

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

CIRCUIT CIVIL DIVISION

ORLEANIS NOA, as natural
guardian and parent, and on behalf of
LEONARD HERNANDEZ NOA, a minor,

CASE NO.:

Plaintiff,

v.

NKDZ WEST PALM, LLC., d/b/a
NINJA KIDZ ACTION PARK,
a Florida Limited Liability Company,

Defendant.

COMPLAINT

COMES NOW, the Plaintiff, ORLEANIS NOA, as parent and natural guardian of minor, LEONARD HERNANDEZ NOA, hereby files this Complaint against Defendant, NKDZ WEST PALM, LLC., d/b/a NINJA KIDZ ACTION PARK, pursuant to Florida Rules of Civil Procedure 1.050 and in support of the allegations herein states as follows:

JURISDICTION

1. Subject matter jurisdiction resides within this Court. This civil action is for damages in excess of Fifty Thousand (\$50,000.00) Dollars.

VENUE

2. This is the appropriate venue for this action. Defendant, NKDZ WEST PALM, LLC., d/b/a NINJA KIDZ ACTION PARK, is a Florida Limited Liability Company authorized to, and doing business in Palm Beach County. Additionally, the cause of action (i.e. slip and fall) occurred in Palm Beach County, Florida.

3. In compliance with Florida Rule of Civil Procedure 1.120 (c), all conditions precedent to the filing of this lawsuit have been performed, occurred, waived, or are otherwise satisfied.

STATEMENT OF FACTS

4. At all material times herein, Plaintiff, LEONARD HERNANDEZ NOA, is a minor.

5. ORLEANIS NOA is the parent (i.e., mother) and natural guardian of minor, LEONARD HERNANDEZ NOA (hereinafter, ORLEANIS NOA and LEONARD HERNANDEZ NOA, if not identified specifically, will be addressed as “Plaintiff” interchangeably).

6. The Defendant, NKDZ WEST PALM, LLC., d/b/a NINJA KIDZ ACTION PARK (hereinafter, “NINJA KIDZ”), is a business operating an action park offering various recreational activities to the public.

7. At all material times hereto, Defendant, NINJA KIDZ, operated, maintained, and controlled the subject premises located at 7645 Lake Worth Rd, Wellington, FL 33467.

8. The Defendant’s facility includes walkways and ramps designed for patrons to ingress and egress between activities.

9. On or about November 2, 2025, Plaintiff, LEONARD HERNANDEZ NOA, a minor, was a lawful guest and patron at the NINJA KIDZ ACTION PARK facility.

10. On that date, the Plaintiff was walking onto a ramp designed to provide access to the trampoline area of the action park.

11. At that time, the ramp was in a wet and slippery condition, creating a dangerous hazard.

12. The Defendant, NINJA KIDZ, knew or should have known of the hazardous condition of the ramp, yet failed to properly maintain the premises, remedy the condition, or adequately warn patrons of the danger.

13. As a direct and proximate result of the Defendant's negligence, the minor Plaintiff slipped on the water and/or transient liquid spilled on the ramp, causing him to fall and sustain serious bodily injuries.

14. At no time prior to the incident was Plaintiff, ORLEANIS NOA, adequately warned of the dangerous condition of the premises, nor was she provided with sufficient information to appreciate the specific risk posed by the wet ramp.

15. At all times material hereto, the Defendant, NINJA KIDZ ACTION PARK, did negligently and carelessly maintain the subject premises to cause Plaintiff, LEONARD HERNANDEZ NOA, to fall and suffer serious and permanent injuries.

16. The Plaintiff, LEONARD HERNANDEZ NOA, suffered permanent and enduring injuries, requiring surgical intervention.

NEGLIGENCE

17. Plaintiff, ORLEANIS NOA, re-asserts the allegations set forth in paragraphs 1 through 16 of the Complaint as if fully set forth out herein.

18. Defendant, NINJA KIDZ, owed a duty to Plaintiffs to properly maintain the subject premises in a reasonably safe condition.

19. Defendant, NINJA KIDZ, negligently failed to exercise reasonable care in the maintenance, inspection, repair, warning, and/or mode of operation of the business premises by allowing a foreign object, or other transient liquids or substances to be and to remain on the floor of the premises.

20. Defendant, NINJA KIDZ, failed to maintain the premises in a reasonably safe condition by allowing a other foreign substance(s) to remain on the floor, creating a dangerous and defective hazard.

21. The Defendant breached said duty by committing one or more of the following negligent acts of commission and/or omission:

- a. The Defendant created a dangerous and defective condition by negligently and carelessly allowing a foreign substance to remain on the floor of the premises, creating a slipping hazard.
- b. The Defendant knew or in the exercise of reasonable care should have known of the dangerous and defective condition.
- c. The Defendant failed to warn the Plaintiff of dangerous and defective condition or, in the alternative, allowed said condition to remain for a period of time sufficient in which a reasonable inspection would have disclosed the same.

22. As a direct and proximate result of Defendant's negligence, Plaintiff, LEONARD HERNANDEZ NOA, was injured in and about his body and extremities and/or suffered damages for pain and suffering, disability, physical impairment, disfigurement, mental anguish, inconvenience, aggravation of a disease or physical defect, loss of capacity for the enjoyment of life and to be sustained in the future, incurred medical expense in the care and treatment of his injuries, and suffered loss of earnings and impairment of her future working ability. The injuries are permanent and continuing in nature.

WHEREFORE, Plaintiffs demand judgment against Defendant, NINJA KIDZ, for compensatory damages, including but not limited to past and future medical expenses, past and future pain and suffering, mental anguish, loss of capacity for the enjoyment of life, lost wages, loss of earning capacity, property damage, costs of this action, and any other damages recoverable

under the laws of the State of Florida, together with such further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

The Plaintiff, ORLEANIS NOA, as guardian of minor, LEONARD HERNANDEZ NOA, and in accordance with Rule 1.430 of the Florida Rules of Civil Procedure, hereby demands a trial by jury of all issues so triable as a right by jury.

DATED this 24th day of June 2026.

LAW OFFICES OF SUAREZ & MONTERO

Attorneys for Plaintiff

351 N.W. 42nd Ave., Suite 202, Miami, FL 33126

Telephone: (305) 723-1000

Facsimile: (305) 631-9990

Primary email: Pleadings@suarezmontero.com

Secondary email: Amontero@suarezmontero.com

By: /s/ Andres G. Montero

Andres G. Montero, Esq.

Florida Bar No. 965618