

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

J&J SPORTS PRODUCTIONS, INC.	*	CASE NO:
	*	
VERSUS	*	
	*	
KCK HOLDINGS, LLC d/b/a THE M BAR,	*	JUDGE:
KEITH B. HODGE, MD, TERRAL C.	*	
JACKSON, JR., KEVIN G. WORK, MD	*	
AND J. CAMILLE WHITWORTH	*	MAGISTRATE JUDGE:

COMPLAINT

To the Honorable Judges and Magistrate Judges of the United States District Court Middle District of Louisiana:

NOW INTO COURT, through undersigned counsel, comes J&J Sports Productions, Inc. (J&J), a corporation organized under the laws of the State of California with its principal place of business located at 2380 South Bascom Avenue, Suite 200, Campbell, California 95008 and files its complaint for the following reasons:

Venue

1.

Venue is proper in the Middle District of Louisiana because all of the defendants' actions and omissions occurred at the commercial establishment of KCK Holdings, LLC d/b/a The M Bar, 350 3rd Street, Baton Rouge, East Baton Rouge Parish, Louisiana although its registered office is located at 1006 Race Street, New Orleans, LA 70130. East Baton Rouge Parish is one of the parishes composing the territory of the United States District Court for the Middle District of Louisiana.

Jurisdiction

2.

J&J asserts that jurisdiction of the Court is based upon:

- (A) 28 U.S.C. section 1331 because the action presents a question or questions of federal law arising under the Constitution of the United States and other laws of the United States as follows:
- (i) The Communications Act of 1934, as amended, Title 47 U.S.C. 605, et seq. ;
 - (ii) The Cable & Television Consumer Protection and Competition Act of 1992, as amended, Title 47 U.S.C. section 553, et seq., which specifically provides that a civil action may be brought in a United States District Court 553 (c)(1) ; and,
 - (iii) Title 18 sections 2511 (1) (a), (5) and 2520 (a).
- (B) Complete diversity of citizenship and the amount in controversy exceeds the sum of \$75,000.00 exclusive of interests and costs as provided in 28 USCA section 1332.

As discussed in detail below, all of the defendants committed certain acts and omissions that violated J&J's rights as the exclusive commercial domestic distributor of the televised fight Program described below. Those acts and omissions consisted of interception, reception, publication, divulgence, display and exhibition of J&J's property within the control of J&J in the State of Louisiana, but without its permission and/or authorization.

3.

Defendants

The following persons are the defendants in this complaint:

- (a) **KCK Holdings, LLC d/b/a The M Bar (KCK)**, a Louisiana limited liability company having a registered office located at 1006 Race Street, New Orleans, Louisiana, but having a place of business located at 350 3rd Street, Baton Rouge, Louisiana, which is the situs of the violations described below;
- (b) **Keith B. Hodge MD (Hodge)**, a major resident of and domiciled at 1006 Race Street, New Orleans, Louisiana 70130;
- (c) **Kevin G. Work, MD (Work)**, a major resident of and domiciled at 2316 Esplanade, New Orleans, LA 70119;
- (d) **J. Camille Whitworth (Whitworth)**, a major resident of and domiciled at 2316 Esplanade, New Orleans, LA 70119; and,
- (e) **Terral C. Jackson, Jr. (Jackson)**, a major resident of and domiciled at 2035 Camellia Race Drive, Baton Rouge, LA 70808.

4.

J&J is informed, believes and alleges that for all times pertinent to the facts of this complaint KCK owned, operated, licensed, permitted, had dominion over, controlled, oversaw and managed the commercial establishment doing business as The M Bar located at 350 3rd Street, Baton Rouge, East Baton Rouge Parish, Louisiana 70801.

5.

KCK possessed and possesses a license to sell alcoholic beverages within Orleans Parish, Louisiana as shown by the official records of the Louisiana Department of Revenue, Office of Alcohol and Tobacco Control.

6.

Upon information and belief, KCK's license described above was in full force and effect at all times pertinent to the facts alleged in this complaint.

7.

Hodge, Work and Whitworth completed and signed "Schedule A's", which were filed with the Louisiana Department of Revenue, Office of Alcohol and Tobacco Control as part of the process for KCK to acquire the license described above.

8.

