

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

**JANETTA JONES,**  
**Plaintiff,**

v.

**CASE NO.:**

**LYFT FLORIDA, INC., a  
Foreign for profit corporation,  
a/k/a LYFT, INC., and LEODANIS,  
Defendants.**

**COMPLAINT AND DEMAND FOR JURY TRIAL**

COME NOW Plaintiff, **JANETTA JONES**, by and through the undersigned attorney, and  
sues Defendant, **LYFT FLORIDA, INC., a/k/a LYFT, INC., and LEODANIS**, and alleges:

**GENERAL ALLEGATIONS**

1. This is a cause of action for damages in excess of fifty thousand dollars (\$50,000.00) exclusive of costs, interest and attorney's fees.
2. At all times material hereto, Plaintiff, **JANETTA JONES**, was a resident of Palm Beach County, Florida.
3. At all times material hereto, Defendant, **LEODANIS**, was a resident of Palm Beach County, Florida.
4. At all times material hereto, Defendant, **LYFT FLORIDA, INC., a Foreign for profit corporation, a/k/a LYFT INC., and LEODANIS**, was conducting business in Florida as a for profit corporation.
5. This cause of action accrued in Palm Beach County, Florida.
5. Venue is proper in the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida.

**COUNT ONE -**  
**NEGLIGENCE OF (LEODANIS)**

6. The Plaintiff, **JANETTA JONES**, realleges and incorporates all the allegations contained in paragraphs one (1) through five (5) above as though fully restated herein.

7. On or about January 18, 2024, Plaintiff, **JANETTA JONES**, was a passenger in a Lyft vehicle, a Toyota Rav 4, being driven by the Defendant, **LEODANIS** and was traveling in West Palm Beach, Palm Beach County, Florida.

8. On or about January 18, 2024, Defendant, **LEODANIS**, was transporting the Plaintiff who was instructing him to their destination, suddenly slammed on his brakes while traveling at a high speed without reason or warning causing the plaintiff to be thrown forward into the back seat and injuring the Plaintiff.

9. On or about January 18, 2024, Defendant, **LEODANIS**, failed to operate the vehicle in a safe manner and drove with careless disregard for the safety of his passenger, the Plaintiff, **JANETTA JONES**, who was injured as the result of his negligent actions while operating the Lyft vehicle.

10. On or about January 18, 2024, Plaintiff, **JANETTA JONES**, was a passenger in a motor vehicle in West Palm Beach, Palm Beach County, Florida.

11. As a direct and proximate result of the negligence of Defendant, **LEODANIS**, through his employer, Defendant, **LYFT FLORIDA, INC., a Foreign for profit corporation, a/k/a LYFT INC.**, Plaintiff, **JANETTA JONES**, has suffered and will continue to suffer in the future the following damages:

- a. permanent personal injuries within a reasonable degree of medical probability;
- b. pain and suffering; past, present, and future;

- c. mental anguish;
- d. physical limitations and impairments;
- e. decreased capacity for the enjoyment of life and decrease of life choices;
- f. loss of earnings; past, present, and future; and
- g. medical expenses for the care and treatment of her injuries, past and future.
- h. aggravation of a preexisting condition.

12. These injuries consist in whole or in part of a significant and permanent loss of important bodily functions, and permanent injuries within a reasonable degree of medical probability. However, should it be determined that any such bodily injuries are not permanent, then Plaintiff claims entitlement to all damages resulting from non-permanent injuries and which are based upon benefits therefore not paid by Personal Injury Protection (No Fault Benefits).

**WHEREFORE**, Plaintiff, **JANETTA JONES**, demands judgment against Defendant, **LEODANIS**, for all damages and relief afforded by Florida law, all costs, interest, pre-judgment interest, post- judgment interest, and Plaintiffs further demand trial by jury on all issues so triable.

**COUNT TWO –**  
**VICARIOUS LIABILITY (LYFT)**

13. The Plaintiff, **JANETTA JONES**, realleges and incorporates all the allegations contained in paragraphs one (1) through five (5) above as though fully restated herein.

14. On or about January 18, 2024, Plaintiff, **JANETTA JONES**, was a passenger in a motor vehicle in West Palm Beach, Palm Beach County, Florida.

15. On or about January 18, 2024, Plaintiff, **JANETTA JONES**, was a passenger in a Lyft vehicle, a Toyota Rav 4, being driven by the Defendant, **LEODANIS** and was traveling in West Palm Beach, Palm Beach County, Florida.

16. On or about January 18, 2024, Defendant, **LEODANIS**, was transporting the Plaintiff who was instructing him to their destination, suddenly slammed on his brakes while traveling at a high speed without reason or warning causing the plaintiff to be thrown forward into the back seat and injuring the Plaintiff.

17. On or about January 18, 2024, Defendant, **LEODANIS**, failed to operate the vehicle in a safe manner and drove with careless disregard for the safety of his passenger, the Plaintiff, **JANETTA JONES**, who was injured as the result of his negligent actions while operating the Lyft vehicle.

18. Upon information and belief, On January 18, 2024, Defendant, **LEODANIS**, was employed by, or the agent of, **LYFT, INC.** and was acting in the scope and course of his employment or agency. Therefore, Defendant **LYFT, INC.** acted through its employee/agent, Defendant **LEODANIS**, when he was operating his vehicle negligently so as to injure plaintiff.

19. As a direct and proximate result of the negligence of Defendant, **LEODANIS**, Plaintiff, **JANETTA JONES** has suffered and will continue to suffer in the future the following damages:

- a. permanent personal injuries within a reasonable degree of medical probability;
- b. pain and suffering; past, present, and future;
- c. mental anguish;
- d. physical limitations and impairments;
- e. decreased capacity for the enjoyment of life and decrease of life choices;
- f. loss of earnings; past, present, and future; and
- g. medical expenses for the care and treatment of her injuries, past and future.

h. aggravation of a preexisting condition.

20. These injuries consist in whole or in part of a significant and permanent loss of important bodily functions, and permanent injuries within a reasonable degree of medical probability. However, should it be determined that any such bodily injuries are not permanent, then Plaintiff claims entitlement to all damages resulting from non-permanent injuries.

WHEREFORE, Plaintiff, **JANETTA JONES**, demands judgment against Defendant, **LEODANIS**, for all damages and relief afforded by Florida law, all costs, interest, pre-judgment interest, post judgment interest, and Plaintiffs further demand trial by jury on all issues so triable.

DATED this 16<sup>th</sup> day of January 2026.

Respectfully Submitted,

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