

IN THE CIRCUIT COURT OF THE  
ELEVENTH JUDICIAL CIRCUIT IN AND  
FOR MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO:

MIRIAM LORENZA MACHADO

12-474520A13

Plaintiff,

v.

MIAMI BUS SERVICE CORPORATION,  
MIAMI BUS SERVICE II, CORPORATION,  
and RAMON FERREIRO.

Defendants.

THE ORIGINAL FILED

ON DEC - 6 2012

IN THE OFFICE OF  
CIRCUIT COURT MIAMI-DADE CO.  
CIVIL DIVISION

**COMPLAINT**

Plaintiff, MIRIAM LORENZA MACHADO, hereby sue Defendants, MIAMI BUS SERVICE CORPORATION and MIAMI BUS SERVICE II CORPORATION and RAMON FERREIRO, and as grounds states as follows:

**GENERAL ALLEGATIONS**

1. This is an action for damages in excess of the jurisdictional limits for this Court, exclusive of interest and costs.
2. At all times material, Plaintiff, MIRIAM LORENZA MACHADO a widow, was and is a resident of Miami-Dade County, Florida and is sui juris.
3. At all times material, Plaintiff, MIRIAM LORENZA MACHADO, was a passenger on a motor vehicle passenger bus owned by the Defendants MIAMI BUS SERVICE CORPORATION (hereafter "MBSC") and/or MIAMI BUS SERVICE II CORPORATION (hereafter "MBSIIC") and operated by Defendant RAMON FERREIRO.

4. At all times material, Defendants MBSC and MBSIIC were Florida corporations in the business of transporting passengers for hire with an office for doing business located in Miami-Dade County, Florida.

5. At all times material, Defendant RAMON FERREIRO, was an employee or agent of Defendants MBSC and/or MBSIIC and was acting within the course and scope of said employment or agency.

6. On or about December 1, 2012 Defendant, RAMON FERREIRO negligently and carelessly operated, maintained and/or controlled the afore described motor vehicle passenger bus so as to cause said motor vehicle passenger bus to strike an overpass located at the Miami International Airport in Miami-Dade County, Florida.

7. At all times material by virtue of their ownership of the aforescribed motor vehicle passenger bus Defendants MBSC and/or MBSIIC are vicariously liable for the aforescribed negligence.

8. At all times material Defendant MBSC and/or MBSIIC are vicariously liable for the aforescribed negligence of their employee/agent Ramon Ferreiro.

9. As a direct and proximate result of the aforesaid negligence the Plaintiff Miriam Lorenza Machado was severely injured in and about her body and extremities including multiple injuries and fractures with resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical, nursing care and treatment, loss of earnings, loss of ability to earn money, and aggravation, activation or acceleration of a previously existing condition. These losses are either permanent or continuing and Plaintiff MIRIAM LORENZA MACHADO will suffer these losses in the future.

WHEREFORE, Plaintiff, MIRIAM LORENZA MACHADO, hereby demands judgment

against Defendants, MBSC and MBSIIC and RAMON FERREIRO for compensatory damages in excess of \$75,000.00, exclusive of interest and costs, and demands trial by jury of all issues triable as a matter of right by a jury.

DATED this 6<sup>th</sup> day of December, 2012.

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SPIER, and CONNOLLY P.A.  
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