

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

LISA DURAN,

CASE NO:

Plaintiff,

vs.

PALM BEACH COUNTY,

Defendant.

COMPLAINT

Plaintiff, LISA DURAN, sues Defendant, PALM BEACH COUNTY and alleges:

1. This is an action for damages that exceeds the sum of FIFTY THOUSAND DOLLARS (\$50,000.00), exclusive of costs, interest and attorneys' fees (The estimated value of Plaintiffs' claim is in excess of the minimum jurisdictional threshold required by this Court). Accordingly, Plaintiffs have entered "\$50,001" in the civil cover sheet for the "estimated amount of the claim" as required in the preamble to the civil cover sheet for *jurisdictional purposes only* (the Florida Supreme Court has ordered that the estimated "amount of claim" be set forth in the civil cover sheet for data collection and clerical purposes only). The actual value of Plaintiffs' claim will be determined by a fair and just jury in accordance with Article 1, Section 21, Fla. Const.

2. At all times material to this action, Plaintiff, LISA DURAN, was a natural person residing in Palm Beach County, Florida.

3. At all times material to this action, Defendant, PALM BEACH COUNTY, was a subdivision and/or agency of the State of Florida.

4. Plaintiff complied with all conditions precedent to bringing this action, including complying with the notice requirements of Section 768.28(6), Florida Statutes. A copy of the Notice of Claim letter and is attached as Exhibit "A".

5. At all times material to this action, venue is proper in Palm Beach County since it is the County where the alleged negligent act occurred.

6. On or about May 11, 2025, Plaintiff, LISA DURAN, was a passenger in the Palm Tran Public Transportation bus traveling westbound on State Road 80 in Palm Beach County, Florida.

7. At that time and place, Jennifer Danita Hanna, was operating a Palm Beach County public transportation vehicle by the name of Palm Tran Public Transportation traveling westbound on State Road 80 in Palm Beach County, Florida. At that time and place, Jennifer Danita Hanna negligently operated and/or maintained the motor vehicle she was operating by crashing into a motor vehicle.

8. At all times material to this action, Jennifer Danita Hanna, operated the above Palm Tran Public Transportation bus with the permission and consent of PALM BEACH COUNTY.

9. At all times material to this action, Jennifer Danita Hanna, was a servant, agent, and/or employee of Defendant, PALM BEACH COUNTY, and was acting in the course and scope of said agency and/or employment and in furtherance of Defendant, PALM BEACH COUNTY, interests.

10. Defendant, PALM BEACH COUNTY, is vicariously liable for the

negligence of Jennifer Danita Hanna, as a result of the respondeat superior doctrine and/or the dangerous instrumentality doctrine and/or is otherwise liable for the negligence of Jennifer Danita Hanna pursuant to Section 768.28, Florida Statutes

11. As a direct and proximate result of Jennifer Danita Hanna's negligence, for which Defendant, PALM BEACH COUNTY, is liable, Plaintiff, LISA DURAN, suffered bodily injury including a permanent injury to the body as a whole, pain and suffering of both a physical and mental nature, disability, physical impairment, disfigurement, mental anguish, inconvenience, loss of capacity for the enjoyment of life, aggravation of an existing condition, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money and loss of ability to lead and enjoy a normal life. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future. Plaintiff's motor vehicle was also damaged.

WHEREFORE, Plaintiff, LISA DURAN, demands judgment for damages against Defendant, PALM BEACH COUNTY, and other such relief deemed proper by the Court. Plaintiff also demands a jury trial on all issues so triable.

RESPECTFULLY submitted this 11th day of February 2026.

/s/ Trevor R. Thomson
TREVOR R. THOMSON
Florida Bar Number: 115833
Morgan & Morgan, P.A.
8151 Peters Road, Suite 4000
Plantation, FL 33324
Telephone: (754) 285-3160
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Attorneys for Plaintiff
Email: Trevor.Thomson@forthepeople.com,
Lesquivel@forthepeople.com
MLaos@forthepeople.com

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RECEIVED

JUL - 8 2025

CITY ATTORNEY'S
OFFICE

NOTICE OF CLAIM
DEMAND FOR COMPENSATION FOR AN INJURY
FLORIDA STATUTES 768-28(6)

VIA REGULAR U.S. MAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO:

Jimmy Patronis, Chief Financial Officer
Florida Department of Financial Services
200 E. Gaines Street
Tallahassee, FL 32399
CERTIFIED MAIL RRR: 7020 0640 0001 4943 9452

