

IN THE STATE COURT OF BULLOCH COUNTY, STATE OF GEORGIA **OCT 01, 2022 03:39 PM**


Heather Banks McNeal, Clerk
Bulloch County, 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
)
) MOTION TO RECUSE JUDGE JOSEPH
) CUSHNER ON GROUNDS THAT HIS
) WIFE IS IN AN ATTORNEY IN THE SAME
) FIRM AS OPPOSING COUNSEL AND ON
) GROUNDS THAT HIS WIFE HAS A
) CURRENT ONGOING FINANCIAL
) RELATIONSHIP WITH PLAINTIFF

MOTION TO RECUSE JUDGE JOSEPH CUSHNER ON GROUNDS THAT HIS WIFE IS IN AN
ATTORNEY IN THE SAME FIRM AS OPPOSING COUNSEL AND ON GROUNDS THAT HIS
WIFE HAS A CURRENT ONGOING FINANCIAL RELATIONSHIP WITH PLAINTIFF

Defendants move for recusal of Judge Joseph Cushner in this case (State Court
STVC2022000202) on grounds that his wife, Leslie Cushner, currently represents one of the
plaintiff parties needed for just adjudication. His wife currently represents Prince Preston,
owning partner of Floors Outlet and owner of MoFlo, LLC, in another case. Because of this
relationship, one of the parties in this case is currently paying money on an ongoing basis to
Judge Cushner's household, he has a pecuniary interest in this case and in the September 8
Motion for Joinder. An affidavit in support of this is attached.

This day of October 1, 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 MOTION TO RECUSE JUDGE JOSEPH CUSHNER ON GROUNDS THAT HIS WIFE IS IN AN ATTORNEY IN THE SAME FIRM AS OPPOSING COUNSEL AND ON GROUNDS THAT HIS WIFE HAS A CURRENT ONGOING FINANCIAL RELATIONSHIP WITH PLAINTIFF with the State Court of Bulloch County and will mail copies to:

Christopher R. Gohagan
12 Siebald Street
Post Office Box 327
Statesboro, Georgia 30459

Brian McDonald
208 Spotted Fawn RD N
Statesboro, GA 30458

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

Signed October 1, 2022



Wilhelmina Randtke
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

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) State Court: STCV2022000202
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) AFFIDAVIT IN SUPPORT OF MOTION TO
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COUNSEL AND ON GROUNDS THAT HIS WIFE HAS A CURRENT ONGOING FINANCIAL
RELATIONSHIP WITH PLAINTIFF

1. On September 29, 2022, Defendants became aware of a conflict of interest for Judge Joseph Cushner in the following way.
2. Previously, on or around September 21, 2022, Defendants received a copy of a Claim of Lien by mail filed against 204 Highland Rd. by "Mo Flo, LCC" and in which Mo Flo, LLC claims to be a "subcontractor, materialman and mechanic" but does not claim to be a contractor nor to have privity with us and does not give the name of the alleged contractor. This claim of lien is attached.
3. In researching the lien perfection and foreclosure process, Defendants became aware of the following: That the lien perfection process would involve suing and serving process on the contractor, but would not involve actual notice to nor services of process on the property owners in the proceeding to perfect the lien. That the lien foreclosure process would involve publishing notice in the paper, but would not involve actual notice nor service of process on the property owners in the foreclosure proceeding. Defendants

Wilhelmina Randtke and Edwin Alexander are the property owners. Defendants believe that Mo Flo, LLC may coordinate with companies owned by the same management to get a default judgment by Mo Flo, LLC against another company registered to the same management, get a default judgment against a strawman company with no capital, and then foreclose without ever having to give Wilhelmina Randtke or Edwin Alexander actual notice of the lien perfection action nor of the foreclosure action.

