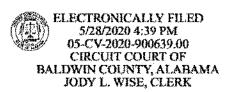
State of Alabama

COVER SHEET

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5/28/2020 4:39 PM
05-CV-2020-900639.00
CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Unified Judicial System	CIRCUIT	COURT - CIVIL CASE	Oξ JODY L. WISE, CLERK		
Form ARCiv-93 Rev. 9/18	(Not For Domestic Relations Cases)		Date of Filing: Judge Code: 06/28/2020		
	GENERAL INFORMATION				
		OURT OF BALDWIN COUNTY, 5 v. LYNNE ERNEST INSURAN	•		
TUCHI	ANCE EXPRES:	i v. linne ernest maurap	ioe lec et me		
First Plaintiff: ☑Business ☐Government	☐ Individual ☐ Other	First Defendant: ☑ Bu ☐ Go	siness		
NATURE OF SUIT: Select prim	nary cause of action	, by checking box (check only one)	that best characterizes your action:		
TORTS: PERSONAL INJURY		OTHER CIVIL FILINGS (cont'd)			
	A Commence of the Commence of	MSXX - Birth/Death Certific Enforcement of Age	ate Modification/Bond Forfeiture Appeal/ ency Subpoena/Petition to Preserve		
TOMV - Negligence: Motor \	Vehicle	CVRT - Civil Rights			
TOWA - Wantonness		COND - Condemnation/Em	inent Domain/Right-of-Way		
TOPL - Product Liability/AEN	MLD	CTMP - Contempt of Court			
TOMM - Malpractice-Medica	ŭ .	CONT - Contract/Ejectment	t/Writ of Seizure		
TOLM - Malpractice-Legal		TOCN - Conversion			
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TOXX - Other:	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	CVUD - Eviction Appeal/Un	lawful Detainer		
		FORJ - Foreign Judgment			
TORTS: PERSONAL INJURY		FORF - Fruits of Crime Fort	feiture		
TOPE - Personal Property			traordinary Writ/Mandamus/Prohibition		
TORE - Real Properly PFAB - Protection From Abuse		use			
OTUED CIVIL ED INCO		EPFA - Elder Protection Fro	жn Abuse		
OTHER CIVIL FILINGS ABAN - Abandoned Automobile		FELA - Railroad/Seaman (FELA)			
ACCT - Account & Nonmorts		RPRO - Real Property			
APAA - Administrative Agen	* -	WTEG - Will/Trust/Estate/Guardianship/Conservatorship			
ADPA - Administrative Proce	- ''	COMP - Workers' Compensation			
ANPS - Adults in Need of Pr	l l	CVXX - Miscellaneous Circ	uit Civil Case		
ORIGIN: F 🖸 INITIAL FILING	3	A APPEAL FROM DISTRICT COURT	O COTHER		
R 🗌 REMANDED		T TRANSFERRED FROM OTHER CIRCUIT COUR			
HAS JURY TRIAL BEEN DEMAN	NDED? TYES	SINO	does not constitute a demand for a 8 and 39, Ala.R.Civ.P. for procedure)		
RELIEF REQUESTED:	MONETARY	AWARD REQUESTED NO M	ONETARY AWARD REQUESTED		
ATTORNEY CODE:	 ' (+ (+- + /-		·		
SCU006	5/28/	2020 4:39:25 PM	/s/ WILLIAM E SCULLY III III		
	Date		Signature of Attorney/Party filing this form		
MEDIATION REQUESTED:	YES	NO JUNDECIDED			
Election to Proceed under the A	Nabama Rules for	Expedited Civil Actions:	YES NO		



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS,	
PLAINTIFF,	<u> </u>
v.) CASE NO.CV-2020-
	,
LYNNE ERNEST INSURANCE, LLC,)
LYNNE ERNEST, CHYNNA ERNEST,)
DEADRA STOKLEY, and JODI PRUITT,	ĺ
FICTITIOUS PARTIES A-D, being persons,)
corporations, entities, or agents, all of whose)
true names are otherwise unknown at this)
time, but will be added when ascertained,)
separately and severally,)
•)
DEFENDANTS.)

COMPLAINT

COMES NOW the plaintiff, INSURANCE EXPRESS, LLC, by and through its undersigned counsel, and files its complaint against the above-named defendants. As grounds therefore, the plaintiff would show unto the Court as follows:

Statement of Fact

- Insurance Express, LLC is an Alabama limited liability company with its principal place of business is Gilbertown, Alabama, in Choctaw County.
- Wayne Taylor is an adult resident citizen of Choctaw County, Alabama, and is the principal owner of Insurance Express.
- Lynne Ernest Insurance, LLC ("LEI") is an Alabama limited liability company
 with its principal place of business in Baldwin County, Alabama, at 400 East Laurel Avenue in
 Foley.
 - 4. On information and belief, Lynne Ernest ("Ernest") is an adult resident citizen of

Marengo County, Alabama, and is the principal owner of LEI.

- On information and belief, Chynna Ernest is an adult resident citizen of Sumter
 County, Alabama, the daughter of Ernest, and an organizer and member of LEI (hereinafter
 "Daughter").
- 6. On information and belief, Deadra Stokley ("Stokley") an adult resident citizen of Washington County, Alabama, who was once employed by Insurance Express but is now employed by LEI.
- 7. On information and belief, Jodi Pruitt ("Pruitt") is an adult resident citizen of Clarke County, Alabama, who was once employed by Insurance Express but is now employed by LEI.
- 8. There may be other entities whose true names and identities are unknown to the Plaintiff at this time who may be legally responsible for the claim(s) set forth herein who may be added by amendment by the Plaintiff when their true names and identities are accurately ascertained by further discovery. Until that time, the Plaintiff will designate these parties in accordance with Rule 9(h), Alabama Rules of Civil Procedure.
 - 9. Ernest, Stokley, and Pruitt were long time employees of Insurance Express.
- On or about August 8, 2018, while still employed at Insurance Express, and
 without their knowledge, Ernest and Daughter incorporated LEI.
- 11. On or about January 9, 2019, while employed by Insurance Express and without their knowledge Ernest was granted a Non-resident Insurance Licenses by the State of Florida.

¹ The word "entity" as used herein is intended to refer to and include any and all legal entities including individual persons, any and all forms of partnerships, but their true names will be substituted by amendment when ascertained, any and all types of corporations and unincorporated associations. The symbol by which these party Defendants are designated is intended to include more than one entity in the event that discovery reveals that the descriptive characterization of the symbol applies to more than one "entity." Plaintiff alleges that the identities of the fictitious party-Defendants are otherwise unknown at this time, or, if known, their identities as proper party-Defendants are not known.

- 12. On or about May 15, 2019, while Ernest was employed by Insurance Express, LEI sought and was granted an Alabama Insurance Producers License, all unbeknownst to Insurance Express.
- 13. On or about July 28, 2019, while still employed at Insurance Express, Stokley returned to the Insurance Express office after business hours, without authorization or legitimate business purpose, and remained there until after midnight.
- 14. Upon information and belief, Stokley made electronic copies of Insurance Express's client files, and then attempted to delete the native copies residing in the Insurance Express system.
- 15. On or about July 29, 2019, Stokley resigned from Insurance Express, yet continued work until August 9, 2019, at which time she began employment at LEI.
- 16. On or about July 29, 2019, Ernest returned to the Insurance Express office after business hours, without authorization or legitimate business purpose, and remained there until approximately 11 pm.
- 17. Upon information and belief, Ernest made electronic copies of Insurance Express client, policy, and renewal records during this time.
- 18. On or about August 13, 2019, Ernest resigned from Insurance Express and began employment at LEI, a direct competitor to Insurance Express that Daughter had founded more than a year prior.
- 19. The Client files obtained by LEI through Ernest and Stokley contained names, addresses, social security numbers, dates of birth, policy information, and renewal dates of clients of Insurance Express, among other information.
 - 20. On or about July 30, 2019, while Ernest was still employed with Insurance

Express, Ernest and / or Stokley induced clients of Insurance Express to sign Agent of Record ("AOR") letters, transferring their policies from Insurance Express to LEI, or to an associate or successor thereof.

- 21. In at least once instance, Ernest and / or Stokley did so without the client's knowledge or authorization.
- 22. In the days immediately following Ernest and Stokley's departure from Insurance Express, plaintiff Insurance Express received multiple AOR letters transferring clients out of its client registry, and into the client registry of LEI.
- 23. To date, LEI, using the Insurance Express' information, has taken forty-nine clients from Insurance Express.
- 24. Additionally, In March of 2019, Jodi Pruitt left employment with Insurance Express for a job at LEI, after which, Insurance Express has received one additional AOR letter transferring business away from it and to LEI or its successor or affiliate.
- 25. Prior to Ernest's departure from Insurance Express, she intentionally sabotaged Insurance Express in 2018 by failing to renew her employer Wayne Taylor's license, a duty she had fulfilled repeatedly during her employ at Insurance Express.
 - 26. Ernest did this, despite renewing her license and that of Stokley at that time.
- 27. In the line and scope of her duties at Insurance Express, Ernest received premiums from clients, which she was to deposit in the Insurance Express trust account, and then pay the premiums to Insurers, on the clients' behalf, again from the Insurance Express trust account.
 - 28. During this period, she paid premiums of several clients of Insurance Express out

² Upon information and belief, the associate or immediate successor in interest to LEt is an entity called HDI.

of the trust account without first collecting the premium from the client.

- 29. During her time at Insurance Express, Ernest used Insurance Express funds to pay personal expenses, including premiums for her own homeowners and auto insurance policies, also from the Insurance Express, again without first paying her premium into the Insurance Express trust account.
- 30. During the same time period, Ernest paid Daughter's auto insurance premiums, her husband's premiums, and premiums on behalf of her other business. The Cleaners on Mulberry, to various insurers, out of Insurance Express' trust account, all without first paying the premium into the Insurance Express trust account.
- 31. Finally, in the line and scope of her duties at Insurance Express, Ernest received commission checks from Insurers, and was to deposit those checks in the Insurance Express's operating account.
- 32. Following her departure from Insurance Express, Insurance Express discovered many stale commission checks, going back as far as 2017, which Ernest had failed to deposit.

FIRST CAUSE OF ACTION REQUEST FOR PRELIMINARY AND PERMANENT INJUCTIVE RELIEF

- 33. Insurance Express adopts and incorporates the allegations set forth in paragraphs
 1 32, above, as if fully set out herein.
- 34. Defendants, all, have diverted clients, client information, misrepresented the position of Insurance Express to clients, and forged signatures of same, all of which they may be continuing to do.
- 35. Such acts constitute a violation of the Alabama Trade Secrets Act, Ala. Code (1975) § 8-27-1, et seq., which contemplates injunctive relief in this context at § 8-27-4(a)(1)(a);

see, Count Six, supra.

