

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF LOUISIANA

WENDY BOSMA	*	CIVIL ACTION
	*	
VERSUS	*	NO.:
	*	
JARED MUNSTER, Individually and in his official capacity as Director of the Department of Safety and Permits for the City of New Orleans, MALACHI HULL, Individually and in his official capacity as Director of the City of New Orleans Taxicab and For Hire Bureau, WILTON JOINER, Individually and in his official capacity as Investigator for City of New Orleans Taxicab and For Hire Bureau	*	SECTION “ ” MAGISTRATE #
	*	
	*	JUDGE
	*	
	*	MAGISTRATE
	*	
	*	JURY TRIAL
	*	
	*	

**COMPLAINT**

**NOW INTO COURT**, through undersigned counsel, comes Wendy Bosma, who files this Complaint against the above-named defendants, respectfully representing upon information and belief as follows:

**I. JURISDICTION**

1.

This action is brought pursuant to 42 U.S.C. § § 1983 and 1988. Jurisdiction is founded on 28 U.S.C. § § 1331 and 1343, and the Fourth, Eighth, and Fourteenth Amendments to the Constitution of the United States. Plaintiff also invokes supplemental jurisdiction over claims under state constitutional and statutory law.

**II. PARTIES**

**PLAINTIFF**

2.

**WENDY BOSMA** is a person of full age of majority and a citizen of the State of Louisiana and domiciled in the Eastern District of Louisiana.

**DEFENDANTS**

3.

**Made Defendants herein are:**

- A. **JARED MUNSTER**, Individually and in his official capacity as Director of the Department of Safety and Permits for the City of New Orleans, is a person of full age of majority and a citizen of the State of Louisiana and domiciled in the Eastern District of Louisiana, who is subject to the jurisdiction of this Court and can be served at 1300 Perdido Street, 7th Floor, New Orleans, Louisiana.
- B. **MALACHI HULL**, Individually and in his official capacity as the Director of the City of New Orleans Taxicab and For Hire Bureau, is a person of full age of majority and a citizen of the State of Louisiana and domiciled in the Eastern District of Louisiana, who is subject to the jurisdiction of this Court and can be served at 1300 Perdido Street, 7th Floor, New Orleans, Louisiana.
- C. **WILTON JOINER**, Individually and in his official capacity as Investigator for the City of New Orleans Taxicab and For Hire Bureau, is a person of full age of majority and a citizen of the State of Louisiana and domiciled in the Eastern District of Louisiana, who

is subject to the jurisdiction of this Court and can be served at 1300 Perdido Street, 7th Floor, New Orleans, Louisiana.

### **III. FACTUAL ALLEGATIONS**

4.

On November 9, 2013, Wendy Bosma was a French Quarter tour guide working for Haunted History Tours, LLC. Bosma's job consisted of taking groups of tourists on tours of the historic French Quarter of New Orleans, Louisiana.

5.

At all times pertinent, Jared Munster was the Director of the Department of Safety and Permits for the City of New Orleans, and as such, he was responsible for the hiring, training, supervision, discipline and control of the staff of the Department of Safety and Permits, which includes the City of New Orleans Taxicab and For Hire Bureau. Munster was responsible for the supervision, administration, policies, practices, customs and operations of the Department of Safety and Permits, including the City of New Orleans Taxicab and For Hire Bureau.

6.

At all times pertinent, Malachi Hull was employed by Munster as the director of the City of New Orleans Taxicab and For Hire Bureau. Hull was responsible for the hiring, training, supervision, discipline and control of the staff, including all investigators, for the City of New Orleans Taxicab and For Hire Bureau. Hull was responsible for the supervision, administration, policies, practices, customs and operations of the City of New Orleans Taxicab and For Hire Bureau.

7.

At all times pertinent, Munster and/or Hull were and continue to be the final policy maker with respect to the operations of the City of New Orleans Taxicab and For Hire Bureau.

8.

At all times pertinent, Wilton Joiner was employed by Munster and/or Hull as an investigator for the City of New Orleans Taxicab and For Hire Bureau.

9.

