

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

CASE NUMBER:

LINDA ROLLE,

Plaintiff,

vs.

SOMERSET ACADEMY, INC.

Defendants.

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, LINDA ROLLE, by and through her undersigned attorney and sues the Defendant, and allege as follows:

- 1) This is an action for damages in excess of \$50,000.00.
- 2) At all times material hereto, Plaintiff, LINDA ROLLE is a resident and citizen of Broward County, Florida, and is over the age of eighteen (18) years, and is otherwise sui juris.
- 3) At all times material hereto, Defendant, **SOMERSET ACADEMY, INC.** is a corporation, duly authorized to do and doing business in the State of Florida.
- 4) At all times material hereto, Defendant, **SOMERSET ACADEMY, INC.**, owned, controlled, possessed, and maintained the property located at 333 SW 4th Avenue, Boca Raton, FL 33432.
- 5) At all times material hereto, Plaintiff, LINDA ROLLE, was rightfully on the premises as an invitee.

6) On or about the 27th day of February, 2025, the Plaintiff, LINDA ROLLE was at the **SOMERSET ACADEMY, INC.**, located at the above address. At said time and place, the Defendant, **SOMERSET ACADEMY, INC.** owed to the general public and to the Plaintiff, LINDA ROLLE, in particular, the duty of keeping its premises in a reasonably safe condition so that persons such as Plaintiff, LINDA ROLLE, would not be injured on said premises.

7) The Defendant, **SOMERSET ACADEMY, INC.**, breached its duty to the Plaintiff in the that the Defendant, its employees, servants or agents, while acting in the course and scope of their employment, created and/or allowed to be created a dangerous and defective condition, to wit; uneven concrete on the school sidewalk, creating a dangerous slippery surface, which caused the Plaintiff, LINDA ROLLE, to slip and fall, thereby injuring herself.

8) The Defendant, **SOMERSET ACADEMY, INC.**, knew or should have known of said dangerous and defective condition; and failed to warn the general public, or the Plaintiff, LINDA ROLLE, in particular, of any danger or, in the alternative, the Defendant allowed said dangerous and defective condition to exist for a length of time sufficient in which a reasonable inspection would have disclosed such condition.

9) As a direct and proximate result of the aforesaid negligence of Defendant, **SOMERSET ACADEMY, INC.**, Plaintiff, LINDA ROLLE, was injured in and about **her** body and extremities, suffered pain and mental anguish therefrom, was required to and did receive medical care, treatment, and related expenses as a result of **her** injuries, suffered great pain and will continue permanently to suffer great

pain, and has suffered and sustained permanent injury within a reasonable degree of medical probability and/or aggravated a pre-existing injury or condition thereto; and said injuries are either permanent or continuing in their nature, that **her** working ability was impaired and **she** suffered a resultant loss of earnings, and will suffer such losses and impairments in the future, as well as conditions not yet diagnosed; that all of said injuries were caused solely by the negligence and carelessness of the Defendant herein.

WHEREFORE, Plaintiff demands judgment for compensatory damages, costs against the Defendant and a trial by jury of all issues triable in this cause.

DATED THIS __15th__ DAY OF APRIL, 2026.

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