- 36. Without a preliminary injunction restricting these practices, Insurance Express will suffer irreparable injury.
- Insurance Express has no adequate remedy at law to prevent defendants continued conduct.
- 38. Insurance Express has a reasonable chance of success on the ultimate merits of its case.
- 39. The hardship imposed on defendants by the injunction will not unreasonably outweigh the benefit accruing to Insurance Express.
 - 40. Insurance Express seeks an order requiring defendants, all, to:
 - A. Immediately cease any and all communication with any past or current customers of Insurance Express gleaned from their improper conduct;
 - B. Immediately cease use of all of client lists, data, and related insurance policy information ("Confidential Information") obtained during their employment with Insurance Express;
 - C. Immediately notify, in writing, any Insurance Express customers they have contacted or communicated with since their employment with Insurance Express ended of their participation in this proceeding, and copy Insurance Express on all such written communications;
 - Return any and all of the Confidential Information in their possession, custody, or control to Insurance Express;
 - E. Certify, in writing, that they have returned all such Confidential Information in their possession to Insurance Express;
 - F. Certify, in writing, that they have destroyed any duplicate or local copies, including electronic files, of Confidential Information in their possession; and
 - G. Certify, in writing, that they will not use any Confidential Information to call on, solicit, take away, or attempt to call on, solicit or take away any customers or potential customers of Insurance Express.

WHEREFORE, Insurance Express respectfully requests that this Honorable Court enter an order requiring the Defendants, all, to abide by the terms enumerated at ¶ 40 of this complaint.

SECOND CAUSE OF ACTION - BREACH OF CONTRACT

- 41. Insurance Express adopts and incorporates by reference the allegations set forth in paragraphs 1 through 40, above.
- 42. Insurance Express had agreements with Ernest, Daughter, Stokley, and Pruitt ("Individual Defendants) in the regular course of their association that required these defendants to perform certain functions in order to receive payment compensation, including the maintenance of proper accounting for client funds, payments, and trust balances, the renewal of professional licenses, the renewal of client policies, as well as the safeguarding of the Confidential Information.
- 43. Insurance Express made payment to defendants and has complied with the terms of the agreements referenced in the preceding paragraph.
 - 44. The Individual Defendants breached their agreements referenced above by:
 - A. Failing to renew their employer's insurance license;
 - B. Failing to maintain proper accounting of client funds, including the failure to deposit moneys rightfully owed to Insurance Express, as well as the issuance of payments from accounts without first depositing customer payments therein; and
 - C. Using Insurance Express funds for their own purposes.
- 45. Insurance Express has and continues to suffer damages as a direct and proximate result of the breach of contract by and wrongful activities the Individual Defendants.

WHEREFORE, Insurance Express respectfully requests that the Individual Defendants be found liable for breach of contract and be made to compensate Insurance Express for its lost revenue, costs, and other compensatory damage, court costs, interest, and any other relief this Honorable Court deems proper.

THIRD CAUSE OF ACTION - CONVERSION

- 46. Insurance Express adopts and incorporates by reference the allegations set forth in paragraphs 1 through 45, above.
- 47. Ernest and Daughter used moneys owned by Insurance Express for her own personal, non-business purposes.
- 48. In doing so, they exercised dominion over property and assets that were the rightful property of Insurance Express.
- 49. As a direct and proximate result of Ernest's and Daughter's misappropriation of these funds, Insurance Express was deprived of income it otherwise would have earned.

WHEREFORE, Insurance Express respectfully requests that Ernest and Daughter be found liable for conversion and be made to compensate Insurance Express for its lost revenue, costs, and other compensatory damage, court costs, interest, and any other relief this Honorable Court deems proper. Insurance Express also requests that Ernest and Daughter be made to pay punitive damages for their willful and premeditated acts.

FOURTH CAUSE OF ACTION INTENTIONAL INTERFERENCE WITH BUSINESS RELATIONS

50. Insurance Express adopts and incorporates by reference the allegations set forth in paragraphs 1 through 49 above.

- 51. Insurance Express had existing business in the form of contracts of insurance with its clients.
 - 52. Defendants were aware of these business relationships.
- 53. Defendants intentionally contacted Insurance Express's clients in order to interfere with those relations, and to secure or receive the business of such clients at the expense of the existing business relationships belonging to Insurance Express.
- 54. Insurance Express was damaged as a direct and proximate result of the intentional contacting and diverting of numerous Insurance Express customers to Defendants' own benefit.

WHEREFORE, Insurance Express respectfully requests that Defendants be found liable for intentional interference with business relations and be made to compensate Insurance Express for its lost revenue, costs, and other compensatory damages, court costs, interest, and any other relief this honorable Court deems proper. Insurance Express seeks punitive damages based on the intentional and malicious nature of Defendants' conduct.

FIFTH CAUSE OF ACTION BREACH OF FIDUCIARY DUTY OF CONFIDENTIALITY AND LOYALTY

- 55. Insurance Express adopts and incorporates by reference the allegations set forth in paragraphs 1 through 54, above.
- 56. The Individual Defendants had a fiduciary duty to protect the interests of Insurance Express as they were its agents and therefore charged to act in its best interest in the exercise of judgment, discretion, and loyalty.
- 57. The Individual Defendants breached that duty when they chose to divert customers belonging to Insurance Express to their own interest, when they attempted to delete / deprive Insurance Express of its own customer files, and Defendants did so through the

intentional, wrongful, and disloyal means of misappropriating the Confidential Information to their own ends.

58. Insurance Express was proximately damaged thereby.

WHEREFORE, Insurance Express respectfully requests that Defendants be found liable for breach of fiduciary duties of confidentiality and loyalty and be made to compensate Insurance Express for its lost revenue, costs, and other compensatory damages, court costs, interest, and any other relief this honorable Court deems proper.

SIXTH CAUSE OF ACTION -VIOLATION OF ALABAMA TRADE SECRETS ACT

- 59. Insurance Express adopts and incorporates by reference the allegations set forth in paragraphs 1 through 58 above.
- 60. The Confidential Information in this proceeding is a Trade Secret, pursuant to Ala. Code (1975) § 8-27-2(1).
- 61. Defendants, all, disclosed or used the trade secrets of Insurance Express, or received such trade secrets, without a privilege to do so, and each misappropriated or received such trade secrets in a willful and malicious manner intended to harm Insurance Express.
- 62. Such trade secrets were discovered and / or appropriated by improper means, and Defendants', all, use of such trade secrets constitutes a breach of confidence reposed in Defendants by Insurance Express.
- 63. All Defendants knew or should have known that the Confidential Information constituted trade secrets, and that such trade secrets had been appropriated under circumstances which violate Alabama Trade Secrets Act.
 - 64. Insurance Express was proximately damaged thereby.

WHEREFORE, Insurance Express respectfully requests that Defendants be found liable for breach of the Alabama Trades Secrets Act, and be made to: identify and disgorge any profits and other benefits conferred by the misappropriation that are attributable to the misappropriation; compensate plaintiff for the actual damages suffered as a result of the misappropriation; pay reasonable attorney's fees, and other compensatory damages, court costs, interest, and any other relief this honorable Court deems proper. Insurance Express also seeks exemplary damages based on the willful and malicious conduct of Defendants.

SEVENTH CAUSE OF ACTION CIVIL CONSPIRACY TO COMMIT VIOLATIONS OF THE ALABAMA TRADE SECRETS ACT

- 69. Insurance Express adopts and incorporates by reference the allegations set forth in paragraphs 1 through 64 above.
- 70. The Defendants both individually and in their capacities as agents for LEI entered into an agreement to steal Confidential Information from Insurance Express and to use that information to take clients from Insurance Express.
- 71. Each of the Defendants took a substantial step toward that goal. Ernest, Stokley and Pruitt, took confidential information from Insurance Express, provided that information to LEI, and in their capacities as agents of LEI have profited from the use of that information.
- 72. Daughter, organized LEI prior to Lynn Ernest's departure from Insurance Express, and in her capacity as member of LEI has benefitted from the other Defendant's the use of the Confidential Information.

WHEREFORE, Insurance Express respectfully requests that Defendants be found liable for Conspiracy to violate of the Alabama Trades Secrets Act, and be made to: identify and

disgorge any profits and other benefits conferred by the misappropriation that are attributable to the misappropriation; compensate plaintiff for the actual damages suffered as a result of the misappropriation; pay reasonable attorney's fees, and other compensatory damages, court costs, interest, and any other relief this honorable Court deems proper. Insurance Express also seeks exemplary damages based on the willful and malicious conduct of Defendants.

SEVENTH CAUSE OF ACTION -CIVIL CONSPIRACY TO CONVERT INSURANCE EXPRESS ASSETS

- 1. Insurance Express adopts and incorporates by reference the allegations set forth in paragraphs 1 through 68 above.
- 2. Defendants Ernest and Daughter entered into an agreement to convert assets belonging to Insurance Express to their own non-business, personal uses.
- Ernest paid funds out of Insurance Express' trust account to insurers on behalf of herself, her husband, her other business interests and Daughter, without first paying monies in to that trust account.
- 4. Daughter directly benefitted from Ernest's misappropriation of funds in that she received insurance coverage for which she knew that she had not paid.

WHEREFORE, Insurance Express respectfully requests that Ernest and Daughter be found liable for conspiracy to commit conversion and be made to compensate Insurance Express for its lost revenue, costs, and other compensatory damage, court costs, interest, and any other relief this Honorable Court deems proper. Insurance Express also requests that Ernest and Daughter be made to pay punitive damages for their willful and premeditated acts.

Respectfully submitted,

DOCUMENT 1

DOCUMENT 2

WILLIAM E. SCULLY, III (SCU006)

Scully Law, P.C. Attorney at Law P.O. Box 962 Daphne, Alabama 36526-0962 (251) 626-5052 (251) 626-5051 (Fax) wes@scullylawpc.com

CERTIFICATE OF SERVICE

I, William E. Scully, III, hereby certify that on this 28th day of May, 2020, I electronically filed the foregoing with the Clerk of the Court using the AlaCourt Electronic Filing system, which will send a copy to all parties listed in this cause.

