

IN THE IOWA DISTRICT COURT FOR LEE COUNTY
IN KEOKUK

IDA RUTH NELSON, SUZANNE)	
BROWN,)	
Plaintiffs,)	Cause No.
)	
vs.)	PETITION AT LAW
)	
SIBLING OF KEOKUK, INC.,)	
MCDONALD'S REAL ESTATE)	
COMPANY,)	
Defendants.)	

Comes Now, the plaintiffs, Ida Ruth Nelson and Suzanne Brown, by and through their attorney, Tyler Logan, and for cause of action against defendants state;

1. Sibling of Keokuk, Inc. is an Iowa Corporation which operates the McDonald's restaurant at 1407 Main Street, Keokuk, Iowa 52632 with its registered agent being Steven J. Mast, 1407 Main St., Keokuk, Iowa 52632.

2. McDonald's Real Estate Company is a Delaware Corporation, licensed to do business in Iowa which is the owner of the real estate at 1407 Main Street, Keokuk, Iowa 52632 with its registered agent being Corporation Service Company, 505 5th Avenue, Suite 729, Des Moines, Iowa 50309.

3. Suzanne Brown f/k/a Suzanne Crowell resides at 211 Locust St., Lot #3, Carthage, Illinois 62321.

4. Ida Ruth Nelson ("Ida") resides at 1528 Franklin Street, Keokuk, Iowa 52632.

5. On or about April 13, 2014 plaintiff Ida Ruth Nelson went to the McDonald's restaurant at 1407 Main Street, Keokuk, Iowa 52632 ("McDonald's") with her husband for a meal.

6. While at the restaurant, Ida fell as a consequence of the floor being unsafe to walk on and there not being any warning or hazard sign indicating the floor's unsafe condition.

7. On or about August 29, 2014 plaintiff Suzanne Brown ("Suzanne") went to McDonald's to get something to eat.

8. While at the restaurant, Suzanne fell as a consequence of the floor being unsafe to walk on and there not being any warning or hazard sign indicating the floor's unsafe condition.

9. Defendants have a duty to the public and their customers to maintain a safe facility and to provide adequate notice when conditions are not safe.

10. Defendants failed in their duty to plaintiffs to maintain floors safe for walking.

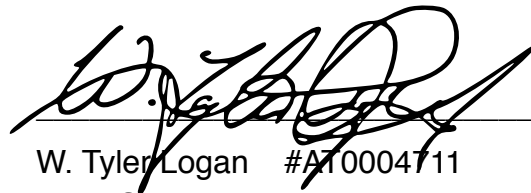
11. As a consequence of defendants' failure in their duties to plaintiffs, they suffered injuries which required medical attention and caused them pain and suffering.

12. In addition, plaintiff Suzanne was not able to fully perform her job at AyerCo in Kahoka.

13. Plaintiff Suzanne remained unemployed until obtaining new employment with Wal-Mart in November.

Wherefore plaintiffs pray the Court to find the defendants negligent in the performance of their duties to plaintiffs and to enter judgment against the defendants which will adequately compensate plaintiffs for their damages caused as a result of defendants' negligence and for such other relief as the Court may determine in the interest of justice and equity.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. Tyler Logan', is written over a horizontal line.

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