

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

JORDAN RICHARDSON,

CASE NO.:

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,  
a Foreign Profit Corporation,  
RASIER (FL), LLC., a Foreign Limited  
Liability Company, d/b/a RASIER, LLC.,  
PORTIER, LLC., a Foreign Limited  
Liability Company, SCHLEUDER, LLC.,  
a Foreign Limited Liability Company,  
and, VEN HAO CHIU LAM,

Defendants.

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**COMPLAINT FOR DAMAGES**

**COMES NOW** Plaintiff, **JORDAN RICHARDSON**, by and through undersigned counsel, and sues the Defendants, **UBER TECHNOLOGIES, INC.**, a Foreign Profit Corporation, **RASIER (FL), LLC.**, a Foreign Limited Liability Company, d/b/a **RASIER, LLC.** (hereinafter "RASIER, LLC."), **PORTIER, LLC.**, a Foreign Limited Liability Company, **SCHLEUDER, LLC.**, a Foreign Limited Liability Company and **VEN HAO CHIU LAM**, and as grounds therefore alleges as follows:

**GENERAL ALLEGATIONS**

1. This is an action for damages in excess of Fifty Thousand Dollars (\$50,000.00).
2. At all times material hereto, Plaintiff, **JORDAN RICHARDSON**, was and is a resident of Miami Beach, Miami-Dade County, Florida, and is otherwise *sui juris*.
3. At all times material hereto, Defendant, **UBER TECHNOLOGIES, INC.**, was and is a Foreign Profit Corporation, licensed to and doing business in the State of Florida.

4. At all times material hereto, Defendant, **RASIER (FL), LLC.**, was and is a Foreign Limited Liability Company, d/b/a **RASIER, LLC.**, licensed to and doing business in the State of Florida.

5. At all times material hereto, Defendant, **PORTIER, LLC.**, a Foreign Limited Liability Company, licensed to and doing business in the State of Florida.

6. At all times material hereto, Defendant, **SCHLEUDER, LLC.**, a Foreign Limited Liability Company, licensed to and doing business in the State of Florida.

7. At all times material hereto, Defendant, **VEN HAO CHIU LAM**, was and is a resident of Boca Raton, Palm Beach County, Florida, or, in the alternative, is a non-resident of the State of Florida, or, in the alternative, is concealing his whereabouts.

**COUNT I**  
**NEGLIGENCE AS TO DEFENDANT, UBER TECHNOLOGIES, INC.,**

Plaintiff, **JORDAN RICHARDSON**, re-alleges, and reasserts the allegations contained in paragraphs 1-7 above, as if fully set forth herein.

8. On or about July 4, 2024, at approximately 9:45 P.M., at or near the intersection of Banyan Road, and Osceola Drive, in the City of Boca Raton, Palm Beach County, Florida, the Defendant, **VEN HAO CHIU LAM**, was the owner and operator of a 2021 Toyota, VIN **JTDEPMAE8MJ175938**, Tag Number **AH62PJ**, during which time an application was being operated, controlled and managed by Defendants, **UBER TECHNOLOGIES, INC., RASIER, LLC., PORTIER, LLC., SCHLEUDER, LLC.**, on the date and time of the aforementioned location.

9. The Defendant, **VEN HAO CHIU LAM**, had a duty to exercise reasonable care with respect to operating the aforementioned vehicle.

10. At the aforesaid time and place, the Defendant, **VEN HAO CHIU LAM**, did carelessly and negligently operate the aforesaid motor vehicle, so as to cause same to violently collide with the motor vehicle operated by Plaintiff, **JORDAN RICHARDSON**, causing the Plaintiff to sustain serious and permanent injuries as hereinafter more fully alleged.

11. As a direct and proximate result of the negligence of the Defendant, **VEN HAO CHIU LAM**, as aforesaid, the Plaintiff, **JORDAN RICHARDSON**, was injured in and about his body and extremities and/or aggravated a preexisting condition, suffered pain therefrom, suffered physical handicap, loss of earnings, incurred medical expenses for the care and treatment of his injuries and his future working abilities have been impaired. Said injuries are either permanent or continuing in their nature and/or the Plaintiff will suffer such losses and impairments in the future.

**WHEREFORE**, Plaintiff, **JORDAN RICHARDSON**, demands judgment against Defendant, **UBER TECHNOLOGIES, INC.**, for damages in excess of \$50,000.00, and for any and all other relief as this Court deems just and proper. Plaintiff further demands a trial by jury of all issues so triable.

