

**IN THE STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA**

NOV 13, 2018 01:08 PM

Heather Banks McNeal
Heather Banks McNeal, Clerk
Bulloch County, Georgia

[REDACTED]

Plaintiff

vs.

JOHN BAKER, CHARLES DUTTON,
MELISSA ROGERS, and,
CITY OF BROOKLET

Defendants

Civil Action File No.

COMPLAINT

NOW COMES Plaintiff, [REDACTED], and files this
Complaint, showing the Court as follows:

1.

Defendant **CITY OF BROOKLET** (hereinafter referred to as "Brooklet") is
a Georgia city subject to the jurisdiction of this Court. Brooklet may be served
through its mayor, William Hendrix, at 104 Church Street, Brooklet GA 30415.

2.

Defendant **JOHN BAKER** (hereinafter referred to as "Baker") is an
individual, subject to the jurisdiction of this Court. Baker may be served at his place
of residence at [REDACTED], Brooklet, Georgia 30415.

3.

Melissa Rogers, also known as Melissa Hatten, is an individual, subject to the jurisdiction of this Court. Rogers may be served at her place of residence at [REDACTED] Oak Street, Brooklet, Georgia, 30415.

4.

Charles Dutton, is an individual subject to the jurisdiction of this Court. Dutton may be served at his place of residence at [REDACTED] Oak Street, Brooklet, Georgia, 30415.

5.

John Does 1-3 are those persons or legal entities who may have assisted other Defendants in harming Plaintiff or violating Plaintiff's rights, including but not limited to conspiring with Defendant Baker to harm Plaintiff. They include but are not limited to the policymakers of the City of Brooklet who condoned and allowed the violations of Plaintiff's rights under color of law. They are subject to the jurisdiction of this court.

COMMON ALLEGATIONS

6.

Defendants Baker, Dutton, and Rodgers were, at all relevant times herein, officers of Defendant City of Brooklet's police department and were acting under

color of law.

7.

On or about March 27, 2017, Plaintiff was admitted to East Georgia Regional Medical Center due to a temporary mental health issue which involved the discharge of a firearm and alcohol.

8.

Defendant Baker came to the hospital and drew blood from Plaintiff and left the room where Plaintiff was located, with his body camera activated.

9.

Defendant Baker then returned to the hospital later, with his body camera deactivated, and assaulted Plaintiff by reaching under her hospital gown and touching her bare breast without her consent.

10.

Defendant Baker's actions were outrageous, extremely upsetting and harmful to Plaintiff, and caused her mental distress and physical discomfort.

11.

Defendant Baker proceeded to regularly harass and intimidate Plaintiff by activities including but not limited to driving by her house excessively, watching and/or following her when she has carried on her daily activities, and watching her

house.

12.

In an attempt to document these harassing activities, Plaintiff proceeded to set up cameras on her own property to monitor the area outside her home.

12.

Defendant Baker had a supervisory role over Defendants Rodgers and Dutton.

13.

Defendant Baker conspired with Defendants Rodgers and Dutton and instructed, directed, encouraged, incited them to go on to Plaintiff's property, in violation of her rights, and steal the cameras set up to monitor activities outside of her house.

14.

Defendants Rodgers and Dutton carried out their acts in furtherance of said conspiracy or enterprise, entered on to Plaintiff's property, and stole one or more of Plaintiff's cameras and/or memory cards containing evidence of Defendants' actions toward Plaintiff.

15.

Defendant City of Brooklet has insurance coverage that provides coverage for one or more incidents complained of in this Complaint.

16.

Defendant City of Brooklet, and its Mayor William Hendrix, continued to provide funding for Defendants Baker, Rodgers, and Dutton, even when they knew or should have known that the Defendants were carrying out tortious, harmful, and/or criminal actions against fellow citizens.

CONSTITUTIONAL RIGHTS VIOLATIONS

20.

Plaintiff incorporates all previous paragraphs.

21.

Defendants had no cause or legal permission to enter on Plaintiff's property and to seize the cameras there without a warrant, in violation of Plaintiff's Federal and State Constitutional rights, including but not limited to those guaranteed under the 4th Amendment.

22.

Defendants violated Plaintiff's rights by entering upon Plaintiff's land without a warrant and seizing the cameras and security related property.

23.

Defendants conspired together to violate Plaintiff's rights, as well as failing to

act to prevent each other from violating Plaintiff's rights, including but not limited to Defendant Baker using unlawful and excessive force on Plaintiff by grabbing her breast.

