

# EXHIBIT A

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

HANS NEWSOM  
3422 N. Brighton  
Kansas City, MO 64117

PLAINTIFF,

-vs-

ERVIN CABLE CONSTRUCTION, LLC  
Serve at:  
C T Corporation System  
120 South Central Ave.  
Clayton, MO 63105

and

GOOGLE FIBER MISSOURI, LLC  
Serve at:  
CSC-Lawyers Incorporating Service Co.  
221 Bolivar St.  
Jefferson City, MO 65101

and

ATLANTIC ENGINEERING GROUP, INC.  
Serve at:  
Secretary of State  
600 W Main St.  
Jefferson City, MO 65102

DEFENDANTS.

Case No.  
Division No.

JURY TRIAL DEMANDED

**PLAINTIFF'S FIRST AMENDED  
PETITION FOR PERSONAL INJURIES**

COMES NOW Plaintiff, Hans Newsom, by and through his legal counsel of record, Ryan Shernaman, of RS Law, and for his Petition for Personal Injuries against Defendants Ervin Cable Construction, LLC, Atlantic Engineering Group, Inc. and Google Fiber Missouri, LLC states and alleges as follows:

### Parties

1. At all times relevant herein, Plaintiff **Hans Newsom** (hereinafter "Plaintiff"), was and is a resident of the City of Kansas City, Clay County, Missouri.

2. At all times relevant herein, Defendant **Ervin Cable Construction, LLC** (hereinafter "Ervin") was a foreign company organized and existing under the laws of the State of Delaware, operating under a certificate of authority to do business in Missouri and was acting as an agent for Defendant Google in the State of Missouri. Under Rule 54.13(b)(3), defendant can be served by serving its Registered Agent, CSC-Lawyers Incorporating Service Co., 221 Bolivar St., Jefferson City, MO 65101.

3. At all times relevant herein, Defendant **Atlantic Engineering Group, Inc.** (hereinafter "Atlantic") was a foreign company organized and existing under the laws of the State of Georgia, operating under a certificate of authority to do business in Missouri and was acting as an agent for Defendant Google in the State of Missouri. On December 5, 2016, after the cause of action arose, Atlantic Engineering Group, Inc. was administratively dissolved under RSMO 351.602 for failure to file a registration report. Under RSMO 351.602 the Missouri Secretary of State becomes "the foreign corporation's agent for service of process in any proceeding based on a cause of action which arose during the time the foreign corporation was authorized to transact business in this state. Service of process on the secretary of state under this subsection is service on the foreign corporation."

4. At all times relevant herein, Defendant **Google Fiber Missouri, LLC** (hereinafter "Google"), is and was a corporation organized and existing under the laws of the State of Missouri. Under Rule 54.13(b)(3), defendant can be served by serving its Registered Agent, CSC-Lawyers Incorporating Service Co., 221 Bolivar St., Jefferson City, MO 65101.

**Jurisdiction and Venue**

5. Plaintiff hereby re-alleges and incorporates paragraph one (1) through five (5) above as if fully set forth within.

6. Venue in this county is proper pursuant to § 508.010, R.S.Mo., in that the cause of action which is the subject of this suit arose in Clay County, Missouri.

**Common Allegations**

7. Plaintiff hereby re-alleges and incorporates paragraphs one (1) through six (6) above as if fully set forth within.

8. Upon information of belief Google hired Atlantic for the installation of 2 HDPE conduits and 3 hand holes on the east and west sides of N. Nashua Drive and crossing at various locations between NW 112<sup>th</sup> St. and N Oak Traffic way, which required excavation of parts of Kansas City streets.

9. On April 3, 2014, Kansas City issued a permit to Atlantic to perform the work described in paragraph 11 above.

10. In performing the excavations for the installment of the 2 HDPE conduits and 3 hand holes described in paragraph 11 above, Atlantic created the dangerous condition resulting in Plaintiff's injury. Atlantic had a responsibility for repairing, modifying and maintaining the roadway at issue.

11. On Sunday, April 12, 2015, around 11:00 pm Plaintiff was riding his Harley Davidson motorcycle to a friend's house at 11147 N. McGee, Kansas City, MO 64155.

12. Plaintiff was driving approximately 5 mph because the area was poorly lit and he was unfamiliar with the roads and traffic.

13. As Plaintiff headed east on N. Nashua Dr., he turned right onto N. McGee St. when suddenly and without warning his front wheel dropped down into a deep rectangular hole that had been cut in the asphalt.

