

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

GENERAL JURISDICTION DIVISION

CASE NO.:

GARY ANDREW LEYSOCK,

Plaintiff,

v.

W.P.R.F., INC.,

Defendant.

_____ /

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, GARY ANDREW LEYSOCK, through the undersigned counsel, files this
Complaint against Defendant, W.P.R.F., INC., and states as follows:

PARTIES, JURISDICTION, AND VENUE

1. This is an action for damages in excess of fifty thousand dollars (\$50,000.00) exclusive of interest, costs, and attorneys' fees, yet is uncertain whether it exceeds \$75,000.
2. Plaintiff is a resident of Palm Beach County, Florida, and, at all times material hereto, was and is *sui juris*.
3. Defendant is a Foreign Profit Corporation licensed to do business in the state of Florida.
4. Pursuant to section 47.011, Florida Statutes (2025), venue is proper in this Court because the cause of this action accrued in Palm Beach County, Florida.
5. All conditions precedent to the filing of this lawsuit have occurred, been satisfied, been waived, or have otherwise been discharged or performed.

COUNT I – NEGLIGENCE OF DEFENDANT,
W.P.R.F., INC.,

6. Plaintiff re-adopts and re-alleges all of the allegations contained in Paragraphs 1 through 5 above as if fully set forth herein.
7. On or about September 9, 2025, Defendant owned, maintained, and/or operated the property located at or near 5500 Century Boulevard in Palm Beach County, Florida, hereinafter referred to as “the premises.”
8. At that time and place, Plaintiff went onto said premises as a business invitee and thereupon was caused to be injured because Defendant negligently maintained the premises equipment in that, while Plaintiff was properly using the lap pulldown machine in its intended and foreseeable manner, the pin and/or clip securing the machine detached, causing Plaintiff to fall backward onto his tailbone.
9. Defendant, by or through its agents or servants (the negligence of which they are liable for), negligently caused Plaintiff to suffer injury by performing or failing to perform one or more of the following acts:
 - a. By carelessly and negligently failing to maintain the grounds on its premises in a reasonably safe condition, Defendant created a dangerous condition, to wit: a hazard to patrons who were ambulating on said premises, including, specifically, the Plaintiff; and
 - b. By failing to correct a dangerous condition of which it knew or should have known by the use of reasonable care, to wit: a hazard to patrons who were ambulating on said premises, including, specifically, the Plaintiff; and
 - c. By negligently failing to warn the Plaintiff of a dangerous condition (a hazard to patrons who were ambulating on said premises) concerning which Defendant had, or should have had, greater knowledge than that of the Plaintiff.
 - d. Defendant created a dangerous condition, to wit: a hazard to patrons who were ambulating on said premises, including, specifically, the Plaintiff;
 - e. The condition occurred with such regularity that Defendant knew or should have known of its existence.

10. As a direct and proximate result of Defendant's commission of one or more of the negligent acts or omissions set forth above in 9(a-e), Plaintiff suffered bodily injury resulting in pain and suffering, disability, disfigurement, mental anguish, aggravation and/or acceleration of pre-existing condition(s), loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, and the loss of ability to earn money in the past and in the future. The losses are either permanent or continuing in nature, and Plaintiff will suffer the losses in the future.

DEMAND FOR JURY TRIAL

WHEREFORE, Plaintiff, GARY ANDREW LEYSOCK, demands a trial by jury and a judgment against Defendant, W.P.R.F., INC., for damages, costs of this action, and for any other further equitable and legal relief this Court may deem appropriate. This Complaint is served with a Summons and Notice of Designation of Email Address.

Dated: July 11, 2026

WOLFSON & LEON

Attorneys for Plaintiff
3399 S.W. 3rd Avenue
Miami, Florida 33145
Telephone: (305) 285-1115
Facsimile: (305) 285-1608
eservice10@wolfsonlawfirm.com

By: /s/ Melissa L. Corrales
Melissa L. Corrales, Esq.
Florida Bar No. 1070447
mcorrales@wolfsonlawfirm.com