The "Schedule A's" described above was notarized and also certified that Hodge, Work and Whitworth were either the "manager, owner, each partner, each officer, and every stockholder owning more than 5 percent of the capital stock" of KCK. However, the official records of the Louisiana Secretary of State also shows that Jackson was/is an officer of KCK. A copy of the Schedule A's and Louisiana Secretary of State's records will be introduced into evidence at the appropriate time.

9.

Because KCK is a legal entity, it acts through its officers, directors and shareholders. Hodge, Work, Whitworth and Jackson as officers and members of KCK are all liable for all conduct occurring on the premises of KCK including the acts of any person who unlawfully

intercepted the Program described below, which was broadcasted on KCK's premises.

10.

J&J is a distributor of closed circuit pay-per view boxing and special events in the United States. Pay-per view means that in order for a customer to view the closed circuit event, it/he/she must pay a fee to J&J, which is/was set by J&J.

11.

KCK owns/owned and operates/operated a bar, which serves/served alcoholic beverages. KCK does possess a license to sell alcoholic beverages as shown by the official records of the Louisiana Department of Revenue, Office of Alcohol and Tobacco Control.

12.

J&J is informed, believes and alleges that on May 5, 2012 (the night of the Program, which is described below in paragraph 19), KCK had the right and ability to supervise the business and activities of its lounge, which included the unlawful interception of J&J's Program.

13

J&J is informed, believes and alleges that on May 5, 2012 (the night of the Program, which is described below in paragraph 19), KCK, Hodge, Work, Whitworth and Jackson supervised the activity of unlawfully intercepting J&J's Program, and, among other responsibilities, had the obligation to ensure that the sale of alcoholic beverages upon its premises was not in violation of law.

14.

J&J is informed, believes and alleges that on May 5, 2012 (the night of the Program, which is described below in paragraph 19), KCK, Hodge, Work, Whitworth and Jackson

specifically and wilfully directed its employees to unlawfully intercept and broadcast J&J's Program on KCK's premises. Furthermore, the actions of KCK's employees were/are directly imputable to KCK, Hodge, Work, Whitworth and Jackson by virtue of their acquiescence, knowledge and acknowledgment that the unlawful interception and broadcast of J&J's Program on KCK's premises did occur.

15.

J&J is informed, believes and alleges that on May 5, 2012 (the night of the Program, which is described below in paragraph 19), KCK had and possessed an obvious and direct financial interest and commercial advantage and private financial gain in the activities conducted on its premises, which included the unlawful interception of J&J's Program.

16.

J&J is informed, believes and alleges that the unlawful and willful interception and broadcast of J&J's Program by KCK resulted in a commercial advantage and private financial gain to KCK due to the increased profits for KCK and/or the possibility of increased profits for KCK.

17.

J&J is informed, believes and alleges that the unlawful and willful interception and broadcast of J&J's Program by KCK resulted in a commercial advantage and private financial gain to Hodge, Work, Whitworth and Jackson due to the increased profits for KCK and/or the possibility of increased profits for KCK.

COUNT I

(Violation of Title 47 U.S.C. Section 605 (a), (e) (3) (a) and (e) (4) and 18 U.S.C. section 2511

in conjunction with section 2520)

18.

J&J incorporates by reference all of the allegations contained in paragraphs 1 through and including 17, as though reproduced here in full.

19.

Pursuant to a valid and enforceable contract, J&J was granted the exclusive nationwide commercial distribution and broadcast (closed-circuit) rights to “Floyd Mayweather, Jr. v. Miguel Cotto, WBA World Light Middleweight Championship Fight Program” telecast nationwide on Saturday, May 5, 2012 (this included all under-card bouts and fight commentary encompassed in the television broadcast of the event, hereinafter referred to as the Program).

20.

Pursuant to the same valid and enforceable contract, J&J, entered into subsequent sub-licensing agreements with various commercial entities throughout North America, including entities within the State of Louisiana, by which it granted these entities limited sub-licensing rights, specifically the rights to publicly exhibit the Program within their respective commercial establishments in the hospitality industry (i.e., hotels, racetracks, casinos, bars, taverns, restaurants, social clubs and other similar businesses). The defendants were **not** granted sub-licensing rights and/or any other right concerning the Program.

21.

