

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

CASE NO.:

DEBORAH KING,

Plaintiff(s),

vs.

WATERFORD HOTEL GROUP, LLC and
BOCA AIRPORT, INC.,

Defendant(s).

COMPLAINT

COMES NOW Plaintiff, DEBORAH KING, and sues WATERFORD HOTEL GROUP, LLC and BOCA AIRPORT, INC., and alleges:

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 estimated value of Plaintiff's claim is in excess of the minimum jurisdictional threshold required by this Court). Accordingly, Plaintiff has entered "\$50,001" in the civil cover sheet for the "estimated amount of the claim" as required in the preamble to the civil cover sheet 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. Plaintiff is a natural person residing in Windsor, Ohio.

3. WATERFORD HOTEL GROUP, LLC is a foreign entity licensed by the State of Florida and doing business in Palm Beach County, Florida.

4. BOCA AIRPORT, INC. is an entity licensed by the State of Florida and doing business in Palm Beach County, Florida.

5. Venue is proper in this Court as the incident giving rise to this action occurred in Palm Beach County, Florida.

COUNT I – NEGLIGENCE AGAINST DEFENDANT, WATERFORD HOTEL GROUP, LLC

Plaintiff hereby incorporates and realleges the allegations contained in paragraphs 1 through 5, as though fully set forth herein and further states:

6. At all times material hereto, WATERFORD HOTEL GROUP, LLC was the owner, manager and/or operator and in possession of a certain business located in Palm Beach County, Florida, at 3400 Airport Rd, Boca Raton, FL 33431, said business being open to the general public, including the Plaintiff herein and doing business as “Fairfield Inn & Suites Boca Raton”.

7. At all times material hereto, WATERFORD HOTEL GROUP, LLC, expressly assumed responsibility for the maintenance and cleanliness of the aforementioned premises and had a duty to maintain same in a reasonably safe condition for the use of business invitees and guests.

8. On or about 7/21/2025, Plaintiff was visiting Defendant, WATERFORD HOTEL GROUP, LLC’s premises located at the above address as a business invitee.

9. At said time and place, Plaintiff was a business invitee, lawfully upon the premises of the Defendant, WATERFORD HOTEL GROUP, LLC, who owed Plaintiff a non-delegable duty to exercise reasonable care for Plaintiff’s safety.

10. At that time and place, Plaintiff suddenly and without warning slipped and fell due to liquid being on the floor near the ice machine on the third floor.

11. At all times material hereto WATERFORD HOTEL GROUP, LLC had actual knowledge of the liquid on the floor. Alternatively, the liquid on the floor existed for such a length of time that, in the exercise of reasonable care, Defendant WATERFORD HOTEL GROUP, LLC should have known about it; or the liquid was on the floor of the ice machine area with regularity

and was therefore foreseeable.

12. As Plaintiff was walking through this area, she stepped in the liquid causing her to fall.

13. At all times material hereto, the Defendant, WATERFORD HOTEL GROUP, LLC, by and through its employees, agents, and assigns, owed a non-delegable duty to Plaintiff, as its business invitee, to maintain its premises in a reasonably safe condition, and to warn Plaintiff of latent or concealed dangers, which are or should be known to the Defendant WATERFORD HOTEL GROUP, LLC and which were unknown to Plaintiff and could not be discovered through the exercise of reasonable care. The Defendant, WATERFORD HOTEL GROUP, LLC, breached its duty to Plaintiff by committing one or more of the following acts or omissions:

- a) Negligently creating and/or allowing a hazardous condition to exist on its premises which was reasonably foreseeable to cause injury to Plaintiff;
- b) Negligently failing to maintain or adequately maintain the premises to prevent Plaintiff from encountering a hazardous condition;
- c) Negligently failing to inspect or adequately inspect the premises to ascertain whether the aforesaid condition constituted a hazard to Plaintiff;
- d) Negligently failing to correct or adequately correct a dangerous and hazardous condition which was and/or should have been known to the Defendant;
- e) Negligently failing to warn the Plaintiff of said dangerous condition when said condition was either known to Defendant or had existed for a sufficient length of time such that Defendant should have known of same had Defendant exercised reasonable care; or the condition occurred with regularity and was therefore foreseeable.