4. On September 29, 2022, Defendants were researching cases in PeachCourt.com in the Superior Court of Bulloch County with a goal of detecting any proceeding to perfect the Claim of Lien. Defendants searched variations of plaintiffs' names which have been given in this proceeding. In this process, Defendants noticed that Prince Preston, an owning partner of Floors Outlet, was a plaintiff in a recently opened case and is currently represented by Leslie Cushner in the Superior Court of Bulloch County in case no. SUDR2022000290 opened in August 2022.
5. Because the last name is the same as the judge, Joseph Cushner, Defendants researched and found a newspaper article in the Statesboro Herald stating that Leslie Cushner and Joseph Cushner are married. The newspaper article states that at the time of the article, in 2019, Joseph Cushner was the Bulloch County Solicitor General. This newspaper is attached to this filing.
6. Joseph Cushner's biography on the website for the State Court of Bulloch County states that he previously served as Solicitor-General of Bulloch County. This biography is attached to this filing.
7. Our August 9, 2022 Defendants' Answer filed in the Magistrate Court of Bulloch County and transferred to State Court, brought counterclaims against Prince Preston as an owning partner of Floors Outlet.

8. Our September 8, 2022, Motion For Joinder And Motion To Correct The Party Names And Clarify Whether Brian McDonald Has Already Appeared Or Needs To Be Served requested Prince Preston be joined as a person needed for just adjudication.
9. Judge Joseph Cushner's wife, Leslie Cushner, currently represents a plaintiff in another matter and currently has a financial relationship with a plaintiff in this case. Prince Preston is currently making payments directly to Judge Joseph Cushner's household.
10. Prince Preston is an owning partner of Floors Outlet, the company we make the contract with. We named Prince Preston as a party to this suit in our August 9, 2022 Defendants' Answer in paragraphs 1, 10, 12, 16, 19-21, 26-27, 46, 52, 55, 57, 74-75, 97, 100-102, 104.
11. Prince Preston also is representing Mo Flo, LLC in the engagement with this legal action. He hired legal counsel here, and has decision making authority in this case. On August 23, 2022, Chris Gogohan mailed to Defendant's address a bill to Prince Preston and his whole packet of documents, which we returned. Our email to Chris Gogohan is attached, as is the bill, and cover letter. Prince Preston retained counsel in this case and is a party with a financial interest as he works for Mo Flo, LLC and engaged counsel on behalf of Mo Flo, LLC.
12. Exhibit O attached to our August 9, 2022 Defendants' Answer shows a local business permit obtained by "MOFLO LCC DBA: FLOORS OUTLET" on June 1, 2022 the day after Floors Outlet stopped work. That local business permit lists Prince Preston as an owner along with Randy Childs, and Brian McDonald, and shows Prince Preston's ownership and financial interest close in time to when Floors Outlet contracted with us.
13. Additionally, Defendants noticed that the law firm at which Leslie Cushner is employed by Taulbee, Rushing, Snipes, Marsh and Hodgins, LLC. The list of attorneys from the firm's website is attached to this filing.

14. According to the newspaper article, Leslie Cushner was promoted to equity partner in 2019, and so has a financial interest in the business of the law firm.
15. Taulbee, Rushing, Snipes, Marsh and Hodgins, LLC is the same law firm that employees Chris Gohagan, who filed a notice of appearance in this case on September 26, 2022.
16. According to Opinion 20 of the Judicial Qualifications Commission of Georgia, a judge is disqualified to handle a case in which one of the lawyers is a member of a firm that includes the judge's son.
17. Ga. Code. Jud. Cond. 2.11 states, "Judges shall disqualify themselves in any proceeding in which their impartiality might reasonably be questioned, or in which: (1) The judge has a personal bias or prejudice concerning [. . .] a party's lawyer". And "Judges shall disqualify themselves in any proceeding in which their impartiality might reasonably be questioned, or in which: (2) The judge is within the third degree of relationship to any of the following listed persons, or the judge's spouse, domestic partner, intimate partner, or any other member of a judge's family residing in the judge's household is within the third degree of relationship to any of the following persons: [. . .] (b) a lawyer in the proceeding; (c) a person known by the judge to have a more than de minimis interest that could be substantially affected by the outcome of the proceeding".
18. OCGA 15-1-8 gives disqualification rules and states in part, "(a) No judge [. . .] shall: [. . .] (2) Preside, act, or serve in any case or matter when such judge is related by consanguinity or affinity within the third degree as computed according to the civil law to any party interested in the result of the case or matter".
19. The word "party" as used in statute under which judge is disqualified when related to party interested in result of case is not restricted to technical limitation of party to case, but includes those who are interested in result of the case, although not parties of record. *Gray v. Barlow*, 1978, 241 Ga. 347, 245 S.E.2d 299