/s/ William E. Scully. III WILLIAM E. SCULLY, III



05-CV-2020-900639.00

To: WILLIAM E SCULLY III III wescullyiii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639,00

The following complaint was FILED on 5/28/2020 4:39:23 PM

Notice Date: 5/28/2020 4:39:23 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: LYNNE ERNEST INSURANCE LLC 5439 HWY 69 SWEET WATER, AL, 36782

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05-CV-2020-900639.00

To: CHYNNA ERNEST 104 E PARK ROAD LIVINGSTON, AL, 36919

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INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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05-CV-2020-900639.00

To: DEADRA STOKLEY 1978 SOUWILPA ROAD SILAS, AL, 36919

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INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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05-CV-2020-900639.00

To: JODI PRUITT 12570 HWY 17 GILBERTOWN, AL, 36908

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017

SUMMONS

- CIVIL -

Court Case Number 05-CV-2020-900639.00

IN THE CIRC INSURANCE EX	CUIT COURT OF BALDWIN CO XPRESS V. LYNNE ERNEST IN:	OUNTY, ALABAMA SURANCE LLC ET AL		
NOTICE TO: LYNNE ERNEST INSURANCE LL	C, 5439 HWY 69, SWEET WATER, AL 36782			
(Name and Address of Defendant)				
THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), WILLIAM E SCULLY III III				
	[Name(s) of Attorney(s)]			
WHOSE ADDRESS(ES) IS/ARE: PO BOX	(962, Daphne, AL, 36526	Plaintiff(s) or Attorney(s))		
OTHER DOCUMENT WERE SERVED OF THE MONEY OR OTHER THINGS DEMA	DELIVERED WITHIN 30 DAYS A IN YOU OR A JUDGMENT BY DEF, INDED IN THE COMPLAINT OR OT	AFTER THIS SUMMONS AND COMPLAINT OR FAULT MAY BE RENDERED AGAINST YOU FOR THER DOCUMENT.		
	PROCEDURE TO SERVE PRO			
You are hereby commanded to ser		the Complaint or other document in		
this action upon the above-named	Defendant.			
Service by certified mail of this Sur	mmons is initiated upon the writte	en request of		
pursuant to the Alabama Rules of t	the Civil Procedure.	havaterall		
05/28/2020	/s/ JODY L. \			
(Deta)	(Signature of C	CHIK) (NOTIFE)		
Certified Mail is hereby requested.	(Plaintiffs/Attorney's	Signature)		
	RETURN ON SERVICE	ÇE .		
Return receipt of certified mail rece	eived in this office on	/Dodnik		
I certify that I personally delivered	a constructible Quantum and Car	(Date) molaint or other document to		
L_ I certify that I personally delivered		County,		
(Name of Person Served)	<u> </u>	(Name of County)		
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Alabama on (Date)	*			
(Crete)		(Address of Server)		
(Type of Process Server)	(Server's Signature)	manuska ka k		
	(Server's Printed Name)	(Phone Number of Server)		

State of Alabama
Unified Judicial System

SUMMONS

Court Case Number 05-CV-2020-900639.00

Form C-34 Rev. 4/2017	, L	*! V }} "		
	N THE CIRCUIT COUR JRANCE EXPRESS V.		DUNTY, ALABAMA ISURANCE LLC ET AL	
NOTICE TO: LYNNE ERNEST, 5439 HWY 69, SWEET WATER, AL 36782				
(Name and Address of Defendant)				
THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), WILLIAM E SCULLY III III				
- And	•	ame(s) of Attorney(s))		
WHOSE ADDRESS(ES) IS/A		[Address(es) of Pa	Plainliff(s) or Attorney(s)]	
OTHER DOCUMENT WERE THE MONEY OR OTHER TH	SERVED ON YOU OR A INGS DEMANDED IN TH	A JUDGMENT BY DEFA E COMPLAINT OR OTH		
	PROCEDU	RE TO SERVE PRO		
You are hereby comma	nded to serve this Sum	mons and a copy of the	the Complaint or other document in	
this action upon the abo	ove-named Defendant.			
Service by certified mail			n request of	
pursuant to the Alabami	a Rules of the Civil Proc		[Name(s)]	
05/28/2020		/s/ JODY L. V		
(Date)		(Signature of C	Člerk) (Name)	
Certified Mail is hereby	requested.	(Plaintiffs/Attorney's S	Signattire)	
жение по	RETU	JRN ON SERVIC	E	
Return receipt of certific	ed mail received in this o	office on	d	
[] I certify that I personally	delivered a copy of this	s Summons and Com	(Date) mplaint or other document to	
		in	County	
(Name of Pe	erson Serverl)		(Name of County)	
Alabama on	(Date)			
	1		(Address of Server)	
(Type of Process Server)	(Server's Sig	jnature)	ts bergsberg museumbehoods op steep va museumbehoods die Gell 1860 in Proppet op steep de geleier de Leise van verschiedelierk besteel	
	(Server's Pri	inted Name)	(Phone Number of Server)	

State of Alabama
Unified Judicial System
Form C-34 Rev 4/2017

SUMMONS - CIVIL -

Court Case Number 05-CV-2020-900639.00

Form C-34 Rev. 4/2017	- GIVIL -	- AMAGA-MANATIN
	N THE CIRCUIT COURT OF BALDWI JRANCE EXPRESS V. LYNNE ERNES	
	T, 104 E PARK ROAD, LIVINGSTON, AL 36919	
	(Name and Addre	ss of Defendant)
TAKE IMMEDIATE ACTION ORIGINAL OF YOUR WRITT OTHER DOCUMENT. WITH	ER DOCUMENT WHICH IS ATTACHED TO PROTECT YOUR RIGHTS. YOU OF TEN ANSWER, EITHER ADMITTING OR DITTHE CLERK OF THIS COURT. A COPYOUR ATTORNEY TO THE PLAINTIFF(S) O	O THIS SUMMONS IS IMPORTANT, AND YOU MUST RYOUR ATTORNEY ARE REQUIRED TO FILE THE ENYING EACH ALLEGATION IN THE COMPLAINT OR Y OF YOUR ANSWER MUST BE MAILED OR HAND R ATTORNEY(S) OF THE PLAINTIFF(S),
·	(Name(s) of Attorney(5)]
WHOSE ADDRESS(ES) IS/A	RE: PO BOX 962, Daphne, AL 36526	
	•	s) of Plaintiff(s) or Attorney(s))
OTHER DOCUMENT WERE	MAILED OR DELIVERED WITHIN 30 DA SERVED ON YOU OR A JUDGMENT BY INGS DEMANDED IN THE COMPLAINT C	YS AFTER THIS SUMMONS AND COMPLAINT OR DEFAULT MAY BE RENDERED AGAINST YOU FOR OTHER DOCUMENT.
	PROCEDURE TO SERVE	
You are hereby comma	nded to serve this Summons and a cop	y of the Complaint or other document in
this action upon the abo	ove-named Defendant.	
Service by certified mai	of this Summons is initiated upon the	written request of
pursuant to the Alabam	a Rules of the Civil Procedure.	[Name(s)]
05/28/2020		Y L. WISE By:
(Date)	(Signatu	ne of Clerk) (Name)
Certified Mail is hereby		ney's Signature)
<u> </u>	RETURN ON SER	RVICE
Return receipt of certific	ed mail received in this office on	(Date)
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	in	(Name of County)
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Alabama on	(P)	
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	(Server's Printed Name)	(Phone Number of Server)
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State of Alabama Unified Judicial System

SUMMONS

Court Case Number 05-CV-2020-900639.00

ISWER, EITHER ADMITTING OR DEN' ISWER, EITHER ADMITTING OR DEN' CLERK OF THIS COURT. A COPY O TTORNEY TO THE PLAINTIFF(S) OR A [Name(s) of Altorney(s)] D BOX 962, Danhne, AL 36526	The summons is important, and you must your attorney are required to file the ying each allegation in the complaint or your answer must be mailed or hand
CE EXPRESS V. LYNNE ERNEST II SOUWILPA ROAD, SILAS, AL 36919 (Name and Address of CUMENT WHICH IS ATTACHED TO TO ROTECT YOUR RIGHTS, YOU OR Y ISWER, EITHER ADMITTING OR DEN'T CLERK OF THIS COURT. A COPY O TTORNEY TO THE PLAINTIFF(S) OR A [Name(s) of Attorney(8)] D BOX 962, Daphne, AL 36526	This summons is important, and you must your attorney are required to file the ying each allegation in the complaint or your answer must be mailed or hand
(Name and Address of CUMENT WHICH IS ATTACHED TO THE ROTECT YOUR RIGHTS. YOU OR YESWER, EITHER ADMITTING OR DEN'T CLERK OF THIS COURT. A COPY OF TORNEY TO THE PLAINTIFF(S) OR A STATE OF THE PLAINTIFF(S) OR A STATE OF THE PLAINTIFF(S) OR A STATE OF THE PLAINTIFF(S) OF A STATE OF THE PLAINTIFF(S) OF A STATE OF THE PLAINTIFF(S) OF A STATE OF THE PLAINTIFF (S) OF	THIS SUMMONS IS IMPORTANT, AND YOU MUST YOUR ATTORNEY ARE REQUIRED TO FILE THE YING EACH ALLEGATION IN THE COMPLAINT OR YE YOUR ANSWER MUST BE MAILED OR HAND
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O BOX 962, Daphne, AL 36526	
5 a data and a second a	of Plaintiff(s) or Attorney(s)]
D OR DELIVERED WITHIN 30 DAYS IED ON YOU OR A JUDGMENT BY DE DEMANDED IN THE COMPLAINT OR O	S AFTER THIS SUMMONS AND COMPLAINT OR EFAULT MAY BE RENDERED AGAINST YOU FOR OTHER DOCUMENT.
R ANY PERSON AUTHORIZED BY PROCEDURE TO SERVE PE	Y THE ALABAMA RULES OF CIVIL ROCESS:
to serve this Summons and a copy of	of the Complaint or other document in
amed Defendant.	
is Summons is initiated upon the wri	itten request of [Name(s)]
es of the Civil Procedure.	to gent a set it
/s/ JODY (
(Signature o	of Clerk) (Name)
ested. (Plaintiff's/Attorne)	y's Signature)
RETURN ON SERV	/ICE
all received in this office on	
	(Date)
vered a copy of this Summons and C	Complaint or other document to
in	County
Served)	(Name of County)
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State of Alabama Unified Judicial System

SUMMONS

CIVIL .

Court Case Number 05-CV-2020-900639.00

om C-34 Rev. 4/2017	I	
INSI	IN THE CIRCUIT COURT OF BALDWIN COL	UNTY, ALABAMA
	URANCE EXPRESS V. LYNNE ERNEST INS	SURANCE LLC ET AL
NOTICE TO: JODI PRUITT, 12	2570 HWY 17, GILBERTOWN, AL 36908	
	(Name and Address of De	efendant)
TAKE IMMEDIATE ACTION ORIGINAL OF YOUR WRIT	ER DOCUMENT WHICH IS ATTACHED TO THIS N TO PROTECT YOUR RIGHTS, YOU OR YOU TEN ANSWER, EITHER ADMITTING OR DENYIN H THE CLERK OF THIS COURT. A COPY OF TOUR OUR ATTORNEY TO THE PLAINTIFF(S) OR ATT	IG EACH ALLEGATION IN THE COMPLAINT OR
	[Name(s) of Attorney(s)]	Ì
WHOSE ADDRESS(ES) IS/	ARE: PO BOX 962, Daphne, AL 36526	VI CIFCI on Attornoutol
	IAGBRESS(CS) OF C	Paintif(s) or Attorney(s)
THE MONEY OR OTHER T	E SERVED ON YOU OR A JODGWICH BY DEFY HINGS DEMANDED IN THE COMPLAINT OR OT	FTER THIS SUMMONS AND COMPLAINT OR AULT MAY BE RENDERED AGAINST YOU FOR HER DOCUMENT.
TO ANY SHE	RIFF OR ANY PERSON AUTHORIZED BY T	HE ALABAMA RULES OF CIVIL CESS:
✓ You are hereby comm	nanded to serve this Summons and a copy of t	the Complaint or other document in
this action upon the at	bove-named Defendant.	
Service by certified ma	all of this Summons is initiated upon the writte	n request of
nursuant to the Alabar	ma Rules of the Civil Procedure.	(Native(8))
05/28/2020	/s/ JODY L. \	
(Oale)	(Signature of C	Clerk) (Name)
Certified Mail is hereb	y requested. (Plaintiff's/Attomey's	Signature)
	RETURN ON SERVIC	E
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(Name of Alabama on	ally delivered a copy of this Summons and Cor in (Date) (Server's Signature)	(Name of County) [Address of Server]
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(Name of Alabama on	ally delivered a copy of this Summons and Cor in (Date) (Server's Signature)	(Name of County) [Address of Server]
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(Name of Alabama on	ally delivered a copy of this Summons and Cor in (Date) (Server's Signature)	(Name of County) (Address of Server)
(Name of Alabama on	ally delivered a copy of this Summons and Cor in (Date) (Server's Signature)	(Name of County) (Address of Server)

