

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

TAWANA WHITE,

CASE NO.:

Plaintiff,

vs.

CITY OF BOCA RATON, a municipality,

Defendant.

COMPLAINT

COMES NOW, the Plaintiff, TAWANA WHITE, by and through the undersigned counsel, and
sues the Defendants, CITY OF BOCA RATON, and states as follows:

GENERAL ALLEGATIONS

1. This is an action for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of the costs of this action, which is the minimum jurisdiction of this Court.
2. At all times material hereto, the Plaintiff, TAWANA WHITE, was and is a resident of Boca Raton, Palm Beach County, Florida, and is otherwise *sui juris*.
3. At all times material hereto, the Defendant, CITY OF BOCA RATON, was and is a municipality and political subdivision of the State of Florida, operating and doing business in Boca Raton, Palm Beach County, Florida with its principal place of business located at 201 West Palmetto Park Road, Boca Raton, Florida 33432 and is otherwise *sui juris*.
4. This is an action in tort for which sovereign immunity has been waived pursuant to Florida Statute §768.28.
5. That all acts giving rise to this suit occurred in Palm Beach County, Florida, and all prerequisites to filing suit have occurred. Copies of said notices are attached as *Composite Exhibit "A"*.

6. The venue and jurisdiction are proper in Palm Beach County, Florida because the automobile collision that forms the basis of this Complaint occurred in Boca Raton, Palm Beach County, Florida.
7. On or about June 11, 2025, the Defendant, CITY OF BOCA RATON, owned a 2016 white Ford van automobile, Vehicle Identification Number NM0LS7E70G1252659.
8. On or about June 11, 2025, the Defendant, CITY OF BOCA RATON permitted and provided authorization for the Defendant's employee, Hector I. Rodriguez Cuadrado, to operate, maintain, and control said van, within the course and scope of his employment.
9. On or about June 11, 2025, the Defendant's employee, Hector I. Rodriguez Cuadrado, operated the aforementioned commercial van, with the Defendant's, CITY OF BOCA RATON's, consent, at 1401 West Glades Road, in Boca Raton, Palm Beach County, Florida.
10. At the time and place aforesaid, Plaintiff, TAWANA WHITE was the driver of a 2009 black Honda automobile.
11. At that time and place aforesaid, the Defendant's employee, Hector I. Rodriguez Cuadrado, negligently operated, maintained, and/or controlled said van, which was owned by the Defendant, CITY OF BOCA RATON, so that it collided into the vehicle that the Plaintiff, TAWANA WHITE, was operating.

COUNT I
TAWANA WHITE'S RESPONDENT SUPERIOR LIABILITY CLAIM AGAINST
DEFENDANT, CITY OF BOCA RATON

The Plaintiff, TAWANA WHITE, realleges and restates all of the allegations contained in the allegations 1 through 12, hereinabove, and further alleges that:

12. At all times material hereto, the Defendant's employee, Hector I. Rodriguez Cuadrado, was an agent, employee, or representative of the Defendant, CITY OF BOCA RATON.
13. At all times material hereto, the Defendant, CITY OF BOCA RATON, is liable for the negligent acts of its agents, employees, and/or representatives that occur within the course

and scope of their employment that is the legal and proximate cause of injury to a third party, including the Plaintiff, TAWANA WHITE.

14. At all times material hereto, the Defendant's employee, Hector I. Rodriguez Cuadrado, was acting within the course and scope of his employment for the Defendant, CITY OF BOCA RATON, when he negligently maintained and operated the aforementioned van so that it collided with the vehicle which the Plaintiff, TAWANA WHITE, was operating.
15. As a result of the Defendant, CITY OF BOCA RATON's, vicarious negligence, the Plaintiff, TAWANA WHITE, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of like, expense of hospitalization, medical and nursing care and treatment, and aggravation of a previously existing condition. The losses are either permanent or continuing and the Plaintiff will suffer the losses in the future. The vehicle that the Plaintiff was operating was damaged and she lost the use of it during the period required for its repair or replacement.

WHEREFORE, the Plaintiff, TAWANA WHITE, demands judgment for damages against the Defendant, CITY OF BOCA RATON, plus costs, interest and any other relief the Court deems proper, reasonable, and just.

DEMAND FOR JURY TRIAL

The Plaintiff in the above-styled cause hereby demands a trial by jury of all the issues triable by right.

Dated this 27th day of May 2026.

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