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**JUN 24 2010**

EDWARD C. WALKER, CIRCUIT CLERK  
BY [Signature] **PLAINTIFF** D.C.

**NO. 10-KV-0059-J**

**DEFENDANT**

**IN THE CIRCUIT COURT OF ADAMS COUNTY, MISSISSIPPI**

**JAMIE A. BROWN**

**VS.**

**RYAN'S GRILL BUFFET & BAKERY**

**COMPLAINT**

**Jury Trial Demanded**

COMES NOW the Plaintiff, Jamie A. Brown, and files her Complaint against the Defendant, Ryan's Grill Buffet & Bakery, and would respectfully show unto this Honorable Court the following, to-wit:

I.

That Plaintiff is an adult resident citizen of Union County, Mississippi.

II.

That the Defendant, Ryan's Grill Buffet & Baker, is a corporation doing business under the laws of the State of Mississippi whose registered agent for service of process is C.T. Corporation System who can be served at 645 Lakeland East Drive, Suite 101, Flowood, MS 39232.

III.

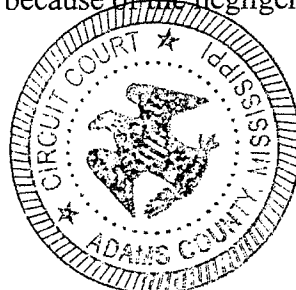
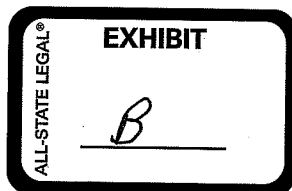
That jurisdiction and venue are proper to this Court.

IV.

That on or about November 16, 2009, the Plaintiff was a customer in a restaurant owned and operated by the Defendant in Natchez, Mississippi.

V.

That while in this store the Plaintiff went to the ladies bathroom to change her child's diaper and fell due to the floor being wet because of the negligence of the employees of the Defendant.



**CERTIFIED  
TRUE COPY**

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VI.

Defendant also failed to place a warning of the dangerous condition.

VII.

That the fall and resulting damages were directly and proximately caused by the negligence of the Defendant, and Defendant's employees in their failure to exercise a proper degree of care in the following respects, to-wit:

- A. Failing to maintain the store in a safe and reasonable manner;
- B. Failing to properly patrol the store in order to keep the Plaintiff safe;
- C. Failing to properly clean and maintain store;
- D. Failure to properly place a warning sign of the known dangerous condition;
- E. Failure to use reasonable care; and
- F. Failure of the Defendant to properly train its employees in how to maintain the store in a safe manner.

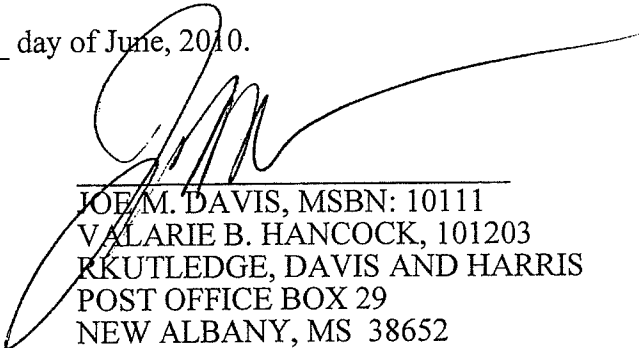
VIII.

As a direct and proximate result of the gross and reckless negligence of the Defendant and Defendant's employees in this action, Jamie A. Brown received permanent, painful and disabling injuries which have caused her to suffer great pain, loss of enjoyment of life, loss of wages and income, expense of medical care, emotional distress, and psychological injuries. In addition, Jamie A. Brown will be forced to continue to suffer great pain, loss of enjoyment of life, loss of wage-earning capacity, expense of medical care, emotional distress and psychological injuries for the remainder of her life.

WHEREFORE, Plaintiff demands judgment against the Defendant, Ryan's Grill Buffet & Bakery, in an amount within the jurisdictional limits of this Honorable Court for compensatory damages incurred by the Plaintiff, Jamie A. Brown, as the result of the gross and reckless negligence of the Defendant and Defendant's employees and for all which the Defendant, Ryan's

Grill Buffet & Bakery, is liable, together with interest, attorney's fees and all court costs herein.

Respectfully submitted, this the \_\_\_\_\_ day of June, 2010.



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