

**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.
4. 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 Plaintiff's 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 16th day of January 2026.

Respectfully Submitted,

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