**COUNT II**  
**NEGLIGENCE AS TO DEFENDANT, RASIER, LLC.**

Plaintiff, **JORDAN RICHARDSON**, re-alleges, and reasserts the allegations contained in paragraphs 1-7 above, as if fully set forth herein.

12. On or about July 4, 2024, at approximately 9:45 P.M., at or near the intersection of Banyan Road, and Osceola Drive, in the City of Boca Raton, Palm Beach County, Florida, the Defendant, **VEN HAO CHIU LAM**, was the owner and operator of a 2021 Toyota, VIN **JTDEPMAE8MJ175938**, Tag Number **AH62PJ**, during which time an application was being operated, controlled and managed by Defendants, **UBER TECHNOLOGIES, INC.**, **RASIER**,

**LLC., PORTIER, LLC., SCHLEUDER, LLC.**, on the date and time of the aforementioned location.

13. The Defendant, **VEN HAO CHIU LAM**, had a duty to exercise reasonable care with respect to operating the aforementioned vehicle.

14. At the aforesaid time and place, the Defendant, **VEN HAO CHIU LAM**, did carelessly and negligently operate the aforesaid motor vehicle, so as to cause same to violently collide with the motor vehicle operated by Plaintiff, **JORDAN RICHARDSON**, causing the Plaintiff to sustain serious and permanent injuries as hereinafter more fully alleged.

15. As a direct and proximate result of the negligence of the Defendant, **VEN HAO CHIU LAM**, as aforesaid, the Plaintiff, **JORDAN RICHARDSON**, was injured in and about his body and extremities and/or aggravated a preexisting condition, suffered pain therefrom, suffered physical handicap, loss of earnings, incurred medical expenses for the care and treatment of his injuries and his future working abilities have been impaired. Said injuries are either permanent or continuing in their nature and/or the Plaintiff will suffer such losses and impairments in the future.

**WHEREFORE**, Plaintiff, **JORDAN RICHARDSON**, demands judgment against Defendant, **RASIER, LLC.**, for damages in excess of \$50,000.00, and for any and all other relief as this Court deems just and proper. Plaintiff further demands a trial by jury of all issues so triable.

**COUNT III**  
**NEGLIGENCE AS TO DEFENDANT, PORTIER, LLC.**

Plaintiff, **JORDAN RICHARDSON**, re-alleges, and reasserts the allegations contained in paragraphs 1-7 above, as if fully set forth herein.

16. On or about July 4, 2024, at approximately 9:45 P.M., at or near the intersection of Banyan Road, and Osceola Drive, in the City of Boca Raton, Palm Beach County, Florida, the Defendant, **VEN HAO CHIU LAM**, was the owner and operator of a 2021 Toyota, VIN

**JTDEPMAE8MJ175938**, Tag Number **AH62PJ**, during which time an application was being operated, controlled and managed by Defendants, **UBER TECHNOLOGIES, INC., RASIER, LLC., PORTIER, LLC., SCHLEUDER, LLC.**, on the date and time of the aforementioned location.

17. The Defendant, **VEN HAO CHIU LAM**, had a duty to exercise reasonable care with respect to operating the aforementioned vehicle.

18. At the aforesaid time and place, the Defendant, **VEN HAO CHIU LAM**, did carelessly and negligently operate the aforesaid motor vehicle, so as to cause same to violently collide with the motor vehicle operated by Plaintiff, **JORDAN RICHARDSON**, causing the Plaintiff to sustain serious and permanent injuries as hereinafter more fully alleged.

19. As a direct and proximate result of the negligence of the Defendant, **VEN HAO CHIU LAM**, as aforesaid, the Plaintiff, **JORDAN RICHARDSON**, was injured in and about his body and extremities and/or aggravated a preexisting condition, suffered pain therefrom, suffered physical handicap, loss of earnings, incurred medical expenses for the care and treatment of his injuries and his future working abilities have been impaired. Said injuries are either permanent or continuing in their nature and/or the Plaintiff will suffer such losses and impairments in the future.

**WHEREFORE**, Plaintiff, **JORDAN RICHARDSON**, demands judgment against Defendant, **PORTIER, LLC.**, for damages in excess of \$50,000.00, and for any and all other relief as this Court deems just and proper. Plaintiff further demands a trial by jury of all issues so triable.

**COUNT IV**  
**NEGLIGENCE AS TO DEFENDANT, SCHLEUDER, LLC.**

Plaintiff, **JORDAN RICHARDSON**, re-alleges, and reasserts the allegations contained in paragraphs 1-7 above, as if fully set forth herein.

