



**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.

**EMMANUEL ESTERLIN** 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, New Orleans, Louisiana.
- B. **MALACHI HULL**, Individually and in his official capacity as 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, New Orleans, Louisiana.

- C. **RONNIE BLAKE**, 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 224 South Dupre Street, New Orleans, LA 70119.
- D. **RONAL SERPAS**, Individually and in his official capacity as Superintendent of police for the New Orleans Police Department, 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, New Orleans, Louisiana.
- E. **SIMONE QUINTERO**, Individually and in her official capacity as a member of the New Orleans Police Department, 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, New Orleans, Louisiana.
- F. **THE NEW ORLEANS POLICE DEPARTMENT**, is a municipal corporation organized under the laws of the State of Louisiana with capacity to sue and be sued,

domiciled in the Eastern District of Louisiana, who is subject to the jurisdiction of this Court and can be served at 1300 Perdido Street, New Orleans, Louisiana.

G. **THE CITY OF NEW ORLEANS**, is a municipal corporation organized under the laws of the State of Louisiana with capacity to sue and be sued, domiciled in the Eastern District of Louisiana, who is subject to the jurisdiction of this Court and can be served at 1300 Perdido Street, New Orleans, Louisiana.

### **III. FACTUAL ALLEGATIONS**

4.

On October 23, 2013, Emmanuel Esterlin was a taxicab driver driving for Alliance Cab.

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/s with respect to the operations of the City of New Orleans Taxicab and For Hire Bureau.

8.

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

9.

At all times pertinent, Ronal Serpas was the Superintendent for the New Orleans Police Department, and as such, he was responsible for the hiring, training, supervision, discipline and control of the members of the New Orleans Police Department. Serpas was responsible for the supervision, administration, policies, practices, customs and operations of the New Orleans Police Department.

10.

At all times pertinent, Serpas was and continues to be the final policy maker with respect to the operations of the New Orleans Police Department.

11.

At all times pertinent, Simone Quintero was employed by Serpas as a member of the New Orleans Police Department.

12.

On October 23, 2013, Esterlin was seated in his taxicab parked on the left side of the street in the 100 block of Dauphine Street in New Orleans, Louisiana. Four to five other taxicabs were parked in front of Esterlin with multiple taxicab drivers seated in their taxicabs and standing outside of their taxicabs. While seated in his taxicab, Esterlin was approached by investigator Ronnie Blake with the City of New Orleans Taxicab and For Hire Bureau who demanded his driver's license and taxicab permit. Esterlin handed Blake his driver's license and taxicab permit through his open taxicab window. Upon receiving Esterlin's driver's license and taxicab permit, Blake demanded Esterlin exit the taxicab. As Esterlin began to exit his taxicab, Blake removed a pair of handcuffs and demanded Esterlin face the wall. Esterlin pleaded with Blake not to handcuff him. Blake then became irate and screamed at Esterlin to "face the wall." Esterlin attempted to walk away from Blake and Blake pursued Esterlin attempting to force Esterlin's hands behind his back. A struggle ensued as Esterlin attempted to prevent Blake from unlawfully using his handcuffs. The struggle ended and both men walked away in separate directions. Moments later, Blake approached Esterlin and sprayed him in the face with pepper spray. The pepper spray brought Esterlin to his knees, Blake then pushed Esterlin's upper body to the ground, and Blake put his knee into Esterlin's back and handcuffed him.

13.

The entire event was captured on video from the surveillance cameras located on the exterior of the Hyatt French Quarter Hotel.

14.

After Esterlin was handcuffed, Blake called 911, who dispatched the Police and an Ambulance. New Orleans Police Officer Simone Quintero arrived on the scene. Esterlin remained on the ground for approximately twenty minutes while Quintero investigated the incident. During the twenty minutes Esterlin was on the ground, Quintero viewed the video surveillance from the Hyatt French Quarter and spoke to Blake. At no time did Quintero interview Esterlin or interview any of the other witnesses on the scene. After viewing the video surveillance and speaking to Blake, Quintero had Esterlin placed on the stretcher and handcuffed him to the stretcher. Esterlin was put into the ambulance and transported to LSU Public Hospital where he was treated for facial injuries from the pepper spray. Quintero followed the ambulance to the emergency room at LSU Hospital. Quintero required Esterlin to remain handcuffed throughout his entire treatment at LSU Hospital emergency room, which lasted approximately two and one half hours. Upon being discharged from LSU Hospital's emergency room, Quintero arrested Esterlin for battery and transported Esterlin to Orleans Parish Prison where Esterlin was booked. Esterlin remained in Orleans Parish Prison for twenty-four hours before posting bail.

15.

On November 5, 2013, Esterlin was contacted by the Director of the Taxicab and For Hire Bureau, Malachi Hull, who asked Esterlin to come to the office of the Taxicab and For Hire Bureau to "clear up a matter." On November 6, 2013, Esterlin went to the Taxicab and For Hire Bureau to meet with Hull. During this meeting Hull stated:

"I had a chance to look at the video. The hotel General Manager, he sent me the images and I saw Blake asking you for your permit multiple times. Right?"

Emmanuel, what I want you to keep in mind man is that it didn't have to go to a battery charge had you just given them your permit. The police officer saw the video. The incident that happened on that side, I can't change that. You were arrested. I can't change that. You were charged with a crime. I can't change that. But let me see what we can do moving forward. Blake is not going to press charges against you. Ok? I'm trying to figure out how can we get to speak to the folks in court though. One of our investigators is going to write you a citation. The citation is going to allow you to operate. They are going to cite you for parking in a zone. Ok?" (See attached citation marked as Exhibit "A")

16.

This entire conversation was audio recorded on Esterlin's smart phone.

17.

As a result of the unjustified attack, Esterlin suffered personal injuries, including but not limited to injuries to his eyes, face and head, and mental and emotional distress and anguish.

18.

Prior to representing Esterlin and with no knowledge of the above incident, undersigned counsel sent Hull and Blake certified cease and desist letters on October 28, 2013 (merely five days after this attack), detailing claims of abuse and harassment by Blake and another Taxicab Bureau investigator, Wilton Joiner, and requested that Hull and Blake "immediately cease and desist...the systematic threats, harassment and reprisals...which they have been inflicting upon tour guides and taxicab drivers throughout the French Quarter in New Orleans, Louisiana." (See attached letter dated October 28, 2013 marked as Exhibit "B"). Despite being informed of Blake's harassing and violent behavior, Munster and Hull allowed Blake to continue to act in his official capacity as an Investigator for the City of New Orleans Taxicab and For Hire Bureau.



19.

The aggravated battery Blake committed against Esterlin 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. Prior to and after Esterlin's attack, 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 the evening of November 9, 2013, Wendy Bosma, a French Quarter tour guide, was conducting a tour for twenty-eight (28) tourists through the French Quarter in New Orleans, Louisiana when Wilton Joiner, an investigator for the City of New Orleans Taxicab and For Hire Bureau, 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, Malachi Hull, who was on the scene and witnessed the incident. The New Orleans Police Department was 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. This entire event was captured on video recording.

20.

All charges against Esterlin were later dropped voluntarily by the New Orleans Police Department.

21.

Further, since this incident and numerous other complaints of excessive and unlawful force, Ronnie Blake was terminated by the City of New Orleans Taxicab and For Hire Bureau.

22.

On May 14, 2014, Ronnie Blake was charged with aggravated battery via bill of information filed in Orleans Parish Criminal District Court under case number 520-267.

22.

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 Esterlin's rights.

23.

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 Blake in this case.

24.

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 Blake.

25.

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.

26.

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 Blake. Munster and/or Hull ignored these prior incidents and hired and/or retained Blake.

27.

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

28.

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, Esterlin, in this case. This deliberate indifference was a cause of the violation of Esterlin's rights alleged herein.

29.

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

30.

Munster and/or Hull knew or should have known of the violent propensities and misconduct of Blake. 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.

31.

By their failure to properly supervise, Munster and/or Hull condoned, ratified and encouraged the excessive and abusive force against Esterlin. 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 Esterlin in this case.

32.

Further, Quintero unlawfully arrested Esterlin.

33.

By allowing NOPD officers to partially and inadequately investigate complaints, Serpas 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 Esterlin's rights.

34.

In addition, at all times relevant to this suit, it was the policy and/or custom of Serpas to inadequately supervise and train his officers thereby failing to discourage further constitutional violations on the part of officers. Serpas did not require appropriate in service training or re-training of his officers.

35.

The above described policies and customs demonstrate deliberate indifference on the part of the policy maker, Serpas, to the constitutional rights of citizens regulated by the New Orleans Police Department, and to plaintiff, Esterlin, in this case. This deliberate indifference was a cause of the violation of Esterlin's rights alleged herein.

36.

Serpas is liable to the plaintiff for damages as a result of his failure to properly supervise Quintero.

37.

By his failure to properly supervise, Serpas condoned, ratified and encouraged the false arrest, use of excessive force, false imprisonment and intentional infliction of emotional distress against Esterlin. These actions and/or failures on the part of Serpas constitute gross negligence in supervising subordinates and show a deliberate indifference toward the constitutional rights of Esterlin in this case.

38.

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

39.

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

40.

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

41.

Esterlin'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**

42.

The actions of Blake violated Esterlin's Fourth and Fourteenth Amendment right to be free from unreasonable searches and seizure. Additionally, the actions of Blake violated Esterlin's Eighth Amendment right to be free from cruel and unusual punishment. Further, Hull and Blake's retaliatory act of manufacturing a municipal code violation and issuing Esterlin a citation in response to Esterlin confronting them regarding the aggravated battery violates Esterlin's rights under the First and Fourteenth Amendment. Munster, Hull and Blake's conspiracy to cover up the truth regarding Blake's aggravated battery on Esterlin violated

Esterlin's rights under the Fourteenth Amendment. Munster, Hull and Blake acted under the color of state law when they violated Esterlin's rights.

43.

The above described policies and/or customs of Munster and/or Hull show deliberate indifference to Esterlin's constitutional rights and directly contributed to the violations of Esterlin's rights alleged in this Complaint. Munster and/or Hull were aware of the violent propensities of Blake, 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 Esterlin in this case. Munster and/or Hull and/or the City of New Orleans are liable to Esterlin for the constitutional violations that Esterlin suffered at the hands of Hull and Blake.

44.

NOPD Officer Simone Quintero falsely detained, falsely arrested and falsely imprisoned Esterlin using her apparent authority under color of law causing permanent injuries upon him and to otherwise violate his federal constitutional and federal civil rights.

45.

By his failure to properly supervise, Serpas condoned, ratified and encouraged the false arrest, use of excessive force, false imprisonment and intentional infliction of emotional distress against Esterlin. These actions and/or failures on the part of Serpas in supervising subordinates

show a deliberate indifference toward the constitutional rights of Esterlin in this case. Serpas and/or the New Orleans Police Department and/or the City of New Orleans are liable to Esterlin for the constitutional violations that Esterlin suffered at the hands of Quintero.

46.

The defendants acted in combination and in concert to commit unlawful and unconstitutional acts against plaintiff. Furthermore, the law under the Fourth, Fifth, Eighth and Fourteenth Amendments in this regard is clearly established so as to defeat any purported police defendants' qualified immunity for state law claims.

#### **STATE LAW TORTS**

47.

Blake committed the state law tort of aggravated battery against Esterlin.

48.

Blake and Hull intentionally inflicted emotional distress and anguish on Esterlin.

49.

At all times relevant hereto, Blake 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 and/or The City of New Orleans are liable to Esterlin for the tortious acts of their employees.



50.

Quintero committed the state law torts of false arrest, assault and battery, including the use of excessive force under the facts and circumstances, false imprisonment and intentional infliction of emotional distress.

51.

At all times relevant hereto, Quintero was acting within the course and scope of her employment with Serpas. Therefore, the doctrine of *respondeat superior* applies for all state-law torts alleged in this Complaint and Serpas and/or the New Orleans Police Department and/or the City of New Orleans are liable to Esterlin for the tortious acts of their employees.

#### **V. DAMAGES**

52.

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

53.

Esterlin 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.

54.

In addition to recovering damages, Esterlin 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.

