

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

JOY SIRMEYER,

CASE NO.:

Plaintiff,  
vs.

TARGET CORPORATION,  
a Foreign Profit Corporation,

Defendant.

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**COMPLAINT**

The Plaintiff, JOY SIRMEYER, by and through undersigned counsel, hereby sues the Defendant, TARGET CORPORATION, and alleges as follows:

1. This is an action for damages in excess of fifty thousand (\$50,000.00) dollars.
2. At all times material hereto, the Plaintiff, JOY SIRMEYER, is an individual residing in Palm Beach County, Florida.
3. At all times material hereto, the Defendant, TARGET CORPORATION, is a corporation doing business in Palm Beach County, Florida.
4. On or about April 11, 2024, the Defendant TARGET CORPORATION, owned, maintained, managed, and/or controlled the property located at or near 21637 State Road 7, Boca Raton, Florida 33428.

**COUNT I**

**NEGLIGENCE AGAINST TARGET CORPORATION**

Plaintiff adopts and re-alleges each and every allegation contained in paragraphs 1 through 4 as if they were fully set forth herein, and further alleges:

5. On the above date the Plaintiff, JOY SIRMEYER, 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, TARGET CORPORATION.

6. Specifically, the Plaintiff, JOY SIRMEYER, was caused to fall due to a negligently designed and maintained curb in the Defendant, TARGET CORPORATION's, parking lot.

7. The Defendant, TARGET CORPORATION, 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.

8. That it was the duty of the Defendant, TARGET CORPORATION, to warn the Plaintiff of aforesaid dangerous and unsafe condition.

9. The Defendant, TARGET CORPORATION, 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 design, maintain, inspect, and examine the subject property;
- (b) The Defendant should have exercised reasonable care in the maintenance of the subject property;
- (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.

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

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

12. 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, JOY SIRMEYER, demands judgment against the Defendant, TARGET CORPORATION, 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 16th day of December 2025.

**ENGLANDER PEEBLES**

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By: /s/ Daniel Drazen

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