20. On or about July 4, 2024, at approximately 9:45 P.M., at or near the intersection of Banyan Road, and Osceola Drive, in the City of Boca Raton, Palm Beach County, Florida, the Defendant, **VEN HAO CHIU LAM**, was the owner and operator of a 2021 Toyota, VIN **JTDEPMAE8MJ175938**, Tag Number **AH62PJ**, during which time an application was being operated, controlled and managed by Defendants, **UBER TECHNOLOGIES, INC., RASIER, LLC., PORTIER, LLC., SCHLEUDER, LLC.**, on the date and time of the aforementioned location.

21. The Defendant, **VEN HAO CHIU LAM**, had a duty to exercise reasonable care with respect to operating the aforementioned vehicle.

22. At the aforesaid time and place, the Defendant, **VEN HAO CHIU LAM**, did carelessly and negligently operate the aforesaid motor vehicle, so as to cause same to violently collide with the motor vehicle operated by Plaintiff, **JORDAN RICHARDSON**, causing the Plaintiff to sustain serious and permanent injuries as hereinafter more fully alleged.

23. As a direct and proximate result of the negligence of the Defendant, **VEN HAO CHIU LAM**, as aforesaid, the Plaintiff, **JORDAN RICHARDSON**, was injured in and about his body and extremities and/or aggravated a preexisting condition, suffered pain therefrom, suffered physical handicap, loss of earnings, incurred medical expenses for the care and treatment of his injuries and his future working abilities have been impaired. Said injuries are either permanent or continuing in their nature and/or the Plaintiff will suffer such losses and impairments in the future.

**WHEREFORE**, Plaintiff, **JORDAN RICHARDSON**, demands judgment against Defendant, **SCHLEUDER, LLC.**, for damages in excess of \$50,000.00, and for any and all other relief as this Court deems just and proper. Plaintiff further demands a trial by jury of all issues so triable.

**COUNT V**  
**NEGLIGENCE AS TO DEFENDANT, VEN HAO CHIU LAM**

Plaintiff, **JORDAN RICHARDSON**, re-alleges, and reasserts the allegations contained in paragraphs 1-7 above, as if fully set forth herein.

24. On or about July 4, 2024, at approximately 9:45 P.M., at or near the intersection of Banyan Road, and Osceola Drive, in the City of Boca Raton, Palm Beach County, Florida, the Defendant, **VEN HAO CHIU LAM**, was the owner and operator of a 2021 Toyota, VIN **JTDEPMAE8MJ175938**, Tag Number **AH62PJ**, during which time an application was being operated, controlled and managed by Defendants, **UBER TECHNOLOGIES, INC., RASIER, LLC., PORTIER, LLC., SCHLEUDER, LLC.**, on the date and time of the aforementioned location.

25. The Defendant, **VEN HAO CHIU LAM**, had a duty to exercise reasonable care with respect to operating the aforementioned vehicle.

26. At the aforesaid time and place, the Defendant, **VEN HAO CHIU LAM**, did carelessly and negligently operate the aforesaid motor vehicle, so as to cause same to violently collide with the motor vehicle operated by Plaintiff, **JORDAN RICHARDSON**, causing the Plaintiff to sustain serious and permanent injuries as hereinafter more fully alleged.

27. As a direct and proximate result of the negligence of the Defendant, **VEN HAO CHIU LAM**, as aforesaid, the Plaintiff, **JORDAN RICHARDSON**, was injured in and about his body and extremities and/or aggravated a preexisting condition, suffered pain therefrom, suffered physical handicap, loss of earnings, incurred medical expenses for the care and treatment of his injuries and his future working abilities have been impaired. Said injuries are either permanent or continuing in their nature and/or the Plaintiff will suffer such losses and impairments in the future.

**WHEREFORE**, Plaintiff, **JORDAN RICHARDSON**, demands judgment against Defendant, **VEN HAO CHIU LAM**, for damages in excess of \$50,000.00, and for any and all other relief as this Court deems just and proper. Plaintiff further demands a trial by jury of all issues so triable.

**MILLER & JACOBS**

Attorneys for Plaintiff

1600 S. Federal Hwy., Suite 1101

Pompano Beach, FL 33062

Tel: (954) 784-2277

Fax: (954) 784-5577

Service Email: litigation@millerandjacobs.com

**BY: /s/ Mark J. Miller, Esq.**

**MARK J. MILLER, ESQUIRE**

**Florida Bar No.: 0059609**