24.

Defendants, through their customs, policies, and practices denoted above, violated Plaintiff's rights and are subject to liability under 42 U.S.C. § 1983, 42 U.S.C. § 1985, and/or 42 U.S.C. § 1986.

25.

Defendant City of Brooklet had, at all relevant times herein, an ongoing pattern or practice, amounting to a policy, of not overseeing the actions of the police department of the City of Brooklet, not ensuring adequate training in Constitutional Rights, and turning a blind eye to complaints regarding police actions, which directly led to the violations of Plaintiff's Constitutional rights.

26.

Plaintiff is entitled to attorneys' fees.

NEGLIGENCE AND TORT

27.

Plaintiff incorporates all previous paragraphs.

28.

Defendants, and their agents and employees, had a ministerial, mandatory duty to exercise care when choosing to seize property and to supervise employees.

29.

Defendants, and their agents and employees, have a duty to adopt policies, training, and procedures that protect citizens' Constitutional rights, and to ensure that their employees and agents do the same.

30.

Defendants, and their individual agents and employees under their control, breached their duty to Plaintiff by adopting policies and procedures that fail to adequately protect citizens' rights to due process or unreasonable searches and seizures under Federal and State Law.

31.

Defendants, and their individual agents and employees under their control, breached their duty to Plaintiff by failing to train and supervise employees and other agents in a manner that ensured Plaintiff's rights were protected.

32.

Defendants, and their individual agents and employees under their control, breached their duty to Plaintiff by assaulting and battering her, proceeding to stalk her, then stealing items off of her property.

33.

Defendants' actions and inactions caused Plaintiff general and special damages, including significant pain and distress, as well as lost items.

34.

Defendants' actions constituted both battery and an intentional, malicious unlawful act designed to harm Plaintiff, as well as being an intentional infliction of emotional distress.

35.

Defendants' actions constituted an unlawful trespass to land and illegal entry on to Plaintiff's land and property for the purpose of harming it without consent to enter.

36.

Defendants' actions constituted conversion and trespass to chattels and personal property, by taking Plaintiff's items unlawfully and without permission.

37.

Defendants' actions constitute multiple crimes under Georgia and Federal law, including but not limited to violations of state law prohibitions against battery/sexual battery (O.C.G.A. § 16-6-5.1, by Baker grabbing Plaintiff's breast), criminal damage to property (O.C.G.A. § 16-7-23, by Dutton and Rodgers seizing

Plaintiff's cameras), trespass (O.C.G.A. § 16-7-21, by Dutton and Rodgers entering Plaintiff's property to commit a crime), violation of oath by public officer (O.C.G.A. § 16-10-1, by attacking Plaintiff's body and/or property), stalking (O.C.G.A. § 16-5-90, by following, approaching harassing and intimidating Plaintiff), and possession of tools for the commission of crime (O.C.G.A. § 16-7-20, by each and every Defendant having a firearm and other items in their possession during their other unlawful actions).

RESPONDEAT SUPERIOR

36.

Plaintiff incorporates all preceding paragraphs.

37.

Defendant City of Brooklet and Defendant Baker is responsible for the acts of their agents and employees in the scope of their employment.

PUNITIVE DAMAGES

38.

Plaintiff incorporates all preceding paragraphs.

39.

The actions of Defendants, as set forth above, show willful misconduct,

wantonness and that entire want of care which raises the presumption of a conscious indifference to the consequences of their actions. Accordingly, Plaintiff seeks punitive damages pursuant to O.C.G.A. § 51-12-5.1 or any other applicable law.

NO IMMUNITY

40.

Defendant City of Brooklet has waived sovereign immunity to state law claims due to O.C.G.A. § 36-33-1.

RICO

41.

Plaintiff incorporates all preceding paragraphs.

42.

Defendants have violated the State RICO Act and are liable to Plaintiff due to O.C.G.A. § 16-14-1, as they are associated in fact through their commonality of working or administering the Brooklet Police Department and through the facts alleged regarding this incident and their conspiracy with each other against Plaintiff.

43.

Defendants engaged in racketeering activity including but not limited to the following:

- a. Defendant Baker's assault and battery of Plaintiff;

- b. Defendants' theft of cameras from Plaintiff's property, covering up the pattern of behavior by Defendant Baker toward Plaintiff; and,
- c. Defendants' tampering with evidence by Defendant Baker deactivated his body camera before returning to Plaintiff's hospital room, and/or Defendants Rogers and Dutton's theft of cameras from Plaintiff.

