

IN THE CIRCUIT COURT OF HARRISON COUNTY, MISSISSIPPI  
SECOND JUDICIAL DISTRICT

PATRICIA JOHNSON and  
EDWARD WILLIAMS

PLAINTIFFS

v.

FILED  
FEB 01 2021  
CONNIE LALNEZ  
CIRCUIT CLERK  
BY: [Signature] D.C.

CAUSE NO.: A2402-2021-019

CAMPING WORLD RV SALES, LLC

DEFENDANT

COMPLAINT

COMES NOW, Plaintiffs, Patricia Johnson and Edward Williams, by and through undersigned counsel, and files this, their Complaint for Damages in the above-referenced lawsuit. In support thereof, the Plaintiffs will show unto this honorable court, the following, to-wit:

I.

Plaintiffs, Patricia Johnson and Edward Williams are adult resident citizens of Orleans Parish, Louisiana.

II.

The Defendant, Camping World RV Sales, LLC, upon information and belief, is a foreign limited liability company doing business in the State of Mississippi, who may be served with process pursuant to the Mississippi Rules of Civil Procedure by serving their registered agent of process, CT Corporation, 645 Lakeland East Drive, Ste. 101, Flowood, Mississippi 39501.

III.

The cause of action occurred or accrued in the Second Judicial District of Harrison County, Mississippi, and pursuant to Miss. Code Ann. § 11-11-3, as amended, venue is proper in this Court.

IV.

On February 15, 2020, and at all times hereafter mentioned, Plaintiffs, Patricia Johnson and Edward Williams were business invitees at Defendant's premises, Camping World of Biloxi, located at 12020 Shriners Boulevard, Biloxi, Mississippi 39532.

V.

The Plaintiffs were interested in looking at an RV that was being sold by the Defendants on the premises.

VI.

That since the golf carts that have seats and are used to transport people were all being used, representatives for the Defendant endeavored to take the Plaintiffs to look at the RV on a golf cart that had rear seats removed in favor of a metal bed that is used for hauling materials

VII.

That the Plaintiffs were instructed to sit in the bed of the golf cart where there were no seats, no safety restraints, nor anything for the Plaintiffs to hold on to.

VIII.

That driver of the golf cart took off in an aggressive and unsafe manner, causing the Plaintiffs to be ejected from the cart.

IX.

That the actions of the driver of the golf cart occurred while in the course and scope of his employment with the Defendant, making the Defendant vicariously liable for his actions under the theory of respondeat superior.

X.

That the incident was caused by the negligence of the Defendant, in the following, non-exclusive ways:

- a. In operating the business in an improper, unsafe, and negligent manner;
- b. In failing to provide a safe environment;
- c. In failing to warn the Plaintiffs of a hidden danger;
- d. In violating the duties owed to a business invitee;
- e. In negligently hiring and training employees;
- f. In violating company policies and procedures;
- g. In violating the Revised Statutes of the State of Mississippi, all of which are pled as if copied herein in extenso; and
- h. All other acts of negligence which was the cause of the incident sued upon and will be shown at the trial of this matter.

XI.

That as a result of the incident, Plaintiff Patricia Johnson suffered injuries, including but not limited to her back and neck.

XII.

That as a result thereto, Plaintiff Patricia Johnson has suffered these damages: bills for medical treatment, past and future; physical pain and suffering including loss of enjoyment of life and household services, past and future; mental and emotional distress, past and future; loss of wages and earning capacity, past and future; permanent impairment and disability.

XIII.

That as a result of the incident, Plaintiff Edward Williams suffered injuries, including but not limited to his left wrist, lower back and shoulders.

XIV.

That as a result thereto, Plaintiff Patricia Johnson has suffered these damages: bills for medical treatment, past and future; physical pain and suffering including loss of enjoyment of life and household services, past and future; mental and emotional distress, past and future; loss of wages and earning capacity, past and future; permanent impairment and disability.

XV.

Plaintiffs show that they are entitled to a trial by jury on all issues raised herein, and pray for a trial by jury on all issues raised herein.

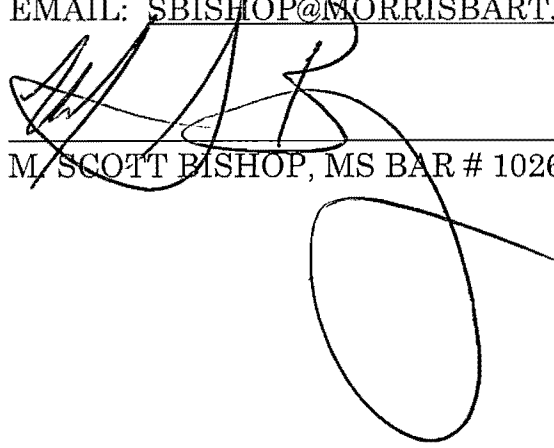
**WHEREFORE**, your Plaintiffs, Patricia Johnson and Edward Williams, pray that Defendant, Camping World RV Sales, LLC, be served with a copy of this Complaint, and after being duly cited to appear and answer hereto, and after the

expiration of all legal delays and due proceedings are had, that there be judgment rendered herein in favor of Plaintiffs, Patricia Johnson and Edward Williams and against Defendant, Caming World RV Sales, LLC, as alleged, together with legal interest, and for all costs of these proceedings including expert witness fees to be taxed as costs of court, and for all legal and equitable relief this honorable court shall deem appropriate. Further, a **TRIAL BY JURY** is requested on all issues raised herein.

RESPECTFULLY SUBMITTED, this the 27 day of January, 2021.

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