

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

LINDA BUCCILLI,

Plaintiff,

v.

CASE NO.:

LAZY DOG RESTAURANTS, LLC., d/b/a
LAZY DOG RESTAURANT & BAR,
A Foreign Company, and SCG UPTOWN
BOCA OWNER, LLC, A Foreign Company,

Defendants.

COMPLAINT

COMES NOW Plaintiff, LINDA BUCCILLI, by and through undersigned counsel, and
sues Defendant, and alleges:

JURISDICTION AND VENUE

1. This is an action for damages in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), exclusive of interest, attorney fees and costs, and is otherwise within the jurisdictional limits of this Court.

2. That at all times material hereto, Plaintiff, was and is a resident of Palm Beach County, Florida, and is otherwise *sui juris*.

3. That at all times material hereto, Defendant, LAZY DOG RESTAURANTS, LLC., d/b/a LAZY DOG RESTAURANT & BAR was and is a foreign company authorized to do business in the State of Florida and was doing business in Palm Beach County, Florida.

4. That at all times material hereto, Defendant, SCG UPTOWN BOCA OWNER, LLC, (hereinafter "SCG") was and is a foreign company authorized to do business in the State of Florida and was doing business in Palm Beach County, Florida.

5. Venue is proper in Palm Beach County, Florida, as the incident giving rise to the subject cause of action occurred in Palm Beach County, Florida.

6. Plaintiff has complied with all conditions precedent to the filing of this lawsuit.

FACTUAL ALLEGATIONS

7. Plaintiff incorporates all preceding paragraphs from the Complaint herein.

8. On or about 1/27/2026, Plaintiff, a business invitee, was lawfully on Defendant LAZY DOG RESTAURANTS, LLC., d/b/a LAZY DOG RESTAURANT & BAR (hereinafter "LAZY DOG") premises located at 9636 Glades Road, Boca Raton, FL (the "Premises").

9. While walking from the parking lot into the restaurant, the Plaintiff tripped, fell, landing on her left side, breaking her elbow and hitting her head on the west side of the restaurant's outside patio due to a solid-colored curb which was no demarked in any way.

10. There were no warning signs, markings and/or colors to alert customers and/or business invitees to the dangerous condition.

11. The curb "rise" was not open and obvious and blended into the parking lot/sidewalk/patio, making it extremely difficult for Plaintiff to detect prior to the fall.

12. The area where the incident occurred was open to the public and under the control and maintenance of Defendants LAZY DOG as well as SCG.

13. The dangerous condition existed for a sufficient period of time that Defendants, in the exercise of reasonable care, should have known of it.

14. Defendants knew or should have known of the presence of the dangerous condition and failed to remedy it or warn of it in a timely and reasonable manner.

COUNT I – NEGLIGENCE AGAINST LAZY DOG RESTAURANTS, LLC.

15. Plaintiff incorporates all preceding paragraphs from the Complaint herein.

16. Defendant owed Plaintiff a duty to maintain its premises in a reasonably safe condition and to warn of any dangerous conditions of which it had actual or constructive knowledge greater than that of Plaintiff.

17. Defendant breached this duty by:

- a. Failing to place markings, colors and/or warning signs or other barriers near the hazardous area;
- b. Failing to maintain its premises in a reasonably safe condition for invitees like Plaintiff;
- c. Failing to properly inspect the premises to discover hazardous conditions;
- d. Failing to train and supervise employees to properly monitor, identify, and address similar safety hazards.

18. The negligent conditions referenced above were known to Defendant LAZY DOG or had existed for a sufficient length of time so that Defendant should have known about the conditions.

19. Alternatively, Defendant created the negligent conditions referenced above.

20. As a direct and proximate result of Defendant's negligence, Plaintiff suffered serious and grievous personal injuries, resulting in pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, past, present and future medical expenses, lost wages, and rehabilitation expenses. These injuries are either permanent or continuing in nature, and Plaintiff will suffer losses in the future.

WHEREFORE Plaintiff, LINDA BUCCILLI, respectfully demands judgment for damages in excess of \$50,000.00 against Defendant, LAZY DOG RESTAURANTS, LLC., including, but not limited to, general damages, all past and future medical and incidental expenses, all out of pocket expenses, for costs of suit incurred in connection with this action, and

other such relief deemed just, proper, and equitable under the circumstances.

COUNT II-NEGLIGENCE AGAINST SCG UPTOWN BOCA RATON, LLC.

21. Plaintiff incorporates all preceding paragraphs from the Complaint herein.

22. Defendant owed Plaintiff a duty to maintain its premises in a reasonably safe condition and to warn of any dangerous conditions of which it had actual or constructive knowledge greater than that of Plaintiff.

23. Defendant breached this duty by:

- e. Failing to place markings, colors and/or warning signs or other barriers near the hazardous area;
- f. Failing to maintain its premises in a reasonably safe condition for invitees like Plaintiff;
- g. Failing to properly inspect the premises to discover hazardous conditions;
- h. Failing to train and supervise employees to properly monitor, identify, and address similar safety hazards.

24. The negligent conditions referenced above were known to Defendant LAZY DOG or had existed for a sufficient length of time so that Defendant should have known about the conditions.

25. Alternatively, Defendant created the negligent conditions referenced above.

26. As a direct and proximate result of Defendant's negligence, Plaintiff suffered serious and grievous personal injuries, resulting in pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, past, present and future medical expenses, lost wages, and rehabilitation expenses. These injuries are either permanent or continuing in nature, and Plaintiff will suffer losses in the future.

WHEREFORE Plaintiff, LINDA BUCCILLI, respectfully demands judgment for damages in excess of \$50,000.00 against Defendant, SCG UPTOWN BOCA OWNER, LLC., including, but not limited to, general damages, all past and future medical and incidental expenses, all out of pocket expenses, for costs of suit incurred in connection with this action, and other such relief deemed just, proper, and equitable under the circumstances.

PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES SO TRIABLE.

Dated: March 12, 2026.

Respectfully Submitted,

By: /s/Jeremy T. Schilling
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