44.

Defendants engaged in a pattern of racketeering activity as the incidents described above involved at least two acts of racketeering activity that involved conspiring to and actually continuing to receive monetary compensation from the City of Brooklet while commonly victimizing Plaintiff, hiding illegal acts by Defendants, and taking Plaintiff's property for their use.

45.

In addition to the continued procurement of taxpayer funds, and intimidation of Plaintiff, Defendants unlawfully gained property of monetary value, namely Plaintiffs' cameras.

46.

Plaintiff was harmed by the Defendants' actions, and their continued

collusion and support from Defendant City of Brooklet and its' mayor and city council.

47.

Defendants have carried on additional actions as part of their enterprise that harmed and targeted other citizens and residents of Brooklet and surrounding areas.

48.

Plaintiff is entitled to treble damages, punitive damages, and attorneys' fees.

WHEREFORE, Plaintiff prays:

- (a) That Summons issue requiring Defendants to be and appear in this Court within the time provided by law to answer this Complaint;
- (b) That Plaintiff have a Jury Trial;
- (c) That Plaintiff has Judgment against Defendants for Compensatory Damages and General Damages as provided by law;
- (d) That Plaintiff be awarded Punitive Damages and Attorney's Fees as provided by law;
- (e) That Plaintiff have such other additional relief as the Court may consider equitable and/or appropriate given the circumstances of this case.

Respectfully Submitted, this ^{November} ~~13~~ ¹³ th day of ~~October~~, 2018.



/s/Jordan Johnson

Jordan Johnson

Georgia State Bar No. 673643

2 Ravinia Drive
Suite 120
Atlanta, GA 30346
770.670.6206

Verification

STATE OF GA,

Bulloch County:

Personally appeared before the undersigned, authorized to administer oaths [redacted] who after being sworn, states that he/she is the Plaintiff (or the official legal representative of the Plaintiff); that as such he/she is authorized to make this verification; and that the facts stated in this instrument are true to the best of his/her knowledge, information and belief.

Dated 9th, Oct, 2018

(By) [redacted]

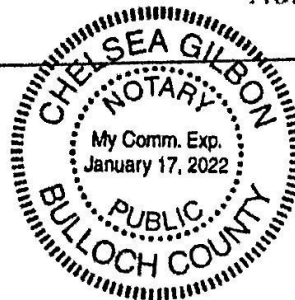
I, Chelsea Gilbon, a notary public for this county and state, certify that [redacted] is signed to the foregoing instrument and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he/she executed the same voluntarily.

Given under my hand this 9 day of Oct, 2018.

[SEAL]

Chelsea Gilbon
Notary Public.

My commission expires 01/17/2022



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**IN THE STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA**

Heather Banks McNeal
Heather Banks McNeal, Clerk
Bulloch County, Georgia

[REDACTED]

Plaintiff

vs.

Civil Action File No.

JOHN BAKER, CHARLES DUTTON,
MELISSA ROGERS, and,
CITY OF BROOKLET

Defendants

PLAINTIFF'S FIRST INTERROGATORIES

COMES NOW Plaintiff in the above captioned matter, and propounds these Interrogatories to each Defendant. Defendants are required to answer these Interrogatories separately and fully in writing under oath and to serve a copy of said answers upon counsel for the plaintiff as required by the Georgia Civil Practice Act or Federal Rules of Civil Procedure.

NOTE A: Defendant shall furnish "such information as is available to the party."

NOTE B: These Interrogatories shall be deemed continuing. Supplemental and amended responses are required to the full extent provided in the Federal Rules of Civil Procedure.

DEFINITIONS

As used herein, the terms listed below are defined as follows:

- (1) **“Person”** means any natural person, corporation, partnership, proprietorship, association, organization, or group of persons.
- (2) **“Document”** means all writings, drawings, graphs, charts, photographs, phono records, and other data compilations from which information can be obtained, translated, if necessary, by the respondent through detection devices into reasonably usable form, of every type and description that is in your possession or control (including but not limited to correspondence, memoranda, tapes, stenographic or handwritten notes, studies, reports, publications, computer records, invoices, purchase orders, shipping orders, bills of lading, acknowledgments, surveys, diagrams, plans, specifications, work orders, inspections, quality control records, etc.); every copy of every such writing or record where such copy contains any commentary or notation whatsoever that does not appear on the original.
- (3) **“Identify”** means:
 - (a) with respect to any **“person”** who is an individual, to provide the name, present or last-known residence address, present or last-known residence telephone number, present or last-known employer or business affiliation, present

or last-known business address, and present or last-known business telephone number of each person mentioned;

