COPY IN THE SUPERIOR COURT OF BULLOCH COUNTY CLERK'S OFFICE

FILED BULLOCH COUNTY

MO FLO, LLC d/b/a FLOORS OUTLET, Plaintiff, vs. Civil Action No.: STCV2022000202 WILHEMINA ALEZANDER and EDWIN ALEXANDER, Defendants. And MO FLO, LLC d/b/a FLOORS OUTLET, Plaintiff/Third-Party Plaintiff, vs. S&T FLOOR COVERING, LLC, Third-Party Defendant.	SIME	or GEORGIA	1011 NOV 15 A 9: 21
vs. Civil Action No.: STCV2022000202 WILHEMINA ALEZANDER and EDWIN ALEXANDER, Defendants. And MO FLO, LLC d/b/a FLOORS OUTLET, Plaintiff/Third-Party Plaintiff, vs. S&T FLOOR COVERING, LLC,) Civil Action No.: STCV2022000202) Plaintiff Action No.: STCV2022000202) Plaintiff Action No.: STCV2022000202))	Heathern Clerk OF COURT
WILHEMINA ALEZANDER and EDWIN ALEXANDER, Defendants. And MO FLO, LLC d/b/a FLOORS OUTLET, Plaintiff/Third-Party Plaintiff, vs. S&T FLOOR COVERING, LLC,) OWN Action No SIC V 2022000202) Plaintiff No SIC V 2022000202) OWN Action No SIC V 2022000202) OWN Action No SIC V 2022000202) OWN Action No SIC V 2022000202) SOM Action No SIC V 2022000202) OWN Action No SIC V 2022000202) S&T FLOOR COVERING, LLC,)	Plaintiff,)	
EDWIN ALEXANDER, Defendants. And MO FLO, LLC d/b/a FLOORS OUTLET, Plaintiff/Third-Party Plaintiff, vs. S&T FLOOR COVERING, LLC,) Defendants.) Outlier, Ou	VS.) Civil Action No.: <u>STCV20</u>	022000202
And MO FLO, LLC d/b/a FLOORS OUTLET, Plaintiff/Third-Party Plaintiff, vs. S&T FLOOR COVERING, LLC,) Outline of the control of the cont)))	
MO FLO, LLC d/b/a FLOORS OUTLET, Plaintiff/Third-Party Plaintiff, vs. S&T FLOOR COVERING, LLC,	Defendants.)	
OUTLET, Plaintiff/Third-Party Plaintiff, vs. S&T FLOOR COVERING, LLC,)	And)	
vs.) S&T FLOOR COVERING, LLC,)))	
S&T FLOOR COVERING, LLC,))	Plaintiff/Third-Party Plaintiff,)	
)	vs.)	
Third-Party Defendant.	S&T FLOOR COVERING, LLC,)	
	Third-Party Defendant.)	

THIRD PARTY DEFENDANT ANSWER AND COUNTERCLAIM

COMES NOW S&T FLOOR COVERING, LLC, Third-Party Defendant and hereby answers and responds to Plaintiff's Petition for Divorce, filed in the Superior Court of Appling County, State of Georgia. Third-Party Defendant shows the Court the following:

1.

Third-Party Defendant neither admits nor denies the allegations contained in Paragraph One (1) of the Petition.

2.

Third-Party Defendant neither admits nor denies the allegations contained in Paragraph Two

(2) of the Petition.

3.

Third-Party Defendant admits the allegations contained in Paragraph Three (3) of the Petition.

4.

Third-Party Defendant denies the allegations contained in Paragraph Four (4) of the Petition.

5.

Third-Party Defendant neither admits nor denies the allegations contained in Paragraph Five (5) of the Petition.

6.

Third-Party Defendant neither admits nor denies the allegations contained in Paragraph Six (6) of the Petition.

7.

Third-Party Defendant admits the allegations contained in the first sentence in Paragraph Seven (7) of the Petition.

8.

Third-Party Defendant denies the allegations contained in Paragraph Eight (8) of the Petition.

9.

Third-Party Defendant denies the allegations contained in Paragraph Nine (9) of the Petition.

10.

Third-Party Defendant neither admits nor denies the allegations contained in Paragraph Ten (10) of the Petition.

Third-Party Defendant neither admits nor denies the allegations contained in Paragraph Eleven (11) of the Petition.

12.

Third-Party Defendant admits the allegations contained in Paragraph Twelve (12) of the Petition.

13.

Third-Party Defendant admits the allegations contained in Paragraph Thirteen (13) of the Petition.

14.

Third-Party Defendant denies the allegations contained in Paragraph Fourteen (14) of the Petition.

15.

Third-Party Defendant denies the allegations contained in Paragraph Fifteen (15) of the Petition.

16.

Third-Party Defendant denies the allegations contained in Paragraph Sixteen (16) of the Petition.

17.

Third-Party Defendant denies the allegations contained in Paragraph Seventeen (17) of the Petition.

COUNTERCLAIM

COMES NOW THIRD-PARTY DEFENDANT, S&T FLOOR COVERING, LLC, and hereby files this Counterclaim in response to the Plaintiff's Complaint filed in the Superior Court of Bulloch County, State of Georgia. Third-Party Defendant shows the Court the following:

1.

The Third-Party Plaintiff has filed the instant action and subjected himself to the jurisdiction of this court.

2.

Jurisdiction and venue are proper in this matter.

3.

The Third-Party Plaintiff hired Third-Party Defendant to perform certain services on the Defendants property, said services being those at issue in this suit.

4.

The Third-Party Plaintiff failed to pay for said services.

5.

The Third-Party Plaintiff owes Third-Party Defendant for services rendered on the subject property.

6.

The Third-Party Plaintiff should be ordered to pay Third-Party Defendant for the services rendered.

7.

The Third-Party Plaintiff is aware that the services rendered were properly performed by Third-Party Defendant.

The Third-Party Plaintiff failed to disclose certain details of the job performed prior to the same.

9.

The claims against the Third-Party Defendant are baseless.

10.

The Third-Party Defendant should be entitled to recover the fees and expenses of litigation for the Third-Party Plaintiff's filing of this action.

WHEREFORE, Third-Party Defendant prays:

- a. The Third-Party Plaintiff's prayers for relief be denied;
- b. That Third-Party Defendant be awarded the amounts due to him for services rendered;
- c. That Third-Party Defendant be awarded fees and expenses of litigation for the Plaintiff's filing of this action;
- d. Third-Party Defendant be granted such other and further relief as the Court may deem just and proper.

Respectfully Submitted on this 14th day of Novembu, 2022.

Shannon Warren, Member S&T Floor Covering, LLC 330 Satilla Church Road Jesup, Georgia 31545