On the evening of November 9, 2013 prior to 10:00 p.m., Bosma was conducting a tour for twenty-eight (28) tourists through the French Quarter in New Orleans, Louisiana when Joiner approached her and her tour group. Joiner claimed Bosma was conducting her tour within fifty (50) feet of another tour group, which is a violation of Orleans Parish Municipal Code Section 30 Paragraph 1489. Joiner asked Bosma to produce her tour guide permit. As Bosma was locating her permit, Joiner became irate and screamed at Bosma to turnover her tour guide permit. Without cause or justification, Joiner then grabbed Bosma's upper right arm, twisted it behind her back, slammed her against a parked vehicle and screamed at Bosma to turnover her tour guide permit before ripping it from the lanyard tied around her neck. Immediately after ripping the permit from around Bosma's neck, Joiner threw Bosma to the ground. Joiner then consulted his immediate supervisor, Hull, who was on the scene and witnessed the incident. The New Orleans Police Department were called and Bosma was issued a citation by Joiner for her alleged violation of Orleans Parish Municipal Code Section 30 Paragraph 1489 for being within fifty (50) feet of another tour group.

10.

The incident was witnessed by the twenty-eight (28) tourists in Bosma's tour group, of which, two (2) in the group recorded the attack on their mobile phones. In the video recording multiple witnesses can be heard yelling at Joiner, "she did nothing wrong," "what the hell is your problem," "y'all are going to lose your jobs" and "there are fifty witnesses out here."

11.

Hull witnessed the unjustified attack on Bosma and did nothing to stop it.

12.

As a result of the unjustified attack, Bosma suffered personal injuries, including but not limited to injuries to her upper right arm, and mental and emotional distress and anguish.

13.

On October 28, 2013 (nearly two weeks prior to the attack on Bosma), undersigned counsel sent Hull and Joiner certified cease and desist letters, detailing claims of abuse and harassment by Joiner and another Taxicab Bureau investigator, Ronnie Blake, which requested that Hull and Joiner "immediately cease and desist"...the systematic threats, harassment and reprisals"...which they have been inflicting upon tour guides throughout the French Quarter in New Orleans, Louisiana. (See attached letter dated October 28, 2013 marked as Exhibit "A"). Despite being informed of Joiner's harassing and violent behavior, Munster and Hull allowed Joiner to continue to act in his official capacity as an Investigator for the City of New Orleans Taxicab and For Hire Bureau. Had Joiner been removed from service, this incident would not have occurred.

14.

Joiner's attack against Bosma is one example of a pattern and practice of unnecessary, excessive and abusive force used by investigators for the City of New Orleans Taxicab and For Hire Bureau. After Bosma's attack was reported by the media, numerous individuals reported incidents of unnecessary, excessive and abusive force by investigators for the City of New Orleans Taxicab and For Hire Bureau. The following is another example of excessive and abusive force used by the investigators:

On October 23, 2013 (a few weeks prior to Bosma's attack), investigator, Ronnie Blake, attacked Emmanuel Esterlin, a New Orleans taxicab driver. Blake attempted to handcuff Esterlin for being illegally parked on Dauphine Street in New Orleans, Louisiana. When Esterlin resisted the handcuffs, Blake sprayed Esterlin with pepper spray, causing Esterlin to collapse on the sidewalk. Once Esterlin was on the sidewalk, Blake drove his knee into Esterlin's back while placing him in handcuffs. Surveillance cameras attached to the Marriot Hotel captured the incident. Blake called the New Orleans Police Department and Esterlin was taken to the emergency room at LSU Interim Hospital. Upon release from the emergency room, Esterlin was charged with battery and booked into Orleans Parish Prison.

15.

By allowing investigators to use excessive and unwarranted force, Munster and/or Hull developed and maintained policies and/or customs exhibiting deliberate indifference to the Fourth, Eighth and Fourteenth Amendment rights of citizens to be free from unreasonable searches, seizures, and cruel and unusual punishment, which deliberate indifference caused the violation of Bosma's rights.

16.

In addition, at all times relevant to this suit, it was the policy and/or custom of Munster and/or Hull to inadequately and improperly investigate complaints against investigators using excessive and/or abusive force against citizens. Acts of misconduct were instead tolerated by Munster and/or Hull including, but not limited to, prior incidents involving Joiner in this case.

17.

At all times relevant to this suit, it was the policy and/or custom of Munster and/or Hull to inadequately supervise and train their investigators thereby failing to discourage further constitutional violations on the part of investigators. Munster and/or Hull did not require appropriate in service training or re-training of the investigators, who were known to have engaged in misconduct, including Joiner.

18.

At all times relevant to this suit, it was the policy and/or custom of Munster and/or Hull to inadequately respond to instances of excessive or abusive force by investigators. Munster's and/or Hull's inadequate responses included a refusal to terminate, suspend, discipline, warn or in any way punish and/or re-train their investigators, for incidents involving excessive force, thereby failing to adequately discourage further constitutional violations by their investigators.

19.

