

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

CASE NO.:

SANDRA R. ESCOBAR, an individual,

Plaintiff,

vs.

RIC BRADSHAW, in his official capacity as
Sheriff of Palm Beach County, and KEVIN W.
BRYANT, in his individual capacity,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW the Plaintiff, SANDRA R. ESCOBAR, an individual, by and through the undersigned counsel, and hereby files suit against Defendants, RIC BRADSHAW, in his official capacity as Sheriff of Palm Beach County, and KEVIN W. BRYANT, in his individual capacity, based upon the following allegations:

ALLEGATIONS COMMON TO ALL COUNTS

1. That this is an action for damages in excess of Fifty Thousand (\$50,000.00) Dollars within the jurisdictional limits of this Court.
2. That at all times material herein the Plaintiff, SANDRA R. ESCOBAR, is over the age of eighteen (18), and is and was a resident of Palm Beach County, Florida and was otherwise sui juris.
3. At all times material hereto, Defendant, KEVIN W. BRYANT, is over the age of eighteen (18) years of age, and is and was a resident of Palm Beach County, Florida, and otherwise sui juris.

4. At all times material hereto, Defendant, RIC BRADSHAW, was and is the appointed Sheriff of Palm Beach County (hereinafter "PBCSO").

5. At all times material hereto, jurisdiction is proper in the courts of the state of Florida.

6. At all times material hereto, venue is proper in Palm Beach County, Florida.

7. On June 18, 2025, the motor vehicle collision which forms the basis of the Complaint occurred on eastbound Southern Boulevard, in Palm Beach County, Florida.

8. On June 18, 2025, the Defendant, KEVIN W. BRYANT, was the authorized operator of a 2014 Ford Interceptor, white in color, bearing Florida vehicle license plate SHERF40121, traveling eastbound in the right lane of Southern Boulevard, in Palm Beach County, Florida.

9. On June 18, 2025, the Plaintiff, SANDRA R. ESCOBAR, was the passenger in a 2017 Toyota Tacoma pickup truck, silver in color, bearing Florida vehicle license plate Y19SZI. The vehicle Ms. Escobar was traveling in on eastbound Southern Boulevard stopped for traffic. When Defendant, KEVIN W. BRYANT, failed to use due care while looking for his ID and not seeing that traffic had come to a stop resulting in the front of Mr. Bryant's vehicle to collide with the rear of the vehicle Plaintiff, SANDRA R. ESCOBAR was the passenger of, in Palm Beach County, Florida.

10. At the time and place forementioned, the Defendant, KEVIN W. BRYANT, so negligently operated and maintained a motor vehicle so that it collided with a motor vehicle occupied by Plaintiff, SANDRA R. ESCOBAR. As such, Plaintiff, SANDRA R. ESCOBAR, sustained significant permanent bodily injuries.

11. On June 18, 2025, the Defendant, PBCSO, owned a commercial motor vehicle which was being operated with its permission, knowledge and consent by the Defendant, KEVIN W. BRYANT, in Palm Beach County, Florida.

12. At all times material hereto, Defendant, KEVIN W. BRYANT, was operating said motor vehicle within the course and scope of his employment with the knowledge and consent of his employer, Defendant, PBCSO, and with the express knowledge and consent of the owner Defendant, PBCSO.

13. At all times material hereto, the Plaintiff, SANDRA R. ESCOBAR, was not comparatively negligent and a proximate cause of the motor vehicle collision which is the subject of this suit.

14. At all times material hereto, the Defendants, KEVIN W. BRYANT, was negligent and the proximate cause of the motor vehicle collision which is the subject of this lawsuit.

15. At all times material hereto, no third parties, pursuant to Florida Statutes 768.81, were negligent and the proximate cause of the motor vehicle collision which is the subject of this suit.

16. At all times material hereto, the Plaintiff, SANDRA R. ESCOBAR, was wearing her seatbelt at the time of the impact in this motor vehicle collision.

17. Plaintiff, SANDRA R. ESCOBAR, has complied with all conditions precedent to the bringing of this action or same have been otherwise waived or excused by Defendants, PBCSO and KEVIN W. BRYANT.

