

NOV 13, 2018 01:18 PM

IN THE STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA

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

BRYAN PRICE,)
)
Plaintiff)
)
vs.)
)
CITY OF BROOKLET, as the official)
Government entity employing all)
City of Brooklet Police Officers, and)
CHARLES DUTTON, AND)
LAWRENCE NORVILLE DOUGLAS)
MEYER III (a/k/a CLIFF, CLIFFORD,)
AND DOUG MEYER), Individually and)
in Their Official Capacities as)
City of Brooklet Police Officers)
)
Defendants)

Civil Action File No.

COMPLAINT

NOW COMES Plaintiff, **BRYAN PRICE**, and files this Complaint, showing the Court as follows:

1.

Defendant **CITY OF BROOKLET** is a governmental entity in the State of Georgia that operates the **CITY OF BROOKLET POLICE DEPARTMENT** and is subject of the jurisdiction of this Court. Its Mayor is Mr. William Hendrix and may be served at 104 Church Street, Brooklet GA 30415.

2.

Defendant **CHARLES DUTTON** (“Dutton”), in his individual capacity, is one of the police officers who individually harmed Plaintiff in this matter, and may be served at his home at 105 Oak Street, Brooklet GA 30415. He was also a City of Brooklet Police Officer. He is subject to the jurisdiction of this Court.

3.

Defendant **LAWRENCE NORVILLE DOUGLAS MEYER III** (“Meyer”) in his individual capacity, is one of the police officers who individually harmed Plaintiff in this matter, and may be served at his home in Franklin County, Tennessee at 1201 Bypass Road, Winchester TN 37398. He is subject to the jurisdiction of this Court.

4.

All ante-litem notice requirements have been complied with.

5.

Venue is proper in this Court.

6.

Defendants have liability insurance that covers some or all of the acts complained of in this action, and have waived immunity to the extent of that liability coverage as provided by Georgia law.

COMMON COUNTS

7.

On or about October 10, 2017, Plaintiff was pulled over for speeding by Defendant Dutton, while he was on his way to pick up his daughter from church.

8.

Plaintiff was cooperative with Defendant Dutton, and followed all of Defendant Dutton's lawful commands, including giving Dutton Plaintiff's driver's license.

9.

While Defendant Dutton was in his vehicle, someone from the church came over to notify Plaintiff of where his daughter was located, and Plaintiff stood outside of the car in the church parking lot.

10.

Soon after Plaintiff exited his vehicle, Defendant Dutton immediately exited his vehicle and came over to Plaintiff and the witness from the church aggressively screaming at Plaintiff about whether or not Plaintiff wished to be arrested and intimidating, threatening, and otherwise "blowing up" at Plaintiff, in spite of the fact the witness from the church explained to Dutton why she was present there, speaking to Plaintiff.

11.

Defendant Dutton eventually told Plaintiff to re-enter his vehicle, which Plaintiff immediately complied with.

12.

Plaintiff was cited for speeding, and allowed to go, although Defendant Dutton failed to return Plaintiff's driver's license.

13.

Plaintiff requested to speak with Dutton's supervisor, and Officer Baker arrived in response to this request.

14.

After speaking with Baker, Plaintiff left.

15.

The next day, on October 11, 2017, Plaintiff went to City Hall to retrieve his license, request a meeting with Defendant Meyer, and make an official complaint on a complaint form about Defendant Dutton.

16.

That evening, Defendant Meyer attempted to call Plaintiff to schedule a meeting and discuss the incident.

17.

On October 12, 2017, Plaintiff went to City Hall to turn in the complaint form and gave it to Councilman Griffith, a member of the City Council of Brooklet at about 12:20 PM.

18.

On October 12, 2017, the witness to the events on October 10, 2017, Robin Middleton met with Defendant Meyer regarding the incident at about 2:30 PM.

19.

Immediately following Plaintiff's complaint, Defendants obtained an arrest warrant against Plaintiff for "Obstructing Law Enforcement Officers", purportedly occurring on October 10, 2017.

20.

Defendant Dutton personally delivered the arrest warrant to Bulloch County on October 12, 2017.

21.

Plaintiff was notified the same day, at about 3:45 PM, about the warrant by a friend who was told about the warrant by Defendant Meyer.

22.

