

IN THE CIRCUIT COURT, EIGHTH JUDICIAL CIRCUIT, IN AND
FOR ALACHUA COUNTY, FLORIDA
CIVIL DIVISION, ALACHUA COUNTY COURTHOUSE
201 East University Avenue-Post Office Box 600
Gainesville, Florida 32602
PHONE (352) 374-3636 FAX (352) 338-3207

RECEIVED
SEP 17 2008
CITY
ATTORNEY
SADIE DARNELL, SHERIFF
ALACHUA COUNTY, FLORIDA
As Deputy Sheriff
20 08

ANTHONY WILLIAMS,
Plaintiff,

vs.

Case No.: 01-08-CA-4249
Division: K

CITY OF GAINESVILLE, a municipal
Corporation,
Defendant.

SUMMONS

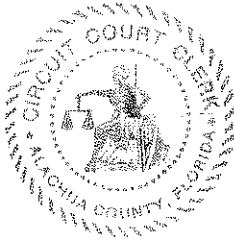
THE STATE OF FLORIDA
To Each Sheriff of the State:

YOU ARE COMMANDED to serve this Summons and a copy of the Complaint or Petition in this action on Defendant: **CITY OF GAINESVILLE, C/O HONORABLE PEGEEN HANRAHAN, MAYOR, 200 EAST UNIVERSITY AVENUE, GAINESVILLE, FLORIDA 32601.**

Each Defendant is required to serve written defenses to the Amended Complaint or Petition on Plaintiff's attorney whose name and address is: **Jason Miller, Esq., Morgan & Morgan, 76 South Laura Street, Ste. 1100, Jacksonville, FL 32202** within 30 days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that Defendant for the relief demanded in the complaint or petition.

WITNESS my hand and seal of said Court on Aug 27, 2008

J. K. "Buddy" Irby
Clerk of the Circuit Court



By Janet Wt
Deputy Clerk

COPY

If you are a person with a disability who needs any accommodation in order to participate in this proceeding you are entitled at no cost to you, to the provision of certain assistance. Person with a disability who need any accommodation in order to participate should call Jan Phillips, ADA coordinator, Alachua County Courthouse, 201 E. University Ave., Gainesville, FL 32601, at (352) 337-6237 within two (2) working days of your receipt of this notice. If you are hearing impaired call (800) 955-8771; if you are voice impaired, call (800) 955-8770.

COPIES

PLAINTIFF'S ATTORNEY
Jason Miller, Esq.
Morgan & Morgan, P.A.
76 S. Laura Street, Suite 1100
Jacksonville, Florida 32202
Fla. Bar #0519758

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

CASE NO.: 01-08-CA-4249
DIVISION: K

ANTHONY WILLIAMS,

Plaintiff,

vs.

CITY OF GAINESVILLE, a municipal
corporation,

Defendant.

RECEIVED BY ALACHUA
COUNTY CLERK OF COURT
DATE: 2008 AUG 14 PM 2:27

COMPLAINT

Plaintiff, ANTHONY WILLIAMS sues Defendant, CITY OF GAINESVILLE, a municipal corporation, and alleges:

1. This is an action for damages that exceed Fifteen Thousand Dollars (\$15,000.00), exclusive of interest, costs and attorneys' fees.
2. At all times material to this action, Plaintiff was a natural person residing in Alachua County, Florida.
3. At all times material to this action, Defendant, CITY OF GAINESVILLE, was a municipality in the State of Florida.
4. Plaintiff has submitted a Notice of Claim, by certified mail, to the appropriate agencies and included the information required by Florida Statute Section 768.28. Attached as Exhibit 1 is the Notice of Claim which was submitted on November 9, 2007.
5. Plaintiff has therefore met the conditions precedent to filing a claim against Defendant pursuant to Florida Statute Section 768.28.

s 6. On or about June 8, 2007, Plaintiff, ANTHONY WILLIAMS, was a passenger on a bus owned by Defendant which was transporting passengers in Gainesville, Alachua County, Florida.

n 7. At that time and place, Defendant owned a bus which was operating as a common carrier in that it was transporting members of the public.

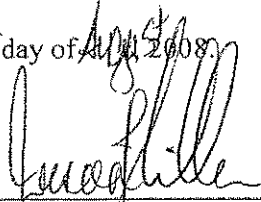
e 8. At that time and place, Defendant's employee negligently operated and/or maintained the bus so that it caused Plaintiff, ANTHONY WILLIAMS, to sustain serious injuries.

Y 9. On the date and at the place aforesaid, the Defendant owed Plaintiff, ANTHONY WILLIAMS, the duty to exercise reasonable care for the safety of Plaintiff.

ff 10. As a direct and proximate result of the negligence of Defendant's employee, Plaintiff suffered bodily injury including a permanent injury to the body as a whole, pain and suffering of both physical and mental nature, disability, physical impairment, disfigurement, mental anguish, inconvenience, loss of capacity for the enjoyment of life, aggravation of an existing condition, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money and loss of ability to lead and enjoy a normal life. The losses are either permanent or continuing and Plaintiff will suffer the loss in the future.

ef **WHEREFORE**, Plaintiffs demand judgment for damages against Defendant and other such relief deemed proper by the Court. **Plaintiff also demands a jury trial on all issues so triable.**

RESPECTFULLY SUBMITTED this 12th day of August, 2008.



Jason S. Miller, Esquire
FL Bar No.: 0519758
Morgan & Morgan
76 South Laura Street, Suite 1100
Jacksonville, FL 32202
Telephone: (904)398-2722
Facsimile: (904)398-2334
Attorneys for Plaintiff