(b) with respect to an institution, business, group or other organization, to provide the current or last-known complete name, address, and telephone number; and

(c) with respect to any "**document**," to provide (irrespective of whether the **document** is subject to any claim privilege) the title or other means of identification of each such **document**, the date of each **document**, **identify** the author, the names of all recipients of each **document** and **identify** all **persons** who have custody, control, or possession of each such **document** or copies of it.

(4) "**Claim**" means each and every claim arising out of the Complaint which forms the subject matter of this litigation.

INTERROGATORIES

1.

Please identify all arrests, detainments, health treatment, or prosecution initiated by the Defendant toward the Plaintiff and identify all documents related to those arrests, detainments, health treatment, or prosecutions.

2.

If Defendant has ever been a party to a lawsuit arising from 42 U.S.C. § 1983, or alleging violations of constitutional rights, please identify all persons or entities involved in such lawsuit or proceeding, give the style and number of the case, the nature of the litigation or proceeding, and the court or administrative body before which the suit or proceeding was filed.

3.

Please fully describe the factual basis for each defense raised by you in your Answer to Plaintiff's Complaint.

4.

Please identify all documents you contend support each defense raised by you in your Answer to Plaintiff's Complaint.

5.

Please identify all persons who have knowledge or information relevant to the subject matter of this litigation, *or*, relevant to any claims or defenses raised in this action.

6.

With regard to each statement (oral, written, recorded, court or deposition transcript, etc.) taken from any person with knowledge relevant to this lawsuit, please state the name of each person, identify the person taking each statement, and give the date each statement was taken.

7.

Please identify all photographs, charts, diagrams, videotapes, and other illustrations of any person, place or thing involved in this lawsuit, giving the date each was made and the name and address of the person(s) with possession, custody or control of each item.

8.

Please identify all expert witnesses or professional consultants retained or consulted by you, or on your behalf, to make an evaluation or investigation of this lawsuit.

9.

Please identify each expert expected to testify at trial and state the subject matter the expert is expected to testify about, the substance of the facts and opinions to which the expert is expected to testify, *and*, provide a summary of the ground for each opinion.

10.

Please identify all persons who to your knowledge, information or belief have investigated any aspect of the subject matter of this litigation, and indicate whether or not each has made a written record of the investigation or any part thereof.

11.

Please identify any insurance policies that may provide coverage for the claims which form the subject matter of this litigation, by providing the name of the insurer, policy number and available limits.

12.

Please identify all documents consulted, referred to, or otherwise utilized in any way in connection with the preparation of your Responses to these Interrogatories.

13.

Please identify all persons consulted, referred to, or otherwise utilized in any way in connection with the preparation of your Responses to these Interrogatories.

14.

Please identify with reasonable particularity all books, documents, transcripts of criminal proceedings, and other tangible things relevant to the issues in this lawsuit or that support your contentions which have not already been identified, and give the name and address of the person(s) have possession, custody or control of each thing.

15.

Please identify all other persons not identified elsewhere in your Answers to these Interrogatories who have knowledge or information relevant to the subject matter of this litigation, *or* relevant to any claims or defenses raised in this action.

16.

Please identify any internal police proceedings or investigations that have been conducted regarding the subject matter of this litigation, the outcome of each, and any documents or other materials related to those proceedings.

17.

Please identify any manuals, procedures, or training materials or procedures that advise or regulate government employee conduct, including officer conduct and policy.

18.

If Defendant has ever been a party to a lawsuit arising from abuse of suspects/citizens/prisoners, battery, false arrest, or false imprisonment, please identify all persons or entities involved in such lawsuit or proceeding, give the style and number of the case, the nature of the litigation or proceeding, and the court or administrative body before which the suit or proceeding was filed.

19.

Please identify all electronic devices and items that may have information relevant to the subject matter of this litigation, including but not limited to cell phones, cameras, cell phone cameras, electronic mail messages, and social media websites.

20.

Please identify all social media websites and e-mail addresses which you have access to, and please provide your user name, password, and any other login

information for such sites. This includes video sharing sites and any other site which allows communication or distribution of information, video, or audio.