20. Within statute prohibiting judge from sitting in cause wherein he is related to either "party," "party" includes any one pecuniarily interested in result of case, not merely party to record. Dennard v. State, 1933, 46 Ga.App. 513, 168 S.E. 311.
21. The spousal relationship is within the close family relationship covered by recusal rules. The recusal in Friends of Chattahoochee, Inc. v. Longleaf Energy Associates, LLC, 285 Ga. 859, 862-863, 684 S.E.2d 632, 63 (2009) states, "Nevertheless, it is imperative that the public have faith and trust in the impartiality of the justice system, and any 'appearance of impropriety' that may exist is enhanced where the relative at issue is the judge's spouse. Therefore, I will disqualify myself from any case in which King & Spalding lawyers are actively representing a party before this Court, including this case. In such cases, no motion to disqualify me needs to be filed; however, if it appears that I have inadvertently overlooked such representation, a motion or a simple letter to our Clerk, copying opposing counsel and advising of that fact, will be welcome."

Signed,



Wilhelmina Randtke



Edwin Alexander

State of Georgia
County of Bulloch

State of Georgia
County of Bulloch

Sworn to (or affirmed) and subscribed before me this 10/11/2022, by Wilhelmina Randtke (Name of Signer).

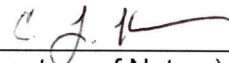
Sworn to (or affirmed) and subscribed before me this 10/11/2022, by Edwin Alexander (Name of Signer).

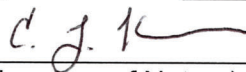
Personally Known
 Produced Identification

Personally Known
 Produced Identification

Type and # of ID Driver's License R532-898-80
946-0

Type and # of ID Driver's License A425-210-79-447-0


 (Signature of Notary)


 (Signature of Notary)

C L Kelsaw
NOTARY PUBLIC
Bulloch County, GEORGIA
(Name of Notary Public, Typed, Stamped, or Printed)

C L Kelsaw
NOTARY PUBLIC
Bulloch County, GEORGIA
(Name of Notary Public, Typed, Stamped, or Printed)

My Commission Expires
05/23/2026
Notary Public, State of Georgia

My Commission Expires
05/23/2026
Notary Public, State of Georgia

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

7084885854
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

STEPHEN T. RUSHING
DANIEL B. SNIPES (GA & SC)
LAURA T. MARSH
WESLEY C. TAULBEE
SCOTT A. HODGIN
CHRISTOPHER R. GOHAGAN (GA & SC)
CHARLIE MCCOOK
SPENCER TYSON
KAYLEE SHEPPARD SHEALY

OF COUNSEL:
DAN R. TAULBEE

LAW OFFICES
**TAULBEE, RUSHING, SNIPES,
MARSH & HODGIN, LLC**
12 SIEBALD STREET
POST OFFICE BOX 327
STATESBORO, GEORGIA 30458
www.statesborolawgroup.com

P: 912-764-9055
F: 912-764-8687
E: awall@statesborolawgroup.com

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 13, 2022

Edwin J. Alexander
Wilhelmina Randtke
204 Highland Road
Statesboro, Georgia 30458
(NO: 7021 0350 0000 6836 9341)

**RE: CLAIM OF LIEN FOR PROPERTY LOCATED AT 204 HIGHLAND ROAD,
STATESBORO, BULLOCH COUNTY, GEORGIA**

TO WHOM IT MAY CONCERN:

Please find the enclosed Claim of Lien which by Mo Flo, LLC against the above-referenced property on dated September 12, 2022. This notice is being provided to you pursuant to O.C.G.A. § 44-14-361.1(a)(2) as you have been identified as the owner (as agent for the owner) of this property.

