

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

HENRIETTA STERN,

CASE NO.: _____

Plaintiff,

v.

CITY OF BOCA RATON,

Defendant.
_____ /

COMPLAINT FOR DAMAGES AND TRIAL BY JURY

COMES NOW the Plaintiff HENRIETTA STERN, by and through the undersigned counsel, and hereby sues the Defendant CITY OF BOCA RATON, and as grounds therefore would state:

1. This is an action for damages that exceed Fifty Thousand Dollars (\$50,000.00), exclusive of interest and costs.
2. At all times material hereto, and at the times of the incident complained of, the Plaintiff HENRIETTA STERN was and is a resident of Palm Beach County, Florida.
3. At all times material hereto, and at the times of the incident complained of, the Defendant CITY OF BOCA RATON was and is a state agency or subdivision of the State of Florida, as defined by Florida Statutes Section 768.28(2).
4. The Plaintiff HENRIETTA STERN has complied with Florida Statutes Section 768.28(6) within the meaning of the statute and as interpreted by the Department of Financial Services as it relates to the issue of notice with regard to lawsuits against a governmental agency.

5. At all times material hereto, the Defendant CITY OF BOCA RATON operated, maintained, and/or was in control of the administration of EMS services as provided by the City of Boca Raton Fire Rescue Services.

6. On or about January 13, 2025, the Plaintiff HENRIETTA STERN was a passenger in a City of Boca Raton Fire Rescue ambulance; the Plaintiff HENRIETTA STERN was riding in the back of the ambulance with her husband, for whom the emergency medical services were summoned.

7. On or about January 13, 2025, the Plaintiff HENRIETTA STERN fell while attempting to get out of the ambulance, sustaining injuries as a result.

COUNT I – NEGLIGENCE AGAINST THE DEFENDANT PUBLIX SUPER MARKETS, INC.

Plaintiff realleges and reavers Paragraphs 1 – 7 as if fully set forth herein and would further state:

8. At said time and place, the Defendant CITY OF BOCA RATON negligently and carelessly created and allowed a dangerous condition to exist by instructing the Plaintiff HENRIETTA STERN to traverse a large drop-off between the ambulance and the ground during her egress, thereby causing the Plaintiff to suffer injuries; importantly, this condition did not exist when the Plaintiff traversed the same drop-off during her ingress as a step was present.

9. The dangerous condition was known to the Defendant CITY OF BOCA RATON, or it had existed for a sufficient length of time so that the Defendant should have known it/known about it.

10. The Defendant CITY OF BOCA RATON was negligent by not correcting said condition and/or providing adequate warnings of said condition for the Plaintiff HENRIETTA STERN's safety.

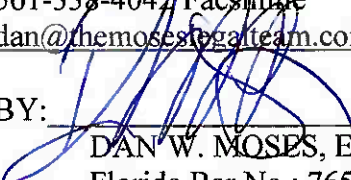
11. As a result, the Plaintiff HENRIETTA STERN suffered bodily injuries which resulted in pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money and other economic damage, and aggravation of a pre-existing condition. The Plaintiff will further from conditions not yet diagnosed. The losses are either permanent or continuing and the Plaintiff will suffer losses in the future.

12. The Plaintiff HENRIETTA STERN further suffered emotional distress and mental anguish as a result of the negligence of the Defendant CITY OF BOCA RATON.

WHEREFORE the Plaintiff HENRIETTA STERN demands judgment against the Defendant CITY OF BOCA RATON, as and for compensatory damages in an amount in excess of Fifty Thousand Dollars (\$50,000.00), plus interest on all liquidated economic damages, and court costs. Plaintiff further demands trial by jury of all issues so triable.

DATED August 28, 2025.

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