As a commercial distributor and licensor of sporting events, including the Program, J&J expended substantial monies marketing, advertising, promoting, administering, and transmitting the Program to its customers, the commercial entities described above.

22.

With full knowledge that the Program was not to be intercepted, received, published, divulged, displayed, and/or exhibited by commercial entities unauthorized to do so, the defendants named above, either through direct action or through actions of employees or agents directly imputable to the defendants (as outlined in paragraphs 1 through and including 21 above), did unlawfully intercept, receive, publish, divulge, display, and/or exhibit the Program at the time of its transmission at the defendant, KCK's, commercial establishment located at 350 3rd Street, Baton Rouge, East Baton Rouge Parish, Louisiana 70801.

23.

The unauthorized interception, reception, publication, exhibition, divulgence, display, and/or exhibition by each of the defendants was done wilfully and for purposes of direct and/or indirect commercial advantage and/or private financial gain. J&J stands ready to present eye-witness testimony and other evidence supporting all allegations made in this complaint.

24

Title 47 U.S.C. Section 605, et seq. and Title 18 U.S.C. sections 2511 and 2520 prohibit the unauthorized publication or use of communications (such as the transmission of the Program for which J&J had the exclusive distribution rights).

25

By reason of the actions, omissions and conduct of all of the defendants described above, each of the defendants violated Title 47 U.S.C. Section 605, et seq. and Title 18 U.S.C. sections 2511 and 2520.

26.

By reason of the actions, omissions and conduct of all of the defendants described above, which resulted in the violation of Title 47 U.S.C. Section 605, et seq, and Title 18 U.S.C. sections 2511 and 2520, J&J has the private right of action pursuant to Title 47 U.S.C. Section 605 and Title 18 U.S.C. sections 2511 and 2520.

27.

By reason of the actions, omissions and conduct of all of the defendants described above, which resulted in the violation of Title 47 U.S.C. Section 605, et seq, and 18 U.S.C. sections 2511 and 2520, J&J is entitled to the following from each defendant:

- (a) Statutory damages for each willful violation in an amount to \$100,000.00 pursuant to Title 47 U.S.C. 605 (e)(3)(C)(ii), and also
- (b) Recovery of full costs, including reasonable attorney's fees pursuant to Title 47 U.S.C. Section 605(e)(3)(B)(iii).

COUNT II

(Violation of Title 47 U.S.C. Section 553)

28.

J&J incorporates by reference all of the allegations contained in paragraphs 1 through and including 27 as though reproduced here in full.

29.

The unauthorized interceptions, reception, publication, divulgence, display, and/or exhibition of the Program by the above named defendants was prohibited by Title 47 U.S.C. section 553, et seq.

30.

By reason of the actions, omissions and conduct of all of the defendants described above, each of the defendants violated Title 47 U.S.C. Section 553, et seq.

31.

By reason of the actions, omissions and conduct of all of the defendants described above, which resulted in the violation of Title 47 U.S.C. Section 553, et seq., J&J has the private right of action pursuant to Title 47 U.S.C. Section 553.

32.

By reason of the actions, omissions and conduct of all of the defendants described above, which resulted in the violation of Title 47 U.S.C. Section 553, et seq., J&J is entitled to the following from each defendant:

- (a) Statutory damages for each violation in an amount to \$10,000.00 pursuant to Title 47 U.S.C. 553 (c)(3)(A)(ii), and also
- (b) Statutory damages for each willful violation in an amount to \$50,000.00 pursuant to Title 47 U.S.C. 553 (c)(3)(B), and also
- (c) Recovery of full costs, including reasonable attorney's fees pursuant to Title 47 U.S.C. Section 553(c)(2), and also
- (d) in the discretion of this Honorable Court, reasonable attorney's fees, pursuant to Title 47 U.S.C. section 553 (c) (2) ©.

33.

Despite the existence of two separate and distinct federal laws (Title 47 U.S.C. Section 605, et seq. and Title 18 U.S.C. sections 2511 and 2520 AND Title 47 U.S.C. Section 553, et seq.),

which were enacted at different times, some federal courts have held that a successful plaintiff may only receive damages under one of those laws but not both. J&J asserts its claims under both sets of federal laws, but if the Court should find that the violations stated above occurred under one or the other statutes cited or that J&J may only recover one set of damages, then to that extent, J&J's claims should be considered as alternative claims. J&J does not seek double damages.

