

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

CASE NO.:

IRIS CREE,

Plaintiff,

vs.

SANDALFOOT PLAZA BOCA, LLC,
a Florida Limited Liability Company,

Defendant.

COMPLAINT

COMES NOW Plaintiff, IRIS CREE, by and through the undersigned attorneys, and hereby sues the Defendants, SANDALFOOT PLAZA BOCA, LLC, a Florida Limited Liability Company, and alleges:

GENERAL ALLEGATIONS

1. This is an action for damages that exceeds the sum of FIFTY THOUSAND DOLLARS (\$50,000.00), exclusive of costs, interest and attorneys' fees. The amount Plaintiff has entered in the civil cover sheet for the "estimated amount of the claim" as required in the preamble to the civil cover sheet is for *jurisdictional purposes only* (the Florida Supreme Court has ordered that the estimated "amount of claim" be set forth in the civil cover sheet for data collection and clerical purposes only). The actual value of Plaintiff's claim will be determined by a fair and just jury in accordance with Article 1, Section 21, Fla. Const.

2. At all times material hereto, Plaintiff, IRIS CREE, was and is a natural person residing in Palm Beach County, Florida and was and is *sui juris*.

3. At all times material hereto, Defendant, SANDALFOOT PLAZA BOCA, LLC, was and is Florida for Profit Corporation licensed to do business in the State of Florida.

4. Venue is proper in this Court as the Defendant conducts its business operations within Palm Beach County, Florida and the incident giving rise to this action occurred in Palm Beach County, Florida.

5. At all times material hereto, and on or about December 11, 2025, the Defendants, SANDALFOOT PLAZA BOCA, LLC, owned, operated, managed, controlled, maintained, and/or possessed a shopping plaza, commonly known as Sandalfoot Square located at 23100 Sandalfoot Plaza Dr., Boca Raton, Palm Beach County, Florida 33428 (hereinafter referred to as the “Premises”), said business being open to the general public, including Plaintiff.

6. On or about December 11, 2025, Plaintiff IRIS CREE, was a business invitee on the Defendant’s premises and was walking through the parking lot near Thick & Thin Restaurant & Pizzeria, when suddenly and without warning, she tripped and fell on a broken, uneven and deteriorated speed bump.

7. Due to the fall, Plaintiff sustained significant, severe and permanent injuries.

COUNT I – NEGLIGENCE AGAINST DEFENDANT
SANDALFOOT PLAZA BOCA, LLC

Plaintiff hereby incorporates and realleges the allegations contained in paragraphs 1 through 7, as though fully set forth herein and states:

8. At the aforesaid time and place, Defendant, SANDALFOOT PLAZA BOCA, LLC, by and through its employees, representatives, and agents had a non-delegable duty as the owner, operator, manager, and/or controller of the premises, including, but not limited to the parking lots.

9. At the aforesaid time and place, Defendant SANDALFOOT PLAZA BOCA, LLC, by and through its employees, representatives, and agents, owed a nondelegable duty to Plaintiff to maintain and keep the subject premises in a reasonably safe condition.

10. At the aforesaid time and place, the Defendant, SANDALFOOT PLAZA BOCA, LLC, breached its non-delegable duty to Plaintiff by committing one or more of the following acts or omissions:

- a) Negligently creating a hazardous condition on its premises from which it was reasonably foreseeable that persons such as Plaintiff would suffer injury;
- b) Negligently failing to inspect or adequately inspect the premises to discover the hazardous condition described above;
- c) Negligently allowing the hazardous condition described above to remain on the premises despite knowledge of the potential harm it presented to persons such as Plaintiff;
- d) Negligently failing to maintain or adequately maintain the premises, thus creating a hazardous condition to invitees such as Plaintiff utilizing said premises;
- e) Negligently failing to correct or adequately correct the said dangerous and hazardous condition which was and/or should have been known to the Defendant;
- f) Negligently failing to warn of the hazardous condition on its premises from which it was reasonably foreseeable that persons such as Plaintiff would suffer injury.

11. As a direct and proximate result of the Defendant SANDALFOOT PLAZA BOCA, LLC's negligence as alleged above, Plaintiff suffered injury including a permanent injury to the body as a whole, including but not limited to pain and suffering of both a physical and mental nature, disability, physical impairment, disfigurement, mental anguish, inconvenience, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and

treatment. These losses are either permanent or continuing and Plaintiff will suffer these losses in the future.

WHEREFORE, Plaintiff, IRIS CREE, sues the Defendant, SANDALFOOT PLAZA BOCA, LLC, for damages and demands judgment in excess of Fifty Thousand Dollars (\$50,000.00), plus interest and costs, and for any other relief this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff, IRIS CREE, demands trial by jury of all issues so triable.

Respectfully submitted this 28th day of May 2026.

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