DOCUMENT 5

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ELECTRONICALLY FILED 6/1/2020 10:52 AM 05-CV-2020-900639.00 CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA JODY L. WISE, CLERK

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017

SUMMONS

- CIVIL -

IN THE CIRCUIT COUR'	t of Baldwin Coun it Ynne ernest insuran	CE LLC ET AL
NOTICE TO: JODI PRUITT, 12570 HWY 17, GILBERTOWN, ALS	(Name and Address of Defendant	A STATE OF THE STA
THE COMPLAINT OR OTHER DOCUMENT WHICH IS TAKE IMMEDIATE ACTION TO PROTECT YOUR BIT ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ALL OTHER DOCUMENT, WITH THE CLERK OF THIS COLIVERED BY YOU OR YOUR ATTORNEY TO THE WILLIAM E SCULLY III III	S ATTACHED TO THIS SUMA GHTS. YOU OR YOUR ATTO MITTING OR DENYING EACT COURT. A COPY OF YOUR OP PLAINTIFF(S) OR ATTORNEY	NONS IS IMPORTANT, AND YOU MUST ORNEY ARE REQUIRED TO FILE THE HALLEGATION IN THE COMPLAINT OR NISWER MUST BE MAILED OR HAND
•	ime(s) of Attorney(s)]	
WHOSE ADDRESS(ES) IS/ARE: PO BOX 962, Daphne	AL 36526 (Ackress(es) of Plaintiff(s)	or Attorney(s)/
THE ANSWER MUST BE MAILED OR DELIVERED OTHER DOCUMENT WERE SERVED ON YOU OR A THE MONEY OR OTHER THINGS DEMANDED IN THI	WITHIN 30 DAYS AFTER 1 JUDGMENT BY DEFAULT M E COMPLAINT OR OTHER DO	THIS SUMMONS AND COMPLAINT OR LAY BE RENDERED AGAINST YOU FOR DOUMENT.
TO ANY SHERIFF OR ANY PERSON	AUTHORIZED BY THE AL RE TO SERVE PROCESS:	ABAMA RULES OF CIVIL
You are hereby commanded to serve this Sum	mons and a copy of the Cor	nplaint or other document in
this action upon the above-named Defendant.		
Service by certified mail of this Summons is ini	tiated upon the written requ	est of [Name(a)]
pursuant to the Alabama Rules of the Civil Pro	cedure.	•
05/28/2020	/s/ JODY L. WISE	By:
(Dele)	(Signature of Clerk)	(Name)
Certified Mail is hereby requested.	(Plaintiffs/Attomey's Signatur	9)
RET	URN ON SERVICE	
Return receipt of certified mail received in this	office on	(Date)
Vi certify that I personally delivered a copy of the	in Charles	
Alabama on 5-39-50 Hold (Date) (Types of Process Server) (Server's F	In Joseph John John John John John John John Joh	(Address of Server) (Address of Server) (Phone Number of Server)
OF-C	V-2020-900639.00	
INSURANCE EXPRESS \	LYNNE ERNEST INSURAN	CE LLC ET AL
C001 - INSURANCE EXPRESS		D005 - JODI PRUITT
(Plantin)		(Patas uners)



SERVICE RETURN COPY

DOCUMENT 5

State of Alaberta	SUMMON	S	Court Case Number 05-CV-2020-900639.00
Unified Judicial System Form C-34 Rev. 4/3017	- CIVIL -	1	()0-CV-2020-900003.00
Annual Control of the	N THE CIRCUIT COURT OF BU	ALDWIN COUNTY, ERNEST INSURAN	ALABAMA NCE LLC ET AL
NOTICE TO: DEADRA STOKE	ey, 1070 Sormilpa Road, SBAS, Al XX	10	
- Angel physical and the second and	Plana s	nd Address of Defenden	(1)
TAKE IMMEDIATE ACTION ORIGINAL OF YOUR WRITT	TO PROTECT TOWN REMITTEN ANSWER, EITHER ADMITTING THE CLERK OF THIS COURT. DUR ATTORNEY TO THE PLAINT!	G OR DENYING EAC A COPY OF YOUR IFF(S) OR ATTORNE	MONS IS IMPORTANT, AND YOU MUST CORNEY ARE REQUIRED TO FILE THE CHALLEGATION IN THE COMPLAINT OR ANSWER MUST BE MALED OR HAND Y(S) OF THE PLAINTIPF(S).
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WHOSE ADDRESS(ES) IS!	ARE: PO BOX 982, Dadine, AL 38	526 (Acktors(or) of Figinalia)	3 or Aromovial
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TO ANY SHE	RIFF OR ANY PERSON AUTHO	DRIZED BY THE AL SERVE PROCESS:	ABAMA RULES OF CIVIL
(V) You are hereby commo	anded to serve this Summons a	nd a copy of the Co	mplaint or other document in
this author worn the st	vova-named Defendant.		
The Sanda by cartified ma	ill of this Summons is initiated u	pon the written requ	test of
had believed by the Alabam	na Rules of the Civil Procedure.	•	[Yalme(s/]
05/28/2020		WINDOW WAR	The second secon
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Alabama on 539	(Date) (Date) (Servere Printed Ne	11 mess	Address of Super Server
			VIDE Return



05-CV-2020-900639.00

To: WILLIAM E SCULLY III III wescullyiii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following RETURN ON SERVICE - SERVED was FILED on 6/1/2020 10:52:00 AM

Notice Date:

6/1/2020 10:52:00 AM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: LYNNE ERNEST INSURANCE LLC (PRO SE) 5439 HWY 69 SWEET WATER, AL. 36782-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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Notice Date: 6/1/2020 10:52:00 AM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: ERNEST LYNNE (PRO SE) 5439 HWY 69 SWEET WATER, AL, 36782-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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Notice Date:

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JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: ERNEST CHYNNA (PRO SE) 104 E PARK ROAD LIVINGSTON, AL, 36919-0000

NOTICE OF ELECTRONIC FILING

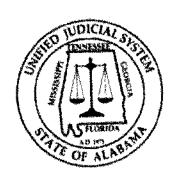
IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following RETURN ON SERVICE - SERVED was FILED on 6/1/2020 10:52:00 AM

Notice Date: 6/1/2020 10:52:00 AM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SOUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: STOKLEY DEADRA (PRO SE) 1978 SOUWILPA ROAD SILAS, AL, 36919-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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Notice Date:

6/1/2020 10:52:00 AM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: PRUITT JODI (PRO SE) 12570 HWY 17 GILBERTOWN, AL, 36908-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

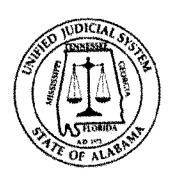
INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following RETURN ON SERVICE - SERVED was FILED on 6/1/2020 10:52:00 AM

Notice Date:

6/1/2020 10:52:00 AM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: WILLIAM E SCULLY III III wescullylii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following RETURN ON SERVICE - SERVED was FILED on 6/1/2020 10:52:00 AM

Notice Date: 6/1/2020 10:52:00 AM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507

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ELECTRONICALLY FILED
6/25/2020 9:23 AM
05-CV-2020-900639.00
CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IODY L. WISE, CLERK

State of Alabama Unified Judicial System

SUMMONS

- CIVIL -

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Form C-34 Rev. 4/2017	- CIVIL	, "		
	IN THE CIRCUIT COURT OF			
ins!	URANCE EXPRESS V. LYNN	IE ERNEST INSURA	NCE LLC ET AL	
NOTICE TO: CHYNNA ERNES	ST, 104 E PARK ROAD, LIVINGSTON, AL	36619		
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WHOSE ADDRESS(ES) IS//	ARE: PO BOX 982, Daphne, AL 3	8626		
	***************************************	[Address(es) of Plaintiff(s		
OTHER DOCUMENT WERE	MAILED OR DELIVERED WITH E SERVED ON YOU OR A JUDG HINGS DEMANDED IN THE COM	SMENT BY DEFAULT (MAY BE RENDERED AG	COMPLAINT OR AINST YOU FOR
TO ANY SHEF	RIFF OR ANY PERSON AUTH PROCEDURE TO	HORIZED BY THE A		IVIL
You are hereby comma	anded to serve this Summons	and a copy of the Co	implaint or other docum	ent in
this action upon the ab	ove-named Defendant			1
	ill of this Summons is initiated		est of	**************************************
pursuant to the Alaban	na Rules of the Civil Procedure	5.	(Nan	HO(S)j
05/28/2020		/s/ JODY L. WISE	By:	
(Date)		(Signature of Clerk)		(Name)
☐ Certified Mail is hereby				
	(Pl	อไทมิสีร/Attomey's Signatu	(B)	
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		<u> </u>	(Date)	
Ly Legitify that I personal	ly delivered a copy of this Sun	nmons and Complain	t or other document to	<u> </u>
Thursh Kar	<i>enest</i> in	31 JUV 11 17 1	111 Durty	County,
1 1	Person Served)	, (Name of County)	
Alabama on 6-22 Rivote Server	(Delte) (Server's Printed No.	11/00888	(Phone Number of Serv	109WORD
ŧ	05-CV-202 INSURANCE EXPRESS V. LYNN	20-900639.00 IE ERNEST INSURANC	DE LLC ET AL	
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tate of Alaberta	SUMMON	\$ /	Court Case Number
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nem C.34 Rev. 4/2017	- CIVIL -		
The state of the s	IN THE CIRCUIT COURT OF B	ALDWIN COUNTY,	ALABAMA
INS	URANCE EXPRESS V. LYNNE	EKNEST MSUKAN	(CE LLU EI ML
NOTICE TO: LYNNE ERNEST	T, 6430 HWY 69, SWEET WATER, AL 36782	The state of the s	
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WHOSE ADDRESS(ES) IS/	/ARE: PO BOX 982, Daphne, AL 36	526 [Address(es) of Plaintiff(s	o' or Atterigifal
THE ANSWER MUST BE OTHER DOCUMENT WER	MAILED OR DELIVERED WITHINGS DEMANDED IN THE COMP	IN 30 DAYS AFTER MENT BY DEFAULT NELAINT OR OTHER D	THIS SUMMONS AND COMPLAINT OR MAY BE RENDERED AGAINST YOU FOR DOCUMENT.
TO ANY SHE	RIFF OR ANY PERSON AUTH	ORIZED BY THE AL BERVE PROCESS	Labama Rules of Civil
Vou are hereby comm	nended to serve this Summons a	and a copy of the Co	implaint or other document in
the address come the of	hose named Defendant.		
Service by certified m	nall of this Summons is initiated t	apon the written requ	uest of //Name(s)/
pursuant to the Alaba	ima Rules of the Civil Procedure	\$,	
05/28/2020		(Signature of Clerk)	By: (Name)
(Dete)		(Difficulty of Asset	
Certified Mail is herei	by requested.	ainijit s/Altomey's Signalu	170)
		ON SERVICE	
,	tified mail received in this office o		(Date)
(V) certify that I person	ally delivered a copy of this Sum	mons and Complain	nt or other document to
Chunga EAR	nest accepted from	Lunnethen	Next - DA DAY County
(Name o	A Person Served)	•	(Name of Goldky)
Alabama on 6.25	2 · 20	Man	10530 Dage 2000
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	(Sarver's Frinted N	lama)	(Phone Number of Server)
	·	20-900839.00	NCE LLC ET AL
1	URANCE EXPRESS	¥.	DC02 - LYNNE ERNEST (Defendent)

