

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

CASE NO.:

DOLORES CONNERS,
Plaintiff,

vs.

KINGS POINT RECREATION
CORPORATION, INC.
Defendant.

COMPLAINT

Plaintiff DOLORES CONNERS, sues Defendant KINGS POINT RECREATION
CORPORATION, INC. and alleges:

1. This is an action for damages that exceeds the \$50,000.00 minimum jurisdictional limits of this court.
2. All acts complained of occurred in Palm Beach County, Florida and Palm Beach County is the proper venue for this action.
3. All conditions precedent to bringing this action have occurred or been waived.
4. At all times material hereto, Defendant was the property management company with a custodial duty for the property located at 7000 Atlantic Avenue, Delray Beach, FL in Palm Beach County Florida, that was used as a shopping plaza.

**COUNT I- NEGLIGENCE AGAINST KINGS POINT RECREATION
CORPORATION, INC.**

5. Plaintiff adopts and realleges paragraphs 1-4 of this complaint and would further show:

6. At all relevant times, Defendant KINGS POINT RECREATION CORPORATION, INC. owed a non-delegable duty to all invitees, licensees, and the general public to maintain, inspect, and repair the premises in a reasonably safe condition for the safety on the premises, which includes reasonable efforts to keep the premises properly maintained, to warn of dangerous conditions, and to not hide dangers within the premises

7. On or about May 25, 2025, Plaintiff DOLORES CONNERS was on the property, located at 7000 Atlantic Avenue, Delray Beach, Florida, as an invitee.

8. Defendant negligently maintained the property by failing to correct the damaged sidewalk areas of the plaza proximately causing Plaintiff to trip and fall on the property.

9. Defendant failed to warn Plaintiff of this unreasonably dangerous condition.

10. The negligent condition was known to defendant or had existed for a sufficient length of time so that Defendant knew or should have known of it.

11. As a result, Plaintiff, DOLORES CONNERS, 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 and treatment, loss of earnings, loss of ability to earn money and aggravation of a previously existing condition. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future.

WHEREFORE Plaintiff, DOLORES CONNORS, demands judgment against Defendant, KINGS POINT RECREATION CORPORATION, INC for damages, interest, costs and for such further relief as this court deems appropriate under the circumstances and further demands a trial by jury on all issues so triable as a matter of right.

Signed and dated this 4th day of May, 2026.

KOGAN AND DiSALVO, P.A.
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