

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA**

CHRISTINE BROWN, Individually
and BOBBY BROWN, her husband.

Plaintiffs,

Case Number:

vs.

Section Number:

UNIVERSAL CITY DEVELOPMENT
PARTNERS, LTD, a Florida Limited
Partnership

Defendant.

_____ /

COMPLAINT AND REQUEST FOR JURY TRIAL

Plaintiffs, **CHRISTINE BROWN**, individually and **BOBBY BROWN**, her husband
by and through their undersigned attorney, sue the Defendant, **UNIVERSAL CITY
DEVELOPMENT PARTNERS, LTD**, a Florida Limited Partnership and allege as follows:

COUNT 1

1. This is an action for damages in excess of Fifteen Thousand Dollars
(\$15,000.00), exclusive of attorneys fees and costs.

2. Plaintiffs are residence of Polk County, Florida.

3. Defendant, **UNIVERSAL CITY DEVELOPMENT PARTNERS, LTD.**,
(hereinafter referred to as (“**UNIVERSAL**”)) is a Florida Limited Partnership.

COUNT 11

4. Plaintiffs re-allege 1 through 3 inclusive.

5. On or about September 04, 2011, Defendant “**UNIVERSAL**”, was the owner of and operator of a theme park located in Orlando, Orange County, Florida, which provides a services of entertainment to the buying public.

6. At that same time and place, Plaintiff, **CHRISTINE BROWN** was a business invitee onto the property for a day of fun and enjoyment and entertainment by the Defendant, “**UNIVERSAL**”.

7. At that time the Plaintiff, **CHRISTINE BROWN** slipped and fell on a bridge that was slippery after a rain, causing her to fall down hard on her right knee and she then fell back on her back , sustaining severe bodily injury. Defendant, “**UNIVERSAL**”, owed Plaintiff, a duty to exercise reasonable care for her safety and to maintain the walking areas in the theme park in a reasonably safe condition after a rain. There were no warning signs on the bridge advising that the bridge would be slippery when wet, or moss or algae buildup on the bridge. There were no slip resistance materials, i.e. adhesive pavement strips on the bridge to help prevent any slip and fall accidents of the patrons.

8. The Defendant was negligent in failing to warn Plaintiff, of the dangerous condition of which it knew or should have known existed.

9. This above-described negligent condition was either known to Defendant, “**UNIVERSAL**”, and/or its employees or existed for a period of time sufficient that Defendant should have known of the condition and taken the appropriate remedial measures. The Defendant’s action or inaction created or allowed to exist this dangerous and hazardous

condition. As a direct and proximate cause of the breach of duties, were the proximate cause of the Plaintiff, **CHRISTINE BROWN'S** injuries.

10. Further, "**UNIVERSAL'S**" employees acting within their scope and authority of their duties negligently caused the minor Plaintiff, to slip and fall on this slippery, wet bridge.

11. As a direct and proximate result of the above referenced negligence for which the Defendant, "**UNIVERSAL**" is responsible to the Plaintiff, **CHRISTINE BROWN**. Plaintiff, **CHRISTINE BROWN** has suffered and/or sustained, and will suffer and/or sustain injures in the future as follows:

- a. Significant and permanent loss of important bodily function, permanent injury within a reasonable degree of medical probability and/or significant and permanent scarring or disfigurement;
- b. Pain, suffering, mental anguish, inconvenience and loss of capacity for enjoyment of life;
- c. The expense and/or reasonable value of medical and nursing care treatment.
- d. The loss of earnings, working time and /or earning capacity; and
- e. the damage to and loss of personal property and other miscellaneous expenses.

WHEREFORE, the Plaintiffs, requests a trial by jury on all issues so triable and judgment against the Defendant, “**UNIVERSAL**”, for compensatory damages, the costs of this action and any such other and further relief as this Court may deem just and proper.

COUNT III

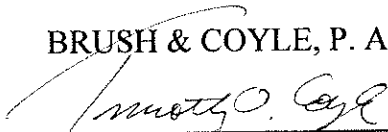
12. Plaintiff, **BOBBY BROWN**, re-alleges paragraph 1 through 11 inclusive.

13. Plaintiff, **BOBBY BROWN**, is the husband of Plaintiff, **CHRISTINE BROWN** and as a further direct and proximate result of the negligence of the Defendant, “**UNIVERSAL**”, the Plaintiff, **BOBBY BROWN**, has in the past and will continue in the future to suffer a diminishment of his wife’s companionship, comfort, services, society and consortium.

WHEREFORE, the Plaintiffs, requests a trial by jury and judgement against the Defendants, for compensatory damages , the costs of this action and any such other and further relief as this court may deem just and proper.

DATED on this 1st day of September, 2015.

BRUSH & COYLE, P. A.



for

ROBERT M. BRUSH, ESQ.

Florida Bar No.: 349992

825 E. Main Street

Lakeland, Florida 33801-5151

Telephone: (863) 603-0563

Facsimile: (863) 603-0884

E-File/E-Mail: bob@brushcoyle.com

Secondary E-File/E-Mail: cj@brushcoyle.com

Attorneys for Plaintiffs