

Filing # 95625674 E-Filed 09/12/2019 04:24:44 PM

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.

MICHAELL LOHAN,

Plaintiff,

v.

JILL MARTIN GOODMAN,

Defendant.

_____ /

COMPLAINT

COMES NOW the Plaintiff, MICHAEL LOHAN, and sues Defendant, JILL MARTIN GOODMAN, and alleges as follows:

GENERAL ALLEGATIONS

1. This is an action for damages which exceeds the sum of Fifteen Thousand (\$15,000.00) Dollars, excluding interest, costs and attorney's fees.
2. At all times material hereto, the Defendant, JILL MARTIN GOODMAN, was a resident of Palm Beach County, Florida.
3. At all times material hereto, the Plaintiff, MICHAEL LOHAN, was a resident of Palm Beach County, Florida.

COUNT I - NEGLIGENCE

4. Plaintiff, MICHAEL LOHAN, re-alleges, adopts and incorporates by reference Paragraphs 1 through 3 as if fully set forth herein and further alleges the following:
5. On January 22, 2019, at approximately 8:55 pm, the Plaintiff, MICHAEL

LOHAN, was operating a 2013 BMW 528i, and traveling southbound at the posted speed limit on Interstate 95 just north of Atlantic Avenue, in the City of Delray Beach, County of Palm Beach, State of Florida. Prior to the Plaintiff, MICHAEL LOHAN'S, arrival in this area, the Defendant, JILL MARTIN GOODMAN, was operating her 2012 Audi Q5 in the number 3 lane of travel.

6. Prior to the Plaintiff, MICHAEL LOHAN'S, arrival in this area, the Defendant, JILL MARTIN GOODMAN'S, Audi was completely stopped in the number 3 lane of travel. The Defendant, JILL MARTIN GOODMAN, abandoned the vehicle on Interstate 95.
7. As a result, the Plaintiff, MICHAEL LOHAN, was traveling the speed limit on the highway when a vehicle in front of him made a quick maneuver to avoid the Audi in the roadway, leaving the Plaintiff, MICHAEL LOHAN, facing an object traveling 65 mph with inadequate time to react. The Plaintiff, MICHAEL LOHAN, reacted by attempting to maneuver right to avoid the Defendant, JILL MARTIN GOODMAN'S, Audi, however, did not have adequate time to make such a maneuver and crashed into the Audi.
8. The Defendant, JILL MARTIN GOODMAN, was negligent in the use, operation and maintenance of her vehicle as described herein above in one or more of the following ways:
 - (a) By stopping her vehicle on Interstate 95;
 - (b) By abandoning her vehicle on Interstate 95;
 - (c) By failing to move the vehicle from Interstate 95;
 - (d) By failing to move her vehicle to the side of Interstate 95 after it became

apparent the vehicle had a mechanical issue;

- (e) Faulty maintenance of her vehicle, causing it to stall or stop on a roadway;
- (f) By failing to warn motorists by using her hazard lights or other means after the vehicle was stopped on Interstate 95;
- (g) Other acts and/or omissions currently unknown to Plaintiff.

9. As a direct result of the Defendant, JILL MARTIN GOODMAN'S, negligence the Plaintiff, MICHAEL LOHAN, suffered bodily injury and resulting pain and suffering, disability, disfigurement, permanent scarring, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of the ability to earn money, and aggravation and/or activation of a previously existing condition. All of these losses are either permanent or continuing in nature and the Plaintiff will continue to suffer these losses into the future.

WHEREFORE, the Plaintiff, MICHAEL LOHAN, demands judgment for damages against the Defendant, JILL MARTIN GOODMAN, together with costs, and further demands trial by jury.

I HEREBY CERTIFY that a true copy of the foregoing has been served upon the Defendant with the Summons and Complaint.

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