

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

CASE NO:

MARCIA NIJAMKIN,  
  
Plaintiff,

BOCA FOOD MARKET LLC.  
a Florida Limited Liability Company  
  
Defendant.

\_\_\_\_\_ /

**COMPLAINT**

The Plaintiff, MARCIA NIJAMKIN, by and through her undersigned counsel, sues the Defendant, BOCA FOOD MARKET LLC., a Florida Limited Liability Company, and alleges as follows:

1. This is an action for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest and costs.
2. At all times material hereto, Defendant, BOCA FOOD MARKET LLC., was and is a Florida Limited Liability Company, licensed to do business and doing business in State of Florida, by the operation of a store, namely, Joseph's Classic Market, located at 6000 Glades Road #1380A, Boca Raton, FL 33486
3. At all times material hereto, Defendant, BOCA FOOD MARKET LLC, owned, operated, maintained and/or controlled its business premises located at 6000 Glades Road #1308A, Boca Raton, FL 33486, Palm Beach County, Florida.
4. At all times material hereto, Plaintiff, MARCIA NIJAMKIN was a resident of Broward County, Florida, is over the age of eighteen (18) years, and is otherwise sui juris.

5. All causes of actions alleged herein occurred in Palm Beach County, Florida.

6. On or about August 17, 2025, the Plaintiff, MARCIA NIJAMKIN, was a business invitee at Joseph's Classic Market, located at 6000 Glades Road, #1308A, Boca Raton, FL 33486, Palm Beach County, Florida. At said time and place, the Defendant, BOCA FOOD MARKET LLC., owed to the general public and to the Plaintiff, MARCIA NIJAMKIN, in particular, the duty of keeping its premises in a reasonably safe condition so that persons such as Plaintiff, MARCIA NIJAMKIN, would not be injured on said premises.

7. The Defendant, BOCA FOOD MARKET LLC., breached its duty to the Plaintiff, MARCIA NIJAMKIN, in that the Defendant, its agents, servants, and/or employees, while acting within the course and scope of their employment, created and/or allowed to be created a dangerous and defective condition, to wit: stack of baskets negligently placed at the entrance of Joseph's Classic Market, which caused the Plaintiff, MARCIA NIJAMKIN, to trip and fall, thereby injuring herself.

8. The Defendant, BOCA FOOD MARKET LLC., knew or should have known of said dangerous and defective condition; and failed to warn the general public, or the Plaintiff, MARCIA NIJAMKIN, 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. That as a direct and proximate result of the aforementioned incident, the Plaintiff, MARCIA NIJAMKIN, was injured in and about her body and extremities, suffered physical handicap and/or aggravation of a pre-existing condition, physical and mental pain and suffering, permanent disability and disfigurement, medical and maintenance expenses and wage loss; said

injuries and losses are either permanent or continuing in nature and the Plaintiff will suffer such losses and impairments in the future.

WHEREFORE, Plaintiff, MARCIA NIJAMKIN, sues the Defendant, BOCA FOOD MARKET LLC., a Florida Limited Liability Company, and demands judgment for damages in excess of Fifty Thousand Dollars (\$50,000.00), and further demands a trial by jury of all issues so triable.

WHEREFORE, Plaintiff, MARCIA NIJAMKIN, sues the Defendant, BOCA FOOD MARKET LLC., a Florida Limited Liability Company, and demands judgment for damages in excess of Fifty Thousand Dollars (\$50,000.00), and further demands a trial by jury of all issues so triable.

Dated this 12<sup>th</sup> day of May, 2026.

CHALIK & CHALIK, P.A.  
Attorneys for Plaintiff  
10063 N. W. 1<sup>st</sup> Court  
Plantation, Florida 33324  
Tel.: (954) 476-1000  
Fax: (954) 472-1173  
[litigation@chaliklaw.com](mailto:litigation@chaliklaw.com)

By \_\_\_\_\_  
DEBI F. CHALIK  
Florida Bar No. 179566