

IN THE CIRCUIT COURT OF BRADLEY COUNTY, TENNESSEE

LILLIE WALKER

Plaintiff

vs.

COLLEGETOWN MOBILE
ESTATES, INC

Defendants

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No. V-05-817

JURY DEMANDED

AFFIDAVIT OF LINDA MORGAN

STATE OF TENNESSEE:

COUNTY OF HAMILTON:

I, Linda Morgan, after being duly sworn according to law, make oath as follows:

1. I am over eighteen (18) years of age, have personal knowledge of the facts contained herein and am competent to make this Affidavit.
2. I moved into Lot #51 sometime approximately April 30, 2004.
3. I maintained that residence through October 25, 2004 and thereafter.
4. From the time I moved in up until the time my mother was injured on October 25, 2004, no work was performed on the subject floor of the mobile home on Lot #51 of Collegetown Mobile Estates, Inc.
5. It is my understanding that Mr. Westfield was the head of maintenance for the defendant.
6. It is my understanding that Mr. Westfield performed an inspection of the premises prior to our moving in.

EXHIBIT

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7. I did not sign a lease for Lot #51.

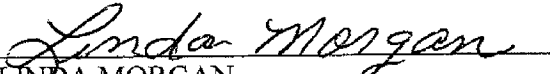
8. The defendant, individually and by and through its agents, knew and acquiesced to my mother, Lillie Walker, staying during her recovery from cataract surgery.

9. Only Mr. Westfield performed any maintenance on the subject mobile home from the time I moved in up until the time of my mother's subject injuries.

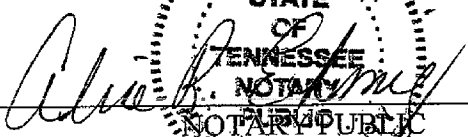
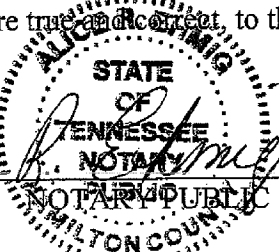
10. Mr. Westfield was aware of the nails sticking out and actually made the statement that "I was not aware they were sticking out that far."

11. The subject nails had to be there prior to our move-in and in that condition because no work was performed in the area by the defendant up until the time my mother received her subject injuries.

FURTHER, THE AFFIANT SAYETH NOT.


LINDA MORGAN

Personally appeared before me this 20th day of September, 2006, LINDA MORGAN, to me personally known, who being first duly sworn according to law, made oath that the statements made in the foregoing Affidavit are true and correct, to the best of his knowledge, information and belief.

My commission expires _____
my Commission Expires
January 6, 2010