Munster and/or Hull were informed and knew or should have known of prior acts of excessive force on the part of their investigators, including but not limited to acts of excessive and abusive force by Joiner. Munster and/or Hull ignored these prior incidents and hired and/or retained Joiner.

20.

As a result of the above described policies and customs, Joiner knew that his actions would not be properly monitored by his supervisors and that misconduct would be tolerated rather than investigated and/or punished.

21.

The above described policies and customs demonstrate deliberate indifference on the part of the policy maker, Munster and/or Hull, to the constitutional rights of persons regulated by the City of New Orleans Taxicab and For Hire Bureau, and to the plaintiff, Bosma, in this case. This deliberate indifference was a cause of the violation of Bosma's rights alleged herein.

22.

Munster and/or Hull are liable to the plaintiff for damages as a result of their failure to properly supervise Joiner.

23.

Munster and/or Hull knew or should have known of the violent propensities and misconduct of Joiner. Munster and/or Hull ignored these violent propensities and previous acts of misconduct and hired him and/or retained him and failed to supervise him properly.

24.

By their failure to properly supervise, Munster and/or Hull condoned, ratified and encouraged the excessive and abusive force against Bosma. These actions and/or failures on the part of Munster and/or Hull constitute gross negligence in supervising subordinates and show a deliberate indifference toward the constitutional rights of Bosma in this case.



25.

All defendants are liable jointly, severally and *in solido* for Bosma's injuries.

26.

The defendant's actions were reckless, willful, wanton and/or malicious.

27.

Defendants, individually and collectively, had the duty and ability to intervene to prevent the violations of the rights of Bosma described herein, but failed to do so.

28.

Bosma's injuries were solely and proximately caused by the intentional and/or negligent acts of the defendants as previously described.

#### **IV. CAUSES OF ACTION**

##### **CONSTITUTIONAL VIOLATIONS**

29.

The actions of Joiner violated Bosma's Fourth and Fourteenth Amendment right to be free from unreasonable searches and seizure. Additionally, the actions of Joiner violated Bosma's Eighth Amendment right to be free from cruel and unusual punishment. Further, Hull and Joiner's retaliatory act of manufacturing a municipal code violation and issuing Bosma a citation in response to Bosma's outburst regarding the assault and battery violates Bosma's rights under the First and Fourteenth Amendment. Munster, Hull and Joiner's conspiracy to cover up the truth regarding Joiner's assault and battery on Bosma violated Bosma's rights under the Fourteenth Amendment. Munster, Hull and Joiner acted under the color of state law when they violated Bosma's rights.

30.

The above described policies and/or customs of Munster and/or Hull show deliberate indifference to Bosma's constitutional rights and directly contributed to the violations of Bosma's rights alleged in this Complaint. Munster and/or Hull were aware of the violent propensities of Joiner, as well as his prior instances of misconduct, but nevertheless hired him and/or retained him. Munster and/or Hull were and continue to be aware of the culture of violence, verbal abuse, physical abuse and excessive force that persist with investigators within the City of New Orleans Taxicab and For Hire Bureau and have exhibited deliberate indifference to it, resulting in the injuries to Bosma in this case. Munster and/or Hull are liable to Bosma for the constitutional violations that Bosma suffered at the hands of Hull and Joiner.

**STATE LAW TORTS**

31.

Joiner committed the state law torts of assault and battery against Bosma.

32.

Joiner intentionally inflicted emotional distress and anguish on Bosma.

33.

At all times relevant hereto, Joiner was acting within the course and scope of his employment with Munster and/or Hull. Therefore, the doctrine of *respondeat superior* applies for all state-law torts alleged in this Complaint and Munster and/or Hull are liable to Bosma for the tortious acts of their employees.

**V. DAMAGES**

34.

As a result of the above-described violations, Bosma suffered and continues to suffer physical injuries, mental and emotional pain and suffering, anguish and distress, embarrassment, and humiliation.

35.

Bosma is entitled to past medical expenses, future medical expenses, past lost wages, future loss of earning capacity, past and future pain and suffering, past and future mental and emotional anguish, past and future loss of enjoyment of life, as well as other damages that will be determined at the trial of this matter.

36.

In addition to recovering damages, Bosma seeks reasonable attorney's fees in accordance with 42 U.S.C. § 1988, plus judicial interest, and for the defendants to bear all costs of these proceedings.

37.

Further, defendants are liable to Bosma for punitive damages.

38.

Plaintiff requests trial by jury.