13. As a direct and proximate result of the Defendant'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 demands judgment in his favor against the Defendant, WATERFORD HOTEL GROUP, LLC, in excess of the minimum jurisdictional limits of this Court for compensatory damages, including incidental and consequential damages, post-judgement interest, costs, and for any other relief this Court deems just and proper.

COUNT II – NEGLIGENCE AGAINST DEFENDANT, BOCA AIRPORT, INC.

Plaintiff hereby incorporates and realleges the allegations contained in paragraphs 1 through 5, as though fully set forth herein and further states:

14. At all times material hereto, BOCA AIRPORT, INC. was the owner, manager and/or operator and in possession of a certain business located in Palm Beach County, Florida, at 3400 Airport Rd, Boca Raton, FL 33431, said business being open to the general public, including the Plaintiff herein and doing business as “Fairfield Inn & Suites Boca Raton”.

15. At all times material hereto, BOCA AIRPORT, INC., expressly assumed responsibility for the maintenance and cleanliness of the aforementioned premises and had a duty to maintain same in a reasonably safe condition for the use of business invitees and guests.

16. On or about 7/21/2025, Plaintiff was visiting Defendant, BOCA AIRPORT, INC.’s premises located at the above address as a business invitee.

17. At said time and place, Plaintiff was a business invitee, lawfully upon the premises of the Defendant, BOCA AIRPORT, INC., who owed Plaintiff a non-delegable duty to exercise

reasonable care for Plaintiff's safety.

18. At that time and place, Plaintiff suddenly and without warning slipped and fell due to liquid being on the floor near the ice machine on the third floor.

19. At all times material hereto BOCA AIRPORT, INC. had actual knowledge of the liquid on the floor. Alternatively, the liquid on the floor existed for such a length of time that, in the exercise of reasonable care, Defendant BOCA AIRPORT, INC. should have known about it; or the liquid was on the floor of the ice machine area with regularity and was therefore foreseeable.

20. As Plaintiff was walking through this area, she stepped in the liquid causing her to fall.

21. At all times material hereto, the Defendant, BOCA AIRPORT, INC., by and through its employees, agents, and assigns, owed a non-delegable duty to Plaintiff, as its business invitee, to maintain its premises in a reasonably safe condition, and to warn Plaintiff of latent or concealed dangers, which are or should be known to the Defendant BOCA AIRPORT, INC. and which were unknown to Plaintiff and could not be discovered through the exercise of reasonable care. The Defendant, BOCA AIRPORT, INC., breached its duty to Plaintiff by committing one or more of the following acts or omissions:

- a) Negligently creating and/or allowing a hazardous condition to exist on its premises which was reasonably foreseeable to cause injury to Plaintiff;
- b) Negligently failing to maintain or adequately maintain the premises to prevent Plaintiff from encountering a hazardous condition;
- c) Negligently failing to inspect or adequately inspect the premises to ascertain whether the aforesaid condition constituted a hazard to Plaintiff;
- d) Negligently failing to correct or adequately correct a dangerous and hazardous

condition which was and/or should have been known to the Defendant;

e) Negligently failing to warn the Plaintiff of said dangerous condition when said condition was either known to Defendant or had existed for a sufficient length of time such that Defendant should have known of same had Defendant exercised reasonable care; or the condition occurred with regularity and was therefore foreseeable.

13. As a direct and proximate result of the Defendant'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 demands judgment in his favor against the Defendant, BOCA AIRPORT, INC., in excess of the minimum jurisdictional limits of this Court for compensatory damages, including incidental and consequential damages, post-judgement interest, costs, and for any other relief this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff, DEBORAH KING, demands trial by jury on all issues triable as of right by jury.

RESPECTFULLY submitted on this day of June 10, 2026.

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