Sincerely,
TAULBEE RUSHING SNIPES
MARSH & HODGIN, LLC

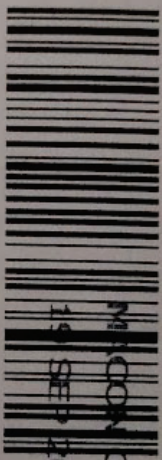

Ashley Wall
Paralegal to Christopher R. Gohagan

P: (912) 764-9055
F: (912) 764-8687
E: awall@statesborolawgroup.com

Enclosures/aw

LAW OFFICES
TAUBEE, RUSHING, SNIPES,
MARSH & HODGIN, LLC
P O BOX 327
STATESBORO, GEORGIA 30459

VERIFIED MAIL



7021 0350 0000 6836 9341

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FIRST-CLASS



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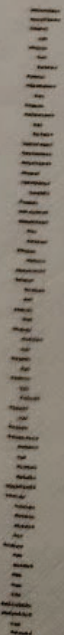


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Edwin J. Alexander
Wilhelmina Rantke
204 Highland Road
Statesboro, GA 30458

30458-078504



Statesboro Herald

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Law firm names Leslie Cushner as a partner



Leslie Cushner

Published: Jan 28, 2019, 5:13 PM



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Seasons of Japan

PIGSKY PICK'EM

The Statesboro law firm of Taulbee, Rushing, Snipes, Marsh, and Hodgkin, LLC announces that Leslie H. Cushner was promoted to partner.

A graduate of The George Washington University and the University of Georgia School of Law, Cushner joined the firm in 2013. Her areas of practice include personal injury, motor vehicle accidents and family law matters.

Firm partner Laura Marsh said: "Leslie is brilliant, dedicated and does an outstanding job for her clients. She is an excellent attorney and we are thrilled that she and Joseph have made Statesboro their home and that she will be joining the firm as an equity partner."

Cushner is married to Bulloch County Solicitor General Joseph Cushner and mother to two daughters. Her community involvement includes the United Way of Southeast Georgia, Statesboro Service League, and the Lynda Brannen Williamson Women's Leadership Academy.

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PAC DRIVE-IN MOVIE SERIES
BULLOCH ACADEMY
STARTS SATURDAY WITH
'DREAMGIRLS' IN FINAL FOUR



LOCAL PAGE 13A

Weekend
10/04/2021
A. Johnson
PHOTOGRAPHY

Statesboro Herald

SFD makes request for more staff

50-person agency logged 1,214 calls in 2020

By A. Johnson
The Statesboro Fire Department (SFD) is asking for more staff to help meet the demand for fire services in 2021. The department logged 1,214 calls in 2020, a 10% increase from 2019. The department is currently staffed with 50 firefighters and is looking for 10 more firefighters to help meet the demand for fire services in 2021.



PHOTOGRAPHY

'Blessing of the Crops'

Warplanes, an aircraft carrier in Statesboro? No worries, all part of filming for Korean War movie 'Devotion'

By A. Johnson
The Statesboro area is set to become a filming location for the Korean War movie 'Devotion'. The movie is being filmed in the Statesboro area and will feature a variety of aircraft, including warplanes and an aircraft carrier. The filming is expected to take place in the Statesboro area in the coming weeks.



PHOTOGRAPHY

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you unprepared

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Updated: Sep 29, 2022, 4:34 PM
Published:



It's that time of year again, and Hurricane Ian has us square in its sights. While the path may vary by the time you read this, it is currently predicted to come right through the southeast Georgia region.

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PAC DRIVE IN MOVIE SERIES BULLOCH ACADEMY STARTS SATURDAY WITH BOYS SQUARE OFF 'DREAMGIRLS' IN FINAL FOUR

LOCAL PAGE 3A
SPORTS PAGE 13A

Wagner Edition
03/06/2021
11:30 AM
Print Page

Statesboro Herald
www.statesboroherald.com

SFD makes request for more staff

50-person agency logged 1,214 calls in 2020

By Staff Writer
The Statesboro Fire Department (SFD) is requesting more staff for the 2021 fiscal year. The department's budget for 2021 is \$1.2 million, and the department is currently operating with 50 full-time employees. The department's budget for 2020 was \$1.1 million, and the department was operating with 45 full-time employees. The department's budget for 2021 is \$1.2 million, and the department is currently operating with 50 full-time employees. The department's budget for 2020 was \$1.1 million, and the department was operating with 45 full-time employees.

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No worries, all part of filming for Korean War movie 'Devotion'

'Blessing of the Crops'

Local farmers and growers are celebrating the start of the growing season with a festival in Statesboro.

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State Court

The State Court of Bulloch County is located in the historic Bulloch County Courthouse in Statesboro, Georgia. Bulloch State Court has served the citizens of Bulloch County and Georgia since it was created by the Georgia General Assembly on August 10, 1903.

Judge Joseph L. Cushner was appointed to the State Court of Bulloch County by Governor Brian Kemp in March of 2020. A native of Bulloch County, he received his undergraduate degree and law degree from the University of Georgia. Prior to serving as Judge of State Court, he was the elected Solicitor-General of Bulloch County. The Court Administrator is Annette Crosby. Heather McNeal is the Clerk of the State Court of Bulloch County.

+ The State Court's jurisdiction includes the following cases which occur in Bulloch County:

State Court Contact



Joseph Cushner

Judge, State Court

📞 (912) 764-8605

📠 (912) 489-1730

✉ statecourt@bullochcounty.net

📍 2 North Main Street Statesboro, Georgia 30458



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- Trust & Estates**
Let us help you set up your will to make sure your loved ones are taken care of. We can also help set up your power of attorney if the need for one should arise.
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- Real Estate**
Whether you are buying or selling your home or property, we will help you through the whole process to make it as easy as possible.
[Read more](#)

WHO WE ARE

Taulbee, Rushing, Snipes, Marsh and Hodgins, LLC has been one of the premier law firms in Southeast Georgia for over three decades, serving the diverse legal needs of its people and businesses with over 100 years of combined experience. Our lawyers are all graduates from top schools in the southeast and hold degrees in accounting, and finance, as well as traditional pre-law majors. We are licensed to practice in Georgia and South Carolina.

OUR HISTORY

- 1979, Opening
- 2008, Market District Location Opened
- 2015, Updated Branding

HOW WE CAN HELP YOU

- Personal Injury
- Family Law
- Real Estate
- Business, Contract & Trust
- Corporations & Partnerships
- LLCS
- Wrongful Death
- Estate & Tax Planning



MEET OUR ATTORNEYS

- | | | | |
|--|---|---|---|
| <p>Dan R. Taulbee
attorney</p> <p>dtaulbee@taulbeerushing.com
Tel: 912.764.9038</p> <p>In F</p> | <p>Stephen T. Rushing
attorney</p> <p>srushing@taulbeerushing.com
Tel: 912.764.9038</p> <p>In F</p> | <p>Daniel B. Snipes
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attorney</p> <p>lmars@taulbeerushing.com
Tel: 912.764.9038</p> <p>In F</p> |
| <p>Wesley C. Taulbee
attorney</p> <p>wtaulbee@taulbeerushing.com
Tel: 912.764.9038</p> <p>In F</p> | <p>Scott A. Hodgins
attorney</p> <p>shodgins@taulbeerushing.com
Tel: 912.764.9038</p> <p>In F</p> | <p>Chris Cobagan
attorney</p> <p>ccobagan@taulbeerushing.com
Tel: 912.764.9038</p> <p>In F</p> | <p>Leslie Cushman
attorney</p> <p>lcushman@taulbeerushing.com
Tel: 912.764.9038</p> <p>In F</p> |

REQUEST A FREE CONSULTATION

Fill out the form below to receive a free and confidential initial consultation.