21.

Please identify each and every time you interacted with Plaintiff, the nature of the interaction, and anything either party said or did to the other.

Respectfully Submitted, this 13th day of November 2018.

/s/Jordan Johnson

Jordan Johnson

Georgia State Bar No. 673643

2 Ravinia Drive
Suite 120
Atlanta, GA 30346
770-670-6206
ajohnson@lawjaj.com

NOV 13, 2018 01:08 PM

**IN THE STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA**

Heather Banks McNeal
Heather Banks McNeal, Clerk
Bulloch County, Georgia



Plaintiff

vs.

JOHN BAKER, CHARLES DUTTON,
MELISSA ROGERS, and,
CITY OF BROOKLET

Defendants

Civil Action File No.

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION

COMES NOW Plaintiff in the above-captioned matter, and files this Request for Production of Documents and Notice to Produce to Defendants. Pursuant to the Federal Rules of Civil Procedure or Georgia Civil Practice Act, each Defendant is required to comply with these Code sections by producing and permitting Plaintiff's attorneys to inspect and copy each of the following documents.

DEFINITIONS

As used herein, the terms listed below are defined as follows:

- (1) **"Person"** means any natural person, corporation, partnership, proprietorship, association, organization, or group of persons.

(2) **“Document”** means all writings, drawings, graphs, charts, photographs, phono records, and other data compilations from which information can be obtained, translated, if necessary, by the respondent through detection devices into reasonably usable form, of every type and description that is in your possession or control (including but not limited to correspondence, memoranda, tapes, stenographic or handwritten notes, studies, reports, publications, computer records, invoices, purchase orders, shipping orders, bills of lading, acknowledgments, surveys, diagrams, plans, specifications, work orders, inspections, quality control records, etc.); every copy of every such writing or record where such copy contains any commentary or notation whatsoever that does not appear on the original.

(3) **“Identify”** means:

(a) with respect to any **“person”** who is an individual, to provide the name, present or last-known residence address, present or last-known residence telephone number, present or last-known employer or business affiliation, present or last-known business address, and present or last-known business telephone number of each person mentioned;

(b) with respect to an institution, business, group or other organization, to provide the current or last-known complete name, address, and telephone number; and

(c) with respect to any "**document**," to provide (irrespective of whether the **document** is subject to any claim privilege) the title or other means of identification of each such **document**, the date of each **document**, **identify** the author, the names of all recipients of each **document** and **identify** all persons who have custody, control, or possession of each such **document** or copies of it.

(4) "**Claim**" means each and every claim arising out of the Complaint which forms the subject matter of this litigation.

REQUESTS TO PRODUCE

1.

The original Declaration Page and a true, accurate and complete copy of all insurance policies which may provide benefits or coverage to you in connection with the claim which forms the subject matter of this litigation.

2.

All photographs, charts, diagrams, videotapes or other illustrations of any person, place or thing related to the claim which forms the subject matter of this

litigation, including, but not limited to Plaintiff, and, any real property or personal property related to the incident which forms the subject matter of this litigation.

This includes Copies of all video (including cell phone video), electronic mail (e-mail), electronic messages on social media websites, text messages, and other communications or recordings that were recorded or transmitted which contain information related to the subject matter of this litigation. These copies should be provided in their original format, with any and all metadata included.

3.

Copies of all correspondence, letters, memoranda, or other written records or documents provided by or to any Defendant, their agents or their attorneys to:

(a) Any alleged witness.

(b) Any expert you or your attorney intends to call as a witness at trial.

(c) Any judicial, governmental or quasi government agency, body, group or organization contacted with regard to the claim which forms the subject matter of this litigation.

4.

Any diary or log of events or expenses or project log of any type that has been prepared with regard to the claim which forms the subject matter of this litigation.

5.

All written, transcribed and/or recorded statements pertaining to the claim which forms the subject matter of this litigation, specifically including but not limited to Plaintiff or any of his alleged agents and transcripts of any proceedings.

6.

Copies of all documentary evidence relied upon to demonstrate and support facts relevant to this litigation.

7.

Copies of all documents, records, and other items identified in your Responses to Plaintiff's First Interrogatories served concurrently herewith.

8.

A copy of any documents or other items identified in earlier pleadings, disclosures, or in response to discovery questions.

9.

Copies of any documents related to other instances over the past 5 years when other persons alleged that their rights were violated by Defendant.