14. This sudden drop of the front end of the motorcycle caused Plaintiff to lose control of the motorcycle and hit the curb.

15. Plaintiff became pinned between the motorcycle and the curb.

16. A friend of Plaintiff, who saw the accident, freed Plaintiff from his entrapment, and immediately rushed him to the emergency room at St. Luke's Hospital.

17. Plaintiff was diagnosed with a tangential displaced fibula fracture, and referred to Northland Bone and Joint.

18. An MRI later revealed, that in addition to a tangential displaced fibula fracture, Plaintiff had a complete rupture of the anterior talofibular ligament and medium-sized tibiotalar joint effusion.

**COUNT I – Negligence**  
**(Plaintiff v. Defendants)**

19. Plaintiff hereby re-alleges and incorporates paragraphs one (1) through eighteen (18) above as if fully set forth herein.

20. Defendants owed Plaintiff, and others so similarly situated, a duty to design, inspect, and maintain roadways located throughout the city and to place appropriate signage, specifically at the location of the roadway defect, yet failed to do so and therefore was negligent, reckless and careless in the following respects:

- a. Defendants knew or by use of the highest degree of care could have known that there was a reasonable likelihood of persons getting injured at the location of the accident;

- b. Defendants failed to properly design, inspect, or maintain the roadway at the intersection of N. Nashua Dr. and N. McGee St.;
- c. Defendants failed to post appropriate signage, warning of the defect in the roadway;
- d. Defendants failed to assess, recognize, and rectify a defect and/or dangerous condition in the intersection;
- e. Defendants failed to respond and take appropriate remedial measures in light of prior complaints, incidents, and/or injuries at the subject location; and
- f. Defendants were otherwise negligent.

21. At least one of the negligent acts or omissions by Defendants was a direct and proximate cause of the injury and the damages to Plaintiff.

22. As a direct and proximate result of the negligence of Defendants, Plaintiff was seriously injured.

23. The roadway at the intersection of N. Nashua Dr. and N. McGee St. was in dangerous condition at the time of the injury.

24. As a direct result from the dangerous condition, created by Defendants, Plaintiff suffered a closed fracture mid diaphysis of the right fibula and complete rupture of the anterior talofibular ligament and medium-sized tibiotalar joint effusion of his right ankle.

25. That the dangerous condition of the roadway at the intersection of N. Nashua Dr. and N. McGee St. created a reasonably foreseeable risk of harm of the kind of injury which was incurred, and that either a negligent or wrongful act or omission of

an employee of Defendants within the course of his/her employment created the dangerous condition or the Defendants had actual or constructive notice of the dangerous condition in sufficient time prior to the injury to have taken measures to protect against the dangerous condition.

**WHEREFORE**, Plaintiff prays for judgment against Defendants in an amount that is fair and reasonable for the injuries that Plaintiff has sustained; for an amount that is fair and reasonable for the permanent injuries that Plaintiff has suffered, which injuries are progressive, for the future medical expenses in which Plaintiff is reasonably likely to incur in the future, for pre- and post-judgment interest; and for such other relief as the Court deems just and proper under the circumstances.

**COUNT II – Agency  
(Plaintiff v. Google)**

26. Plaintiff hereby re-alleges and incorporates paragraphs one (1) through twenty five (25) above as if fully set forth herein.

27. The above-described acts of Defendant Atlantic and Defendant Ervin were committed while acting as an agent, servant, or employee of Defendant Google in accordance with an express or implied agreement between Google and Atlantic and Ervin.

28. The above-described acts of Defendant Atlantic and Defendant Ervin were committed while in the scope of their agency and while furthering the business interests of Defendant Google.

29. Google controlled the conduct of Atlantic and Ervin.

30. As the principal for Defendant Atlantic and Defendant Ervin, Defendant Google is responsible for all of the acts committed by Defendant Atlantic and Defendant

Ervin while in the scope of their agency.

**WHEREFORE**, Plaintiff prays for judgment against Defendant Google in an amount that is fair and reasonable for the injuries that Plaintiff has sustained; for an amount that is fair and reasonable for the permanent injuries that Plaintiff has suffered, which injuries are progressive, for the future medical expenses in which Plaintiff is reasonably likely to incur in the future, for pre- and post-judgment interest; and for such other relief as the court deems just and proper under the circumstances.

**JURY DEMAND**

Plaintiff Hans Newsom respectfully requests a trial by jury on all issues so triable.