Keith A James, Mayor
Palm Beach County
401 Clematis Street
West Palm Beach, FL 33401
CERTIFIED MAIL RRR: 7020 1290 0000 6874 6392

Palm Beach Risk Management Division
100 Australian Ave #200
West Palm Beach, FL 33406
CERTIFIED MAIL RRR: 7020 1290 0000 6874 6408

Palm Beach Transportation and Public Works
401 Clematis Street
West Palm Beach, FL 33401
CERTIFIED MAIL RRR: 7020 1290 0000 6874 6415

Director, Palm Tran
Palm Beach County Department of Transportation
100 N. congress Ave.
Delray, FL 33445
CERTIFIED MAIL RRR: 7020 1290 0000 6874 6422

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CLAIMANT:

Lisa Duran

Date of Birth:

January 15, 1983

Place of Birth:

Pahokee, FL

Social Security #:

CONSORTIUM**CLAIMANT:****PRIOR ADJUDICATED****UNPAID CLAIMS:**

Claimant:

None

Consortium Claimant:

None

DATE OF INCIDENT:

May 13, 2025

PLACE OF INCIDENT:

SR 80, Palm-Beach County, FL, at Latitude 26.725642 and Longitude -80.451309.

**DESCRIPTION OF
INCIDENT:**

On May 13, 2025, at approximately 3:30 PM EST, my Client Ms. Lisa Duran was a passenger the your Palm Tran Public Transportation bus, VIN # 15GGD2716M3196035 bearing TAG # TD9179. The Palm Tran Public Transportation bus was being operated by Palm Beach County's employee/driver Jennifer Danita Hanna.

Your Palm Tran Public Transportation bus driver, Ms. Hanna, was traveling westbound on State Road 80 approaching the intersection with Connors Highways. Without warning or reason, Ms. Hanna failed to stop for the red traffic signal and entered the intersection striking the left fender/driver side of vehicle 2.

Immediately after the collision, Palm Beach county Sheriff's Office was summoned and Patrol W. Vargas, Badge # 37250, came to the scene of the crash. Patrol W. Vargas prepared the Florida Traffic Crash Report number 25060533 (HSMV 27296856) noting that Palm Tran Public Transportation employee/driver Ms. Hanna "failed to top for the red traffic signal and entered the intersection, resulting in a collision." . A copy of this Florida Traffic Crash Report is attached herein for your reference.

As a direct result of Palm Trans Public Transportation bus employee/driver Ms. Hanna negligent and careless driving, my Client Ms. Ms. Lisa Duran sustained serious and permanent injuries and damages which will continue to plague her for the rest of her life.

This law firm represents the above-referenced claimant who was involved in the following incident on the above-referenced date of loss.

This letter is notice of a claim against Palm Beach County, Palm Beach Risk Management Division, the Department of Financial Services, Palm Beach Transportation and Public Works and Palm Beach County Department of Transportation which we believe are or may be liable for the injuries my Client Ms. Lisa Duran sustained in the incident.

My Client Ms. Lisa Duran owes to the state, its agency officers or subdivisions \$0.00 in adjudicated penalties, fines, fees, or victim restitution fund and other judgments more than \$200.00.

If we have failed to comply with § 768.28 in any manner whatsoever, please advise us in immediately by email to bcarvajal@forthepeople.com and angic.perez@forthepeople.com, specifying how we have failed. If we do not receive such written notice within seven (7) days of receipt of this notice, we will presume that you have accepted this letter as proper notice under § 768.28 of intent to bring a claim.

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Please also take all steps necessary to preserve any evidence of this accident including any recordings which may assist in determining the cause of injury. Please contact the undersigned as soon as possible to discuss this matter. We would like to attempt a settlement without having to file another Complaint.

RELIEF SOUGHT:

My Client's damages, include pain and suffering exceed \$250,000.00 currently and the damages continue as our client continues to treat.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by certified mail to the above agencies, this 26th day of June, 2025.

Angie Perez, Esq.
FBN: 1048562
Morgan & Morgan, P.A.
703 Waterford Way, Ste. 1000
Miami, FL 33126
(786) 761 6613
Attorneys for Claimant



12800 University Drive, Suite 600
P.O. Box 9504
Fort Myers, FL 33906-9504

FT MYERS FL 339

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FIRST CLASS MAIL

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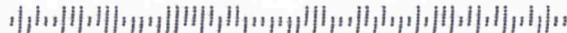
CERTIFIED MAIL



Keith A. James, Mayor
Palm Beach County
401 Clematis Street
West Palm Beach, FL 33401

17749185

33401-531901



NOT A CERTIFIED COPY

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE