

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

CASE NO:

TERESA LYNN MARROQUIN,

Plaintiff,

vs.

WALMART INC.,  
and WAL-MART STORES EAST LP,

Defendant.

---

**COMPLAINT**

The Plaintiff, TERESA LYNN MARROQUIN, by and through the undersigned counsel, sues the Defendant, WALMART INC., and WAL-MART STORES EAST LP, individually, and alleges as follows:

1. This is an action for damages that exceeds Fifty Thousand Dollars (\$50,000.00) and is otherwise within this Court's jurisdiction.
2. At all times material to this action, Plaintiff, TERESA LYNN MARROQUIN, is a resident of Palm Beach County, Florida.
3. At all times material to this action, Defendant, WALMART INC., is foreign profit corporation with its principal place of business located in the State of Arkansas and doing business in Palm Beach County, Florida.
4. At all times material to this action, Defendant, WAL-MART STORES EAST, LP, is a foreign profit corporation with its principal place of business located in the State of Arkansas and doing business in Palm Beach County, Florida.
5. On or about December 20, 2023, Defendant, WALMART INC., owned, managed, controlled, operated, or maintained the premises located at 101 N Congress Avenue, Lake Park,

Florida, 33403 that was operated as a retail store.

6. On or about December 20, 2023, Defendant, WAL-MART STORES EAST, LP, owned, managed, controlled, operated, or maintained the premises located at 101 N Congress Avenue, Lake Park, Florida, 33403.

7. At that time and place, Plaintiff, TERESA LYNN MARROQUIN, was on the premises as a business invitee shopper when she tripped and fell in a hole that was located in the asphalt of the parking lot.

8. The hole that was located in the asphalt of the parking lot constituted a dangerous condition.

**COUNT I NEGLIGENT MAINTENANCE AGAINST DEFENDANT**  
**WALMART INC.**

9. Plaintiff realleges paragraphs 1 through 8 as if stated fully herein.

10. Defendant, WALMART INC., owed its business invitees, and specifically Plaintiff, TERESA LYNN MARROQUIN, the duty to maintain its premises in a reasonably safe condition, including keeping the parking lot of the store free from holes in the asphalt.

11. Defendant, WALMART INC., its agents, servants, or employees acting within the course and scope of their employment, breached its duty to Plaintiff, TERESA LYNN MARROQUIN, by negligently creating or allowing the dangerous condition of the hole that was located in the asphalt of the parking lot to exist.

12. Defendant, WALMART INC., had actual notice or knowledge of the dangerous condition prior to the incident and failed to remedy it.

13. In the alternative, Defendant, WALMART INC., had constructive knowledge of the dangerous condition and failed to remedy it.

14. The dangerous condition existed for such a length of time that, in the exercise of ordinary care, the Defendant, WALMART INC., should have known of the condition and taken

action to remedy it.

15. The dangerous condition occurred with regularity and was therefore foreseeable to Defendant, WALMART INC.

16. As a direct and proximate result of the negligence of Defendant, WALMART INC., Plaintiff, TERESA LYNN MARROQUIN, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, medical care and treatment and related expenses, loss of earnings, loss of ability to earn money, and aggravation of a previously existing condition. The losses are either permanent or continuing in nature and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, TERESA LYNN MARROQUIN, hereby demands judgment for damages and costs from the Defendant, WALMART INC., together with any such further relief the Court deems just and appropriate.

**COUNT II NEGLIGENT FAILURE TO WARN AGAINST DEFENDANT  
WALMART INC.**

17. Plaintiff realleges paragraphs 1 through 8 as if stated fully herein.

18. The hole that was located in the asphalt of the parking lot was a latent dangerous condition.

19. Plaintiff, TERESA LYNN MARROQUIN, was unaware of the dangerous condition of the floor at the time of the incident.

20. Defendant, WALMART INC., had actual notice or knowledge of the concealed dangerous condition of the floor prior to the subject incident.

21. In the alternative, Defendant, WALMART INC., had constructive notice or knowledge of the concealed dangerous condition of the floor.

22. The dangerous condition existed for such a length of time that in the exercise of ordinary care the Defendant, WALMART INC., should have known of the dangerous condition.

23. The dangerous condition occurred with regularity and was therefore foreseeable to the Defendant, WALMART INC.

24. Defendant, WALMART INC., had superior knowledge to that of Plaintiff, TERESA LYNN MARROQUIN, regarding the dangerous condition of the parking lot.

25. Defendant, WALMART INC., had a duty to give Plaintiff, TERESA LYNN MARROQUIN, timely and adequate notice and warning of the dangerous condition of the parking lot.

26. Defendant, WALMART INC., breached its duty by failing to warn or adequately warn Plaintiff, TERESA LYNN MARROQUIN, of the dangerous condition that existed at the time of the Plaintiff's incident.

27. Defendant, WALMART INC., breached its duty by failing to place barricades, signs, or other marking devices utilized to alert customers, including Plaintiff, TERESA LYNN MARROQUIN, of the dangerous condition that existed at the time of the Plaintiff's incident.

28. As a direct and proximate result of the negligence of Defendant, WALMART INC., Plaintiff, TERESA LYNN MARROQUIN, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, medical care and treatment and related expenses, loss of earnings, loss of ability to earn money, and aggravation of a previously existing condition. The losses are either permanent or continuing in nature and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, TERESA LYNN MARROQUIN, hereby demands judgment for damages and costs from the Defendant, WALMART INC., together with any such further relief the Court deems just and appropriate.

**COUNT III NEGLIGENT MAINTENANCE AGAINST DEFENDANT WAL-MART  
STORES EAST, LP**

29. Plaintiff realleges paragraphs 1 through 8 as if stated fully herein.

30. Defendant, WAL-MART STORES EAST, LP, owed its business invitees, and specifically Plaintiff, TERESA LYNN MARROQUIN, the duty to maintain its premises in a reasonably safe condition, including keeping the parking lot of the store free from holes in the asphalt.

31. Defendant, WAL-MART STORES EAST, LP, its agents, servants, or employees acting within the course and scope of their employment, breached its duty to Plaintiff, TERESA LYNN MARROQUIN, by negligently creating or allowing the dangerous condition of the hole that was located in the asphalt of the parking lot to exist.

32. Defendant, WAL-MART STORES EAST, LP, had actual notice or knowledge of the dangerous condition prior to the incident and failed to remedy it.

33. In the alternative, Defendant, WAL-MART STORES EAST, LP, had constructive knowledge of the dangerous condition and failed to remedy it.

34. The dangerous condition existed for such a length of time that, in the exercise of ordinary care, the Defendant, WAL-MART STORES EAST, LP, should have known of the condition and taken action to remedy it.

35. The dangerous condition occurred with regularity and was therefore foreseeable to Defendant, WAL-MART STORES EAST, LP.

36. As a direct and proximate result of the negligence of Defendant, WAL-MART STORES EAST, LP, Plaintiff, TERESA LYNN MARROQUIN, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, medical care and treatment and related expenses, loss of earnings, loss of ability to earn money, and aggravation of a previously existing condition. The

losses are either permanent or continuing in nature and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, TERESA LYNN MARROQUIN, hereby demands judgment for damages and costs from the Defendant, WAL-MART STORES EAST, LP, together with any such further relief the Court deems just and appropriate.

**COUNT IV NEGLIGENT FAILURE TO WARN AGAINST DEFENDANT**  
**WAL-MART STORES EAST, LP**

37. Plaintiff realleges paragraphs 1 through 8 as if stated fully herein.

38. The hole that was located in the asphalt of the parking lot was a latent dangerous condition.

39. Plaintiff, TERESA LYNN MARROQUIN, was unaware of the dangerous condition of the floor at the time of the incident.

40. Defendant, WAL-MART STORES EAST, LP, had actual notice or knowledge of the concealed dangerous condition of the floor prior to the subject incident.

41. In the alternative, Defendant, WAL-MART STORES EAST, LP, had constructive notice or knowledge of the concealed dangerous condition of the floor.

42. The dangerous condition existed for such a length of time that in the exercise of ordinary care the Defendant, WAL-MART STORES EAST, LP, should have known of the dangerous condition.

43. The dangerous condition occurred with regularity and was therefore foreseeable to the Defendant, WAL-MART STORES EAST, LP.

44. Defendant, WAL-MART STORES EAST, LP, had superior knowledge to that of Plaintiff, TERESA LYNN MARROQUIN, regarding the dangerous condition of the parking lot.

45. Defendant, WAL-MART STORES EAST, LP, had a duty to give Plaintiff, TERESA LYNN MARROQUIN, timely and adequate notice and warning of the dangerous condition of the parking lot.

46. Defendant, WAL-MART STORES EAST, LP, breached its duty by failing to warn or adequately warn Plaintiff, TERESA LYNN MARROQUIN, of the dangerous condition that existed at the time of the Plaintiff's incident.

47. Defendant, WAL-MART STORES EAST, LP, breached its duty by failing to place barricades, signs, or other marking devices utilized to alert customers, including Plaintiff, TERESA LYNN MARROQUIN, of the dangerous condition that existed at the time of the Plaintiff's incident.

48. As a direct and proximate result of the negligence of Defendant, WAL-MART STORES EAST, LP, Plaintiff, TERESA LYNN MARROQUIN, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, medical care and treatment and related expenses, loss of earnings, loss of ability to earn money, and aggravation of a previously existing condition. The losses are either permanent or continuing in nature and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, TERESA LYNN MARROQUIN, hereby demands judgment for damages and costs from the Defendant, WAL-MART STORES EAST, LP, together with any such further relief the Court deems just and appropriate.

**DEMAND FOR JURY TRIAL**

Plaintiff, CELINA WHITE, hereby demands trial by jury of all issues so triable as a matter of right. DATED: December 17, 2025

RAMON, RODRIGUEZ & BLANCO-HERRERA  
Attorney for Plaintiff  
1750 Coral Way, Second Floor  
Miami, FL. 33145  
Telephone: (305) 800-4663  
Service Emails: [mbh@rrbhlaw.com](mailto:mbh@rrbhlaw.com)  
[ml@rrbhlaw.com](mailto:ml@rrbhlaw.com)

/s/ Ramon Blanco-Herrera  
RAMON BLANCO-HERRERA, ESQ.  
Florida Bar No.: 11494

NOT A CERTIFIED COPY