request for Admissions is a true and correct copy of the Statesboro Code of Ordinances, section 18-104.
55. Admit that on April 9, 2022, Floors Outlet had a location or office within the City of Statesboro.
56. Admit that on April 9, 2022, Floors Outlet did not have a local business license with the City of Statesboro.
57. Admit that on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) was required to have a local business license according to the City of Statesboro Code of Ordinances Sec. 18-104. - Occupation tax levied; computation of full-time employees; occupation tax schedule; limitations available at [https://library.municode.com/ga/statesboro/codes/code\\_of\\_ordinances?nodeId=PTIICOR\\_CH18BU\\_ARTVADFEREFEOCTA\\_S18-104OCTALECOFUMEEMOCTASCLI](https://library.municode.com/ga/statesboro/codes/code_of_ordinances?nodeId=PTIICOR_CH18BU_ARTVADFEREFEOCTA_S18-104OCTALECOFUMEEMOCTASCLI)

58. Admit that on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) had a location or office within the City of Statesboro.
59. Admit that on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) did not have a local business license with the City of Statesboro.
60. Admit that on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) was required to have a local business license according to the City of Statesboro Code of Ordinances Sec. 18-104. - Occupation tax levied; computation of full-time employees; occupation tax schedule; limitations available at [https://library.municode.com/ga/statesboro/codes/code\\_of\\_ordinances?nodeId=PTIICOR\\_CH18BU\\_ARTVADFEREFEOCTA\\_S18-104OCTALECOFUMEEMOCTASCLI](https://library.municode.com/ga/statesboro/codes/code_of_ordinances?nodeId=PTIICOR_CH18BU_ARTVADFEREFEOCTA_S18-104OCTALECOFUMEEMOCTASCLI)
61. Admit that on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) had a location or office within the City of Statesboro.
62. Admit that on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) did not have a local business license with the City of Statesboro.
63. Admit that labor performed at 204 Highland Rd to fulfill the April 9, 2022 contract was performed by Shannon Warren's company or its subcontractors. For purposes of this Request for Admission, treat misspellings of "Shannon Warren" as equivalent to Shannon Warren.
64. Admit that on May 27, 2022, Brian McDonald wrote a single check to a subcontractor for all labor on the April 9, 2022 contract to install tile at 204 Highland Rd.
65. Admit that between May 26 and June 1, 2022 inclusive, Brian McDonald wrote a single check to a subcontractor for all labor on the April 9, 2022 contract to install tile at 204 Highland Rd.
66. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that quarterround was not completely installed in violation of the contract provision requiring Contractor to "Install all of the materials for the designated areas". Large runs of quarterround were not caulked, while it is the practice of Floors Outlet's or its principal's subcontractors to caulk quarterround.
67. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that grout was not completely installed in violation of the contract provision requiring Contractor to "Install all of the materials for the designated areas". Grout was installed but it had large gaps and holes.
68. Admit that the original April 9, 2022 contract to install tile at 204 Highland Rd was to install Hickory grout from Mapei. The April 30, 2022 revision changed the color to Mocha grout from Mapei.
69. Admit that the April 30, 2022 revision to the April 9, 2022 contract to install tile at 204 Highland Rd was made at the suggestion of Brian McDonald or Josh White with the explanation that Hickory grout from Mapei was out of stock and back ordered while other colors including Mocha grout from Mapei were in stock and if ordered could arrive promptly.
70. Admit that grout installed under the April 9, 2022 contract to install tile at 204 Highland Rd was mixed to different consistencies such that color varies from location to location. The color variation in grout installed at 204 Highland Rd is greater than the color variation between Hickory grout and Mocha grout from Mapei.



71. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that furniture which had been moved to the garage or cover porch by Floors Outlet or its subcontractor(s) was not placed back in the house in violation of the contract provision requiring Contractor to "Set aside/put back furniture but limited to: Heavy items that customer(s) prefers to be moved".
72. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that thinset smeared and dripped on the brick porch was not cleaned in violation of the contract provision requiring Contractor to "Clean area after installation is complete".
73. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that thinset splattered on the brick siding was not cleaned in violation of the contract provision requiring Contractor to "Clean area after installation is complete".
74. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that grout and thinset smeared on interior walls was not cleaned in violation of the contract provision requiring Contractor to "Clean area after installation is complete".
75. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that grout and thinset smeared on interior doors was not cleaned in violation of the contract provision requiring Contractor to "Clean area after installation is complete".
76. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that grout and thinset smeared on kitchen cabinets was not cleaned in violation of the contract provision requiring Contractor to "Clean area after installation is complete".
77. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd put a doorknob through the drywall in the dining room resulting in a hole in the drywall.
78. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that breaking the hole in the dry wall in the dining room at 204 Highland Rd and not patching the hole and matching paint violated the contract provision requiring Contractor to "Clean area after installation is complete".
79. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that breaking the hole in the dry wall in the dining room at 204 Highland Rd and not patching the hole and matching paint violated the duty to perform a construction contract in a workmanlike manner.
80. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd broke a piece off a kitchen cabinet door.
81. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that breaking a piece off the kitchen cabinet at 204 Highland Rd and not repairing and matching paint violated the contract provision requiring Contractor to "Clean area after installation is complete".
82. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that breaking a piece off the kitchen cabinet at 204 Highland Rd and not repairing and matching paint violated the duty to perform a construction contract in a workmanlike manner.
83. Admit that on April 9, 2022, the display floor in the Floors Outlet showroom at 1267 Northside Dr E, Statesboro, GA 30458 included sections completed in porcelain tile. On April 9, 2022, no tiles used in the display floor were cracked.

84. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd broke tiles into pieces while cutting and installed broken pieces of tile next to one another pieced together to recreate the tile.
85. Admit that workers under the April 9, 2022 contract installed cracked tiles.
86. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that installing cracked tile at 204 Highland Rd resulted in installation of a different quality of floor than that represented as being sold by way of showing the display floor of uncracked porcelain tiles shown to Defendants on April 9, 2022 at the Floors Outlet showroom at 267 Northside Dr E, Statesboro, GA 30458.
87. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that installing cracked tile at 204 Highland Rd violated the duty to perform a construction contract in a workmanlike manner.
88. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd made all cuts to tile with a wet saw. (For purposes of this Request for Admission, using a garden hose to drip water onto the blade of an angle grinder while cutting should not be considered to be using a wet saw.)
89. Admit that dry cut tiles represent approximately 28% of tiles installed under the April 9, 2022 contract to install tile at 204 Highland Rd.
90. Admit that dry cut tiles represent more than 20% of tiles installed under the April 9, 2022 contract to install tile at 204 Highland Rd.
91. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that instructions on the boxes in which the tile was packed indicate to wet cut and not to dry cut tile such that dry cutting the tile reduced the quality of supplies to below what was contracted for.
92. Admit that tiles installed at 204 Highland Rd which were cut, were cut with jagged, flaked, or wavy edges rather than smooth cut edges.
93. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that cutting tile with flaked, jagged, or wavy edges violated the duty to perform a construction contract in a workmanlike manner.
94. Admit that replacement of tiles along walls, such as tiles which were cut to size in order to fit along a wall, requires removal and reinstallation of quarterround.
95. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd made 25% or fewer of cuts to tile with an angle grinder or dry saw rather than a wet saw. (For purposes of this Request for Admission, using a garden hose to drip water onto the blade of an angle grinder while cutting should not be considered to be using a wet saw.)
96. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd made 25% to 50% of cuts to tile with an angle grinder or dry saw rather than a wet saw. (For purposes of this Request for Admission, using a garden hose to drip water onto the blade of an angle grinder while cutting should not be considered to be using a wet saw.)
97. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd made 51% to 75% of cuts to tile with an angle grinder or dry saw rather than a wet saw. (For purposes of this Request for Admission, using a garden hose to drip water onto the blade of an angle grinder while cutting should not be considered to be using a wet saw.)

98. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd made 76% or greater of cuts to tile with an angle grinder or dry saw rather than a wet saw. (For purposes of this Request for Admission, using a garden hose to drip water onto the blade of an angle grinder while cutting should not be considered to be using a wet saw.)
99. Admit that workers under the April 9, 2022 contract to install tile at 204 Highland Rd made all cuts to tile with an angle grinder or dry saw rather than a wet saw. (For purposes of this Request for Admission, using a garden hose to drip water onto the blade of an angle grinder while cutting should not be considered to be using a wet saw.)
100. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that while disconnecting or reconnecting the washing machine a worker performing under the April 9, 2022 contract damaged the washing machine hookup in violation of the contract provision requiring Contractor to "Remove and reinstall appliances".
101. Admit that disconnecting or reconnecting a washing machine or refrigerator to a plumbing system is "plumbing", according to OCGA 43-14-2 which defines plumbing as "'Plumbing" means the practice of installing [ . . . ] appliances [ . . . ] in connection with [ . . . ] public or private water supply systems within or adjacent to any building, structure, or conveyance [ . . . ]".
102. Admit that all labor under the April 9, 2022 contract to install tile at 204 Highland Rd was performed under a single subcontract from Floors Outlet or its principal(s) to the same subcontractor.
103. Admit that labor under the April 9, 2022 contract to install tile at 204 Highland Rd was performed under a subcontract with labor charges in excess of \$2,500. If multiple subcontractors were used, answer affirmatively if at least one subcontract included labor charges in excess of \$2,500.
104. Admit that Brian McDonald uses the email address [brian@floors-outlet.com](mailto:brian@floors-outlet.com) to conduct business for Floors Outlet or its principals.
105. Admit that Brian McDonald uses the phone number 912-243-5477 to conduct business for Floors Outlet or its principals.
106. Admit that Josh White uses the email address [jcwhite1103@gmail.com](mailto:jcwhite1103@gmail.com) to conduct business for Floors Outlet or its principals.
107. Admit that Josh White uses the phone number 678-232-3817 to conduct business for Floors Outlet or its principals.
108. Admit that the tile flooring installed at 204 Highland Rd is installed below industry standards.
109. Admit that the tile flooring installed at 204 Highland Rd is installed 10% below industry standards.
110. Admit that the tile flooring installed at 204 Highland Rd is installed more than 10% below industry standards (11% to 100% below industry standards).
111. Admit that the tile flooring installed at 204 Highland Rd is installed 1% to 9% below industry standards.
112. Admit that the tile flooring installed at 204 Highland Rd is installed meeting industry standards.

113. Admit that the April 9, 2022 contract to install tile at 204 Highland Rd was not completed in that installing tile below industry standards violated the duty to perform a construction contract in a workmanlike manner.
114. Admit that a United States penny is 1.52mm thick.
115. Admit that a United States penny is approximately 1/16 inch thick (the thickness of a penny rounds to 0.06 inches and 1/16 inch rounds to 0.06 inches).
116. Admit that the spec sheet included as Exhibit Z to Defendants' Answer filed on August 9, 2022 in this case is a true and accurate spec sheet for the tile in the April 9, 2022 contract to install tile at 204 Highland Rd. Because the Magistrate Court of Bulloch County altered the record in that the Magistrate Court printed out Exhibits in black and white on a low quality printer and then scanned them which greatly reduced legibility, refer to Exhibit Z as posted at <https://happy-floors.s3.us-west-1.amazonaws.com/production%2F2021-01-12%2FEternity-1.pdf-a6732393-38a5-4c89-9677-3deda5313e71.pdf> (an incoming link is posted from the "Brochure" link available at <https://www.happy-floors.com/product/eternity/> ). A printout of the spec sheet is enclosed as an attachment.
117. Admit that lippage of more than 1/32 inch is unacceptable for the tile in the April 9, 2022 contract to install tile at 204 Highland Rd.
118. Admit that lippage of more than 1/16 inch is unacceptable for the tile in the April 9, 2022 contract to install tile at 204 Highland Rd.
119. Admit that lippage of more than 3/32 inch is unacceptable for the tile in the April 9, 2022 contract to install tile at 204 Highland Rd.
120. Admit that lippage of more than 1/8 inch is unacceptable for the tile in the April 9, 2022 contract to install tile at 204 Highland Rd.
121. Admit that lippage in at least some areas of 204 Highland Rd is more than 1/32 of an inch.
122. Admit that lippage in at least some areas of 204 Highland Rd is more than 1/16 of an inch.
123. Admit that lippage in at least some areas of 204 Highland Rd is more than 3/32 of an inch.
124. Admit that lippage in at least some areas of 204 Highland Rd is more than 1/8 of an inch.
125. Admit that 204 Highland Rd is concrete slab construction.
126. Admit that all tile installed at 204 Highland Rd was installed directly onto the concrete slab.
127. Admit that removal of tile flooring from a concrete slab destroys all installed materials such as tile, grout, and thinset, such that they cannot be reused nor reinstalled.
128. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, Floors Outlet would charge \$16,319.44.
129. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and to get to the same install contracted for on April 9, 2022, Floors Outlet would charge more than \$16,319.44 (representing additional costs to remove tile over the preexisting flooring).

130. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, Floors Outlet would charge \$16,719.44.
131. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, Floors Outlet would charge more than \$16,719.44 (representing additional costs to remove tile over removal of carpet and laminate).
132. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, Floors Outlet would charge \$22,261.94 (representing additional costs to remove tile over removal of carpet and laminate).
133. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, Floors Outlet would charge more than \$22,261.94 (representing additional costs to remove tile over removal of carpet and laminate).
134. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, Floors Outlet would charge \$22,661.94 (representing additional costs to remove tile over removal of carpet and laminate).
135. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, Floors Outlet would charge more than \$22,661.94 (representing additional costs to remove tile over removal of carpet and laminate).
136. Admit that to remove the tile flooring at 204 Highland Rd, MoFlo, LLC (GA Corporations Division control number 19113366) would charge \$5.00 per square foot to remove tile.
137. Admit that to remove the tile flooring at 204 Highland Rd, MoFlo, LLC (GA Corporations Division control number 19113366) would charge more than \$5.00 per square foot to remove tile.
138. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) would charge \$16,319.44.
139. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and to get to the same install contracted for on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) would charge more than \$16,319.44 (representing additional costs to remove tile over the preexisting flooring).
140. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) would charge \$16,719.44.
141. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) would charge more than \$16,719.44 (representing additional costs to remove tile over removal of carpet and laminate).

142. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) would charge \$22,261.94 (representing additional costs to remove tile over removal of carpet and laminate).
143. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) would charge more than \$22,261.94 (representing additional costs to remove tile over removal of carpet and laminate).
144. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) would charge \$22,661.94 (representing additional costs to remove tile over removal of carpet and laminate).
145. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, MoFlo, LLC (GA Corporations Division control number 19113366) would charge more than \$22,661.94 (representing additional costs to remove tile over removal of carpet and laminate).
146. Admit that to remove the tile flooring at 204 Highland Rd, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge \$5.00 per square foot to remove tile.
147. Admit that to remove the tile flooring at 204 Highland Rd, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge more than \$5.00 per square foot to remove tile.
148. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge \$16,319.44.
149. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and to get to the same install contracted for on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge more than \$16,319.44 (representing additional costs to remove tile over the preexisting flooring).
150. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge \$16,719.44.
151. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge more than \$16,719.44 (representing additional costs to remove tile over removal of carpet and laminate).
152. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge \$22,261.94 (representing additional costs to remove tile over removal of carpet and laminate).

153. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge more than \$22,261.94 (representing additional costs to remove tile over removal of carpet and laminate).
154. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge \$22,661.94 (representing additional costs to remove tile over removal of carpet and laminate).
155. Admit that to remove the tile flooring at 204 Highland Rd, and complete the job with the same supplies and with the same install contracted for on April 9, 2022, P3 Flooring, LLC (GA Corporations Division control number 15011444) would charge more than \$22,661.94 (representing additional costs to remove tile over removal of carpet and laminate).
156. Admit that the tile in the April 9, 2022 contract to install tile at 204 Highland Rd. is a PEI 5 tile.
157. Admit that the tile in the April 9, 2022 contract to install tile at 204 Highland Rd. is a PEI 5 tile with an ADA rating for slip resistance.
158. Admit that a total cost of \$22,261.94 is a reasonable cost to remove tile, prepare the floor, install PEI 5 tile with an ADA rating for slip resistance, and complete finishing work such as quarterround in Bulloch County.
159. Admit that a total cost of \$22,661.94 is a reasonable cost to remove tile, prepare the floor, install PEI 5 tile with an ADA rating for slip resistance, and complete finishing work such as quarterround in Bulloch County.
160. Admit that a total cost of \$26,327.21 is a reasonable cost to remove tile, prepare the floor, install PEI 5 tile with an ADA rating for slip resistance, and complete finishing work such as quarterround in Bulloch County.
161. Admit that a total cost of \$800 is a reasonable cost to clean thinset off a 7 foot by 13 foot brick porch in Bulloch County.
162. Admit that a total cost of \$705 is a reasonable cost to paint kitchen cabinets in Bulloch County.
163. Admit that 11 days is a reasonable time to perform the following work: remove all tile installed at 204 Highland Rd. under the April 9, 2022 contract, prepare the floor, properly install tile, and do finishing work such as quarterround install.
164. Admit that it is reasonable for residents of a house to stay in a hotel while tile is removed from the house, because dust produced during tile removal is a health hazard.
165. Admit that it is reasonable for residents of a house to stay in a hotel while tile is installed in the house, because walking on recently installed tile before the thinset is cured can damage the installation resulting in an installation below industry standards.
166. Admit that a total cost of \$2,594.48 is a reasonable cost for a hotel stay for six people for 11 days in Bulloch County.
167. Admit that a total cost of \$2,307.72 is a reasonable cost for rental of storage unit space to store furniture from 1335 square feet of a residential house for one month in Bulloch County.