State of Alabama	SUM	MONS	Court Case Number 05-CV-2020-900639.00		
Unified Judicial System	- C	VIL -	05-CV-2020-900059:00		
Form C-34 Rev. 4/2017 IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA					
l Jenj	N THE CIRCUIT COUR JRANCE EXPRESS V. I	LYNNE ERNEST INSURAL	YCE LLC ET AL		
NOTICE TO: CHYMNA ERNES	it, 104 e park road, livingst	ON, AL 26919			
ALL PROPERTY OF THE PARTY OF TH		(Name and Address of Defendar	II)		
THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),					
WILLIAM E SCULLY III III	//	amo(s) of Attorney(s)]			
WHOSE ADDRESS(ES) IS/	ARE: PO BOX 962, Daphn	e, AL 36526	***************************************		
			e) or Allomey(s))		
THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.					
TO ANY SHE	RIFF OR ANY PERSON	AUTHORIZED BY THE A	Labana Rules of Civil		
V You are hereby comm	anded to serve this Sun	mons and a copy of the Co	emplaint or other document in		
this nation woon the si	hous-named Defendant.				
Service by certified m	all of this Summons is in	itiated upon the written req	uest of		
oursuant to the Alaba	ma Rules of the Civil Pro	ocedure.			
05/28/2020		/s/ JODY L. WISE	By: (Name)		
(Date)		(Signature of Clerk)	(uana)		
Certified Mail is hereby requested. (Plaintiff's/Altomey's Signature)					
	RET	URN ON SERVICE			
Return receipt of cert	ified mail received in this	office on	(Date)		
1					
[Pi certify that I personally delivered a copy of this Summons and Complaint on other document to					
Alabama on 6.2 Brigate S Type of Process Server)	Server's	An MORER Printed Name	(Phone Number of Server)		
05-CV-2020-900639.00 INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL					
C001 - INSL	JRANCE EXPRESS	٧.	0003 - CHYNNA ERNEST		
	(Piekuti)		(Defendant)		
			SERVICE RETURN COPY		

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SUMMONS

- CIVIL -

Court Case Number 05-CV-2020-900639.00

IN THE CIPCLITT O	OURT OF BALDWIN COUNTY, ALAB	AMA			
INSURANCE EXPRES	S V. LYNNE ERNEST INSURANCE LL	CETAL			
NOTICE TO: LYMNE ERNEST INSURANCE LLC, 5439 H	WAY 69, SWEET WATER, AL 38782				
H1417	(Name and Address of Defendant)				
THE COMPLAINT OR OTHER DOCUMENT WH TAKE IMMEDIATE ACTION TO PROTECT YO ORIGINAL OF YOUR WRITTEN ANSWER, EITH OTHER DOCUMENT, WITH THE CLERK OF T DELIVERED BY YOU OR YOUR ATTORNEY TO WILLIAM E SCULLY III III	DER ADMITTING OR DENYING EACH ALLE THIS COURT. A COPY OF YOUR ANSW THE PLAINTIFF(S) OR ATTORNEY(S) OF	EGATION IN THE COMPLAINT OR ER MUST BE MAILED OR HAND			
	(Name(s) of Attorney(s))				
WHOSE ADDRESS(ES) IS/ARE: PO BOX 982, E	Dephne, AL 36526				
	Defend a constant at a server of the server	mey(s)			
THE ANSWER MUST BE MAILED OR DELIV OTHER DOCUMENT WERE SERVED ON YOU THE MONEY OR OTHER THINGS DEMANDED	IN THE COMPLAINT OR OTHER DOCUM	ENT.			
TO ANY SHERIFF OR ANY PER	REON AUTHORIZED BY THE ALABAS CEDURE TO SERVE PROCESS:	MA RULES OF CIVIL			
You are hereby commanded to serve this	s Summons and a copy of the Complain	t or other document in			
this within more the above-named Defen	dant.				
Service by certified mail of this Summon	s is initiated upon the written request of	[Name(s)]			
pursuant to the Alabama Rules of the Civ	vil Procedure.	• • • • • • • • • • • • • • • • • • • •			
05/28/2020	/s/ JODY L. WISE	By:			
(Da(e)	(Signature of Clerk)	(SECTIO)			
Certified Mail is hereby requested.	(Plaintiffs/Altorney's Signature)				
	RETURN ON SERVICE				
The second of th					
		(Dale)			
I certify that I personally delivered a cop	y of this Summons and Complaint or of	ner document to			
Change Farnest accepted too hyp	ne Konnesh Incurance - L	ANWIN County,			
(Name of Person Served)	(Name o	(County)			
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(Date)	29	DIII ARRIVITA			
Phyloton Soules	O(1/1/1920el "	200 Plan 11 2/276			
(Type of Process Server)	Ner's Siggoture)	51120 TO 1 FEL (2002 L)			
	So-Lin MOORER _	951.0895			
(50	river's Printed Name) (F	Phone Number of Server)			
05-CV-2020-900639.00					
INSURANCE EXP	RESS V. LYNNE ERNEST INSURANCE LLC	C ET AL			
1	•	ERNEST INGURANCE LLC			
C001 - INSURANCE EXPRESS		(Defendant)			
(Lateral)					

SERVICE RETURN COPY



05-CV-2020-900639.00

To: WILLIAM E SCULLY III III wescullyiii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following RETURN ON SERVICE - SERVED was FILED on 6/25/2020 9:23:08 AM

Notice Date:

6/25/2020 9:23:08 AM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: LYNNE ERNEST INSURANCE LLC (PRO SE) 5439 HWY 69 SWEET WATER, AL, 36782-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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05-CV-2020-900639.00

To: ERNEST LYNNE (PRO SE)
5439 HWY 69
SWEET WATER, AL, 36782-0000

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05-CV-2020-900639.00

To: ERNEST CHYNNA (PRO SE) 104 E PARK ROAD LIVINGSTON, AL, 36919-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL. 05-CV-2020-900639.00

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JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: STOKLEY DEADRA (PRO SE) 1978 SOUWILPA ROAD SILAS, AL, 36919-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

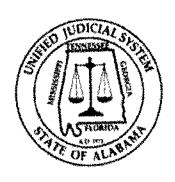
INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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05-CV-2020-900639.00

To: PRUITT JODI (PRO SE) 12570 HWY 17 GILBERTOWN, AL, 36908-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

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05-CV-2020-900639.00

To: WILLIAM E SCULLY III III wescullyiii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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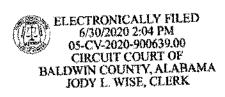
JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507

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STATE OF ALABAMA Unified Judicial System	Revised 3/5/08	ීට් Circu	it Court	Cas CV2	((E)) Bai	6/30/2020 2:04 PM 05-CV-2020-900639.00 CIRCUIT COURT OF LDWIN COUNTY, ALABAMA
05-BALDWIN	Thisruct cour	(7) M15 M46				JODY L. WISE, CLERK
INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL			CIVIL MOTION COVER SHEET the of Filing Party: D004 - STOKLEY DEADRA D005 - PRUITT JODI			
Name, Address, and Telephone No. of Attorney JAMES BRADFORD PITTMAN, JR. JR. POST OFFICE BOX 2525 DAPHNE, AL 36526 Attorney Bar No.: PIT026		oF MOT		guments Re		auticing Ego
Motions Requiring Fee	derf81 dasymmetries - Immericantes 27, mms mmflym, m,				IS NOT ILE	culring Fee
Default Judgment (\$50.00) Joinder in Other Party's Dispositive for (i.e. Summary Judgment, Judgment of crother Dispositive Motion not pursue (\$50.00) Judgment on the Pleadings (\$50.00) Motion to Dismiss, or in the Alternatic Summary Judgment (\$50.00) Renewed Dispositive Motion (Summary Judgment, Judgment on the Pleading Dispositive Motion not pursuant to Rule Summary Judgment pursuant to Rule Motion to Intervene (\$297.00) Other pursuant to Rule *Motion fees are enumerated in §12-1* pursuant to Local Act are not included. Clerk of the Court regarding applicable. Local Court Costs \$ 0	on the Pleadings, and to Rule 12(b)) ye ary gs, or other ule 12(b)) (\$50.00) e 56(\$50.00) (\$50.0 g-71(a). Fees Please contact the a local fees.	30)	Compel Consolidi Continue Depositic Designat Judgmer Disburse Extensio In Limine Joinder More De Motion to Objectio Pendent Plaintiff: Pretimin Protectin Release Sanctior Sever Special Stay Strike Suppler Vacate Withdra	ation ation ation a Mediator at as a Matter Funds finite Statem Dismiss purial n of Examplific E Lite Motion to D ary Injunction ye Order from Stay of ns Practice in A ment to Pend or Modify w Notice of Extension Pleadin or Rule n/a I Stans	ent ent suant to ons Clair ismiss i Execution labama ing Motion of Appea	on rance and Request for ne to File Responsive (Subject to Filing Fee)
Check here if you have filed or are filing contemorane with this medion an Affidavit of Substantial Hantship or are filing on bohalf of an apency or department of the county, or municipal government. (Pursuant to §6-8-1 of Alabama (1975), governmental entities are exampt prepayment of filing frees)	State 6/30/2020	2:02:51	PM	Signa /e/ J/	ature of At AMES BR	ADFORD PITTMAN, JR. JR.

DOCUMENT 9

"Tris Cover Sheet must be completed and submitted to the Clerk of Court upon the filing of any motion. Each motion should contain a separate Cover Sheet, "Motions titled 'Motion to Cismisa' that are not pursuant to Rule 12(b) and are in fact Motions for Summary Judgments are subject to filing fee.

DOCUMENT 10



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS,

Plaintiff,

VS.

Case No. CV-20-900639

LYNNE ERNEST INSURANCE, LLC, LYNNE ERNEST, CHYNNA ERNEST, DEADRA STOKLEY, and JODI PRUITT,

Defendants.

NOTICE OF APPEARANCE AND REQUEST FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS

COMES NOW, undersigned attorneys Jon C. Archer II and James B. Pittman, Jr. and advise the Court that they are in the process of being retained as counsel of record for Defendants JODI PRUITT and DEADRA STOKLEY. Pruitt and Stokely were purportedly served with the Summons and Complaint on May 30, 2020 and undersigned request an additional 30 days to prepare responsive pleadings as the Complaint contains numerous allegations and seven counts against Defendants.