COUNT I-NEGLIGENCE CLAIM AGAINST DEFENDANT, KEVIN W. BRYANT

18. The Plaintiff hereby re-alleges and reavers all the Allegations Common to All Counts contained in paragraphs 1 through 17 above, as though fully set forth herein.

19. On June 18, 2025, Defendant, KEVIN W. BRYANT, was negligently operating a motor vehicle and/or negligently maintained his motor vehicle as to cause it to negligently come into contact with a motor vehicle in which the Plaintiff, SANDRA R. ESCOBAR, was the passenger.

20. The collision was caused by the reckless, carelessness and negligence of the Defendant, KEVIN W. BRYANT, for that among other acts and omissions:

- a) operated the motor vehicle at a high, dangerous and excessive rate of speed under the circumstances then and there existing;
- b) failed to reduce speed to avoid a collision;
- c) failed to observe due care and precaution and to maintain proper and adequate control of the motor vehicle;
- d) failed to keep a proper lookout for other vehicles lawfully upon the highway;
- e) failed to exercise reasonable care in the operation of the motor vehicle under the circumstances then and there existing; and
- f) in other respects, not now known to the Plaintiff but which may become known before or at the time of trial.

21. As a direct and proximate result of the negligence of the Defendant, KEVIN W. BRYANT, Plaintiff, SANDRA R. ESCOBAR, was injured in and about her body, suffered aggravation of a pre-existing condition, pain and suffering, disability, disfigurement, impairment of working ability, mental anguish, loss of enjoyment of life and Plaintiff incurred medical expenses in the care and treatment of said injuries, loss of wages, loss of ability to earn money and the Plaintiff will incur medical expenses in the future; all of said injuries are permanent within a reasonable degree of medical probability.

COUNT II- VICARIOUS LIABILITY OF DEFENDANT OWNER, RIC BRADSHAW
APPOINTED SHERIFF OF PALM BEACH COUNTY

22. Plaintiff, SANDRA R. ESCOBAR, re-alleges, and incorporates by reference all those facts and allegations as set forth in paragraphs 1 through 21 above, and further alleges:

23. On June 18, 2025, the Defendant, RIC BRADSHAW, was and is the appointed Sheriff of Palm Beach County (hereinafter "PBCSO"), was the owner of a 2014 Ford Interceptor, white in color, bearing Florida vehicle license plate SHERF40121.

24. At the time of the crash, Defendant, KEVIN W. BRYANT, was a permissive user, operating said vehicle with the consent of Defendant, PBCSO.

25. Defendant, PBCSO, is vicariously liable for any and all damages caused by Defendant, KEVIN W. BRYANT's, negligent conduct while operating the vehicle owned by Defendant, PBCSO, with their knowledge, permission and/or consent.

26. As a direct and proximate result of the negligence of the Defendants, Plaintiff, SANDRA R. ESCOBAR, was injured in and about her body, suffered pain and suffering, disability, disfigurement, impairment of working ability, mental anguish, loss of enjoyment of life and Plaintiff incurred medical expenses in the care and treatment of said injuries; all of said injuries are permanent within a reasonable degree of medical probability. Plaintiff will continue to incur damages into the future and for the remainder of her life.

WHEREFORE, the Plaintiff, SANDRA R. ESCOBAR, demands judgment against Defendants, RIC BRADSHAW, in his official capacity as Sheriff of Palm Beach County, and KEVIN W. BRYANT, in his individual capacity, for damages plus prejudgment interest, the costs of this action, attorney's fees, if appropriate, and such other and further relief as this Court deems just and proper and further request trial by jury on all issues so triable.

DEMAND FOR JURY TRIAL

The Plaintiff, SANDRA R. ESCOBAR, demands trial on all issues triable as of right by jury.

DATED this 25th day of February 2026.

/s/ Gabriel Isasi V

Gabriel Isasi, Esquire

Florida Bar No.: 1022119

Attorneys for Plaintiff

Lytal, Reiter, Smith, Ivey & Fronrath

4300 TBC Way, Suite 200

Palm Beach Gardens, FL 33410

Telephone: (561) 655-1990

Facsimile: (561) 832-2932

Primary Email: gabriel.isasi@foryourrights.com

Secondary Email: jarroyo@foryourrights.com

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