STEPHEN T. RUSHING
DANIEL B. SNIPES (GA & SC)
LAURA T. MARSH
WESLEY C. TAULBEE
SCOTT A. HODGIN
CHRISTOPHER R. GOHAGAN (GA & SC)
CHARLIE MCCOOK
SPENCER TYSON
KAYLEE SHEPPARD SHEALY

LAW OFFICES
TAULBEE, RUSHING, SNIPES,
MARSH & HODGIN, LLC
12 SIEBALD STREET
POST OFFICE BOX 327
STATESBORO, GEORGIA 30458
www.statesborolawgroup.com

P: 912-764-9055
F: 912-764-8687
E: awall@statesborolawgroup.com

OF COUNSEL:
DAN R. TAULBEE

U.S. MAIL & EMAIL: office@floorsewf.com

August 23, 2022

Wilhelmina Randtke
c/o Prince Preston
204 Highland Road
Statesboro, Georgia 30458

RE: MO FLO, LLC V. WILHELMINA ALEXANDER
BULLOCH COUNTY MAGISTRATE COURT
CASE NO.: 2022-11739CS

Dear Mr. Preston,

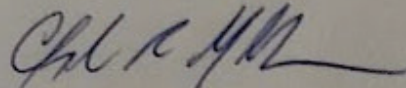
Thank you for considering Taulbee, Rushing, Snipes, Marsh & Hodgin, LLC, in connection with the above referenced lawsuit. This letter confirms that Taulbee, Rushing, Snipes Marsh & Hodgin, LLC, is not undertaking representation in the above-referenced matter.

In declining representation in this matter, we do not express any opinion regarding the merits or demerits of any claims. Should you decide to proceed further, I recommend that you contact counsel as soon as possible to ensure you do not go into default. If you decide to pursue this matter, I am sure whoever you retain will advise you accordingly.

Again, thank you for your consideration of Taulbee, Rushing, Snipes, Marsh & Hodgin, LLC. We wish you the best of luck in all future endeavors.

Very truly yours,

Taulbee, Rushing, Snipes
Marsh & Hodgin, LLC



Christopher R. Gohagan

CRG/aw

Enclosed are the original
documents you provided to
our office. (aw)

LAW OFFICES
**TAULBEE, RUSHING, SNIPES,
MARSH & HODGIN, LLC**
12 SIEBALD STREET
POST OFFICE BOX 327
STATESBORO, GEORGIA 30458
www.statesborolawgroup.com

INVOICE

To: Wilhelmina Randtke
c/o Prince Preston
204 Highland Road
Statesboro, Georgia 30458

ATTORNEY

Christopher R. Gohagan

Date	Description	Time	Total
08/23/2022	Consultation Fee	FLAT FEE	\$500.00
		Total	\$500.00

You can submit payment by mail, in-person, or online at
<https://secure.lawpay.com/pages/statesborolawgroup/operating>.

THANK YOU!



Wilhelmina Randtke <randtke@gmail.com>

You sent me an invoice and client files; I'm the opposing party; please send a runner to pick this up

Wilhelmina Randtke <randtke@gmail.com>

Tue, Aug 30, 2022 at 5:03 PM

To: cgohagan@statesborolawgroup.com

Cc: wrandtke@georgiasouthern.edu, Edwin Alexander <edwinalexander127@gmail.com>

Christopher Gohagan,

Last Thursday, I got a bill and client file from you. I've never been your prospective client. I'm the opposing party. I believe your prospective client, who you declined to accept, is Randy Childs, based on the client files you sent me. It is possible your client is Prince Preston, since you listed his name in your bill. Those two have a common law partnership that does unlicensed contracting in town, and did something like \$35K damage to my house, and Prince Preston assaulted me in my own bedroom.

I phone called your number on the letter Thursday, Aug 25, 2022 and left a message saying your name, with this same info about the opposing party's files being sent to me, and with my number, and never got a call back.

I phone called today, and got your receptionist who I gave this same info to and she did not take my name or contact info, and said to email you. I think she spoke to you while I was on the phone with her, so maybe you remember.

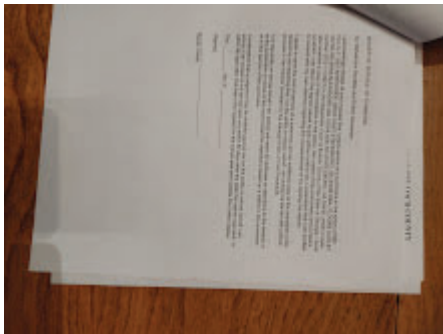
Please send a runner to pick this client file up, so sort out who your prospective client was, and you can get this paperwork to them and they can know you declined representation.

I will put the files you sent me in my backpack. You can pick it up from the Systems Office of Henderson Library on the Georgia Southern campus between 8am and 5pm.

Don't send me another bill, because I have never consulted with you. I am the opposing party and you are conflicted out for me, so we have no business at this time.

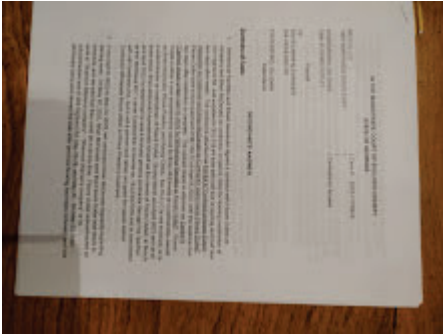
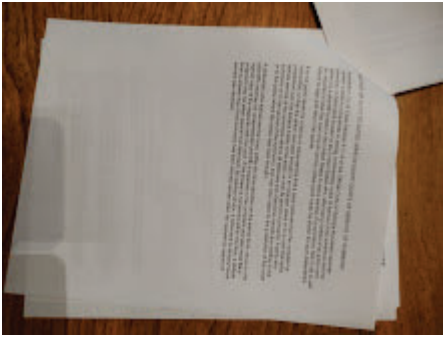
-Wilhelmina Randtke
850-345-6123

6 attachments



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The Judicial Qualifications Commission of Georgia



Opinion 20

Home / Opinion 20

Opinion 20

ex.: Opinion 30



All categories ▶ Conflict of Interest/Failure to Disqualify ▶ Opinion 20

The Commission has been asked to express an opinion as to whether a judge is disqualified to handle a case in which one of the lawyers is a member of a firm that includes the judge's son. The judge has already decided that he will disqualify himself (a) in any case in which his son personally participates, or (b) in any case handled by the law firm on a contingent fee basis; and his inquiry relates only to non-contingent fee cases in which his son will not participate.

Rule 2.11 of the Code of Judicial Conduct provides in part:

Categories:

- Administrative Duties other than Delay
- Bias/Prejudice/Partiality
- Conflict of Interest/Failure to Disqualify
- Delay/Failure in Scheduling/Deciding a Matter
- Failure to attend Mandatory Training
- Failure to Follow the Law/Incompetence
- Improper Election/Political Campaign Conduct
- Improper Public Comment
- Misconduct Off the Bench
- Misuse of the Prestige of Judicial Office

(A) Judges shall disqualify themselves in any proceeding in which their impartiality might reasonably be questioned, or in which:

...

(2) The judge is within the third degree of relationship to any of the following listed persons, or the judge's spouse, domestic partner, intimate partner, or any other member of a judge's family residing in the judge's household is within the third degree of relationship to any of the following persons:

...

(b) a lawyer in the proceeding;

Commentary [5]:

The fact that a lawyer in a proceeding is affiliated with a law firm with which a relative of the judge is affiliated does not of itself disqualify the judge. Under appropriate circumstances, the fact that the judge's impartiality might "reasonably be questioned" under Rule 2.11 (A), or that the relative is known by the judge to have an interest in the law firm that could be "substantially affected by the outcome of the proceeding" under Rule 2.11 (A) (2) (c) requires the judge's disqualification.

There is no automatic disqualification under this Canon in the situation covered by the inquiry. However, the Commission believes that under the particular circumstances outlined in the judge's request, his "impartiality might reasonably be questioned," within the meaning of Rule 2.11(A). Accordingly, it is the Commission's opinion that the judge should not preside in any case in which any partner or associate of the law firm that includes his son actively participates.

[Pertinent Code of Judicial Conduct provisions: Rule 1.2(B), 2.11(A). Cross reference to other relevant opinions for review: #33, #71, #72, #84, #93, #128, #140, #168.]