January 11, 2019

Respectfully submitted,  
RS Law, L.L.C.

/s/ Ryan J. Shernaman

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Ryan J. Shernaman, MO 65175  
4240 Blue Ridge Blvd., Suite 350  
Kansas City, MO 64133  
Phone: (816) 287-8080 / Fax: (816) 841-4153  
[ryan@rslawkc.com](mailto:ryan@rslawkc.com)  
ATTORNEY FOR PLAINTIFF



**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

HANS NEWSOM

**PLAINTIFF(S),**  
VS.

**CASE NO. 1916-CV01693  
DIVISION 15**

**ERVIN CABLE CONSTRUCTION, LLC ET AL**

**DEFENDANT(S),**

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE  
AND ORDER FOR MEDIATION**

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NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable JALILAH OTTO on 29-APR-2019 in DIVISION 15 at 09:30 AM. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16<sup>th</sup> Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16<sup>th</sup> Judicial Circuit web site at [www.16thcircuit.org](http://www.16thcircuit.org) after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

**MEDIATION**

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

**POLICIES/PROCEDURES**

Please refer to the Court's web page [www.16thcircuit.org](http://www.16thcircuit.org) for division policies and procedural information listed by each judge.

**/S/ JALILAH OTTO**

**JALILAH OTTO, Circuit Judge**

**Certificate of Service**

This is to certify that a copy of the foregoing was mailed postage pre-paid or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

**Attorney for Plaintiff(s):**

RYAN JOE SHERNAMAN, 4240 BLUE RIDGE BLVD, SUITE 350, KANSAS CITY, MO  
64133

**Defendant(s):**

ERVIN CABLE CONSTRUCTION, LLC  
GOOGLE FIBER MISSOURI, LLC  
ATLANTIC ENGINEERING GROUP, INC.

Dated: 18-JAN-2019

MARY A. MARQUEZ  
Court Administrator

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

AT KANSAS CITY  AT INDEPENDENCE

RE: HANS NEWSOM V ERVIN CABLE CONSTRUCTION, LLC ET AL  
CASE NO: 1916-CV01693

TO: RYAN JOE SHERNAMAN  
4240 BLUE RIDGE BLVD, SUITE 350  
KANSAS CITY, MO 64133

We have received pleadings, which you submitted for filing in the case and they have been file-stamped on January 11, 2019. However, your pleading cannot be processed further until the following action is taken:

**RULE 3.2 - STYLE**

- Additional service instructions are needed.
- Incorrect case number/filed in wrong county.
- Document is unreadable.

**RULE 4.2 (2)**

- Need Circuit Court Form 4

**RULE 5.6 – COLLECTIONS OF DEPOSIT**

- No fee, or incorrect fee, received; fee required is \$ \_\_\_\_\_.
- Insufficient Filing Fee; Please Remit \$ \_\_\_\_\_
- No signature on check/form 1695.
- No request to proceed in forma pauperis.
- No personal checks accepted.

**RULE 68.1**

- Need Circuit Court Form 17

**OTHER:** Before your case can be processed further you will need to eFile service instructions for the defendants. If service will be done by a private process server you will need to eFile a Motion and Order for Appointment of Private Process Server with the required PPS19 number(s) on it.

- Please take the actions necessary to comply with the Circuit Court Rules and your request will be processed.
- The private process server listed is not on our approved list.
- Execution in effect. Return date \_\_\_\_\_. Request may be resubmitted within one week prior to return date.
- Supreme Court Rule 90.13 requires interrogatories be served with summons of garnishment.

**RULE 68.7 – VITAL STATISTICS REPORT**

- Need Certificate of dissolution of marriage form.

**RULE 74.14 SUPREME CT – FOREIGN JUDGMENT**

- Authentication of foreign judgment required.
- Affidavit pursuant to Supreme Court Rule 74.14

**RULE 54.12 SERVICE IN REM OR QUASI IN REM ACTIONS**

- Affidavit for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- Order for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- Notice for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- Affidavit for Service by Certified/Registered Mail pursuant to Supreme Court Rule 54.12b.

**If the filing was a new case, please be advised that unless the additional information marked is received within 30 days of the date of this notice this case will be dismissed pursuant to Rule 37.4 for failure to prosecute without prejudice, at the Plaintiff's cost. Collection efforts will be pursued for these costs.**

Please refer to the Court's website at [www.16thcircuit.org](http://www.16thcircuit.org) for Court Rules or Forms.

