

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

RUBY STREETER, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 OFFICE OF DOUGLAS R. BURGESS, )  
 LLC, and DOUGLAS R. BURGESS, )  
 ET AL. )  
 )  
 Defendants. )

CASE NUMBER: 1:07-cv-97-WKW

**DEFENDANT DOUGLAS J. MACKINNON’S SPECIAL LIMITED APPEARANCE  
AND MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Pursuant to FED. R. CIV. P. Rule 12(b)(2), Defendant Douglas J. MacKinnon (“Mr. MacKinnon”) appears specially by and through undersigned counsel for the limited purpose of moving this Court to dismiss the claims against him for lack of personal jurisdiction. The grounds on which Mr. MacKinnon’s motion is based are set forth in his Memorandum in Support of Motion to Dismiss for Lack of Personal Jurisdiction. In addition to his Memorandum, Mr. MacKinnon also submits his Declaration in support of this motion.

Wherefore, Mr. MacKinnon respectfully requests that this Court dismiss the claims against him in their entirety for lack of personal jurisdiction.

Respectfully submitted,

s/ Fern H. Singer  
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Fern H. Singer  
Stacey A. Davis  
Attorneys for Defendant

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I certify that the foregoing has been served upon the following counsel of record by electronic mail on this the 21st day of May, 2008:

Gary Wyatt Stout  
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s/ Fern H. Singer \_\_\_\_\_  
Of Counsel