55.

Further, defendants are liable to Esterlin for punitive damages.

56.

Plaintiff requests trial by jury.

**WHEREFORE**, Plaintiff, Emmanuel Esterlin, 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 his favor and against defendants, Jared Munster, Malachi Hull, Ronnie Blake, Ronal Serpas and Simone Quintero, individually and in their official capacities, and the New Police Department and the City of New Orleans, 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 Street  
New Orleans, LA 70112

Malachi Hull  
1300 Perdido Street  
New Orleans, LA 70112

Ronnie Blake  
224 South Durpe Street  
New Orleans, LA 70119

Ronal Serpas  
1300 Perdido Street  
New Orleans, LA 70112

Simone Quintero  
1300 Perdido Street  
New Orleans, LA 70112

New Orleans Police Department  
1300 Perdido Street  
New Orleans, LA 70112

City of New Orleans  
1300 Perdido Street  
New Orleans, LA 70112

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

Emmanuel Esterlin

(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 / (504) 453-0607 607 St. Charles Ave., Suite 300 New Orleans, LA 70130

DEFENDANTS

Jared Munster, et al

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) City Attorney's Office City of New Orleans 1300 Perdido Street New Orleans, LA 70112

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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, 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)

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PRISONER PETITIONS, TORTS, PERSONAL INJURY, PERSONAL PROPERTY, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER/STATUTES.

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: Aggravated Battery, False Arrest, False Imprisonment, IIED

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 July 1, 2014 SIGNATURE OF ATTORNEY OF RECORD [Signature]

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

CITY OF NEW ORLEANS GROUND TRANSPORTATION BUREAU  
SUMMONS

CASE NO. \_\_\_\_\_ HEARING ROOM 2W84  
CAR NO. 3059 ARREST CREDIT 97

BEFORE ME, THE UNDERSIGNED AUTHORITY AT

1300 Perdido St. Rm 2W84

LOCATION WHERE SWORN

NEW ORLEANS, LOUISIANA, PERSONALLY CAME AND APPEARED INVESTIGATOR

L. Martin BADGE NO. N/A

WHO, FIRST BEING DULY SWORN, DID DEPOSE AND SAY THAT HE HAS REASONABLE GROUNDS TO BELIEVE AND DOES BELIEVE THAT ON

Wednesday THE 6 DAY OF November 20 13

AT ABOUT 11:16 M. AM

Emmanuel Esterlin DEFENDANT

WHO GAVE HIS/HER NAME ABOVE BIRTH DATE 08-05-1980

RACE N/A SEX M AGE 33 AND HIS

ADDRESS 5429 Loring Drive

AND HIS EMPLOYMENT Alliance Cab

C.P.N.C. # / HOLDER 1680 Guisguerra PERMIT # 041 DR N86

LIC. PLATE # 6077 1680 DRIVER LIC # 02R52537

DID AT Dauphine & Canal

LOCATED IN THE CITY OF NEW ORLEANS, PARISH OF ORLEANS, STATE OF LOUISIANA, THEN AND THERE WANTONLY AND UNLAWFULLY VIOLATE SECTION 162.249 OF ORDINANCE NO. 1727 M.C.S. CODE OF THE CITY OF NEW ORLEANS AS AMENDED RELATIVE TO

SECTION 162 PARAGRAPH 446 RELATIVE TO Driver's  
Good Conduct

SECTION 162 PARAGRAPH 1654 RELATIVE TO Restricted  
Area Delinial

SECTION 162 PARAGRAPH \_\_\_\_\_ RELATIVE TO \_\_\_\_\_

SECTION 162 PARAGRAPH \_\_\_\_\_ RELATIVE TO \_\_\_\_\_

ALL AGAINST THE PEACE AND DIGNITY OF SAME

L. Martin  
AFFIANT'S SIGNATURE

SWORN TO AND SUBSCRIBED BEFORE ME ON THE \_\_\_\_\_ DAY OF \_\_\_\_\_

20

INVESTIGATOR SUPERVISOR

ALLOWED TO OPERATE  NOT ALLOWED TO OPERATE

WARNING: I ACKNOWLEDGE RECEIPT OF THE ABOVE WARNING

ACCUSED 7th Floor City Hall Rm 7605

SUMMONS: THEREFORE YOU, THE ACCUSED

Emmanuel Esterlin

ARE HEREBY NOTIFIED AND SUMMONED BY THE AUTHORITY VESTED IN THE UNDERSIGNED INVESTIGATOR TO PERSONALLY APPEAR BEFORE HEARING OFFICER OF THE CITY OF NEW ORLEANS 1300 PERDIDO ST. RM. 2W84 ON THE

