

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

JEAN ORIMA,

CASE NO.:

Plaintiff,

vs.

BROWARD COUNTY, FLORIDA,

Defendant.

_____ /

COMPLAINT

COMES NOW, the Plaintiff, **JEAN ORIMA**, by and through the undersigned counsel and sues the Defendant, **BROWARD COUNTY, FLORIDA**, (hereinafter referred to as "BROWARD"), and alleges as follows:

1. This is an action for damages in excess of fifty thousand (\$50,000.00) dollars.
2. At all times material hereto, Plaintiff, JEAN ORIMA was and is a resident of Broward County, Florida, over the age of 18 years, and is otherwise sui juris.
3. At all times material hereto, Defendant, BROWARD was and is a Florida County Government existing under the laws of the State of Florida.
4. The required statutory notice(s) have been provided to the Defendant, BROWARD COUNTY, and INSURANCE COMMISSIONER as indicated in Exhibit "A", attached hereto.
5. At all times material hereto, the Defendant, BROWARD, owned, maintained and/or controlled the property located at or near 900 N. Flamingo Road, Pembroke Pines, FL 33028 which is operated under the name Paradise Cove Waterpark.

6. On August 2, 2024, at approximately 2:00 PM, JEAN ORIMA, was a guest lawfully present at Paradise Cove Water Park in Broward County, Florida. Mr. ORIMA used a green water slide present at the Paradise Cove Water Park which was being overseen by staff employed by BROWARD COUNTY. Mr. ORIMA slid down the slide with his infant daughter, but when he was standing to exit the slide, he was hit by another park patron, causing serious and permanent bodily damage to Mr. ORIMA.

7. The Defendant, BROWARD, by and through its agents, servants and employees owed the Plaintiff, JEAN ORIMA, a duty of reasonable care to oversee the water park and slides within including having staff ensure that water park guests did not slide down the slides while the previous guest had not yet exited the slide. Defendant BROWARD, through its employees, failed to properly monitor the guests using the slide, failed to give proper instructions concerning when it was safe to go, and created the conditions that led to JEAN ORIMA's injuries.

8. The Defendant, by and through its employees, servants, and/or agents breached its duty of care to the Plaintiff, by committing one or more of the following negligent acts of commission and/or omission which proximately caused injury to the Plaintiff as hereinafter alleged more fully:

- a. in failing to properly oversee its own slides to ensure guest safety;
- b. by failing to properly instruct guests when it was safe to slide down the slide;
- c. in failing to adequately train and supervise its employees and/or agents to monitor and instruct guests on the use of the water park slides;

- d. by failing to ensure that the landing area of the slide was clear before instructing the guest to use the slide;
- e. by failing to warn the guests of the potential hazard of using the slide before other guests had exited;
- f. in committing other acts of negligence to be determined through discovery;

9. As a direct and proximate result of the negligence of the Defendant, BROWARD, the Plaintiff has incurred medical bills, has suffered bodily injury resulting in severe physical pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, aggravation of preexisting injuries, if any, lost wages and loss of the ability to earn wages. Plaintiff's losses are permanent and continuing in nature and the Plaintiff will suffer losses in the future.

WHEREFORE, the Plaintiff, **JEAN ORIMA** demands judgment against the Defendant, **BROWARD COUNTY**, for damages, costs, and any other relief this Court may deem appropriate. The Plaintiff further demands trial by jury as to all issues so triable as a matter of right. *Trial by Jury is demanded of all issues so triable as a matter of right.*

Dated this 7th day of July, 2026.

THOMAS, PEARL & HOY, P.A.
Attorneys for Plaintiff
2404 N. E. 9th Street
Fort Lauderdale, Florida 33304
Telephone: (954) 563-9225
Facsimile: (954) 563-9497

By: /s/ Brian D Gabriel
Brian D Gabriel, ESQ.
Florida Bar No.: 31527

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Exhibit “A”

- Place of Birth : Davie Petit Glaze, Haiti
- Social Security Number : 026-95-9115

Select One:

- _____ The claimant *does not* owe any adjudicated unpaid penalties, fines, fees, victim restitution fund, or other judgements in excess of \$200 to the State, its agency, office, or subdivision.
- _____ The claimant *does* owe adjudicated unpaid penalties, fines, fees, victim restitution fund, or other judgements in excess of \$200 to the State, its agency, officer, or subdivision.
- a) Nature and amount of monies owed:
 - b) Case Style and Tribunal:

Please accept this letter as notification of our attorney's fee lien on any and all proceeds recovered in this matter.

Very truly yours,

Jonathan Davalos, Esq.

Jonathan Davalos, Esq.
Thomas & Pearl, P.A.

JD/jmp

USPS TRACKING#



First-Class Mail
Postage & Fees Paid
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Permit No. G-10

9590 9402 8671 3244 4320 77

United States
Postal Service

Sender: Please print your name, address, and ZIP+4® in this box*

THOMAS & PEARL, P.A.
ATTORNEY AT LAW
2404 NORTHEAST 9 STREET
FORT LAUDERDALE, FL 33304

RECEIVED

OCT 1 2024

Thomas & Pearl P.A.

Sovereign Immunity

DRima-JMP

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Broward County Commission
15 S. Andrews Ave
Room 421
Ft. Lauderdale, FL 33301



9590 9402 8671 3244 4320 77

2. Article Number (Transfer from service label)
9589 0710 5270 1251 8479 84

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery
 16-4-24

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Insured Mail Restricted Delivery (over \$500)
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Domestic Return Receipt

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- Social Security Number : 026-95-9115

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Very truly yours,

Jonathan Davalos, Esq.

Jonathan Davalos, Esq.
Thomas & Pearl, P.A.

JD/jmp

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Thomas & Pearl P.A.

THOMAS & PEARL, P.A.
ATTORNEY AT LAW
2404 NORTHEAST 9 STREET
FORT LAUDERDALE, FL 33304

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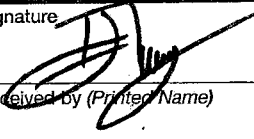
Florida Department of
 Financial Services
 200 E. Gaines Street
 Tallahassee, FL 32399



9590 9402 9078 4122 3502 50

2. Article Number (Transfer from service label)
 9589 0710 5270 1251 8479 53

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 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

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 - Signature Confirmation™
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