

IN THE CIRCUIT COURT OF THE 15<sup>th</sup>  
JUDICAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

CASE NO.:

SONY ALEXIS,

Plaintiff,

v.

SCHOOL BOARD OF PALM BEACH COUNTY,

Defendant.

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**COMPLAINT**

The Plaintiff, SONY ALEXIS by and through the undersigned counsel and hereby sues the Defendant SCHOOL BOARD OF PALM BEACH COUNTY, and alleges as follows:

1. This is an action for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest, costs and attorneys' fees.
2. That at all times material to the cause herein, the Plaintiff, SONY ALEXIS, was and is a resident of Palm Beach County, Florida.
3. At all times material hereto, the Defendant, SCHOOL BOARD OF PALM BEACH COUNTY, is a political subdivision of the State of Florida and is subject to jurisdiction of this Court and Plaintiff has performed or otherwise complied with all conditions precedent to suing a governmental entity under Florida Statute. Specifically, Plaintiff complied with the notice provisions of Florida Statute Section 768.28(6)
4. On or about September 23, 2023, Harvey Mendelson operated a 2018 Ford van on or about the 3400 block of NW 5<sup>th</sup> Ave, Boca Raton, Palm Beach County, Florida while in the

course and scope of his employment with Defendant, SCHOOL BOARD OF PALM BEACH COUNTY.

5. At said time and place, Harvey Mendelson was an employee or agent of Defendant, SCHOOL BOARD OF PALM BEACH COUNTY, and was operating in his capacity as an employee or agent of Defendant, SCHOOL BOARD OF PALM BEACH COUNTY, at the time of the accident.

6. Defendant, SCHOOL BOARD OF PALM BEACH COUNTY, is vicariously liable for the negligent acts of its agents, servants, and employees committed within the scope and course of their employment including, Harvey Mendelson, who caused the accident in question.

7. That at above time and place, the Defendant, SCHOOL BOARD OF PALM BEACH COUNTY, did owe a duty of care to the Plaintiff, SONY ALEXIS, to use reasonable care and/or caution to properly maintain, operate, and control the motor vehicle in which their employees are operating.

8. As a direct and proximate result of the negligence of the Defendant, SCHOOL BOARD OF PALM BEACH COUNTY, the Plaintiff, SONY ALEXIS, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care, loss of wages in the past and future, and treatment and aggravation of a previously existing condition.

9. The losses are either permanent or continuing and the Plaintiff, SONY ALEXIS, will suffer the losses in the future.

WHEREFORE, the Plaintiff, SONY ALEXIS, hereby demands judgment against the Defendant, SCHOOL BOARD OF PALM BEACH COUNTY, together with costs and interest and demands trial by jury.

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By: /s/ William Zoeller  
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