10.

Copies of any documents related to other instances when other persons, over the past 3 years, filed a grievance or lawsuit against Defendant for violations of 42

U.S.C. § 1983, 42 U.S.C. § 1985, 42 U.S.C. § 1986, or other violations of
Constitutional Rights.

Respectfully Submitted, this 13th day of November 2018.

/s/Jordan Johnson

Jordan Johnson

Georgia State Bar No. 673643

2 Ravinia Drive
Suite 120
Atlanta, GA 30346
770-670-6206
ajohnson@lawjaj.com

STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA

FILED IN OFFICE
CLERK OF STATE COURT
BULLOCH COUNTY, GEORGIA
STCV2018000202

NOV 13, 2018 01:08 PM


Heather Banks McNeal, Clerk
Bulloch County, Georgia

CIVIL ACTION NUMBER STCV2018000202

PLAINTIFF

VS.

Baker, John
Dutton, Charles
Rogers, Melissa, AKA Melissa Hatten
City of Brooklet, DBA (c/o Mayor Hendrix)

DEFENDANTS

SUMMONS

TO THE ABOVE NAMED DEFENDANTS:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Jordan Johnson
Law Offices of Jordan "Alex" Johnson, LLC
2 Ravinia Drive, Suite 120
Atlanta, Georgia 30346

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 13th day of November, 2018.

Clerk of State Court


Heather Banks McNeal, Clerk
Bulloch County, Georgia

STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA

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City of Brooklet, DBA (c/o Mayor Hendrix)

DEFENDANTS

SUMMONS

TO THE ABOVE NAMED DEFENDANTS:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Jordan Johnson
Law Offices of Jordan "Alex" Johnson, LLC
2 Ravinia Drive, Suite 120
Atlanta, Georgia 30346

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 13th day of November, 2018.

Clerk of State Court


Heather Banks McNeal, Clerk
Bulloch County, Georgia

STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA

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BULLOCH COUNTY, GEORGIA
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DEFENDANTS

SUMMONS

TO THE ABOVE NAMED DEFENDANTS:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Jordan Johnson
Law Offices of Jordan "Alex" Johnson, LLC
2 Ravinia Drive, Suite 120
Atlanta, Georgia 30346

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 13th day of November, 2018.

Clerk of State Court


Heather Banks McNeal, Clerk
Bulloch County, Georgia

STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA

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City of Brooklet, DBA (c/o Mayor Hendrix)

DEFENDANTS

SUMMONS

TO THE ABOVE NAMED DEFENDANTS:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Jordan Johnson
Law Offices of Jordan "Alex" Johnson, LLC
2 Ravinia Drive, Suite 120
Atlanta, Georgia 30346

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 13th day of November, 2018.

Clerk of State Court


Heather Banks McNeal, Clerk
Bulloch County, Georgia

General Civil and Domestic Relations Case Filing Information Form

FILED IN OFFICE
 CLERK OF STATE COURT
 BULLOCH COUNTY, GEORGIA
STCV2018000202

NOV 13, 2018 01:08 PM

Heather Banks McNeal
 Heather Banks McNeal, Clerk
 Bulloch County, Georgia

Superior or State Court of Bulloch County

For Clerk Use Only

Date Filed 11-13-2018 Case Number STCV2018000202
 MM-DD-YYYY

Plaintiff(s)

Last	First	Middle I.	Suffix	Prefix
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Defendant(s)

Baker, John

Last	First	Middle I.	Suffix	Prefix
Dutton, Charles				
Last	First	Middle I.	Suffix	Prefix
Rogers, Melissa				
Last	First	Middle I.	Suffix	Prefix
City of Brooklet				
Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney Johnson, Jordan

Bar Number 673643 Self-Represented

Check One Case Type in One Box

General Civil Cases

- Medical Malpractice Tort
- Product Liability Tort
- Automobile Tort
- General Tort
- Contract
- Real Property
- Civil Appeal
- Habeas Corpus
- Restraining Petition
- Injunction/Mandamus/Other Writ
- Garnishment
- Landlord/Tenant
- Other General Civil

Domestic Relations Cases

- Dissolution/Divorce/Separate Maintenance
- Paternity/Legitimation
- Support - IV-D
- Support - Private (non-IV-D)
- Adoption
- Family Violence Petition
- Other Domestic Relations

Post-Judgement - Check One Case Type

- Contempt
- Non-payment of child support, medical support, or alimony.
- Modification
- Administrative/Other

Check if the action is related to another action(s) pending or previously pending in this court involving some or all the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number _____

Case Number _____

I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. §9-11-7.1.

