

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

Marjorie Lynn,

CASE NO.:

Plaintiff,

vs.

BESTCLEAN LLC
AURA BOCA OWNER, LLC
"
Defendants.

PLAINTIFF'S COMPLAINT

The Plaintiff, MARJORIE LYNN, by and through undersigned counsel and pursuant to Fla. R. Civ. P. 1.190(a), hereby files Plaintiff's Complaint against the Defendants, BestClean LLC and AURA BOCA OWNER, LLC., and alleges as follows:

1. This is an action for damages in excess of the jurisdictional limits of this court.
2. At all times material hereto, the Plaintiff, MARJORIE LYNN, is an individual residing in Palm Beach County, Florida.
3. At all times material hereto, the Defendant, BESTCLEAN LLC, is a corporation doing business in Palm Beach County, Florida.
4. At all times material hereto, the Defendant, AURA BOCA OWNER, LLC., is a corporation doing business in Palm Beach County, Florida.
5. On or about July 19, 2024, the Defendant AURA BOCA OWNER, LLC, owned, maintained, managed, and/or controlled the property located at or 789 W. YAMATO ROAD, BOCA RATON, FL 33431.
6. On or about July 19, 2024, the Defendant BESTCLEAN, LLC maintained, managed, and/or controlled the property located at or near 789 W. YAMATO ROAD, BOCA

RATON, FL 33431..

COUNT I

NEGLIGENCE AGAINST AURA BOCA HOLDINGS, LLC

Plaintiff adopts and re-alleges each and every allegation contained in paragraphs 1 through 6 as if they were fully set forth herein, and further alleges:

7. On the above date the Plaintiff, MARJORIE LYNN, while exercising due care and caution for her own safety, was lawfully on the Defendant's property when she was injured due to the negligence of the Defendant, AURA BOCA OWNER, LLC.

8. Specifically, the Plaintiff, MARJORIE LYNN, was caused to slip and fall due to a transitory foreign substance on the floor.

9. The Defendant, AURA BOCA OWNER, LLC, owed to the Plaintiff a duty of reasonable care to maintain the subject property in a condition reasonably safe for its intended use and free from all conditions which would render it dangerous and unsafe for the Plaintiff, or present an unreasonable risk of harm to her, in her lawful use of the same.

10. That it was the duty of the Defendant, AURA BOCA OWNER, LLC, to warn the Plaintiff of aforesaid dangerous and unsafe condition.

11. The Defendant, AURA BOCA OWNER, LLC, breached its duty of care to the Plaintiff, by committing one or more of the following negligent acts of commission and/or omission which proximately caused injury to the Plaintiff as hereinafter alleged more fully:

- (a) The Defendant failed to properly maintain, inspect, and examine the subject property, specifically the floors;
- (b) The Defendant should have exercised reasonable care in the care of the subject property, specifically the floors;

- (c) The Defendant failed to warn the Plaintiff of the dangerous condition; and
- (d) the afore-described dangerous condition was a regular, reoccurring, and ongoing condition; therefore, Defendant knew, or in the exercise of reasonable care, should have known of the aforesaid dangerous and hazardous conditions.

12. Defendant knew, or in the exercise of reasonable care, should have known of the afore-described dangerous and hazardous condition.

13. That the aforesaid acts of negligence on the parts of the Defendant were the proximate cause of the injuries sustained by the Plaintiff.

14. As a direct result, the Plaintiff has incurred medical bills, has suffered bodily injury resulting in severe physical pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, aggravation of preexisting injuries, if any, lost wages, and loss of the ability to earn wages. Her losses are permanent and continuing in nature and the Plaintiff will suffer losses in the future.

WHEREFORE, the Plaintiff, MARJORIE LYNN, demands judgment against the Defendant, AURA BOCA OWNER, LLC for damages, costs, and any other relief this Court may deem appropriate. The Plaintiff further demands trial by jury as to all issues so triable as a matter of right.

COUNT II

NEGLIGENCE AGAINST BESTCLEAN, LLC

Plaintiff adopts and re-alleges each and every allegation contained in paragraphs 1 through 6 as if they were fully set forth herein, and further alleges:

15. On the above date the Plaintiff, MARJORIE LYNN, while exercising due care and caution for her own safety, was lawfully on the Defendant's property when she was injured due to the

negligence of the Defendant, BESTCLEAN, LLC.

16. Specifically, the Plaintiff, MARJORIE LYNN, was caused to slip and fall due to a transitory foreign substance on the floor.

17. The Defendant, BESTCLEAN, LLC owed to the Plaintiff a duty of reasonable care to maintain the subject property in a condition reasonably safe for its intended use and free from all conditions which would render it dangerous and unsafe for the Plaintiff, or present an unreasonable risk of harm to her, in her lawful use of the same.

18. That it was the duty of the Defendant, BESTCLEAN, LLC to warn the Plaintiff of aforesaid dangerous and unsafe condition.

19. The Defendant, BESTCLEAN, LLC breached its duty of care to the Plaintiff, by committing one or more of the following negligent acts of commission and/or omission which proximately caused injury to the Plaintiff as hereinafter alleged more fully:

- (a) The Defendant failed to properly maintain, inspect, and examine the subject property, specifically the floors;
- (b) The Defendant should have exercised reasonable care in the care of the subject property, specifically the floors;
- (c) The Defendant failed to warn the Plaintiff of the dangerous condition; and
- (d) the afore-described dangerous condition was a regular, reoccurring, and ongoing condition; therefore, Defendant knew, or in the exercise of reasonable care, should have known of the aforesaid dangerous and hazardous conditions.

20. Defendant knew, or in the exercise of reasonable care, should have known of the afore-described dangerous and hazardous condition.

21. That the aforesaid acts of negligence on the parts of the Defendant were the proximate

cause of the injuries sustained by the Plaintiff.

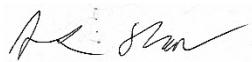
22. As a direct result, the Plaintiff has incurred medical bills, has suffered bodily injury resulting in severe physical pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, aggravation of preexisting injuries, if any, lost wages, and loss of the ability to earn wages. Her losses are permanent and continuing in nature and the Plaintiff will suffer losses in the future.

WHEREFORE, the Plaintiff, MARJORIE LYNN, demands judgment against the Defendant, AURA BOCA OWNER, LLC., for damages, costs, and any other relief this Court may deem appropriate. The Plaintiff further demands trial by jury as to all issues so triable as a matter of right.

DATED this 15th day of December, 2025.

Alex's Law Firm, PLLC

Alex Shkolyar, Esq.



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