

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

TAMEISA SUTTON, as Natural Mother
and Guardian of T.S. a, minor,

CASE NO.:

Plaintiff,

vs.

SZ BOYNTON BEACH L.L.C., d/b/a
SKY ZONE BOYNTON BEACH,

Defendant.

COMPLAINT

COMES NOW the Plaintiff, TAMEISA SUTTON, as Natural Mother and Guardian of T.N., a minor, (hereinafter referred to as "Plaintiff"), by and through the undersigned counsel, files this cause of action against Defendant, SZ BOYNTON BEACH d/b/a SKY ZONE BOYNTON BEACH (hereinafter referred to as "Defendant" or "SKYZONE"), and allege as follows:

JURISDICTION, PARTIES & VENUE

1. This is an action for damages that exceed \$50,000.00, exclusive of interests and costs.
2. At all times material hereto, Plaintiff is and was a resident of Palm Beach County, Florida, and is otherwise sui juris.
3. At all times material hereto, Defendant, SKY ZONE was and is an active limited liability company authorized to and doing business as SKY ZONE in Boynton Beach, Palm Beach County, Florida.

4. On or about August 31, 2025, Defendant owned, operated, maintained and/or managed an indoor entertainment center located at 1729 N Congress Ave., Boynton Beach, Florida 33426NW (hereinafter “the subject premises”).
5. Venue is proper in Palm Beach County, Florida because the Defendant's subject premises is located in this county and the events that resulted in Plaintiff's injuries that is the subject matter of this lawsuit occurred there.

GENERAL ALLEGATIONS

6. On or about August 31, 2025, Plaintiff, T.N was a business invitee, lawfully in the subject premises that is open to the public.
7. On or about August 31, 2025, Plaintiff, T.N., had established herself on a trampoline. After some time, another child entered her area which violated the “one-child per trampoline” rule. The child fell on the Plaintiff's leg causing it to break.
8. Allowing more than one child on the trampoline constituted a dangerous condition.
9. As a result of the Defendant's failure to safely monitor and supervise the subject premises and/or warn of the dangerous condition, Plaintiff suffered serious injuries.
10. All conditions precedent to the filing of this Complaint have been satisfied, met, and/or waived.

**COUNT I - NEGLIGENCE AGAINST DEFENDANT,
SZ BOYNTON BEACH d/b/a SKY ZONE BOYNTON BEACH**

Plaintiff realleges paragraphs 1 through 10 as if fully set forth herein and further alleges as follows:

11. Defendant, by and through its agents and employees, owed a duty to Plaintiff to maintain and keep the subject premises in a reasonably safe condition and to warn Plaintiff of the

existing unsafe and hazardous condition it knew or, in the exercise of reasonable care, should have known about.

12. The Defendant breached its duty to the Plaintiff and was negligent including, but not limited to, the following:
 - a) by failing to provide proper supervision for the subject area.
 - b) by creating dangerous conditions in the subject premises but not enforcing their own policies and procedures;
 - c) by allowing the unsafe and hazardous condition to exist in the subject premises, which business invitees, such as the Plaintiff, would utilize thereby creating an unsafe, dangerous and hazardous condition;
 - d) by failing to correct or remedy the dangerous and hazardous condition, although Defendant knew, or in the exercise of reasonable care should have known, of the existence of unsafe and hazardous condition;
 - e) by representing to its business invitees, including Plaintiff, that its premises was safe and suitable when, in fact, it was not;
 - f) by failing to provide adequate warnings and/or other reasonable notice of the unsafe, dangerous, and hazardous condition to its business invitees, including Plaintiff, although Defendant knew, or in the exercise of reasonable care, should have known of the existence of said condition;
 - g) by failing to adequately train and/or supervise personnel at its premises in maintaining a safe premises and/or to remedy dangerous conditions such as the one described herein.
13. The dangerous condition was known to Defendant or had existed for a sufficient length of time so that Defendant should have known of it.
14. As a result of Defendant's negligence, the Plaintiff suffered bodily injuries and resulting pain and suffering, disability, physical impairment, disfigurement, inconvenience, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment. The losses are either permanent or continuing, and Plaintiff will suffer losses in the future.

WHEREFORE, Plaintiff, TAMEISA SUTTON, as Natural Mother and Guardian of T.N. a minor, hereby demands judgment against Defendant, SZ BOYNTON BEACH d/b/a SKY ZONE BOYNTON BEACH, for damages in an amount in excess of Fifty Thousand Dollars and 00/100 Cents (\$50,000.00), plus taxable costs and any such other relief the Court may deem just and proper.

PLAINTIFF DEMANDS A TRIAL BY JURY.

Dated on this 9th day of June 2026.

**THE LAW OFFICES OF
BERMAN & BERMAN, P.A.**

Attorneys for the Plaintiff

Post Office Box 272789

Boca Raton, Florida 33427

Telephone (561) 826-5200

Facsimile (561) 826-5201

By: /s/ Joseph Schulz

Joseph C. Schulz, Esq.

Florida Bar No.: 0660620

service@thebermanlawgroup.com