Plaintiff immediately reported to Bulloch County Jail to turn himself in at about 4:15 PM. He had to wait there, in custody, until 9:45 PM to post bail and be

released, due to the Defendants failing to have someone come down to the jail.

23.

On or about October 30, 2017, Plaintiff met with Defendant Meyer and Councilman Griffith, where Defendants offer to have the obstruction charge dropped in exchange for a letter from Plaintiff exonerating Defendants' actions.

24.

Plaintiff had to hire an attorney to fight the Obstruction charge, which was ultimately nolle prossed in his favor on or about May 29, 2018.

25.

Plaintiff has been fearful for his safety and life due to Defendants' lies and interactions with him.

26.

Defendants have a practice, or an unofficial policy arising to the level of a policy and procedure, of harassing and intimidating citizens in violation of their constitutional rights, including through retaliation against them for any critical statements regarding the City of Brooklet Police Department.

27.

Defendants have at least 3 other incidents, as reported by All on Georgia and likely to be placed into litigation, of some or all Defendants targeting, harassing, and

retaliating against citizens for their actions protected by the First, Fourth, or Fourteenth Amendments to the United States Constitution.

28.

Defendants' arrest of Plaintiff for Obstruction was pretextual and in retaliation for Plaintiff's exercising of his constitutional rights and not due to any violation of the law.

29.

Defendants' arrest of Plaintiff for Obstruction was part of an unconstitutional policy or practice of bullying and intimidating citizens for their speech, and was wholly unsupported by probable cause.

30.

Defendants' attempt to have Plaintiff exonerate the police department in exchange for dropping the Obstruction charge was an unconstitutional attempt to use the color of law to compel Plaintiff to speak.

31.

At all times relevant herein, Defendants were acting under color of law.

32.

Defendants' conspired with each other to fabricate apparent cause in government documents, namely incident reports, to justify their unlawful arrest of

Plaintiff. Defendants also falsely characterized Plaintiff's actions at the initial speeding stop.

33.

The Obstruction prosecution initiated against Plaintiff was fully terminated in his favor.

34.

At no point did Plaintiff do anything that a reasonable officer would characterize as Obstruction of Law Enforcement.

35.

Plaintiff complied with all lawful commands from law enforcement officers.

STATE LAW CLAIMS

36.

Defendants, as state law enforcement officers, have a ministerial duty to only arrest people for violations of the law, not due to personal anger, malice, or offense due to a citizen exercising his or her rights or desiring not to speak to or being afraid of them.

37.

Defendants had a duty to follow Georgia state law, as well as internal procedures when interacting with the public.

38.

Defendants breached their duty to Plaintiff when they arrested Plaintiff without cause.

39.

Defendant City of Brooklet failed to train their employees adequately on policies and procedures regarding constitutional rights of citizens and to supervise or prevent them from having a pattern or practice of retaliating against citizens for complaining about their actions or activities, and not complying with unlawful orders.

40.

Defendant City of Brooklet knows that officers will fabricate cause in reports and arrest citizens for exercising their constitutional rights but fails to supervise said officers and they do nothing to stop it.

41.

Defendants' negligence directly caused Plaintiff being detained, arrested, held in jail, and prosecuted by Defendants and their employees.

42.

Defendants' negligence caused Plaintiff monetary damage, emotional distress, pain and suffering, attorney fees, and other damages.

43.

Defendants have failed to enact any changes to prevent such rights violations in the future, and Plaintiff requests declaratory and injunctive relief ordering that Defendants' actions are unconstitutional and that Defendant City of Brooklet must enact remedial measures including, at a minimum, being properly trained and supervised to know they are not allowed to fabricate evidence or to detain people for simply angering police officers.

FEDERAL CLAIMS AGAINST DEFENDANTS

44.

Plaintiff incorporates all previous paragraphs.

45.

This is an action for money damages brought pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 1988 and certain provisions of the United States Constitution.

46.

At all times relevant, individual Defendants were each acting under color of law as law enforcement officers

47.

Individual Defendants violated Plaintiff's Fourth and Fourteenth Amendment rights by detaining, arresting, and prosecuting him for absolutely no lawful reason or

cause, and were intentionally retaliating against him with malice for exercising his right to complain about acts of the government under the First Amendment.

48.

Individual Defendants violated Plaintiff's Fourth and Fourteenth Amendment rights by fabricating and conspiring with each other to fabricate evidence and reports, not have body camera video of the original stop, and to lie regarding other items in the incident report.