**WHEREFORE**, Plaintiff, Wendy Bosma, prays that the defendants be duly cited and served copies of the above and foregoing, and made to timely appear and answer, that the Court exercise its supplemental jurisdiction over the state law claims, and after due proceedings there be a judgment in her favor and against defendants, Jared Munster, Malachi Hull and Wilton

Joiner, individually and in their official capacities, holding them liable jointly, severally and *in solido* for all compensatory and punitive damages alleged herein, together with judicial interest, for all attorney's fees, and that the defendants bear all costs of these proceedings, and for all further legal, equitable, and general relief available. Plaintiff requests trial by jury.

Respectfully submitted,

*/s/ Thomas W. Shlosman*

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THOMAS W. SHLOSMAN (Bar No. 34086)

The Shlosman Law Firm

607 St. Charles Ave., Suite 300

New Orleans, LA 70130

(504) 453-0607 Phone

(504) 581-5588 Fax

shlosmanlaw@gmail.com

**PLEASE SERVE:**

Jared Munster  
1300 Perdido St., 7th Floor  
New Orleans, LA 70112

Malachi Hull  
1300 Perdido St., 7th Floor  
New Orleans, LA 70112

Wilton Joiner  
1300 Perdido St., 7th Floor  
New Orleans, LA 70112

# THE SHLOSMAN LAW GROUP

Malachi Hull  
Deputy Director  
Taxicab and For Hire Bureau  
Dept. of Safety and Permits  
1300 Perdido St., Suite 2W89  
New Orleans, LA 70112

Dear Mr. Hull,

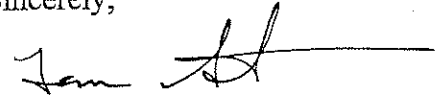
Numerous tour guide companies throughout the French Quarter have retained me to handle legal matters surrounding the systematic threats, harassment and reprisals your investigators have subjected them to beginning on October 18, 2013. Let this letter be a formal request for you to immediately cease and desist this behavior.

Please be aware that I will be filing a temporary restraining order and a preliminary injunction seeking a court order that will immediately prevent your investigators from any further violation of my clients' constitutional rights. Title 42 of the United States Code § 1983 made relief, in the form of money damages, available to those whose constitutional rights had been violated by an actor acting under State authority.

I have obtained more than fifteen affidavits from tour guides with five different companies that have given specific instances of misconduct on the behalf of your investigators ranging from allegations of bribery and shakedowns to extreme harassment and intimidations.

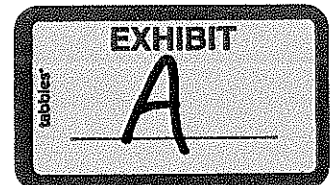
Please be aware that we have full intentions to seek legal action to the fullest extent permitted by law.

Sincerely,



Thomas W. Shlosman

607 ST. CHARLES AVE.  
NEW ORLEANS, LA 70130  
SHLOSMANLAWGROUP@GMAIL.COM  
(504) 453-0607 (O)  
(504) 581-5588 (F)



- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Malachi Hull  
 1300 Perdido, Suite 2W89  
 New Orleans, LA 70112

A. Signature  Agent  Addressee  
*M. Clausell*  
 B. Received by (Printed Name) *M. Clausell*  
 C. Date of Delivery *10/29/13*  
 D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:

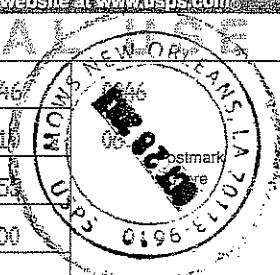
3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.  
 4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from service label) **7013 0600 0001 2082 8857**

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-15

**U.S. Postal Service**  
**CERTIFIED MAIL - RECEIPT**  
 (Domestic Mail Only. No Insurance Coverage Provided.)  
 For delivery information visit our website at [www.usps.com](http://www.usps.com)

NEW ORLEANS LA 70112

Postage	\$ 0.46	
Certified Fee	\$3.10	
Return Receipt Fee (Endorsement Required)	\$2.55	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 6.11	

Sent To: *Malachi Hull*  
 Street, Apt. No., or PO Box No.: *1300 Perdido, Suite 2W89*  
 City, State, ZIP+4: *New Orleans, LA 70112*

PS Form 3800, August 2006 See Reverse for Instructions

7013 0600 0001 2082 8857

SCANNED  
 11/15/13 RC

# THE SHLOSMAN LAW GROUP

Whilton Joiner  
Inspector  
Taxicab and For Hire Bureau  
Dept. of Safety and Permits  
1300 Perdido St., Suite 2W89  
New Orleans, LA 70112

Dear Mr. Joiner,

Numerous tour guide companies throughout the French Quarter have retained me to handle legal matters surrounding the systematic threats, harassment and reprisals you have subjected them to beginning on October 18, 2013. Let this letter be a formal request for you to immediately cease and desist this behavior.

