

LEGISTAR NO.

160215

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

SONIA GEEVARUGHESE,

CASE NO.:
FBN: 476706

Plaintiff,

vs.

CITY OF GAINESVILLE, a municipal
Subdivision of the State of Florida,

Defendant.

COMPLAINT FOR DAMAGES PURSUANT TO F.S. 768-28

COMES NOW the Plaintiff, **SONIA GEEVARUGHESE**, by and through the undersigned counsel, and sues the Defendants, **CITY OF GAINESVILLE**, a municipal Subdivision of the State of Florida and states as follows:

1. This is an action for damages in excess of the minimum jurisdiction of this Court.
2. At all times material hereto Plaintiff, **SONIA GEEVARUGHESE**, was and is a resident of Broward County, Florida, and is over the age of eighteen (18) years, and is otherwise sui juris.
3. That upon information and belief and at all times material hereto, the Defendant, **CITY OF GAINESVILLE**, is a municipal subdivision of the State of Florida.
4. At all times material hereto, the Plaintiff has complied with the notification requirements and provisions of Florida Statute 768.28 (copies are attached hereto).
5. At all times material hereto, George Otis Smith was an employee of Defendant, **CITY OF GAINESVILLE** and was operating a vehicle bearing VIN Number 15GCD201311110910.

6. At all times material hereto, the Defendant, CITY OF GAINESVILLE was responsible for the actions of their employees who were working within the course and scope of their employment at the time of the subject occurrence and at all times material hereto.
7. On March 29th, 2012 at approximately 11:35 a.m., the vehicle operated by employee of Defendant, CITY OF GAINESVILLE, and the bicycle operated by Plaintiff, SONIA GEEVARUGHESE, collided at the intersection of Museum Road and Fraternity Drive in Alachua County, Florida.
8. The collision was caused solely by the negligence of the employee of Defendant, CITY OF GAINESVILLE, herein.
9. Defendant, CITY OF GAINESVILLE, employee was negligent in failing to properly control his vehicle, in violating Plaintiff's right of way, in failing to observe or properly observe Plaintiff's bicycle, and in permitting his vehicle to collide with the Plaintiff's bicycle.
10. As a result, Plaintiff, SONIA GEEVARUGHESE, sustained permanent injury within a reasonable degree of medical probability, disability, mental anguish, pain and suffering, loss of enjoyment of life and required and will continue to require medical care and attention, incurred and will in the future continue to incur medical expenses and suffered loss of earnings and loss of future earning capacity.

WHEREFORE, Plaintiff, SONIA GEEVARUGHESE, demands judgment against Defendants, CITY OF GAINESVILLE, a municipal Subdivision of the State of Florida, in a sum in excess of \$15,000.00 together with the costs and disbursements herein and

Plaintiff demands a trial by jury.

DATED this 24th day of March, 2016

NEGRONI LAW GROUP, LLC
Attorney for Plaintiff
7050 NW 4th Street, Suite 201
Plantation, Florida 33317
(954) 321-6115
Primary email: jose@negronilaw.com
Secondary email: lsanchez@negronilaw.com

BY: /s/José A. Negroni
JOSE A. NEGRONI, ESQ.