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IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO:

BEAUFORD DANIELS,

Plaintiff,

v.

SCHUMACHER AUTOMOTIVE, INC.,

Defendant.

_____ /

COMPLAINT

The Plaintiff, BEAUFORD DANIELS, by and through her undersigned counsel, sues the Defendant, SCHUMACHER AUTOMOTIVE, INC., and alleges as follows:

1. This is an action for damages in excess of \$30,000.00, exclusive of interest, attorney fees and costs, and is within the jurisdiction of this Court.
2. At all times mentioned herein, Plaintiff, BEAUFORD DANIELS, resided in Palm Beach County, Florida.
3. At all times material to this action, SCHUMACHER AUTOMOTIVE, INC., is a Florida Profit Corporation authorized to do business in the State of Florida and located in palm Beach County at 3720 Northlake Blvd., Lake Park, Florida 33402.
4. Venue is proper in Palm Beach County because that is where the Plaintiff lives, Defendant is located, and the negligence happened.
5. On or about April 17, 2020, Plaintiff attempted to get in the driver's seat of the subject 2015 Chevy Silverado using the step side assistance when the entire step side collapsed from the truck causing Plaintiff to crash to the ground severely injuring himself.



6. The subject truck was purchased from Defendant and the subject truck was taken to Defendant for repair of the step side on multiple occasions prior to the incident.

7. All times material hereto Defendant had a duty to:

- a. reasonably inspect and ensure the truck is in good working order before selling the truck;
- b. reasonably inspect and repair the subject truck and step side and ensure said service of the truck were free from danger;
- c. correct dangerous conditions on the truck which it either knew or should have known existed;
- d. warn of dangerous conditions on the truck which it either had or should have had greater knowledge of than Plaintiff;

8. Defendant breached its duty to Plaintiff by providing him with a defective and/or negligently repaired step side so as to cause Plaintiff's fall and subsequent injuries.

9. As a result, Plaintiff suffered bodily injury and resulting pain and suffering, disability, disfigurement, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, aggravation of pre-existing injury, mental anguish, loss of earnings and loss of ability to earn money. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future.

WHEREFORE the Plaintiff demands judgment against the Defendant, SCHUMACHER AUTOMOTIVE, INC., for damages in excess of \$30,000.00, to be ascertained at the time of trial of this cause, costs, pre-judgment interest for paid un-reimbursed expenses, and any other and further relief as this Honorable Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff, BEAUFORD DANIELS, demands a trial by jury on all issues so triable as a matter of right.

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