Please be aware that I will be filing a temporary restraining order and a preliminary injunction seeking a court order that will immediately prevent you from any further violation of my clients' constitutional rights. Title 42 of the United States Code § 1983 made relief, in the form of money damages, available to those whose constitutional rights had been violated by an actor acting under State authority.

I have obtained more than fifteen affidavits from tour guides with five different companies that have given specific instances of misconduct on your behalf ranging from allegations of bribery and shakedowns to extreme harassment and intimidations.

Please be aware that we have full intentions to seek legal action to the fullest extent permitted by law.

Sincerely,



Thomas W. Shlosman

607 ST. CHARLES AVE.  
NEW ORLEANS, LA 70130  
SHLOSMANLAWGROUP@GMAIL.COM  
(504) 453-0607 (O)  
(504) 581-5588 (F)

SENDER: COMPLETE THIS SECTION COMPLETE THIS SECTION ON DELIVERY

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Whilton Joiner  
 1300 Perdido, Suite 2489  
 New Orleans, LA 70112

A. Signature  Agent  
 Addressee  
*M. Clausell*  
 B. Received by (Printed Name) *M. Clausell* C. Date of Delivery: *10/29/13*  
 D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.  
 4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from service label) **7013 0600 0001 2082 8864**

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-154

**U.S. Postal Service**  
**CERTIFIED MAIL™ RECEIPT**  
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 For delivery information visit our website at www.usps.com

**NEW ORLEANS, LA 70112 SPECIAL USE**

Postage	\$	\$0.46
Certified Fee		\$3.10
Return Receipt Fee (Endorsement Required)		\$2.55
Restricted Delivery Fee (Endorsement Required)		\$0.00
<b>Total Postage &amp; Fees</b>	<b>\$</b>	<b>\$6.11</b>

NEW ORLEANS, LA 70112-0046  
 OCT 29 2013  
 106  
 mark

Sent To *Whilton Joiner*  
 Street, Apt. No., or PO Box No. *1300 Perdido, Suite 2489*  
 City, State, ZIP+4 *New Orleans, LA 70112*

PS Form 3800, August 2006 See Reverse for Instructions

4 9 9 8 2 9 0 2 1 0 0 0 0 0 9 0 0 7 0 1

SCANNED  
 11/18/13 Re



CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Wendy Bosma

(b) County of Residence of First Listed Plaintiff Orleans (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

The Shlosman Law Firm, Thomas W. Shlosman 607 St. Charles Ave., Suite 300 New Orleans, LA 70118

DEFENDANTS

Jared Munster Malachi Hull Wilton Joiner

County of Residence of First Listed Defendant Orleans (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with 5 main categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Each category contains a list of specific legal claims with checkboxes.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 USC 1983

Brief description of cause:

Assault & Battery

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: X Yes O No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

April 24, 2014

SIGNATURE OF ATTORNEY OF RECORD

Tom Shlosman

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

UNITED STATES DISTRICT COURT
for the

Eastern District of Louisiana

WENDY BOSMA

Plaintiff(s)

v.

JARED MUNSTER
MALACHI HULL
WILTON JOINER

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Jared Munster
1300 Perdido Street, 7th Floor
New Orleans, Louisiana 70112

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

The Shlosman Law Firm
Thomas W. Shlosman
607 St. Charles Ave., Suite 300
New Orleans, Louisiana 70130
(504) 453-0607

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the

Eastern District of Louisiana

WENDY BOSMA

Plaintiff(s)

v.

JARED MUNSTER
MALACHI HULL
WILTON JOINER

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Malachi Hull
1300 Perdido Street, 7th Floor
New Orleans, Louisiana 70112

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

The Shlosman Law Firm
Thomas W. Shlosman
607 St. Charles Ave., Suite 300
New Orleans, Louisiana 70130
(504) 453-0607

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

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was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the

Eastern District of Louisiana

WENDY BOSMA

Plaintiff(s)

v.

JARED MUNSTER
MALACHI HULL
WILTON JOINER

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Wilton Joiner
1300 Perdido Street, 7th Floor
New Orleans, Louisiana 70112

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

The Shlosman Law Firm
Thomas W. Shlosman
607 St. Charles Ave., Suite 300
New Orleans, Louisiana 70130
(504) 453-0607

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the summons unexecuted because \_\_\_\_\_; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: