

LEGISTAR NO.

110938

IN THE CIRCUIT COURT OF THE 8th JUDICIAL CIRCUIT IN AND
FOR ALACHUA COUNTY, FLORIDA

CASE NO. 2012-CA-1397
J

GENERAL JURISDICTION DIVISION

F.B.N.: 152358

ALFREDO NOBLE-RODRIGUEZ,

Plaintiff,

vs.

COMPLAINT FOR DAMAGES

CITY OF GAINESVILLE,

Defendant.

The Plaintiff, ALFREDO NOBLE-RODRIGUEZ, by and through his undersigned counsel
sues defendant, CITY OF GAINESVILLE and alleges:

1. This is an action for damages that exceeds \$15,000.
2. That at the time of the incident, the Plaintiff, ALFREDO NOBLE-RODRIGUEZ, was
a resident of Hillsborough County, but has since moved and is a resident of Miami Dade County,
Florida.
3. That at all times material hereto, the Defendant, CITY OF GAINESVILLE, is a
political subdivision of the State of Florida. As such, the Defendant, City of Gainesville, Florida,
has the authority to sue and be sued in its own name.
4. That the Plaintiff has complied with Florida Statute 768.28 by providing written notice
to the appropriate governmental agencies and has served the Department of Insurance.
5. That on or about January 15, 2009, the Defendant, CITY OF GAINESVILLE owned a
motor vehicle that was operated with their knowledge, permission and consent by Betsy E. Miller
at or near the intersection of US HWY 441 (SR 25) and SR 331 in the City of Gainesville,
Alachua County, Florida.
6. That at that time and place Betsy E. Miller, negligently operated or maintained the

motor vehicle so that it collided with Plaintiff's motor vehicle.

7. As a result the Plaintiff, ALFREDO NOBLE-RODRIGUEZ, suffered bodily injury and resulting 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 aggravation of a previously existing condition. The losses are either permanent or continuing and plaintiff will suffer the losses in the future. Plaintiff's automobile was damaged and he lost the use of it during the period required for its repair or replacement.

WHEREFORE plaintiff demands judgment for damages against defendants and a trial by jury on all issues.

DATED this ____ day of March, 2012.

Respectfully submitted,

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By: 

JOSE A. DAPENA, ESQ.