168. Admit that one month of storage unit space is reasonable to store furniture during a 2 week tile installation, because storage units in Bulloch County and storage rentals such as PODS have a minimum rental duration of one month.

This day of September 13, 2022



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



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



Attachment: Statesboro Code of Ordinances, Section 18-104

Sec. 18-104. - Occupation tax levied; computation of full-time employees; occupation tax schedule; limitations.

(a) An occupation tax based upon number of employees is levied upon businesses and practitioners of professions and occupations if the business or practitioner:

(1) Has one or more locations or offices within the corporate limits of the City; or

(2) Is an out-of-state business or practitioner with no location or office in the city but:

a. Has employees or agents engaging in substantial efforts to solicit business or serve customers or clients within the corporate limits of the city; or

b. Owns personal or real property that generates income and is located within the corporate limits of the city.

(b) The occupation tax is levied based on the number of employees of the business or practitioner as computed on a full-time basis or full-time position equivalent basis, provided that for the purpose of this computation an employee who works 40 hours or more weekly shall be considered a full-time employee and that the average weekly hours of employees who work less than 40 hours weekly shall be added and such sum shall be divided by 40 to produce full-time position equivalents.

(c) The occupational tax is levied in accordance with the schedule in Appendix A [attached to the ordinance from which this article derives.]

(d) The city shall not require the payment of more than one occupation tax for each location of a business or practitioner.

(e) A business or practitioner that has locations in Georgia and is subject to occupation tax by more than one local government in Georgia shall only be subject to occupation tax by the City of Statesboro for the number of employees who are employed within the corporate limits of the city.

(1) This limitation shall only apply when the business or practitioner has provided to the city satisfactory proof of current payment of the occupation tax to the other local government(s).

(2) If an employee works for the same business in more than one jurisdiction, the city or county in which the employee works the most in a calendar year may count the employee for occupation tax purposes.

(f) A business or practitioner with no location or office in Georgia shall only be required to pay occupation tax to the local government in Georgia where the largest dollar volume of business is done or service is performed by such business or practitioner.

(1) This limitation shall only apply when the business or practitioner has provided to the city satisfactory proof as to the applicability of this subsection.


(2) If a business or practitioner with no location or office in Georgia provides to the city proof of payment of a local business or occupation tax in another state that purports to tax the business's or practitioner's sales or services in this state, then the business or practitioner shall be exempt from this occupation tax.

(g) Real Estate brokers shall be subject to occupation tax pursuant to this ordinance only if they maintain a principal branch or office in the city.


(Ord. of 7-5-07)




# ETERNITY



QUESTI PORTELLANO CONFORMAZIONE IN MASSA  
POLYMER PORTLAND CEMENT WITH MAXI COLORING



UNI EN ISO 10545-2  
UNI EN ISO 10545-3  
UNI EN ISO 10545-4  
UNI EN ISO 10545-5  
UNI EN ISO 10545-6  
UNI EN ISO 10545-7  
UNI EN ISO 10545-8  
UNI EN ISO 10545-9  
UNI EN ISO 10545-10  
UNI EN ISO 10545-11  
UNI EN ISO 10545-12



