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CLERK'S OFFICE U.S. DIST. COURT
AT LYNCHBURG, VA
FILED

JUL 01 2009

JOHN F. CORCORAN, CLERK
BY: 
DEPUTY CLERK

June 30, 2009

Honorable John F. Corcoran, Clerk
United States District Court,
Western District of Virginia
1101 Court Street, Suite A66
Lynchburg, Virginia 24504

Re: *Holly Branham v. Dolgencorp, Inc., etc.*
C.A. No. : 6:09-cv-37
Our file No. : 61940.099

ATTN: Judy

Dear Mr. Corcoran:

Enclosed please find the Summons and Complaint to be filed with the Notice of Removal in the above referenced matter.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Very truly yours,



Susan P. Summers
Paralegal to James G. Muncie, Jr.

Enclosures

cc: Robert S. Ganey, Esq. (via first-class mail, w/enclosures)

COMMONWEALTH OF VIRGINIA.



SUMMONS - CIVIL ACTION

Case No. CL09007449-00

AMHERST COUNTY CIRCUIT COURT

113 TAYLOR ST., P. O. BOX 462 AMHERST, VA. 24521

ADDRESS

TO:

DOLGEN CORP, INC.

DBA DOLLAR GENERAL STORE

CORPORATION SERVICE COPANY, REG. AGENT

11 SOUTH 12TH STREET, RICHMOND, VA. 23219

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia.

JUNE 8, 2009

DATE

ROY C. MAYO, 111

Clerk

by

Roy C. Mayo, Jr.

DEPUTY CLERK

VIRGINIA:

IN THE CIRCUIT COURT OF THE COUNTY OF AMHERST

HOLLY BRANHAM,

Plaintiff,

v.

DOLGEN CORP, INC.
d/b/a/ Dollar General Store
a Kentucky Corporation
SERVICE REGISTERED AGENT
Corporation Service Company
11 South 12th Street
Richmond, Virginia 23219


0 9 0 0 7 4 4 9

Defendant.

COMPLAINT

1. On June 8, 2007, the Plaintiff, was severely and permanently injured when she fell at Dollar General Store at 171 Ambriar Plaza in Amherst County, Virginia. The store was owned and operated by the Defendant and employees and agents of the Defendant.
2. The Plaintiff fell due to the negligence of the Defendants agents and employees who negligently failed to remove the liquid from the floor and had negligently failed to place warning signs to alert and warn the Plaintiff of the wet floor. The Defendants thru its employees breached their duty to warn the Plaintiff of the dangerous wet floor.
3. As a direct result of the negligence of the Defendants agents and employees, acting in the scope of their employment, the Plaintiff was severely and permanently injured. She lost many of the pleasures of life. She suffered pain. She has incurred medical and hospital bills. Her ability to earn an income was dissipated.
4. The Plaintiff seeks a judgment in the amount of Three Hundred Thousand Dollars (\$300,000.00) against the Defendant.

HOLLY BRANHAM





COUNSEL FOR PLAINTIFF 13936 bAV
Robert S. Ganey, Esq.
P.O. Box 174
Hanover, VA 23069
(804) 627-2723

Filed in Clerk's Office
Amherst Circuit Court

JUN 8 2009

Roy C. Mayo, III
Clerk