49.

Individual Defendants violated Plaintiff's rights by using unlawful and excessive force against Plaintiff by using the force necessary to handcuff and arrest Plaintiff.

50.

Individual Defendants had a warrant sworn against Plaintiff for Obstruction, and had him arrested and prosecuted, in response to the content of Plaintiff's speech, namely his complaints to the Defendant City of Brooklet regarding the acts of Defendant Dutton and Defendant Meyer's police department.

52.

Defendants' allegations regarding Plaintiff's conduct were pretextual and without probable cause, and led to charges being filed against Plaintiff.

53.

The false obstruction charge against Plaintiff was resolved in Plaintiff's favor.

54.

Plaintiff suffered physical (unlawful confinement), mental, and monetary damages as a result of being held and arrested, as well as costing him attorney's fees to fight the charge.

55.

Pursuant to federal law, Plaintiff is entitled to all attorney's fees and costs of this action when resolved in Plaintiff's favor.

56.

Defendant City of Brooklet has an ongoing policy or practice arising to the level of a policy or procedure, of allowing or turning a blind eye to the pervasive practice of officers disobeying the U.S. Constitution and acting above the law to justify detentions, investigations, or arrests of otherwise apparently law abiding citizens, especially if they exercise their First Amendment Rights by disagreeing with or complaining about law enforcement activities.

57.

Defendant City of Brooklet's policy is unconstitutional and illegal on its face, and is a violation of the U.S. Constitution's First, Fourth, and Fourteenth

Amendments.

58.

Plaintiff requests that proper declaratory and injunctive relief be granted against Defendant City of Brooklet, including but not limited to Defendant City of Brooklet policymakers and police officers being required to undergo constitutional rights training, and for all officers to be required to have body cameras activated at all times before any arrest warrant may issue for an alleged crime.

PUNITIVE DAMAGES

59.

All preceding paragraphs are incorporated herein.

60.

The actions of Defendants, as set forth above, show intentional 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 and Federal law.

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 be awarded injunctive and declaratory relief, *and*,
- (f) 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 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

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IN THE STATE COURT OF BULLOCH COUNTY
STATE OF GEORGIA

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

BRYAN PRICE,)
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 Plaintiff)
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 vs.)
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 CITY OF BROOKLET, as the official)
 Government entity employing all)
 City of Brooklet Police Officers, *and*)
 CHARLES DUTTON, AND)
 LAWRENCE NORVILLE DOUGLAS)
 MEYER III (a/k/a CLIFF, CLIFFORD,)
 AND DOUG MEYER), Individually and)
 in Their Official Capacities as)
 City of Brooklet Police Officers)
)
 Defendants)

Civil Action File No.

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

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
STCV2018000203

NOV 13, 2018 01:18 PM


Heather Banks McNeal, Clerk
Bulloch County, Georgia

CIVIL ACTION NUMBER STCV2018000203

Price, Bryan

PLAINTIFF

VS.

City of Brooklet, DBA (c/o Mayor Hendrix)
Dutton, Charles
Meyer, Lawrence Norville Douglas, III, AKA
Doug Meyer, Chief Meyer

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

FILED IN OFFICE
CLERK OF STATE COURT
BULLOCH COUNTY, GEORGIA
STCV2018000203

NOV 13, 2018 01:18 PM


Heather Banks McNeal, Clerk
Bulloch County, Georgia

Price, Bryan CIVIL ACTION NUMBER STCV2018000203

PLAINTIFF

VS.

City of Brooklet, DBA (c/o Mayor Hendrix)
Dutton, Charles
Meyer, Lawrence Norville Douglas, III, AKA
Doug Meyer, Chief Meyer

DEFENDANTS

SUMMONS

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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

FILED IN OFFICE
CLERK OF STATE COURT
BULLOCH COUNTY, GEORGIA
STCV2018000203

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Heather Banks McNeal, Clerk
Bulloch County, Georgia

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PLAINTIFF

VS.

City of Brooklet, DBA (c/o Mayor Hendrix)
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Jordan Johnson
Law Offices of Jordan "Alex" Johnson, LLC
2 Ravinia Drive, Suite 120
Atlanta, Georgia 30346

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This 13th day of November, 2018.

Clerk of State Court


Heather Banks McNeal, Clerk
Bulloch County, Georgia

SHERIFF'S ENTRY OF SERVICE

Civil Action No. STCV2018000203

Date Filed 11/13/18 01:18 PM

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

Superior Court Magistrate Court
State Court Probate Court
Juvenile Court

Georgia, BULLOCH COUNTY

Price, Bryan

Plaintiff

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

VS.
City of Brooklet, DBA (c/o Mayor Hendrix); Dutton,

Charles; Meyer, Lawrence Norville Douglas, III, AKA
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

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 _____ day of _____, 20_____

Deputy

SHERIFF'S ENTRY OF SERVICE

Civil Action No. STCV201900283

Date Filed 11/13/18 01:18 PM

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

Superior Court Magistrate Court
State Court Probate Court
Juvenile Court

Georgia, FULLOCH COUNTY

Place, Bryan

Plaintiff

Name and Address of Party to be Served
Dutton, Charles
105 Oak Street
Franklet, Georgia 30415

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

Charles Meyer, Lawrence Neville Douglas, III, AKA
Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

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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 properly addressed 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.

HIGHEST

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This _____ day of _____, 20_____

Deputy

NOV 13, 2018 01:18 PM

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

General Civil and Domestic Relations Case Filing Information Form

Superior or State Court of Bulloch County

For Clerk Use Only

Date Filed 11-13-2018 Case Number STCV2018000203
 MM-DD-YYYY

Plaintiff(s)

Price, Bryan

Last	First	Middle I.	Suffix	Prefix

Defendant(s)

City of Brooklet

Last	First	Middle I.	Suffix	Prefix
Dutton, Charles				
Meyer, Lawrence Norville Douglas, III				

Plaintiff's Attorney Johnson, Jordan

Bar Number 673643 Self-Represented

Check One Case Type in One Box

General Civil Cases	
<input type="checkbox"/>	Medical Malpractice Tort
<input type="checkbox"/>	Product Liability Tort
<input type="checkbox"/>	Automobile Tort
<input checked="" type="checkbox"/>	General Tort
<input type="checkbox"/>	Contract
<input type="checkbox"/>	Real Property
<input type="checkbox"/>	Civil Appeal
<input type="checkbox"/>	Habeas Corpus
<input type="checkbox"/>	Restraining Petition
<input type="checkbox"/>	Injunction/Mandamus/Other Writ
<input type="checkbox"/>	Garnishment
<input type="checkbox"/>	Landlord/Tenant
<input type="checkbox"/>	Other General Civil

Domestic Relations Cases	
<input type="checkbox"/>	Dissolution/Divorce/Separate Maintenance
<input type="checkbox"/>	Paternity/Legitimation
<input type="checkbox"/>	Support - IV-D
<input type="checkbox"/>	Support - Private (non-IV-D)
<input type="checkbox"/>	Adoption
<input type="checkbox"/>	Family Violence Petition
<input type="checkbox"/>	Other Domestic Relations

Post-Judgement - Check One Case Type	
<input type="checkbox"/>	Contempt
<input type="checkbox"/>	Non-payment of child support, medical support, or alimony.
<input type="checkbox"/>	Modification
<input type="checkbox"/>	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. STCV2018000203

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

Date Filed 11/13/18 01:18 PM

2018 NOV 14 P 2:21

Georgia, BULLOCH COUNTY

Attorney's Address Jordan Johnson
Law Offices of Jordan Alex Johnson, LLC
2 Ravinia Drive, Suite 1200
Atlanta, Georgia 30346

Price, Bryan
Plaintiff

Name and Address of Party to be Served.
Dutton, Charles
105 Oak Street
Brooklet, Georgia 30415

VS.
City of Brooklet, DBA (c/o Mayor Hendrix); Dutton,
Charles; Meyer, Lawrence Norville Douglas, III, AKA
Defendant
Garnishce

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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

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TACK & MAIL

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NON EST

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

This 14 day of Nov, 20 18

epi. Meenie Lester B-40 Deputy

09410

SHERIFF'S ENTRY OF SERVICE FILED

BULLOCH COUNTY CLERK'S OFFICE

Civil Action No. STCV2018000203

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

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

Georgia, BULLOCH COUNTY

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

Plaintiff

VS.

Name and Address of Party to be Served, City of Brooklet

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

Charles; Meyer, Lawrence Norville Douglas, III, AKA

Defendant

104 Church Street

Brooklet, Georgia 30415

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

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.

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

0930