Copies electronic noticed, faxed, emailed and/or mailed JANUARY 18, 2019 to:

COURT ADMINISTRATOR'S OFFICE  
DEPARTMENT OF CIVIL RECORDS  
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

By Peggy Holley  
Peggy Holley, 816-881-6491  
Deputy Court Administrator

- 415 East 12<sup>th</sup> St., Kansas City, Missouri 64106
- 308 W. Kansas, Independence, Missouri 64050

JANUARY 18, 2019

Date

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

HANS NEWSOM  
3422 N. Brighton  
Kansas City, MO 64117

PLAINTIFF,

-vs-

ERVIN CABLE CONSTRUCTION, LLC  
Serve at:  
C T Corporation System  
120 South Central Ave.  
Clayton, MO 63105

and

GOOGLE FIBER MISSOURI, LLC  
Serve at:  
CSC-Lawyers Incorporating Service Co.  
221 Bolivar St.  
Jefferson City, MO 65101

and

ATLANTIC ENGINEERING GROUP, INC.  
Serve at:  
Secretary of State  
600 W Main St.  
Jefferson City, MO 65102

DEFENDANTS.

Case No.  
Division No.

MOTION FOR APPROVAL AND APPOINTMENT OF SPECIAL PROCESS SERVER

COMES NOW Petitioner HANS NEWSOM, by and through counsel, and pursuant to Supreme Court rule 54.03, hereby moves for the approval and appointment of ROBERT J. ROWLAND of Pente Legal Solutions, LLC and/or its agents, as private process server in the above-captioned matter to serve Plaintiff's *Petition for Personal Injuries*, and summons upon the above named Defendants, ERVIN CABLE CONSTRUCTION, LLC, GOOGLE FIBER MISSOURI, LLC, and ATLANTIC ENGINEERING GROUP, INC.

In support of said motion, Plaintiff states that the above-named individual is on the Court's list of approved process servers, registration number PPS19-0526, and the information contained in his application and affidavit on file is current and still correct.

January 22, 2019

Respectfully submitted,  
RS Law, L.L.C.

/s/ Ryan J. Shernaman

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Ryan J. Shernaman, MO 65175  
4240 Blue Ridge Blvd., Suite 350  
Kansas City, MO 64133  
Phone: (816) 287-8080 / Fax: (816) 841-4153  
[ryan@rslawkc.com](mailto:ryan@rslawkc.com)  
ATTORNEY FOR PLAINTIFF

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

HANS NEWSOM  
3422 N. Brighton  
Kansas City, MO 64117

PLAINTIFF,

-vs-

ERVIN CABLE CONSTRUCTION, LLC  
Serve at:  
C T Corporation System  
120 South Central Ave.  
Clayton, MO 63105

and

GOOGLE FIBER MISSOURI, LLC  
Serve at:  
CSC-Lawyers Incorporating Service Co.  
221 Bolivar St.  
Jefferson City, MO 65101

and

ATLANTIC ENGINEERING GROUP, INC.  
Serve at:  
Secretary of State  
600 W Main St.  
Jefferson City, MO 65102

DEFENDANTS.

Case No.  
Division No.

**ORDER APPOINTING SPECIAL PROCESS SERVER**

Now on this 24TH day of JANUARY 2019, comes Plaintiff's Motion for Approval and Appointment of Special Process Server and for good cause shown.

**IT IS THEREFORE ORDERED**, that the following individuals are appointed special process servers in this matter:

Robert J. Rowland, PPS19-0526, of Pente Legal Solutions, LLC and/or its agents

  
DEPUTY COURT ADMINISTRATOR





IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JALILAH OTTO	Case Number: 1916-CV01693
Plaintiff/Petitioner: HANS NEWSOM	Plaintiff's/Petitioner's Attorney/Address RYAN JOE SHERNAMAN 4240 BLUE RIDGE BLVD SUITE 350 KANSAS CITY, MO 64133
Defendant/Respondent: ERVIN CABLE CONSTRUCTION, LLC	vs. Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: ERVIN CABLE CONSTRUCTION, LLC Alias: CT CORPORATION SYSTEM 120 SOUTH CENTRAL AVE CLAYTON, MO 63105	<b>PRIVATE PROCESS SERVER</b>
 <p><b>COURT SEAL OF CIRCUIT COURT OF MISSOURI JACKSON COUNTY</b></p>	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">24-JAN-2019 Date</p> <p style="text-align: right;"> Clerk</p>
Further Information:	

