

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

VILEANA BRIGGS,

Plaintiff,

vs.

Case No: _____
Division: _____

BOCA PLAZA BY LOWKL,

Defendant.

_____/

COMPLAINT

Plaintiff, VILEANA BRIGGS (hereinafter referred to as "BRIGGS") by and through the undersigned attorney, sues Defendant, BOCA PLAZA BY LOWKL (hereinafter referred to as "LOWKL") and alleges the following:

GENERAL ALLEGATIONS

1. This is an action for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest and costs.
2. At all times material hereto, Plaintiff, BRIGGS, was and is a natural person residing in Hillsborough County, Florida.
3. At all times material hereto, Defendant, LOWKL, was and is a Florida Limited Liability Company doing business in Palm Beach County, Florida, and who operated a hotel located at 2901 N Federal Hwy, Boca Raton, FL 33431 named Boca Plaza By Lowkl.

4. At all times material hereto, Defendant LOWKL was doing business in Palm Beach County, Florida, who owned, controlled and/or maintained the hotel located at 2901 N Federal Hwy, Boca Raton, FL 33431.
5. At all times material hereto and specifically on July 14, 2025, Plaintiff, BRIGGS, rented a hotel room at the subject premises, specifically at 2901 N Federal Hwy, Boca Raton, FL 33431 from Defendant, LOWKL.
6. On or about July 14, 2025, Plaintiff, BRIGGS, was lawfully inside her hotel room located at 901 N Federal Hwy, Boca Raton, FL 3343.

COUNT I - NEGLIGENCE OF LOWKL

7. Plaintiff, BRIGGS realleges and incorporates herein the allegations contained in Paragraphs 1 through 6 as if fully set forth herein.
8. Defendant LOWKL, owned, controlled, operated, managed, and maintained the hotel, including the guest room rented by Plaintiff, BRIGGS.
9. The entrance door to Plaintiff, BRIGGS' hotel room lacked adequate weather stripping, door seals, or other protective barriers necessary to prevent rainwater from entering the interior of the room.
10. During a period of rainfall on July 14, 2025, rainwater infiltrated Plaintiff BRIGGS' hotel room through the improperly sealed entrance door.
11. On or about July 14, 2025, Plaintiff, BRIGGS, slipped and fell in her hotel room on rainwater that had infiltrated her hotel room.

12. Defendant, LOWKL, owed to its invitees, including Plaintiff, BRIGGS, duties to include the following:

- a. The duty to maintain the subject premises in a reasonably safe condition;
- b. The duty to use ordinary care to prevent dangerous conditions and
- c. The duty to correct or warn of dangers that Defendant LOWKL knew or should have known about through the exercise of reasonable care.

13. Defendant LOWKL, by and through its agents, servants or employees, breached its duty owed to Plaintiff, BRIGGS, in the following ways:

- a. By failing to maintain the premises, specifically failing to install or maintain adequate weather stripping or door seals at the entrance to Plaintiff BRIGGS' hotel room; and/or
- b. By allowing rainwater to intrude into Plaintiff BRIGGS' hotel room; and/or
- c. By failing to inspect the premises for hazardous conditions, including water intrusion; and/or
- d. By failing to correct or repair a known defective condition involving the door and weather stripping; and/or
- e. By failing to warn Plaintiff of the presence of water accumulation; and/or
- f. By failing to implement reasonable maintenance and safety procedures to prevent water intrusion and slip hazards.

14. As a direct and proximate result of Defendant, LOWKL, negligence described herein, Plaintiff, BRIGGS, suffered bodily injury resulting in pain and suffering, disability, disfigurement, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings and the ability to earn money, and possibly an aggravation of a previously existing condition. Some or all of the injuries sustained are either permanent or continuing in nature within a reasonable degree of medical probability and Plaintiff will continue to suffer impairment in the future. Alternatively, and/or in addition, Plaintiff has significant and permanent loss of an important bodily function, and/or significant and permanent scarring or disfigurement.

WHEREFORE Plaintiff, BRIGGS, demands judgment against Defendant, LOWKL, for damages, costs, interest and such other relief as this Court deems just and proper. Further, Plaintiff demands trial by jury on all issues.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial on all issues triable before a jury.

Dated this November 21, 2025.

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