Bla GL

Caratteristiche Features	Unità di misura Units of measurement	Valore medio Saline mean value	Valore minimo Min. value	Metodo di prova Test method
Dimensione laste Dimensions - Length and width	%	0,4	+/- 0,6 max.	UNI EN ISO 10545-2
Ripartimento del lotto Lot distribution	%	0,4	+/- 0,5 max.	UNI EN ISO 10545-2
Omogeneità degli spigoli Edges homogeneity	%	0,4	+/- 0,6 max.	UNI EN ISO 10545-2
Scandole Flattness	%	0,4	+/- 0,5 max.	UNI EN ISO 10545-2
Spessore Thickness	%	0,4	+/- 0,5 max.	UNI EN ISO 10545-2
Absorbimento di acqua Water absorption	%	0,05 + 0,07	0,05	UNI EN ISO 10545-3
Storzo di rottura Breaking strength	N	conforme	2100 +/- 50 N / 21	UNI EN ISO 10545-4
Modulo di rottura Modulus of rupture	N/mm <sup>2</sup>	55	335	UNI EN ISO 10545-4
Distorsione termica Coeff. of linear thermal expansion	10 <sup>-6</sup> / (°C)	7,0	metodo disponibile available method	UNI EN ISO 10545-6
Resistenza agli sbalzi Resistance to thermal shock	resiste	resiste	metodo disponibile available method	UNI EN ISO 10545-9
Resistenza al dimento Resistance to dimensional change	conforme	conforme	metodo disponibile available method	UNI EN ISO 10545-10
Resistenza al gelo Frost resistance	conforme	conforme	metodo disponibile available method	UNI EN ISO 10545-11
Stabilità anticolor Colour stability	conforme	conforme	metodo disponibile available method	UNI EN ISO 10545-12

UNI EN ISO 10545-2  
UNI EN ISO 10545-3  
UNI EN ISO 10545-4  
UNI EN ISO 10545-5  
UNI EN ISO 10545-6  
UNI EN ISO 10545-7  
UNI EN ISO 10545-8  
UNI EN ISO 10545-9  
UNI EN ISO 10545-10  
UNI EN ISO 10545-11  
UNI EN ISO 10545-12

Il presente documento è un estratto del manuale di riferimento "UNI EN ISO 10545-1".  
The list of our items certified by "UNI" is available for our customers.



www.happy-floors.com

# ETERNITY

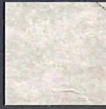
FULL BODY PORCELAIN



Almond - 12'x24"  
PEI V



Almond - 18'x18"



Almond - 12'x12"



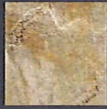
Almond - 6'x6"



Gold - 12'x24"  
PEI V



Gold - 18'x18"



Gold - 12'x12"



Gold - 6'x6"



1x2 Mosaic Mix  
Murato - 12'x12"  
Black - Grey



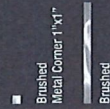
1.5x1.5 Mosaic Mix  
Mesico - 12'x12"  
Black - Grey



1.5x1.5 Mosaic Mix  
Forest - Multicolor



1.5x1.5 Mosaic Mix  
Mesico - 12'x12"  
Gold - Almond  
Forest - Multicolor



Brushed  
Metal Corner 1'x1"



Brushed  
Metal Pencil 1'x11.7"



Bullnose 3'x12"  
available in all colors



M11.9



R10-B



R



ASTM C  
1028 > 0.6  
0.9 / 0.60  
M10.61



Grey - 12'x24"  
PEI IV



Grey - 18'x18"



Grey - 12'x12"



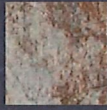
Grey - 6'x6"



Forest - 12'x24"  
PEI IV



Forest - 18'x18"



Forest - 12'x12"



Forest - 6'x6"



Black - 12'x24"  
PEI IV



Black - 18'x18"



Black - 12'x12"



Black - 6'x6"



Multicolor - 12'x24"  
PEI IV



Multicolor - 18'x18"



Multicolor - 12'x12"



Multicolor - 6'x6"



CERTIFICATE OF SERVICE

I certify that I sent a copy of this DEFENDANTS' FIRST REQUEST FOR ADMISSIONS FROM AMBIGUOUSLY IDENTIFIED CLIENT(S) OF R. MATTHEW SHOEMAKER 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

Signed September 13, 2022



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