**Sheriff's or Server's Return**

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

other \_\_\_\_\_ (address)

Served at \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

\_\_\_\_\_  
Printed Name of Sheriff or Server

\_\_\_\_\_  
Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

<b>Sheriff's Fees</b>	
Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$. _____ per mile)
<b>Total</b>	\$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16<sup>th</sup> Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JALILAH OTTO	Case Number: 1916-CV01693
Plaintiff/Petitioner: HANS NEWSOM	Plaintiff's/Petitioner's Attorney/Address RYAN JOE SHERNAMAN 4240 BLUE RIDGE BLVD SUITE 350 KANSAS CITY, MO 64133
Defendant/Respondent: ERVIN CABLE CONSTRUCTION, LLC	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: **GOOGLE FIBER MISSOURI, LLC**  
Alias:  
CSC-LAWYERS INC SERVICE CO  
221 BOLIVAR ST.  
JEFFERSON CITY, MO 65101

**PRIVATE PROCESS SERVER**

**COURT SEAL OF JACKSON COUNTY**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

24-JAN-2019  
Date

\_\_\_\_\_  
Clerk

Further Information: \_\_\_\_\_

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

other \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server \_\_\_\_\_ Signature of Sheriff or Server \_\_\_\_\_

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal) Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public \_\_\_\_\_

<b>Sheriff's Fees</b>	
Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$ _____ per mile)
<b>Total</b>	\$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

## **SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION**

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Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

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Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI


Judge or Division: JALILAH OTTO	Case Number: 1916-CV01693
Plaintiff/Petitioner: HANS NEWSOM	Plaintiff's/Petitioner's Attorney/Address RYAN JOE SHERNAMAN 4240 BLUE RIDGE BLVD SUITE 350 KANSAS CITY, MO 64133
Defendant/Respondent: ERVIN CABLE CONSTRUCTION, LLC	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

**The State of Missouri to:** ATLANTIC ENGINEERING GROUP, INC. **PRIVATE PROCESS SERVER**  
 Alias:

SECRETARY OF STATE  
 600 W MAIN ST  
 JEFFERSON CITY, MO 65102

**COURT SEAL OF**  
  
 JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

24-JAN-2019  
 Date

\_\_\_\_\_  
 Clerk

Further Information:

**Sheriff's or Server's Return**

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delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

other \_\_\_\_\_ (address)

Served at \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

\_\_\_\_\_  
 Printed Name of Sheriff or Server

\_\_\_\_\_  
 Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

<b>Sheriff's Fees</b>	
Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$. _____ per mile)
<b>Total</b>	\$ _____

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Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

HANS NEWSOM

PLAINTIFF,

-vs-

ERVIN CABLE CONSTRUCTION, LLC

and

GOOGLE FIBER MISSOURI, LLC

and

ATLANTIC ENGINEERING GROUP, INC.

DEFENDANTS.

Case No. : 1916-CV01693  
Division No. 15

**NOTICE OF ENGAGED COUNSEL & REQUEST  
TO RESET CASE MANAGEMENT CONFERENCE**

COMES NOW Petitioner HANS NEWSOM, by and through counsel, and gives notice to the Court of engaged counsel as follows:

1. This case is presently set for a Case Management Conference on April 29, 2019 in Division 15 at 9:30 pm.
2. The undersigned Attorney will be unavailable on that day and time as the undersigned will be engaged in Trial in Ellis County Kansas, Irwin v Reif, Case 2017-CV-000107.

WHEREFORE, Plaintiff prays the Court reset the above stated hearing in this cause until after May 7, 2019.

February 5, 2019

Respectfully submitted,  
RS Law, L.L.C.

*/s/ Ryan J. Shernaman*

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Ryan J. Shernaman, MO 65175  
2045 Grand Blvd., Suite 1040  
Kansas City, MO 64108  
Phone: (816) 287-8080 / Fax: (816) 841-4153  
[ryan@rslawkc.com](mailto:ryan@rslawkc.com)  
ATTORNEY FOR PLAINTIFF




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JALILAH OTTO	Case Number: 1916-CV01693
Plaintiff/Petitioner: HANS NEWSOM	Plaintiff's/Petitioner's Attorney/Address RYAN JOE SHERNAMAN 4240 BLUE RIDGE BLVD SUITE 350 KANSAS CITY, MO 64133
Defendant/Respondent: ERVIN CABLE CONSTRUCTION, LLC	vs. Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

**Summons in Civil Case**

The State of Missouri to: **GOOGLE FIBER MISSOURI, LLC**  
 Alias:  
 CSC-LAWYERS INC SERVICE CO  
 221 BOLIVAR ST.  
 JEFFERSON CITY, MO 65101

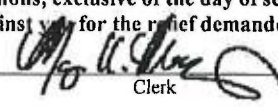
**PRIVATE PROCESS SERVER**



JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

24-JAN-2019  
Date

  
 Clerk

Further Information:

**Sheriff's or Server's Return**

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to Shelley Lewis (name) Authorized Agent (title).

other \_\_\_\_\_

Served at 221 Bolivar St. Jefferson City Mo (address)  
 in COE (County/City of St. Louis), MO, on 2-4-19 (date) at 8:25 A.M. (time).

Rufus R. Harmon (Signature of Sheriff or Server)  
 DONNA R. MEYER, Notary Public - Notary Seal, STATE OF MISSOURI, Commissioned for Cole County, Commission No. 13435325, My Commission Expires 3/3/2021. Subscribed and sworn to before me on 02-07-2019 (date).  
Donna R. Meyer (Signature of Notary Public), Notary Public

**Sheriff's Fees**

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$. _____ per mile)
<b>Total</b>	\$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.





IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JALILAH OTTO	<b>Case Number: 1916-CV01693</b>
Plaintiff/Petitioner: HANS NEWSOM	Plaintiff's/Petitioner's Attorney/Address RYAN JOE SHERNAMAN 4240 BLUE RIDGE BLVD SUITE 350 KANSAS CITY, MO 64133
Defendant/Respondent: ERVIN CABLE CONSTRUCTION, LLC	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

**Summons in Civil Case**

<b>The State of Missouri to:</b> ATLANTIC ENGINEERING GROUP, INC. Alias: SECRETARY OF STATE 600 W MAIN ST JEFFERSON CITY, MO 65102	<h2 style="margin: 0;">PRIVATE PROCESS SERVER</h2>
<div style="display: flex; align-items: center;"> <div> <p style="text-align: center;">You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">24-JAN-2019 Date</p> <p style="text-align: center;">Further Information:</p> </div> </div>	<p style="text-align: center;">Clerk</p>

**Sheriff's or Server's Return**

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to  
Carolyn Cook (name) Authorized Agent (title).

other \_\_\_\_\_

Served at 600 W. MAIN ST. Jefferson City Mo (address)  
 in Cole (County/City of St. Louis), MO, on 2-4-19 (date) at 8:35 AM (time).

August R. Haunhor (Signature of Sheriff or Server)  
 Signature of Sheriff or Server

**MUST BE SWORN BEFORE A NOTARY PUBLIC IF NOT SERVED BY AN AUTHORIZED OFFICER:**

Subscribed and sworn to before me on 02-07-2019 (date).  
 My commission expires: 03-03-2021 Date  
Donna R. Meep Notary Public

<b>Sheriff's Fees</b>	
Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ <u>10.00</u>
Mileage	\$ _____ ( _____ miles @ \$ _____ per mile)
<b>Total</b>	\$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JALILAH OTTO	Case Number: 1916-CV01693
Plaintiff/Petitioner: HANS NEWSOM	Plaintiff's/Petitioner's Attorney/Address RYAN JOE SHERNAMAN 4240 BLUE RIDGE BLVD SUITE 350 KANSAS CITY, MO 64133
Defendant/Respondent: ERVIN CABLE CONSTRUCTION, LLC	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: ERVIN CABLE CONSTRUCTION, LLC  
Alias:  
CT CORPORATION SYSTEM  
120 SOUTH CENTRAL AVE  
CLAYTON, MO 63105

**PRIVATE PROCESS SERVER**

**COURT SEAL OF JACKSON COUNTY**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

24-JAN-2019  
Date

*[Signature]*  
Clerk

Further Information:

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to Bonnie Love (name) Intake Specialist (title).

other \_\_\_\_\_

Served at 120 S Central Ave Clayton, MO 63105 (address)  
in St. Louis (County/City of St. Louis), MO, on 2/4/19 (date) at 11:32 AM (time).

Robert A. Anderson (Printed Name of Sheriff or Server) [Signature] (Signature of Sheriff or Server)

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on 02-04-19 (date).

My commission expires: 02-27-19 (Date) RR Cu (Notary Public)

**Sheriff's Fees**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.