WHEREFORE, premises considered, undersigned attorneys respectfully request an additional 30 days to file responsive pleadings on behalf of Defendants Pruitt and Stokely.

/s/ Jon C. Archer II JON C. ARCHER II (ARC009) JAMES B. PITTMAN, JR. (PIT026)

OF COUNSEL: JAMES B. PITTMAN, JR., P.C. Post Office Box 2525 Daphne, AL 36526

DOCUMENT 10

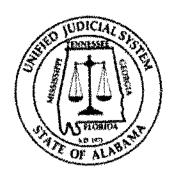
Tel: (251) 626-7704 Fax: (251) 626-8202

CERTIFICATE OF SERVICE

I certify that I have on this 30th day of June, 2020 served a copy of the foregoing by Electronic Notification, Facsimile and/or U.S. Mail postage prepaid and properly addressed to the all parties, including:

William E. Scully, III Scully Law, P.C. P.O. Box 962 Daphne, AL 36526

/s/ Jon C. Archer II
JON C. ARCHER II (ARC009)
JAMES B. PITTMAN, JR. (PIT026)



05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: JAMES BRADFORD PITTMAN, JR. JR. james@jbplaw.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following matter was FILED on 6/30/2020 2:04:00 PM

D004 STOKLEY DEADRA D005 PRUITT JODI

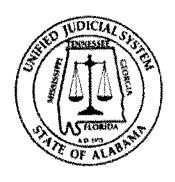
NOTICE OF APPEARANCE AND REQUEST FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS

[Filer: PITTMAN JAMES BRADFORD JR]

Notice Date:

6/30/2020 2:04:00 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: LYNNE ERNEST INSURANCE LLC (PRO SE) 5439 HWY 69

SWEET WATER, AL, 36782-0000

NOTICE OF ELECTRONIC FILING

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INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: ERNEST LYNNE (PRO SE)
5439 HWY 69
SWEET WATER, AL, 36782-0000

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05-CV-2020-900639.00

Judge: JODY W. BISHOP

To: ERNEST CHYNNA (PRO SE) 104 E PARK ROAD LIVINGSTON, AL, 36919-0000

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05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: STOKLEY DEADRA (PRO SE) 1978 SOUWILPA ROAD SILAS, AL, 36919-0000

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05-CV-2020-900639.00

Judge: JODY W. BISHOP

To: PRUITT JODI (PRO SE) 12570 HWY 17 GILBERTOWN, AL, 36908-0000

NOTICE OF ELECTRONIC FILING

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INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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D005 PRUITT JODI

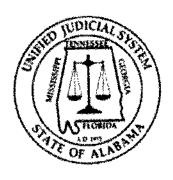
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JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

Judge: JODY W. BISHOP

To: SCULLY WILLIAM EDWARD III wescullyiii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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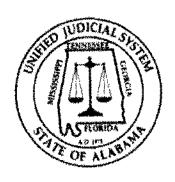
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05-CV-2020-900639.00

Judge: JODY W. BISHOP

To: SCULLY WILLIAM EDWARD III wescullyiii@gmail.com

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

A court action was entered in the above case on 7/2/2020 12:00:35 PM

ORDER

[Filer:]

Disposition:

GRANTED

Judge:

JWB

Notice Date:

7/2/2020 12:00:35 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: PITTMAN JAMES BRADFORD JR

james@jbplaw.com

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INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: LYNNE ERNEST INSURANCE LLC (PRO SE) 5439 HWY 69 SWEET WATER, AL, 36782-0000

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ORDER

[Filer:]

Disposition:

GRANTED

Judge:

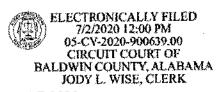
JWB

Notice Date:

7/2/2020 12:00:35 PM

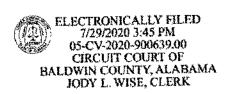
JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507

DOCUMENT 12



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

E	OONE this 2 nd day of July, 2020.						
NOTICE OF APPEARANCE AND REQUEST FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING filed by STOKLEY DEADRA and PRUITT JODI is hereby GRANTED.							
ORDER							
	LYNNE ERNEST INSURANCE LLC, ERNEST LYNNE, ERNEST CHYNNA, STOKLEY DEADRA ET AL, Defendants.						
	v. ,	Case No.:	CV-2020-900639.00				
	INSURANCE EXPRESS,) Plaintiff,	<u> </u>					



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS,

Plaintiff,

vs.

Case No. CV-20-900639

LYNNE ERNEST INSURANCE, LLC, LYNNE ERNEST, CHYNNA ERNEST, DEADRA STOKLEY, and JODI PRUITT,

Defendants.

NOTICE OF APPEARANCE AND REQUEST FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS

COMES NOW, undersigned attorneys Jon C. Archer Hand James B. Pittman, Jr. and file this Notice of Appearance as counsel of record for Defendants LYNNE ERNEST INSURANCE, LLC, LYNNE ERNEST, and CHYNNA ERNEST.

/s/ Jon C. Archer II JON C. ARCHER II (ARC009) JAMES B. PITTMAN, JR. (PIT026)

OF COUNSEL: JAMES B. PITTMAN, JR., P.C. Post Office Box 2525 Daphne, AL 36526 Tel: (251) 626-7704 Fax: (251) 626-8202

CERTIFICATE OF SERVICE

I certify that I have on this 29th day of July, 2020 served a copy of the foregoing by Electronic Notification, Facsimile and/or U.S. Mail postage prepaid and properly addressed to the all parties, including:

DOCUMENT 14

William E. Scully, III Scully Law, P.C. P.O. Box 962 Daphne, AL 36526

/s/ Jon C. Archer II
JON C. ARCHER II (ARC009)
JAMES B. PITTMAN, JR. (PIT026)



05-CV-2020-900639.00

To: JAMES BRADFORD PITTMAN, JR. JR. james@jbplaw.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following NOTICE OF APPEARANCE was FILED on 7/29/2020 3:45:31 PM

Notice Date:

7/29/2020 3:45:31 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: LYNNE ERNEST INSURANCE LLC (PRO SE) 5439 HWY 69 SWEET WATER, AL, 36782-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following NOTICE OF APPEARANCE was FILED on 7/29/2020 3:45:31 PM

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JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: ERNEST LYNNE (PRO SE) 5439 HWY 69 SWEET WATER, AL, 36782-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: ERNEST CHYNNA (PRO SE) 104 E PARK ROAD LIVINGSTON, AL, 36919-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: SCULLY WILLIAM EDWARD III wescullyiii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507



05-CV-2020-900639.00

To: ARCHER JON CHARLES II associate@jbplaw.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following NOTICE OF APPEARANCE was FILED on 7/29/2020 3:45:31 PM

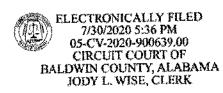
Notice Date: 7/29/2020 3:45:31 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507

DOCUMENT 16

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Unified Judicial System	Revised 3/5/08	9100010 9100010	.i.e. C	Cas CV2		7/30/2020 5;36 PM 05-CV-2020-900639.00 CIRCUIT COURT OF LDWIN COUNTY, ALABAM
05-BALDWIN	District Court	VjCirci	uit Court	,		JODY L. WISE, CLERK
INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL			CIVIL MOTION COVER SHEET Name of Filing Party: C001 - INSURANCE EXPRESS			
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Summary Judgment pursuant to Rule 5	υ(φου.ινι)		Extension	of Time		
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Other	(\$50.0	m l	Joinder			
pursuant to Rule	[φοσ.σ	~' [Inite Stateme		
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are fling on behalf of an agency or department of the State, county, or musicipal government. (Pursuant to §6-5-1 Code of Alabama (1976), governmental entities are exempt from prepayment of filing fees)	7/30/2020 \$	5,00:23 P	tA <u>i</u>			

^{*}This Cover Sheet must be completed and submitted to the Cterk of Court upon the filing of any motion. Each motion should contain a separate Cover Sheet.
**Motions titled 'Motion to Dismise' that are not pursuant to Rule 12(b) and are in fact Motions for Summary Judgments are subject to filing les.



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS,	
PLAINTIFF,	
v. {	CASE NO.CV-2020-900639.00
LYNNE ERNEST INSURANCE, LLC,	
LYNNE ERNEST, CHYNNA ERNEST, DEADRA STOKLEY, and JODI PRUITT,	
DEFENDANTS.)	

OBJECTION TO EXTENSION OF TIME FOR ANSWER

COMES NOW the Plaintiff, Insurance Express, by counsel, and files his objection to Defendants Lynne Ernest Insurance, LLC, Lynne Ernest and Chynna Ernest request for an extension of time to file an answer to the Complaint. In support thereof, the Plaintiff says as follows:

- Counsel for the Defendants has been aware of this case as he represents the other Defendants and requested additional time to answer those complaints as well.
- 2. This is a case where the Plaintiff is seeking an injunction against the Defendants for the use of trade secrets and client lists. This is a case in which time is of the essence.
- 3. Plaintiff will be harmed by the delay if the Defendants continue their use of the Plaintiff's property.

WHEREFORE the Plaintiff asks this Honorable Court to deny the request for an enlarged time to answer the complaint.

Respectfully submitted,

/s/ William E. Scully, III

WILLIAM E. SCULLY, III (SCU006)

Scully Law, P.C.
P.O. Box 962
Daphne, Alabama 36526-0962
(251) 626-5052
(251) 626-5051 (Fax)
wes@scullylawpc.com
Counsel for the Plaintiff

DOCUMENT 17

CERTIFICATE OF SERVICE

I, William E. Scully, III, hereby certify that on this 30th day of July, 2020, I electronically filed the foregoing with the Clerk of the Court using the AlaCourt Electronic Filing system which will send notification of such filing to all counsel of record.

/s/ William E. Scully, III WILLIAM E. SCULLY, III



05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: WILLIAM E SCULLY III III wescullyiii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following matter was FILED on 7/30/2020 5:36:23 PM

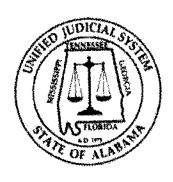
C001 INSURANCE EXPRESS

OBJECTION TO EXTENSION OF TIME [Filer: SCULLY WILLIAM EDWARD III]

Notice Date: 7/30/2020 5:36:23 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL. 36507

251-937-9561 jody.wise@alacourt.gov



05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: PITTMAN JAMES BRADFORD JR james@jbplaw.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following matter was FILED on 7/30/2020 5:36:23 PM

C001 INSURANCE EXPRESS

OBJECTION TO EXTENSION OF TIME [Filer: SCULLY WILLIAM EDWARD III]

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> 251-937-9561 lody.wise@alacourt.gov



05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: ARCHER JON CHARLES II associate@jbplaw.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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OBJECTION TO EXTENSION OF TIME
[Filer: SCULLY WILLIAM EDWARD III]

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> 251-937-9561 jody.wise@alacourt.gov

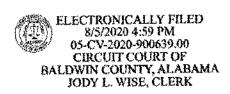
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*Motion fees are enumerated in §12- pursuant to Local Act are not include Clerk of the Court regarding applicat	d, Please contact the	, ,	Motion to New Tria	o Dismiss p	ursuani k	o Rule 12(b) med
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prepayment of filing fees)	(i			i		

DOCUMENT 19

*This Cover Sheet must be completed and submitted to the Clerk of Court upon the fitting of any motion. Each motion should contain a separate Cover Sheet.