13<sup>th</sup> DAY OF December 20 13 AT 1:30 P.M.

TO BE ARRAIGNED WITHOUT FAIL. OTHERWISE A WARRANT FOR YOUR ARREST MAY BE SOUGHT ALL ACCORDING TO LAW PARTICULARLY 17271 M.C.S. FAILURE TO APPEAR MAY RESULT IN FINES, REVOCATION OF C.P.N.C., DRIVER'S PERMIT, TOUR GUIDE LICENSE AND/OR TOUR PLANNERS LICENSE

L. Martin  
INVESTIGATOR

BADGE NO. N/A

I ACKNOWLEDGE RECEIPT OF THE ABOVE SUMMONS

ACCUSED *[Signature]*

Defendant: Please read notice on the other side of this summons.

OFFICER: Yellow Copy DEFENDANT: Green Copy COURT: White Copy

10845

EXHIBIT

A

tabbies

# THE SHLOSMAN LAW GROUP

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

Dear Mr. Blake,

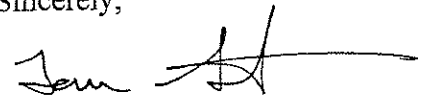
Numerous tour guide companies throughout the French Quarter have retained me to handle legal matters surrounding the systematic threats, harassment and reprisals you have subjected them to beginning on October 18, 2013. Let this letter be a formal request for you to immediately cease and desist this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

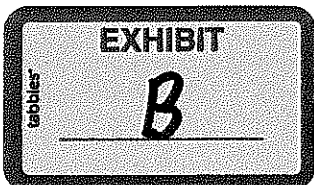
Please be aware that we have full intentions to seek legal action to the fullest extent permitted by law.

Sincerely,



Thomas W. Shlosman

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





# 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,

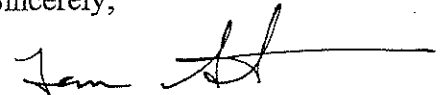
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Please be aware that I will be filing a temporary restraining order and a preliminary injunction seeking a court order that will immediately prevent your investigators from any further violation of my clients' constitutional rights. Title 42 of the 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.

A. Signature  Agent  Addressee  
*McClusell*

B. Received by (Printed Name) *McClusell* C. Date of Delivery *10/29/13*

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

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
<b>Total Postage &amp; Fees</b>	<b>\$ 6.11</b>

Postmark: NEW ORLEANS, LA 70112 10/28/2013

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 2005 See Reverse for Instructions

SCANNED  
 11/15/13 RC

UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

Emmanuel Esterlin

Plaintiff(s)

v.

Jared Munster, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Jared Munster
1300 Perdido Street
New Orleans, LA 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, LA 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

Emmanuel Esterlin

Plaintiff(s)

v.

Jared Munster, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Malachi Hull
1300 Perdido Street
New Orleans, LA 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, LA 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

Emmanuel Esterlin

Plaintiff(s)

v.

Jared Munster, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Ronnie Blake
224 South Dupre Street
New Orleans, LA 70119

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, LA 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 \$ \_\_\_\_\_.

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

Emmanuel Esterlin

Plaintiff(s)

v.

Jared Munster, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Ronal Serpas
1300 Perdido Street
New Orleans, LA 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, LA 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

Emmanuel Esterlin

Plaintiff(s)

v.

Jared Munster, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Simone Quintero
1300 Perdido Street
New Orleans, LA 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, LA 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:



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

Emmanuel Esterlin

Plaintiff(s)

v.

Jared Munster, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

City of New Orleans
1300 Perdido Street
New Orleans, LA 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, LA 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: