

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

CASE NO.:

CAROL WEINSTEIN,

Plaintiff,

vs.

5901 NW 79<sup>th</sup> AVENUE OPERATIONS LLC d/b/a  
NSPIRE HEALTHCARE TAMARAC and  
MILLENNIUM MANAGEMENT L.L.C.,

Defendants.

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**COMPLAINT**

Plaintiff, CAROL WEINSTEIN, hereby sues Defendant, 5901 NW 79th Avenue Operations, LLC d/b/a NSPIRE Healthcare Tamarac and MILLENNIUM MANAGEMENT L.L.C., as grounds therefore alleges the following:

**PARTIES, JURISDICTION & VENUE**

1. This is an action for damages which exceeds Fifty Thousand dollars, exclusive of fees and costs.
2. Plaintiff, at all times material to this cause, was a resident of Broward County, Florida, and is otherwise sui juris.
3. Defendant 5901 NW 79th Avenue Operations, LLC d/b/a NSPIRE Healthcare Tamarac (Defendant 1) at all times material to this cause, was authorized to conduct and was conducting business in the state of Florida.

4. Defendant MILLENNIUM MANAGEMENT L.L.C. (Defendant 2) at all times material to this cause, was authorized to conduct and was conducting business in the state of Florida.
5. The events giving rise to this Complaint occurred in Broward County, Florida.

**COUNT I – NEGLIGENCE CLAIM AGAINST DEFENDANT 1**

Plaintiff, adopts and realleges paragraphs one through five as if fully set forth herein, and further alleges as follows:

6. On 9/11/24, Defendant, owned, possessed, operated, maintained and/or controlled the premises located at 5901 NW 79th Ave, Tamarac, Broward County FL 33321.
7. On that date, Plaintiff, was on said premises as a guest/invitee of Defendant.
8. As Plaintiff was walking on the premises she slipped on an unknown substance on the floor causing her to fall onto the ground.
9. The existence of the unknown substance on the floor created an unreasonably dangerous and unsafe condition.
10. Defendant, its employees, agents, and/or apparent agents had actual or constructive notice of the existence of the unknown substance on the floor.
11. Defendant owed Plaintiff a non-delegable duty to use reasonable care in the maintenance of said premises.
12. Defendant, breached that duty was negligent and failed to use reasonable care in one or more of the following ways:
  - a. Failing to properly maintain the subject premises in a reasonable safe condition; by allowing the subject premises to become dangerous, defective and unsafe, and in creating a slipping hazard for the Plaintiff and other, similar invitees;

- b. Failing to adequately train and supervise its employees and/or agents to locate and repair such hazards at the subject property;
- c. Failing to restrict access to the subject area that contained dangerous conditions;
- d. Failing to warn Plaintiff of dangerous conditions that existed at the subject premises, that the Defendant knew or should have known existed;
- e. Failing to correct a dangerous condition it knew or should have known existed;
- f. Failing to provide an adequate walking surface,
- g. In other ways to be determined during discovery.

13. That as a direct and proximate result of Defendant's negligence, Plaintiff, sustained injuries resulting in pain and suffering, disability, disfigurement, mental anguish, loss of the capacity for enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, loss of earnings and loss of the ability to earn money in the future, and aggravation of a previously existing condition, if any. These losses are either permanent or continuing in nature and Plaintiff, will suffer these losses in the future.

WHEREFORE, Plaintiff, demands judgment and damages against Defendant, for damages in excess of Fifty Thousand Dollar, plus costs, and further demands trial by jury on all issues so triable as a right by jury.

#### **COUNT II – NEGLIGENCE CLAIM AGAINST DEFENDANT 2**

Plaintiff, adopts and realleges paragraphs one through five as if fully set forth herein, and further alleges as follows:

1. On 9/11/24, Defendant, owned, possessed, operated, maintained and/or controlled the premises located at 5901 NW 79th Ave, Tamarac, Broward County FL 33321.
2. On that date, Plaintiff, was on said premises as a guest/invitee of Defendant.

3. As Plaintiff was walking on the premises she slipped on an unknown substance on the floor causing her to fall onto the ground.
4. The existence of the unknown substance on the floor created an unreasonably dangerous and unsafe condition.
5. Defendant, its employees, agents, and/or apparent agents had actual or constructive notice of the existence of the unknown substance on the floor.
6. Defendant owed Plaintiff a non-delegable duty to use reasonable care in the maintenance of said premises.
7. Defendant, breached that duty was negligent and failed to use reasonable care in one or more of the following ways:
  - a. Failing to properly maintain the subject premises in a reasonable safe condition; by allowing the subject premises to become dangerous, defective and unsafe, and in creating a slipping hazard for the Plaintiff and other, similar invitees;
  - b. Failing to adequately train and supervise its employees and/or agents to locate and repair such hazards at the subject property;
  - c. Failing to restrict access to the subject area that contained dangerous conditions;
  - d. Failing to warn Plaintiff of dangerous conditions that existed at the subject premises, that the Defendant knew or should have known existed;
  - e. Failing to correct a dangerous condition it knew or should have known existed;
  - f. Failing to provide an adequate walking surface,
  - g. In other ways to be determined during discovery.
13. That as a direct and proximate result of Defendant's negligence, Plaintiff, sustained injuries resulting in pain and suffering, disability, disfigurement, mental anguish, loss

of the capacity for enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, loss of earnings and loss of the ability to earn money in the future, and aggravation of a previously existing condition, if any. These losses are either permanent or continuing in nature and Plaintiff, will suffer these losses in the future.

WHEREFORE, Plaintiff, demands judgment and damages against Defendant, for damages in excess of Fifty Thousand Dollar, plus costs, and further demands trial by jury on all issues so triable as a right by jury.

DATED on this 19 June 2026

**THE INJURY FIRM**

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