

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

CASE NO.:
DIVISION:

STAR SIGNOR, as mother
And natural guardian of
DILLON O 'BRIEN and
SEAN STEGER, minor children

Individuals,

Plaintiff,

v.

SUN CITY TRANSPORTATION a Florida Corporation, and
ALFREDO GARCIA, an individual

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, STAR SIGNOR, as mother and natural guardian of DILLON OBRIEN and SEAN STEGER, minor children, sues Defendants SUN CITY TRANSPORTAION., a Florida Corporation, and ALFREDO GARCIA an individual, and alleges as follows:

GENERAL ALLEGATIONS

1. This is an action for damages in excess of fifteen thousand dollars (\$15,000.00) exclusive of costs and attorneys fees.
2. At all times material to this cause, Plaintiffs, STAR SIGNOR, as mother and natural Guardian of DILLON OBRIEN and SEAN STEGER, minor children, were and are residents of Gainesville, Alachua County, Florida and are otherwise sui juris.
3. At all times material to this cause, Defendant, SUN CITY TRANSPORTATION.

("SUN CITY"), was and is a Florida corporation operating and doing business in Hialeah, Miami-Dade County, Florida.

4. At all times material to this cause ALFREDO GARCIA, was employed by SUN CITY. In the course and scope of his employment ALFREDO GARCIA, is a truck driver who transports and delivers goods.

5. On or about May 31, 2016, the at-fault driver, ALFREDO GARCIA, with the consent and permission of his employer and vehicle owner, SUN CITY TRANSPORTATION, operated a semi-trailer truck which was involved in an automobile accident at or near Waldo Road in Alachua County, Florida.

6. At that time and place Defendant, ALFREDO GARCIA, within the scope of his employment, with the consent and permission of his employer and vehicle owner, SUN CITY TRANSPORTATION, negligently operated and/or maintained the semi-trailer truck in a manner so that it collided with a school bus driven by Jerome Thomas, upon which the minor children Dillon O'Brien and Sean Steger were attempting to board at the time of the subject collision.

**COUNT I- NEGLIGENCE AS TO STAR SIGNOR AS MOTHER AND NATURAL
GUARDIAN OF DILLON O'BRIEN**

The Plaintiffs, STAR SIGNOR, as mother and natural guardian of DILLON O'BRIEN and, minor child, re-alleges and incorporates by reference paragraphs 1 through 6 and alleges further:

7. As a direct and proximate result of the Defendant, ALFREDO GARCIA's, negligence, Plaintiff, DILLON O'BRIEN, suffered bodily injury resulting 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, and loss of ability to earn money. The losses are permanent and continuing in nature and include, but are not limited to, one or more of the following: (A) significant and permanent loss of an important bodily function; (B) permanent injury within a reasonable degree of medical probability, other than scarring and disfigurement; (C) significant and permanent scarring and disfigurement and has been caused to undergo surgery. The Plaintiff, DILLON O 'BRIEN, has incurred these losses in the past and will continue to suffer the losses in the future.

WHEREFORE, Plaintiff, STAR SIGNOR as mother and natural guardian of DILLON OBRIEN, demands a trial by jury and a judgment for damages against Defendants, ALFREDO GARCIA., and SUN CITY, in excess of fifteen thousand dollars (\$15,000.00) and for such other relief to which Plaintiff is entitled.

COUNT II- NEGLIGENCE AS TO STAR SIGNOR AS MOTHER AND NATURAL GUARDIAN OF SEAN STEGER

The Plaintiffs, STAR SIGNOR, as mother and natural guardian of SEAN STEGER , minor child, re-alleges and incorporates by reference paragraphs 1 through 6 and alleges further:

1. As a direct and proximate result of the Defendant, ALFREDO GARCIA's, negligence, Plaintiff, SEAN STEGER, suffered bodily injury resulting 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, and loss of ability to earn money. The losses are permanent and continuing in nature and include, but are not limited to, one or more of the following: (A) significant and permanent loss of an important bodily function; (B) permanent injury within a reasonable degree of medical probability, other than

scarring and disfigurement; (C) significant and permanent mental anguish. The Plaintiff, STAR SIGNOR as mother and natural guardian of SEAN STEGER, has incurred these losses in the past and will continue to suffer the losses in the future.

WHEREFORE, Plaintiffs, STAR SIGNOR, as mother and natural guardian of DILLON OBRIEN and SEAN STEGER, minor children, demands a trial by jury and a judgment for damages against Defendants, ALFREDO GARCIA., and SUN CITY, in excess of fifteen thousand dollars (\$15,000.00) and for such other relief to which they are entitled.

DEMAND FOR JURY TRIAL

Plaintiff, STAR SIGNOR, as mother and natural guardian of DILLON OBRIEN and SEAN STEGER, minor children hereby demands a trial by jury on all issues herein.

DATED this 17th, day of June 2016

OSSI & NAJEM, P.A.

/s/ Lawrence J. Najem
LAWRENCE J. NAJEM
Florida Bar No. 0754803
1506 Prudential Drive
Jacksonville, Florida 32207
(904) 399-0606
(904) 398-8988 Facsimile
Emails: lnajem@onr-law.com
kminahan@onr-law.com
Attorney for Plaintiff

FLORIN ROEBIG, P.A.

/s/ Thomas D. Roebig, Jr.
THOMAS D. ROEBIG, JR.
Florida Bar No. 0651702
777 Alderman Road
Palm Harbor, FL 34683
(727) 786-5000
(727) 772-9833 Facsimile
Emails: tdr@florinroebig.com
bknetzer@florinroebig.com
PISERVICE@florinroebig.com
Attorney for Plaintiff