Is interpreter needed in this case? If so, provide the language(s) required. _____
 Language(s) Needed

Do you or your client need any disability accommodations? If so, please describe the accommodation request.

SHERIFF'S ENTRY OF SERVICE FILED

BULLOCH COUNTY CLERK'S OFFICE

Civil Action No. STCV2018000202

Superior Court [] Magistrate Court []
State Court [x] Probate Court []
Juvenile Court []

Date Filed 11/13/18 01:08 PM 18 NOV 14 P 2:21

Georgia, BULLOCH COUNTY

Attorney's Address Jordan Johnson
Law Offices of Jordan Johnson LLC
2 Ravinia Drive, Suite 120
Atlanta, Georgia 30346

Plaintiff

VS.

Baker, John; Dutton, Charles; Rogers, Melissa, AKA

Melissa Hatten; City of Brooklet, DBA (c/o Mayor Hendrix)
Defendant

Name and Address of Party to be Served.

Baker, John
787 Spence Drive
Brooklet, Georgia 30415

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant John Bskel personally with a copy of the within action and summons.

NOTORIOUS

I have this day served the defendant by leaving a copy of the action and summons at his most notorious place of abode in this County.

Delivered same into hands of described as follows: age, about years; weight pounds; height, about feet and inches, domiciled at the residence of defendant.

CORPORATION

Served the defendant a corporation by leaving a copy of the within action and summons with in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope property address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant not to be found in the jurisdiction of this court.

This 14 day of NOV, 20 18

Cpl Maurice Lester B-40 Deputy

0950

SHERIFF'S ENTRY OF SERVICE

Civil Action No. STCV2018000202 FILED Superior Court Magistrate Court
Date Filed 11/13/18 01:08 PM BULLOCH COUNTY State Court Probate Court
CLERK'S OFFICE Juvenile Court
Georgia, BULLOCH COUNTY

Attorney's Address Jordan Johnson 2018 NOV 14 P 2:21
Law Offices of Jordan "Alex" Johnson, LLC
2 Ravinia Drive, Suite 120
Atlanta, Georgia 30346 Plaintiff
CLERK OF COURT

Name and Address of Party to be Served.
Rogers, Melissa VS. Baker, John; Dutton, Charles; Rogers, Melissa, AKA
Brooklet, Georgia 30415 Melissa Hatten; City of Brooklet, DBA (c/o Mayor Hendrix)
Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant Melissa Rogers personally with a copy of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.

Delivered same into hands of _____ described as follows: age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

Served the defendant _____ a corporation by leaving a copy of the within action and summons with _____ in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope property address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant not to be found in the jurisdiction of this court.

This 14 day of Nov, 20 18

SA Mavis Leaty B-16
Deputy

09410

SHERIFF'S ENTRY OF SERVICE FILED

BULLOCH COUNTY CLERK'S OFFICE

Civil Action No. STCV2018000202

Superior Court [] Magistrate Court []
State Court [x] Probate Court []
Juvenile Court []

Date Filed 11/13/18 01:08 PM 2018 NOV 14 P 2:20

Georgia BULLOCH COUNTY

Attorney's Address Jordan Johnson
Law Offices of Jordan Alex Johnson, CLERK
2 Ravinia Drive, Suite 120
Atlanta, Georgia 30346

Plaintiff

Name and Address of Party to be Served.
City of Brooklet
104 Church Street
Brooklet, Georgia 30415

VS.
Baker, John; Dutton, Charles; Rogers, Melissa, AKA
Melissa Hatten; City of Brooklet, DBA (c/o Mayor Hendrix)
Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL [] I have this day served the defendant personally with a copy of the within action and summons.

NOTORIOUS [] I have this day served the defendant by leaving a copy of the action and summons at his most notorious place of abode in this County.

[] Delivered same into hands of described as follows: age, about years; weight pounds; height, about feet and inches, domiciled at the residence of defendant.

CORPORATION [x] Served the defendant city of Brooklet a corporation by leaving a copy of the within action and summons with Angela A. Wirth in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL [] I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope property address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NONEST [] Diligent search made and defendant not to be found in the jurisdiction of this court.

This 14 day of Nov, 20 18

SAI Marie Lester B-40 Deputy

0930