

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

**CASE NO.:**

MARY ANN COHEN,

Plaintiff,

vs.

BOCA RATON REGIONAL HOSPITAL  
INC., a Florida Not For Profit Corporation,

Defendant.

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**COMPLAINT**

**COMES NOW** the Plaintiff, MARY ANN COHEN, by and through his/her undersigned attorneys, and hereby sues the Defendant, BOCA RATON REGIONAL HOSPITAL INC., a Florida Not For Profit Corporation, a Florida Corporation, and alleges as follows:

**GENERAL ALLEGATIONS**

1. This is an action for damages in excess of the sum of Fifty Thousand and One Dollars (\$50,001.00), exclusive of costs, interest, and attorney's fees.
2. At all times material hereto, the Plaintiff, MARY ANN COHEN, was a resident of Palm Beach County, Florida.
3. At all times material hereto, the Defendant, BOCA RATON REGIONAL HOSPITAL INC., was a corporation duly licensed and authorized to conduct business in the State of Florida, and doing business in Palm Beach County, Florida.

4. That the Plaintiff, MARY ANN COHEN, was a patient at BOCA RATON REGIONAL HOSPITAL on or about June 18, 2025, for radiology and laboratory studies.

5. That during Plaintiff's visit on June 18, 2025, MARY ANN COHEN, was the victim of negligent and substandard care or treatment at the Defendant's facility, causing her to suffer a fall, resulting in a back injury and extensive bruising on her back and arms.

**COUNT I – GENERAL NEGLIGENCE CLAIM AGAINST BOCA RATON REGIONAL HOSPITAL, INC.**

6. The Plaintiff, MARY ANN COHEN, hereby realleges and reavers each and every General Allegation contained in paragraphs 1 through 5, above, as though fully set forth herein.

7. That on or about the date of the accident, June 18, 2025, the Defendant, BOCA RATON REGIONAL HOSPITAL INC., owned, operated, managed, and/or was in control of a business located at 800 Meadows Road, Boca Raton, Palm Beach County, Florida, 33486, and known as BOCA RATON REGIONAL HOSPITAL INC.

8. At the time and place aforesaid, the Plaintiff was legally upon the property of the Defendant as an invitee and as a member of the general public that was expressly or impliedly invited upon said premises for the benefit of the Defendant because she was a patient at Defendant's facility.

9. At the time and place aforesaid, the Defendant, through its agents, servants, and/or employees, while acting within the scope and course of such agency or employment, was negligent in one or more of the following ways:

- a. Failing to maintain the premises and/or its areas of ingress and egress in a reasonably safe condition.
- b. Failing to correct a dangerous condition of a damaged wheelchair that it knew or reasonably should have known existed.

- c. Failing to warn Plaintiff about a dangerous condition that the Defendant reasonably did or reasonably should have had superior knowledge about and that Plaintiff did not know existed.
  - d. Failing to correct a dangerous condition that occurred with regularity and that was therefore foreseeable.
  - e. Failing to train its employees in the proper methods of inspecting for, cleaning up, and/or warning about a dangerous condition that the defendant knew or should have known existed or that occurred with regularity, and that was therefore foreseeable.
  - f. Creating the condition by its business activities and the activities of its agents, employees, vendors, suppliers, and/or authorized representatives.
  - g. By engaging in a negligent or unreasonable mode of business operation.
  - h. In constructing, repairing, replacing, or maintaining its premises in violation of applicable building codes, statutes, and ordinances.
  - i. The condition occurred with regularity and was therefore foreseeable.
  - j. In other ways to be determined in discovery.
10. The Defendant, BOCA RATON REGIONAL HOSPITAL INC., conducted and maintained its premises with a negligent mode of operation.
11. The Defendant, BOCA RATON REGIONAL HOSPITAL INC., had actual or constructive knowledge of the dangerous condition and failed to take action to remedy it.
12. The Defendant, BOCA RATON REGIONAL HOSPITAL INC., a Florida Not For Profit Corporation, its agents, servants, and/or employees acting within the course and scope of such agency, service or employment, had a non-delegable duty to the general public to properly maintain said premises in a reasonably safe condition for the general public while they were on the premises,

especially in view of the fact that such condition was known or should have been known to the Defendant.

13. As a direct and proximate result of the negligence of Defendant, BOCA RATON REGIONAL HOSPITAL INC., the Plaintiff, MARY ANN COHEN, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings and loss of ability to earn money and aggravation of a pre-existing condition. The losses are either permanent or continuing in nature, and Plaintiff, MARY ANN COHEN, will suffer the losses and impairment in the future.

**WHEREFORE**, Plaintiff, Mary Ann Cohen, demands judgment for damages against the Defendant, BOCA RATON REGIONAL HOSPITAL INC., a Florida Not For Profit Corporation, in an amount in excess of Fifty Thousand and One Dollars (\$50,001.00), exclusive of costs and interest, and other relief this Honorable Court deems just and proper, and further demands trial by jury.

**DEMAND FOR JURY TRIAL**

The Plaintiffs in the above styled cause hereby demand a trial by jury of all of the issues triable by right.

**CERTIFICATE OF USE OF ARTIFICIAL INTELLIGENCE**

Artificial intelligence was used in the preparation of this filing. The undersigned certifies that all factual assertions, legal authority, citations, and arguments contained herein have been independently reviewed and verified for accuracy and accepts full responsibility for the contents of this filing.

I understand that attorneys and parties remain fully responsible for their filings under the Rules Regulating The Florida Bar, the applicable Florida Rules of Procedure, and this Court's Administrative Orders.

**DATED:** June 25, 2026

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