*Motions titled 'Motion to Dismiss' that are not pursuant to Rule 12(b) and are in fact Motions for Summary Judgments are subject to filing fee.

DOCUMENT 20



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS,

Plaintiff.

VS.

Case No. CV-20-900639

LYNNE ERNEST INSURANCE, LLC, LYNNE ERNEST, CHYNNA ERNEST, DEADRA STOKLEY, and JODI PRUITT.

Defendants.

MOTION TO DISMISS FOR IMPROPER VENUE AND LACK OF SERVICE, OR ALTERNATIVELY TO TRANSFER VENUE TO CHOCTAW COUNTY, ALABAMA

COMES NOW, undersigned as counsel of record for Defendants LYNNE ERNEST INSURANCE, LLC, LYNNE ERNEST, CHYNNA ERNEST, DEADRA STOKLEY, and JODI PRUITT and show unto the Court as follows:

- 1. Rule 82(b)(1)(A), Ala. Rule Civ. Pro. states that Actions against an individual or individuals having a permanent residence in this state <u>must be brought in the county where the defendant or any material defendant resides at the commencement of the action</u>, except that if the action is a personal action other than an action on a contract, it may be brought either in the county where the act or omission complained of occurred, or in the county of the permanent residence of the defendant or one of them. As set out below, all defendants permanently reside in Choctaw County or Marengo County and the pertinent facts allegedly occurred in Choctaw County, Alabama.
 - 2. Ala. Code § 6-3-2 (1975) Venue of actions Against individuals states that (a) In

DOCUMENT 20

proceedings of a legal nature against individuals: (2) All actions on contracts, except as may be otherwise provided, must be commenced in the county in which the defendant or one of the defendants resides if such defendant has within the state a permanent residence.(3) All other personal actions, if the defendant or one of the defendants has within the state a permanent residence, may be commenced in the county of such residence or in the county in which the act or omission complained of may have been done or may have occurred. As shown below, three individual Defendants reside in Choctaw County and the fourth Defendant resides in Marengo County and all allegations are alleged to have occurred in Choctaw County.

- As set out in Plaintiff's Complaint, Plaintiff Insurance Express, LLC is an Alabama 3. limited liability company with its principal place of business in Choctaw County, Alabama.
- As set out in Plaintiff's Complaint, Wayne Taylor is an adult resident of Choctaw 4. County, Alabama and is the principal owner of Plaintiff Insurance Express, LLC, which is located in Choctaw County.
- Defendant Lynne Ernest Insurance, LLC ("LEI") is an Alabama limited liability 5. company with its Registered Office in Marengo County, Alabama, which is adjacent to and immediately north of Choctaw County. LEI operates an insurance agency in Foley, Baldwin County, Alabama. (See Exhibit "A").
- Defendant Lynne Ernest is a resident of Choctaw County, Alabama and has never 6. resided in Baldwin County, Alabama. (See L. Ernest Affidavit as Exhibit "B"). Lynne Ernest has not been personally served with the Summons and Complaint in this matter, I Id. Lynne Ernest has

I The process server left a copy of the Summons and Complaint with Chynna Ernest at the Foley office of LEI and then certified that Lynne Ernest had been properly served. Contrary to the Return of Service filed with the Clerk, Chynna

DOCUMENT 20

never lived in Baldwin County, Alabama and was not served with the Summons and Complaint in Baldwin County. *Id.* Lynne Ernest, through LEI, purchased the book of business of HDL Insurance Agency located in Foley, Alabama, *Id.* Jacquelin Nunamacker, the former HDL Agency owner staffs the Foley office of LEI and Lynne Ernest manages LEI from her home in Choctaw County, where she also runs other unrelated businesses. *Id.* The former agency owner has no knowledge of or involvement in the allegations made by Plaintiff. *Id.*

- As alleged in the Complaint, the Plaintiff company, Insurance Express, is the former employer of Lynne Ernest and is located in Choctaw County, Alabama. Any work performed for Insurance Express was in Choctaw County. Id.
- 8. The Complaint alleges that Defendant Jodi Pruitt resides in Clarke County, Alabama. However, Jodi Pruitt is a resident of Choctaw County and has resided in Choctaw County since 2016. (See Affidavit of J. Pruitt attached as Exhibit "C"). She was served with the Summons and Complaint in Choctaw County. *Id.* Jodi Pruitt has never lived or worked in Baldwin County, Alabama. *Id.*
- 9. As alleged in the complaint, the Plaintiff company, Insurance Express, is the former employer of Jodi Pruitt and is located in Choctaw County, Alabama. Any work performed for Insurance Express by Pruitt was in Choctaw County. *Id.*
- 10. The Complaint alleges that Defendant Deadra Stokley resides in Washington County, Alabama. However, Deadra Stokley is a resident of Choctaw County and has resided in Choctaw County her entire life. (See Affidavit of Deadra Stokley as Exhibit "D"). Despite the Certificate of

DOCUMENT 20

Service stating otherwise, Stokely was not served with the Summons and Complaint.2 *Id.* Deadra Stokely has never lived or worked in Baldwin County, Alabama. *Id.*

- 11. As alleged in the Complaint, the Plaintiff company, Insurance Express, is the former employer of Deadra Stokely and is located in Choctaw County, Alabama. Any work performed for Insurance Express by Stokely was in Choctaw County. *Id*.
- 12. The Complaint alleges that Defendant Chynna Ernest resides in Sumter County, Alabama. However, Chynna Ernest is a resident of Marengo County, Alabama which is north of Choctaw County. (See Affidavit of C. Ernest as Exhibit "E"). Chynna Ernest is employed at Defendant LEI which has an office in Foley, Baldwin County, Alabama, and she commutes to the LEI Foley office one or two days a week. *Id*.
- 13. As set out in Plaintiff's Complaint, the allegations in Paragraph 9 allegedly occurred in Choctaw County.
- 14. The allegations in Paragraph 10 of Plaintiff's Complaint allegedly occurred in Marengo County, Alabama. (Exhibit "A").
- 15. As set out in Plaintiff's Complaint, the allegations in Paragraphs 11 32 all allegedly occurred in Choctaw County.
- 16. Plaintiff has made no factual allegations of any alleged event occurring in Baldwin County, Alabama.
 - 17. The only tie to Baldwin County in Plaintiff's Complaint is that LEI has an office in

² The process server served the Summons and Complaint upon Jodi Pruitt in Choctaw County and asked Pruitt if she knew Stokely. Pruitt advised that she did know Stokely and the process server then gave a copy of the Summons and Complaint to Pruitt and asked her to give the Summons and Complaint to Stokely. The process server then filed a service return stating Stokely had been properly served. Therefore, the attempted service upon Stokely is improper pursuant to

DOCUMENT 20

Foley, Alabama. None of the individual defendants' permanent residence is in Baldwin County. Neither the Plaintiff nor its principal reside in Baldwin County but are instead located in Choctaw County. All of the individual Defendants work for LEI from their homes in Choctaw County or Marengo County. Lynne Ernest and Chynna Ernest occasionally visit the Foley LEI office and Pruitt and Stokely work exclusively from their homes in Choctaw County and have never been to the Foley LEI office.

- 18. All allegations allegedly occurred in Choctaw County.
- 19. There will be extensive Counterclaims filed by Defendants. All discovery associated with those counterclaims will relate to documents or witnesses located in Choctaw County or Counties other than Baldwin County.
- 20. Any witnesses necessary to litigate this matter will be located in or near Choctaw County as all relevant allegations pertain to Choctaw County.
 - 21. This matter was filed in Baldwin County to harass and annoy Defendants.
- 22. Ala. Rule Civ. Pro. Rule 4 requires that an individual defendant be served with the Summons and Complaint by serving the individual, or by leaving a copy of the Summons and Complaint at the individual's dwelling house or usual place of abode with some person of suitable age and discretion the residing therein, or by delivering the Summons and Complaint to an agent authorized by appointment or by law to receive service of process. Clearly neither Lynne Ernest nor Deadra Stokely were served in compliance with Rule 4, therefore service upon those Defendants is improper. (See Affidavits of Lynne Ernest (Ex "B") and Deadra Stokely (Ex "D")).
 - 23. Rule 82 and § 6-3-2 require that this action be filed in Choctaw County and the

DOCUMENT 20

interests of justice require that this matter be dismissed for improper venue or in the alternative that it be transferred to the Choctaw County Circuit Court.

WHEREFORE, premises considered, Defendants respectfully request that this action be dismissed for improper venue, improper service of process, or in the alternative, that this case be transferred to the Circuit Court of Choctaw County, Alabama.

/s/ Jon C. Archer II
JON C. ARCHER II (ARC009)
JAMES B. PITTMAN, JR. (PIT026)

OF COUNSEL: JAMES B. PITTMAN, JR., P.C. Post Office Box 2525 Daphne, AL 36526 Tel: (251) 626-7704

Tel: (251) 626-7704 Fax: (251) 626-8202

CERTIFICATE OF SERVICE

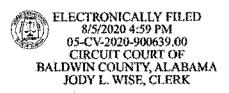
I certify that I have on this 5th day of August, 2020 served a copy of the foregoing by Electronic Notification, Facsimile and/or U.S. Mail postage prepaid and properly addressed to the all parties, including:

William E. Scully, III Scully Law, P.C. P.O. Box 962 Daphne, AL 36526

/s/ Jon C. Archer II
JON C. ARCHER II (ARC009)
JAMES B. PITTMAN, JR. (PIT026)



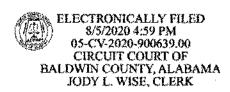
Alabama Secretary of State



Lynne Ernest Insurance, LLC				
Entity ID Number	526 - 091			
Entity Type	Domestic Limited Liability Company			
Principal Address	Not Provided			
Principal Malling Address	Not Provided			
Status	Exists			
Place of Formation	Marengo County			
Formation Date	8-1-2018			
Registered Agent Name	ERNEST, LYNNE W			
Registered Office Street Address	5439 HWY 69 SWEET WATER, AL 36782			
Registered Office Mailing Address	5439 HWY 69 SWEET WATER, AL 36782			
Nature of Business				
Organizers				
Organizer Name	ERNEST, LYNNE W			
Organizer Street Address	5439 HWY 69 SWEET WATER, AL 36782			
Organizer Mailing Address	5439 HWY 69 SWEET WATER, AL 36782			
Organizer Name	ERNEST, CHYNNA			
Organizer Street Address	104 EAST PARK DRIVE LIVINGSTON, AL 35470			
Organizer Mailing Address	104 EAST PARK DRIVE LIVINGSTON, AL 35470			
T'ransactions				
Transaction Date	8-8-2018			
Miscellaneous Filing Entry	New Entity Effective 08-01-2018 11:43			
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Browse Results

New Search



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS.

Plaintiff.

YX.

Case No. CV-20-900639

LYNNE ERNEST INSURANCE, LLC, LYNNE ERNEST, CHYNNA ERNEST, DEADRA STOKLEY, and JODI PRUITT,

Defendants.

AFFIDAVIT OF LYNNE ERNEST

STATE OF ALABAMA COUNTY OF CHOCTAW

Lynne Ernest, being first duly sworn, deposes and says:

- I am an adult resident of Choctaw County, Alabama and have personal knowledge of the matters set forth below.
- 2. Despite what is stated on the Service Return, I was not personally served with the Summons and Complaint of this matter in Baldwin County, Alabama. In fact I still have not been served with these documents, though I have been provided a copy of those documents by my daughter, Chynna Ernest.
- The Complaint alleges that I reside in Marengo County, Alabama however, I reside in Choctaw County, Alabama and I have resided in Choctaw County for five years.
- 4. As alleged in the Complaint, the Plaintiff company, Insurance Express, which is my former employer, is located in Choctaw County, Alabama and when I was employed by Plaintiff, I only worked in Choctaw County.

EXHIBIT JE.

- 5. I have never lived in Baldwin County, Alabama.
- 6. I do not live with my daughter, Chynna Ernest.
- 7. I formed Lynne Ernest Insurance, LLC ("LEI") in Marengo County, Alabama.
- 8. I, through LEI, purchased the book of business from the HDL Agency located in Foley, Alabama. Jacquelin Nunamaker, the former HDL Agency owner, staffs the Foley office of LEI and I manage LEI remotely from my home in Choctaw County, where I also manage other unrelated businesses that I own. The former agency owner has no knowledge of or involvement in the allegations made by Plaintiff.

Further affiant saith not.

Lynne Ernest

STATE OF ALABAMA COUNTY OF CHOCTAW

I, the undersigned Notary Public, in and for said County in the said State, do hereby certify that Lynne Ernest, whose name is signed to the foregoing Affidavit and who is known to me, acknowledged before me on this day that she signed the same voluntarily on the day the same bears date.

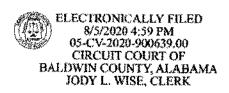
Given under my hand and official seal on this 364 day of

2020.

HOTAR, OZ

NOTARY PUBLIC
My commission expires:

3/17/2024



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS,	
Plaintiff,	
v s.	Case No. CV-20-900639
LYNNE ERNEST INSURANCE, LLC, LYNNE ERNEST,	

Defendants.

CHYNNA ERNEST, DEADRA STOKLEY, and JODI PRUITT,

AFFIDAVIT OF JODI PRUITT

STATE OF ALABAMA COUNTY OF CHOCTAW

Jodi Pruitt Moore, being first duly sworn, deposes and says:

- 1. I am an adult resident of Choctaw County, Alabama and have personal knowledge of the matters set forth below.
 - 2. I was served with the Summons and Complaint of this matter in Choctaw County.
- The Complaint alleges that I reside in Clarke County, Alabama however, I reside in Choctaw County, Alabama and I have resided in Choctaw County since 2016.
- 4. As alleged in the complaint, the Plaintiff company, Insurance Express, which is my former employer, is located in Choctaw County, Alabama and when I was employed by Plaintiff I only worked in Choctaw County.
 - 5. I have never lived in Baldwin County, Alabama.
 - 6. I have never worked in Baldwin County, Alabama.

The process server served me with the Summons and Complaint in Choctaw County 7. and asked me if I knew Defendant Deadra Stokely. I advised that I did know her and the process server then gave me a copy of the Summons and Complaint meant for Stokely and asked me to give the Summons and Complaint to Stokely. I do not reside with Stokely and have never resided with Stokely. I have never been authorized to accept service of process on her behalf and I did not accept any service of process on her behalf.

Further affiant saith not.

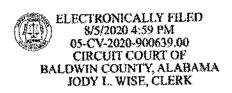
STATE OF ALABAMA COUNTY OF CHOCTAW

I, the undersigned Notary Public, in and for said County in the said State, do hereby certify that Jodi Pruitt Moore, whose name is signed to the foregoing Affidavit and who is known to me, acknowledged before me on this day that she signed the same voluntarily on the day the same bears date.

Given under my hand and official scal on this 30 day of July , 2020.

NOTARY PUBLIC
My commission expires: 6-4-2020





IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS,	
Plaintiff,	
vs.	Case No. CV-20-900639
LYNNE ERNEST INSURANCE, LLC,	
LYNNE ERNEST, CHYNNA ERNEST,	
DEADRA STOKLEY, and JODI PRUITT,	
Defendants.	

AFFIDAVIT OF DEADRA STOKLEY

ST A TE OF ALABAMA COUNTY OF CHOCTAW

Deadra Stokley, being first duly sworn, deposes and says:

- I am an adult resident of Choctaw County, Alabama and have personal knowledge of the matters set forth below.
- 2. The Complaint alleges that I reside in Washington County, Alabama however, I reside in Choctaw County, Alabama and I have resided in Choctaw County my entire life.
- 3. As alleged in the complaint, the Plaintiff company, Insurance Express, which is my former employer, is located in Choctaw County, Alabama and when I was employed by Plaintiff, I only worked in Choctaw County.
 - 4. I have never lived in Baldwin County, Alabama.
- I have never worked in Baldwin County, Alabama, for Lynne Ernest Insurance, LLC,
 or any other employer.

6. I have never been served with the Summons and Complaint in this matter.

Further affiant saith not.

Deadra Stokley

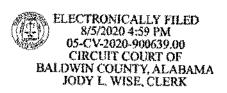
ST A TE OF ALABAMA COUNTY OF CHOCTAW

I, the undersigned Notary Public, in and for said County in the said State, do hereby certify that Deadra Stokley, whose name is signed to the foregoing Affidavit and who is known to me, acknowledged before me on this day that she signed the same voluntarily on the day the same bears date.

Given under my hand and official seal on this 30 day of 11, 2020.

NOTARY PUBLIC

My commission expires: 10-16-2021



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS,	****		
Plaiatiff,			
Vs.	Case No. CV-20-900639		
LYNNE ERNEST INSURANCE, LLC, LYNNE ERNEST, CHYNNA ERNEST, DEADRA STOKLEY, and JODI PRUITT,			
Defendants.			
AFFIDAVIT OF CHYNNA ERNEST			

STATE OF ALABAMA COUNTY OF CHOCTAW

Chynna Ernest, being first duly sworn, deposes and says:

- 1. I am an adult resident of Marengo County, Alabama and have personal knowledge of the matters set forth below.
- The Complaint alleges that I reside in Sumter County, however I permanently reside in Marengo County, Alabama. Marengo County is North of Choctaw County, Alabama.
- 3. I am employed at Lynne Ernest Insurance, LLC ("LEI") which has an office in Foley, Baldwin County, Alabama, while I work remotely I do commute to the Foley office one or two days per week.
- 4. My mother, Lynne Ernest, does not reside with me and I have never accepted service of process on behalf of Lynne Ernest. The process server gave me a copy of the Summons and

DOCUMENT 25

Complaint meant for Lynne Ernest at the Foley LEI office, despite my instructions that my mother was not there and that I was not authorized to accept service on her behalf.

Further affiant saith not.	
Unyma Gart Chypnal Ernest	
STATE OF ALABAMA COUNTY OF CHOCTAW	
I, the undersigned Notary Public, in and for said County in the said Stat that Chynna Ernest, whose name is signed to the foregoing Affidavit and wlacknowledged before me on this day that she signed the same voluntarily on the date.	no is known to me,
Given under my hand and official seal on this day of	, 2020.
NOTARY PUBLIC	HELLER FOR THE COMMENTAL STREET, STREE
My commission agricus	



05-CV-2020-900639.00

Judge: JODY W. BISHOP

To: JAMES BRADFORD PITTMAN, JR. JR. james@jbplaw.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

The following matter was FILED on 8/5/2020 4:59:04 PM

D001 LYNNE ERNEST INSURANCE LLC
D002 ERNEST LYNNE
D003 ERNEST CHYNNA
D004 STOKLEY DEADRA
D005 PRUITT JODI

MOTION FOR CHANGE OF VENUE/TRANSFER [Filer: PITTMAN JAMES BRADFORD JR]

Notice Date: 8/5/2020 4:59:04 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507

251-937-9561 jody.wise@alacourt.gov



05-CV-2020-900639.00

Judge: JODY W. BISHOP

To: SCULLY WILLIAM EDWARD III wescullyiii@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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MOTION FOR CHANGE OF VENUE/TRANSFER
[Filer: PITTMAN JAMES BRADFORD JR]

Notice Date:

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> 251-937-9561 jody.wise@atacourt.gov



05-CV-2020-900639.00 Judge: JODY W. BISHOP

To: ARCHER JON CHARLES II associate@jbplaw.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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251-937-9561 jody.wise@alacourt.gov



05-CV-2020-900639.00

Judge: JODY W. BISHOP

To: SCULLY WILLIAM EDWARD III wescullyiii@gmail.com

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

A court action was entered in the above case on 8/10/2020 12:13:47 PM

ORDER

[Filer:]

Disposition:

PENDING

Judge:

JWB

Notice Date:

8/10/2020 12:13:47 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507

> 251-937-9561 jody.wise@alacourt.gov



05-CV-2020-900639.00

Judge: JODY W. BISHOP

To: PITTMAN JAMES BRADFORD JR james@jbplaw.com

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

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Disposition:

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Judge:

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> 251-937-9561 jody.wise@alacourt.gov



05-CV-2020-900639,00 Judge: JODY W. BISHOP

To: ARCHER JON CHARLES II associate@jbplaw.com

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS V. LYNNE ERNEST INSURANCE LLC ET AL 05-CV-2020-900639.00

A court action was entered in the above case on 8/10/2020 12:13:47 PM

ORDER

[Filer:]

Disposition:

PENDING

Judge:

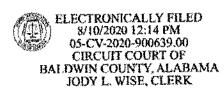
JWB

Notice Date:

8/10/2020 12:13:47 PM

JODY L. WISE CIRCUIT COURT CLERK BALDWIN COUNTY, ALABAMA 312 COURTHOUSE SQUARE SUITE 10 BAY MINETTE, AL, 36507

> 251-937-9561 jody.wise@alacourt.gov



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

INSURANCE EXPRESS, Plaintiff,				
V	Case No.:	CV-2020-900639.00		
LYNNE ERNEST INSURANCE LLC, ERNEST LYNNE, ERNEST CHYNNA, STOKLEY DEADRA ET AL, Defendants.				
ORDER				
MOTION TO DISMISS FOR IMPROPER VENUE AND LACK OF SERVICE, OR ALTERNATIVELY TO TRANSFER VENUE TO CHOCTAW, ALABAMA filed by LYNNE ERNEST INSURANCE LLC, ERNEST LYNNE, ERNEST CHYNNA, STOKLEY DEADRA and PRUITT JODI is hereby PENDING. Opposing party is granted 7 days to file a response. Response shall be submitted as a supplement to the pending motion.				
DONE this 10 th day of August, 2020.	INDV M DICE	JOB		
<u> </u>	JODY W. BISI RCUIT JUDGE			