

IN THE STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

IN THE COURT OF COMMON PLEAS)
FOR THE 12TH JUDICIAL CIRCUIT)

RODNEY JONES,)

CASE NO:)

Plaintiff,)

v.)

SUMMONS
(Jury Trial Demanded)

HHF Inc. d/b/a McDonald's,)

Defendant.)

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to file and serve upon Jennifer Randolph Purdy, Plaintiff's attorney, whose address is 828 Woodrow Street Columbia, South Carolina 29205, an Answer to the Complaint, which is herewith served upon you, within thirty (30) days after service of this summons upon you, exclusive of the day of service.

YOU ARE HEREBY GIVEN FUTHER NOTICE, that if you fail to appear and defend and fail to Answer the Complaint as required by this summons, within (30) days after service hereof, judgment by default will be taken against you for the relief demanded in the Complaint.

PURDY LAW, LLC

s/ Jennifer Randolph Purdy
Jennifer Randolph Purdy
SC Bar No.: 11121
Attorney for Plaintiff
828 Woodrow Street
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Columbia, South Carolina
Dated: November 17, 2025

IN THE STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF FLORENCE)	FOR THE 12TH JUDICIAL CIRCUIT
RODNEY JONES,)	CASE NO:
Plaintiff,)	
v.)	COMPLAINT
HHF Inc. d/b/a McDonald's,)	(Jury Trial Demanded)
Defendant.)	

The Plaintiff, complaining of the Defendant, alleges and says as follows:

PARTIES AND JURISDICTION

- 1. Plaintiff is a citizen and resident of Union County, North Carolina.
- 2. Upon information and belief, Defendant is a Corporation incorporated under the laws of South Carolina and operates a restaurant in Florence County, South Carolina doing business as McDonald's located at 2016 W. Palmetto Street, Florence, South Carolina 29501.

JURISDICTION & VENUE

- 3. The incident giving rise to this cause of action set forth herein occurred at McDonald's located at 2016 W. Palmetto Street, Florence, South Carolina 29501, in the County of Florence, State of South Carolina.
- 4. This Court has subject-matter jurisdiction over the claims in this lawsuit and has personal jurisdiction over the parties.
- 5. Venue is proper in this county under South Carolina Code § 15-7-30.

FACTS

6. Plaintiff hereby incorporates the preceding paragraphs of the Complaint as if fully rewritten herein.

7. On or about January 6, 2024, Plaintiff was an invitee of the Defendant's McDonald's restaurant located at 2016 W Palmetto Street, Florence, South Carolina 29501.

8. On the aforementioned date, there was liquid on the floor inside Defendant's restaurant.

9. Plaintiff was not aware of the liquid's presence nor had he been warned of the danger by the Defendant.

10. Suddenly, Plaintiff slipped on the liquid present on the floor.

11. The liquid on the floor caused Plaintiff to slip and fall violently down onto the floor of the restaurant, resulting in serious and permanent injuries.

12. Prior to the Plaintiff's fall, another customer in the restaurant notified the Defendant's employees of the liquid on the floor and the dangerous condition it created.

13. Defendant failed to remove the liquid or warn the Plaintiff of the presence of the liquid on the floor.

NEGLIGENCE OF DEFENDANT

(Premises Liability, Negligent and Reckless Conduct, Gross Negligence)

14. Plaintiff incorporates all allegations of paragraphs above into this cause of action as if set forth verbatim.

15. At the time of the incident described above, Plaintiff was an invitee of the Defendant's restaurant.

16. At all times relevant to this matter, the employees of Defendant's restaurant were acting within the course and scope of their employment and were agents of the Defendant.

17. Pursuant to the doctrine of respondeat superior, Defendant is liable for the acts and omission of its employees who were acting within the course and scope of their employment with the Defendant.

18. Defendant was aware of the liquid on the floor and had both actual and constructive notice of the dangerous condition prior to Plaintiff's fall.

19. That the Defendant, by its acts and omissions, was negligent, grossly negligent, careless, reckless, willful and wanton in one or more of the following particulars, to wit:

- a) In then and there failing to maintain the store's premises in a reasonable and safe condition for customers and guests;
- b) In then and there allowing a dangerous condition to exist on the store's premises;
- c) In then and there creating an unreasonably dangerous condition on the store's premises;
- d) In then and there fostering an environment which resulted in the creation of an unreasonably dangerous condition on the store's premises;
- e) In then and there failing to prevent, eliminate and/or correct a dangerous condition about which it knew or should have known;
- f) In then and there failing to warn customers in the store of dangerous conditions about which it knew or should have known;
- g) In then and there failing to regularly and routinely monitor, survey, and/or inspect the restaurant's floors for unsafe, dangerous, and/or hazardous

- conditions;
- h) In allowing liquid to remain on the floor for extended periods of time, when it knew or should have known that allowing liquid to remain on the floor created a dangerous condition for its customers;
 - i) In failing to keep its restaurant free of unreasonable, foreseeable pedestrian hazards that could pose a danger to its invitees and in accordance with industry standards and safety rules;
 - j) In failing to warn of latent or hidden dangers on premises, including dangerous liquids on the floor of which Defendant had knowledge or should have had knowledge upon reasonable inspections;
 - k) In failing to place safety mats at the entrance and exit ways of the restaurant to prevent invitees from slipping on water and other liquids;
 - l) In failing to anticipate the harm to its invitees and to take precautions to remove the potential dangers and harm;
 - m) In failing to put up warning signs, caution signs, and/or “wet floor” signs;
 - n) In failing to take affirmative and prompt action upon notice of a dangerous condition on the premises and to eliminate the danger or warn others of the danger.
 - o) In failing to properly supervise the store and its employees;
 - p) In failing to properly train its managers and employees;
 - q) In failing to properly and routinely observe the condition of the floor and/or in failing to clean up any incidents and/or dangerous conditions immediately;

- r) In failing to have policies and procedures in place to prevent injuries to its customers, and if such policies and procedures were in place, failing to properly utilize them;
- s) In failing to have video surveillance of the restaurant, or if such surveillance existed, in failing to properly utilize the surveillance and preserve the footage;
- t) In acting in reckless disregard for the rights and safety of the restaurant's guests and patrons;
- u) In then and there failing to exercise that degree of care which a reasonable and prudent business entity would have exercised under the same or similar circumstances; and,
- v) In such other particulars as may be discovered during discovery and/or at trial.

All of which were the direct and proximate cause of the injuries and damages the Plaintiff suffered, as are more fully set forth below, said acts being in violation of the laws of the State of South Carolina.

20. The injuries and damages complained of herein were directly and proximately caused by the preceding negligent, careless, reckless, willful, and grossly negligent acts of Defendant, all in violation of the statutes and common laws of the State of South Carolina, and for such other acts omissions that may become more apparent through the discovery and/or trial of this matter.

21. No conditions existed at the time of this incident which would have prevented the Defendant, in the exercise of due caution, and in furtherance of its duty to provide safe premises

for members of the public, from inspecting the condition of its restaurant, making necessary actions to render the space safe and fit for use.

22. Defendant failed to act reasonably and prudently under the circumstances then and there existing, and its conduct demonstrated a complete absence of due care and such conduct and/or failure to act was negligent, grossly negligent and reckless and constituted a willful disregard for the safety of the intended and foreseeable invitees and users of the Defendant's restaurant, including the Plaintiff.

23. As a direct result of the negligence, gross negligence, carelessness, willfulness, wantonness, and recklessness of the Defendant, by and through its agents and employees who were at all times set forth acting within the course and scope of their agency relationship; or by reason of any agency and/or employment, and as a direct and proximate result thereof, Plaintiff suffered a fall and sustained serious injuries.

DAMAGES/REQUEST FOR RELIEF

24. Plaintiff incorporates all allegations of paragraphs above into this cause of action as if set forth verbatim.

25. That as a direct and proximate result of the aforesaid negligent, grossly negligent, careless, reckless, willful and wanton acts or omissions of the Defendant, the Plaintiff:

- a) Fell, striking various parts of his body with great force and violence;
- b) Suffered and will continue to suffer severe, painful, serious and permanent injuries about various parts of his body;
- c) Suffered and will continue to suffer embarrassment, emotional distress, anxiety, mental anguish, worry, stress, and suffering;

- d) Has required, and will continue to require, extensive medical care, surgery, medical procedures, and treatment;
- e) Has been subjected to and will continue to experience extreme pain, suffering, mental anguish, emotional distress, and discomfort;
- f) Has required, and will continue to require pain medications and other prescription medication;
- g) Has incurred, and will continue to incur, substantial medical, doctor, and pharmaceutical bills and other expenses;
- h) Was, and will continue to be, unable to pursue many of his usual avocations, thereby being deprived of the enjoyment of life;
- i) Sustained permanent injuries and scarring;
- j) Suffered and will continue to suffer economic hardships, loss of income, and loss of earning capacity;

26. The Plaintiff is informed and believes that he is entitled to judgment against the Defendant in the sum of such actual and punitive damages as a jury may find, together with the costs of this action.

WHEREFORE, Plaintiff prays for judgment against the Defendant, in an amount of actual and punitive damages to be determined by the trier of fact; for the costs and disbursements of this action; for a trial by jury; and, for such other and further relief as this Court may deem just and proper.

[Signature follows].

PURDY LAW, LLC

s/ Jennifer Randolph Purdy

Jennifer Randolph Purdy

SC Bar No.: 11121

Attorney for Plaintiff

828 Woodrow Street

Columbia, SC 29205

(803) 999-5009 phone

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Dated: November 17, 2025