

STATE OF NORTH CAROLINA FILED

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

COUNTY OF CARTERET

2020 JAN 17 P 3:14

20 CVS 59

COURTNEY PARKER, Individually and  
as Guardian Ad Litem for CHARLESTON  
PARKER, a minor,

CARTERET CO. C.87C.  
BY [Signature]

Plaintiff,

v.

EXOTIC ANIMAL EXHIBITS, LLC  
d/b/a It's a Zoo Life, BOBBIE JO  
ABRAMS and GERALD W.  
ABRAMS, II,

Defendants.

**COMPLAINT**

Plaintiff Courtney Parker, Individually and as Guardian Ad Litem for Charleston Parker, a minor, complaining of Defendants, alleges and says:

1. Plaintiff is a citizen and resident of Carteret County, North Carolina, and has been duly appointed as Guardian Ad Litem for minor Plaintiff, Charleston Parker ("Minor Plaintiff"), by the Clerk of Court of Carteret County, North Carolina.

2. Upon information and belief, Exotic Animal Exhibits, LLC, is a North Carolina limited liability company organized and existing under the laws of the State of North Carolina, with a place of business in Edgecombe County, North Carolina and as such, has the capacity to sue and be sued in its corporate name under N.C. Gen. Stat. § 160A-610. Further, upon information and belief, Exotic Animal Exhibits, LLC, is and was at all times relevant doing business as It's a Zoo Life, an "exotic animal exhibit and petting zoo" hereinafter referred to as "Defendant Zoo."

3. Upon information and belief, Defendant Bobbie Jo Abrams is a citizen and resident of Edgecombe County, North Carolina, and at the time of the events detailed herein was the owner/operator of Defendant Zoo. As the owner/operator, Defendant Bobbie Jo Abrams was responsible for assuring that children attending Defendant Zoo were afforded a safe environment.

4. Further, upon information and belief, Defendant Bobbie Jo Abrams at the time of the events detailed herein, was co-owner of that certain real property located at 3238 Hwy. 111 South, Pinetops, North Carolina, on which Defendant Zoo is located ("the Premises"). She is being sued in both her individual and official capacities.

5. Upon information and belief, Defendant Gerald W. Abrams, II, is a citizen and resident of Edgecombe County, North Carolina, and at the time of the events detailed herein was co-owner of the Premises with Defendant Bobbie Jo Abrams.

6. On or about April 21, 2019, the minor Plaintiff and Plaintiff were guests at Defendant Zoo on the Premises.

7. At the same time and place, the minor Plaintiff was visiting the lemur habitat on the Premises accompanied by her father when suddenly and without warning the minor Plaintiff was attacked by one of the lemurs owned by Defendants.

8. The dangerous propensities of the lemurs were not apparent to Plaintiffs, nor were they obvious to Plaintiffs.

9. At the time of the attack, Plaintiffs had no knowledge or notice of the dangerous propensities of the lemurs.

10. Upon information and belief, prior to April 21, 2019, Defendants' lemurs exhibited dangerous, vicious, mischievous and ferocious behavior.

11. Prior to and including April 21, 2019, Defendants knew or should have known of their lemurs' dangerous propensities, character and habits.

12. Despite Defendants' knowledge of their lemurs' vicious propensities, character and habits, Defendants negligently failed to keep these lemurs adequately restrained and under control.

13. Despite Defendants' knowledge of their lemurs' vicious propensities, character and habits, Defendants negligently failed to warn Plaintiffs of said danger.

14. In addition to Defendants' knowledge of their lemurs' vicious propensities, character and habits, Defendants are strictly liable for Plaintiffs' injuries for keeping wild, undomesticated animals on the Premises.

15. The injuries and damages sustained as alleged herein were a direct and proximate result of the negligent conduct of Defendants, as alleged herein.

16. The minor Plaintiff's injuries required medical attention, including sutures. She has permanent scarring and has endured physical and emotional pain and suffering.

17. Defendants were negligent because as the owners of the lemurs they had a duty to protect the public from their wild, undomesticated animals.

18. Defendants breached their duty by failing to keep said animals properly restrained, supervised and/or under control, allowing said animal to attack the minor Plaintiff, causing serious personal injury.

19. As a proximate result of the negligence of Defendants as alleged herein, the minor Plaintiff received serious and painful bodily injuries which, upon information and belief, may be permanent.

20. As a result of the injuries aforesaid, the minor Plaintiff has suffered and continues to suffer pain of body, mind and spirit, which are the immediate and necessary consequences of said injuries.

21. As a further direct and proximate result of Defendants' negligent and careless conduct, the minor Plaintiff has suffered and continues to suffer mental anguish and anxiety, which are the immediate and necessary consequences of said injuries.

22. As a direct and further result of Defendants' negligent and careless conduct, the minor Plaintiff has required extensive medical treatment and care and Plaintiff Courtney Parker has incurred expenses for medical care related directly to said injuries.

23. As Plaintiff is further advised, informed, believes and so alleges, the minor Plaintiff will require additional medical treatment, requiring Plaintiff to incur additional medical expenses in an amount to be determined.

WHEREFORE, Plaintiff Courtney Parker, Individually and as Guardian Ad Litem for the minor Plaintiff, respectfully prays the Court:

1. That she has and recovers of Defendants, jointly and severally, an amount in excess of the minimum jurisdictional limit of this Court in compensatory damages, together with interest as by law allowed;
2. That the costs of this action be taxed against Defendants if by law allowed, to include attorneys' fees, and
3. That she has such other and further relief as the Court may deem just, equitable and proper.

Respectfully submitted this the 13<sup>th</sup> day of January, 2020.

**RICCI LAW FIRM, P.A.**



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