THEREFORE, J&J Sports Productions, Inc. prays that all of the defendants be served with a summons and certified copy of this complaint and required to answer it within the legal delays provided by the Federal Rules of Civil Procedure.

FURTHERMORE, J&J Sports Productions, Inc. prays for judgment in its favor and against all of the defendants, in solido, for the following sums of money, subject to the jurisprudential rule that double damages are not permitted:

As to Count I (Violation of Title 47 U.S.C. Section 605 and Title 18 U.S.C. sections 2511 and 2520)

- At J&J's elections in accordance with 47 U.S.C. section (e) (3) (B) and (C) (ii),
- (a) statutory damages in the amount of \$110,000.00 against the defendants, and each of them; and,
 - (b) reasonable attorney's fees as mandated by statute; and,
 - (c) all costs of suit, including but not limited to filing fees, service of process fees, iKCKestigative costs; and,
 - (d) such other and further relief as this Honorable Court may deem just and proper.

As to Count II (Violation of Title 47 U.S.C. Section 553 (a) (1), (c)(1), (2), (B), (C), 3 (A), (B))

- (a) statutory damages in the amount of \$60,000.00 against the defendants, and each of

them;

- (b) reasonable attorney's fees as may be awarded in the Court's discretion pursuant to statute;
- (c) all costs of suit, including but not limited to filing fees, service of process fees, iKCKestigative costs; and,
- (d) such other and further relief as this Honorable Court may deem just and proper.

The Berthelot Law Firm, LLC
1660 Thibodeaux Avenue
Baton Rouge, Louisiana 70802
(225) 454-0488—cell phone
1-484-842-8566—facsimile
ronniejberthelot@gmail.com

By: s/Ronnie J. Berthelot

Ronnie J. Berthelot, T.A.
LSBA bar roll no. 1012

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

J&J SPORTS PRODUCTIONS, INC.	*	CASE NO:
	*	
VERSUS	*	
	*	
KCK HOLDINGS, LLC d/b/a THE M BAR,	*	JUDGE:
KEITH B. HODGE, MD, TERRAL C.	*	
JACKSON, JR., KEVIN G. WORK, MD	*	
AND J. CAMILLE WHITWORTH	*	MAGISTRATE JUDGE:

Certificate of Service

I certify that I mailed the foregoing “Complaint” to the following defendant—an attorney is unknown at this time—:

KCK Holdings, LLC
1006 Race Street
New Orleans, LA 70130

Keith B. Hodge, MD
1006 Race Street
New Orleans, LA 70130

Terral C. Jackson, Jr.
2035 Camellia Race Drive
Baton Rouge, LA 70808

Kevin G. Work, MD
2316 Esplanade
New Orleans, LA 70119

J. Camille Whitworth
2316 Esplanade
New Orleans, LA 70119

by placing a copy of the “Civil Cover Sheet” and the “Complaint” in the United States Mail properly addressed and post-paid on May 1, 2014.

s/Ronnie J. Berthelot
Ronnie J. Berthelot

CIVIL COVER SHEET

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

I. (a) PLAINTIFFS

J&J SPORTS PRODUCTIONS, INC.

(b) County of Residence of First Listed Plaintiff SANTA CLARA, CA (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) The Berthelot Law Firm, LLC; Ronnie J. Berthelot, Esq.; 1660 Thibodeaux Avenue, Baton Rouge, LA 70806; (225) 454-0488

DEFENDANTS

KCK HOLDINGS, LLC d/b/a THE M BAR, KEITH B. HODGE, MD, TERRAL C. JACKSON, JR., KEVIN G. WORK, MD AND J. CAMILLE WHITWORTH

County of Residence of First Listed Defendant ORLEANS PARISH, LA (IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known)

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

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

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

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location (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, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, 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): 47 USCA 605 et. seq.; 47 USCA 553 et. seq.; 18 USCA 2511 (1) (a), (5) and 2520 (a)
Brief description of cause: A claim for damages due to an unlawful interception of a closed-circuit television transmission

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 170,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 04/27/2014 SIGNATURE OF ATTORNEY OF RECORD /s/ Ronnie J. Berthelot, Esq.; LSBA bar roll no. 1012

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- Date and Attorney Signature.** Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Louisiana

J&J SPORTS PRODUCTIONS, INC.

Plaintiff(s)

v.

KCK HOLDINGS, LLC d/b/a THE M BAR, KEITH B. HODGE, MD, TERRAL C. JACKSON, JR., KEVIN G. WORK, MD AND J. CAMILLE WHITWORTH

Defendant(s)

Civil Action No. 14-269-BAJ-SCR

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) J. Camille Whitworth
2316 Esplanade
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 Berthelot Law Firm, LLC
Ronnie J. Berthelot, Esq.
1660 Thibodeaux Avenue
Baton Rouge, LA 70806
(225) 454-0488

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: 05/02/2014

Signature of Clerk or Deputy Clerk

Civil Action No. 14-269-BAJ-SCR

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 \$ _____ 0.00 _____ .

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:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Louisiana

J&J SPORTS PRODUCTIONS, INC.

Plaintiff(s)

v.

KCK HOLDINGS, LLC d/b/a THE M BAR, KEITH B. HODGE, MD, TERRAL C. JACKSON, JR., KEVIN G. WORK, MD AND J. CAMILLE WHITWORTH

Defendant(s)

Civil Action No. 14-269-BAJ-SCR

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Kevin G. Work, MD
2316 Esplanade
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 Berthelot Law Firm, LLC
Ronnie J. Berthelot, Esq.
1660 Thibodeaux Avenue
Baton Rouge, LA 70806
(225) 454-0488

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: 05/02/2014

Signature of Clerk or Deputy Clerk

Civil Action No. 14-269-BAJ-SCR

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 \$ _____ 0.00 _____ .

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:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Louisiana

J&J SPORTS PRODUCTIONS, INC.

Plaintiff(s)

v.

KCK HOLDINGS, LLC d/b/a THE M BAR, KEITH B. HODGE, MD, TERRAL C. JACKSON, JR., KEVIN G. WORK, MD AND J. CAMILLE WHITWORTH

Defendant(s)

Civil Action No. 14-269-BAJ-SCR

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Terral C. Jackson, Jr. 2035 Camellia Race Drive Baton Rouge, LA 70808

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 Berthelot Law Firm, LLC Ronnie J. Berthelot, Esq. 1660 Thibodeaux Avenue Baton Rouge, LA 70806 (225) 454-0488

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: 05/02/2014

Signature of Clerk or Deputy Clerk

Civil Action No. 14-269-BAJ-SCR

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 \$ _____ 0.00 _____ .

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:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Louisiana

J&J SPORTS PRODUCTIONS, INC.

Plaintiff(s)

v.

KCK HOLDINGS, LLC d/b/a THE M BAR, KEITH B. HODGE, MD, TERRAL C. JACKSON, JR., KEVIN G. WORK, MD AND J. CAMILLE WHITWORTH

Defendant(s)

Civil Action No. 14-269-BAJ-SCR

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Keith B. Hodge, MD
1006 Race Street
New Orleans, LA 70130

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 Berthelot Law Firm, LLC
Ronnie J. Berthelot, Esq.
1660 Thibodeaux Avenue
Baton Rouge, LA 70806
(225) 454-0488

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: 05/02/2014

Signature of Clerk or Deputy Clerk

Civil Action No. 14-269-BAJ-SCR

PROOF OF SERVICE

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

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was received by me on *(date)* _____ .

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_____ on *(date)* _____ ; or

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_____, 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)*:

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

Date: _____

Server's signature

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Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

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J&J SPORTS PRODUCTIONS, INC.

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v.

KCK HOLDINGS, LLC d/b/a THE M BAR, KEITH B. HODGE, MD, TERRAL C. JACKSON, JR., KEVIN G. WORK, MD AND J. CAMILLE WHITWORTH

Defendant(s)

Civil Action No. 14-269-BAJ-SCR

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) KCK Holdings, LLC through its agent for service of process Keith B. Hodge, MD 1006 Race Street New Orleans, LA 70130

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 Berthelot Law Firm, LLC Ronnie J. Berthelot, Esq. 1660 Thibodeaux Avenue Baton Rouge, LA 70806 (225) 454-0488

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: 05/02/2014

Signature of Clerk or Deputy Clerk

Civil Action No. 14-269-BAJ-SCR

PROOF OF SERVICE

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_____ 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)* _____
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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: