

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO.:

RICQUAN JAMES,
BRENTLEY WILLIAMS,
And NIYA PICKETT

Plaintiffs,

vs.

MAURKICE POUNCEY,
MICHAEL POUNCEY and
CAMEO MANAGEMENT, LLC

Defendants.

COMPLAINT

COMES NOW the Plaintiffs, RICQUAN JAMES, NIYA PICKETT and BRENTLEY WILLIAMS, hereby files this complaint, and shows that they are entitled to relief against the Defendants based on the following allegations:

VENUE, PARTIES AND JURISDICTION

1. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00) exclusive of interest and costs.
2. All conditions precedent to the bringing of this action have occurred or have been performed, and/or have been waived or excused.
3. Venue for this action is proper in the Circuit Court in and for Miami-Dade County, State of Florida.
4. Plaintiff, RICQUAN JAMES, is a resident of Miami-Dade County and a citizen of the United States.

5. Plaintiff, BRENTLEY WILLIAMS, is a resident of Miami-Dade County and a citizen of the United States.

6. Plaintiff, NIYA PICKETT, is a resident of Miami-Dade County and a citizen of the United States.

7. Defendant, MAURKICE POUNCEY, is a Florida resident, and at all times relevant herein was a professional football player with the Pittsburgh Steelers.

8. Defendant, MICHAEL POUNCEY, is a Florida resident, and at all times relevant herein was a professional football player with the Miami Dolphins.

9. Defendant, CAMEO MANAGEMENT, LLC, (hereafter referred to as "CAMEO") is a limited liability company and organized under the laws of the State of Florida whose principal place of business is located at 690 Lincoln Road, Suite 201, Miami, Florida 33139.

STATEMENT OF RELEVANT FACTS

10. On the evening of July 11, 2014 and the early morning of July 12, 2014, 6'4" 304 pound Maurkice Pouncey (hereinafter referred to as "MAURKICE") and 6'5" 305 pound Michael Pouncey (herein referred to as "MICHAEL") hosted a birthday party at Cameo nightclub in Miami Beach, FL for their annual birthday party. This is the second consecutive year the Pouncey brothers' birthday party has been hosted at Cameo nightclub.

11. Defendants MICHAEL and MAURKICE entered Cameo with their security detail and other members of the Pouncey party.

12. On July 12, 2014, 5'6" 140 pound Riquan James (hereinafter referred to as "JAMES"), Niya Pickett (hereinafter referred to as "PICKETT") and Brentley Williams (hereinafter referred to as "WILLIAMS") were also patrons of a Cameo nightclub.

13. At approximately 4:20 a.m., due to his sexual orientation and preference, JAMES was addressed with derogatory and homophobic remarks and anti gay slurs by Defendants MAURKICE and MICHAEL and by their security detail and their entourage.

14. MAURKICE and MICHAEL then began to shove and push JAMES.

15. JAMES then politely requested that MAURKICE and MICHAEL stop pushing and shoving him. In response to the request made by JAMES, MAURKICE struck JAMES in the face several times and then MAURKICE, MICHAEL, their security and agents all began to punch, hit and kick JAMES while he was laying in a fetal position.

16. PICKETT attempted to intervene and requested that the Pouncey group cease from beating JAMES. MAURKICE then grabbed PICKETT, spun her towards him, punched her in the face and knocked her unconscious. JAMES and PICKETT were then violently beat and thrown throughout the club and eventually thrown outside the club by MAURKICE, MICHAEL, their security, and agents and by security employed by CAMEO nightclub.

17. As JAMES and PICKETT were being thrown throughout the club by MAURKICE, MICHAEL, their security, and agents and by security employed by CAMEO nightclub, JAMES AND PICKETT were thrown into several CAMEO patrons including WILLIAMS.

18. As a result of the actions of Defendants MAURKICE, MICHAEL their security detail and agents, and the security employed by CAMEO; JAMES and PICKETT suffered blunt force trauma to the head, neck, chest and back and had multiple contusions and bruises over a great extent of their bodies. JAMES further suffered broken teeth. PICKETT further suffered from an injury to one of her eyes, which is affecting her sight. WILLIAMS suffered contusions

and bruises over the great extent of her body and a laceration to her right leg, which required several stitches.

19. As a result of the actions of Defendants MAURKICE, MICHAEL their security detail and agents, and the security employed by CAMEO, PLAINTIFFS suffered a number of injuries, contusions and bruises over a great extent of their bodies; as such, DEFENDANTS are jointly and severally liable for the PLAINTIFFS injuries and damages.

20. At all times relevant herein, Defendants MAURKICE and MICHAEL Pouncey's security detail and their agents were acting within the scope and course of their employment and served an agency and servant relationship with Defendant MAURKICE AND MICHAEL.

21. At all times relevant herein, Defendant CAMEO's employees and security were acting within the scope and course of their employment and served an agency and servant relationship with Defendant CAMEO.

COUNT I
(Assault & Battery As To Defendant
MAURKICE POUNCEY By Plaintiff RICQUAN JAMES)

22. Plaintiff incorporates by reference paragraphs 1 through 21, as if fully set forth herein.

23. Defendant MAURKICE without proper grounds, willfully and maliciously attacked Plaintiff JAMES in Cameo without just cause. The injuries suffered by Plaintiff JAMES were inflicted while he was presenting no immediate threat to anyone.

24. As a direct and proximate result of the willful, wanton, malicious and intentional actions of Defendant MAURKICE and his employees and agents, Plaintiff JAMES suffered severe bodily injuries, disfigurement, mental anguish, humiliation and embarrassment.

WHEREFORE, Plaintiff Ricquan James demands judgment against the Defendant Maurkice Pouncey, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT II
(Intentional Infliction of Emotional Distress As To
MAURKICE POUNCEY By Plaintiff RICQUAN JAMES)

25. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

26. Defendant MAURKICE and his employees and agents intentionally caused severe emotional distress to Plaintiff JAMES by his intentional, willful, wanton, extremely reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of JAMES which directly led to his severe bodily injuries.

27. The intentional and malicious actions of Defendant MAURKICE, his employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

28. The aforesaid actions by Defendant MAURKICE, his employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

29. As a direct and proximate result of Defendant MAURKICE's extremely, reckless and indifferent conduct, Plaintiff JAMES suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, RICQUAN JAMES, demands judgment against the Defendant, MAURKICE POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable.

Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT III
(Vicarious Liability Against
MAURKICE POUNCEY By Plaintiff RICQUAN JAMES)

30. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

31. At all times relevant herein, the members of Defendant MAURKICE's employees, security detail, and his agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant MAURKICE.

32. Defendant MAURKICE acted in contravention to his duty of care to Plaintiff JAMES, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor his employees, security staff and agents in their duties and responsibilities.

33. As a direct and proximate result of the acts and omissions of Defendant MAURKICE, Plaintiff JAMES was wrongfully and unlawfully attacked and beaten by

Defendant MAURKICE's employees, security staff, agents or apparent agents at his direction and in the presence of Defendant MAURKICE.

WHEREFORE, Plaintiff, RICQUAN JAMES, demands judgment against the Defendant, MAURKICE POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable.

Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT IV
(Assault & Battery As To Defendant
MICHAEL POUNCEY By Plaintiff RICQUAN JAMES)

34. Plaintiff incorporates by reference paragraphs 1 through 21, as if fully set forth herein.

35. Defendant MICHAEL without proper grounds, willfully and maliciously attacked Plaintiff JAMES in Cameo without just cause. The injuries suffered by Plaintiff JAMES were inflicted while he was presenting no immediate threat to anyone.

36. As a direct and proximate result of the willful, wanton, malicious and intentional actions of Defendant MICHAEL and his employees and agents, Plaintiff JAMES suffered severe bodily injuries, disfigurement, mental anguish, humiliation and embarrassment.

WHEREFORE, Plaintiff, RICQUAN JAMES, demands judgment against Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so

triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT V
(Intentional Infliction of Emotional Distress As To
MICHAEL POUNCEY By Plaintiff RICQUAN JAMES)

37. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

38. Defendant MICHAEL and his employees and agents intentionally caused severe emotional distress to Plaintiff JAMES by his intentional, willful, wanton, extremely reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of JAMES which directly to his severe bodily injuries.

39. The intentional and malicious actions of Defendant MICHAEL, his employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

40. The aforesaid actions by Defendant MICHAEL, his employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

41. As a direct and proximate result of the Defendant MICHAEL's extremely, reckless and indifferent conduct, Plaintiff JAMES suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, RICQUAN JAMES, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this

Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT VI
(Vicarious Liability Against
MICHAEL POUNCEY By Plaintiff RICQUAN JAMES)

42. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

43. At all times relevant herein, the members of Defendant MICHAEL's employees, security detail, and his agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant MICHAEL.

44. Defendant MICHAEL acted in contravention to his duty of care to Plaintiff JAMES, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor his employees, security staff and agents in their duties and responsibilities.

45. As a direct and proximate result of the acts and omissions of Defendant MICHAEL, Plaintiff JAMES was wrongfully and unlawfully attacked and beaten by MICHAEL's employees, security staff, agents or apparent agents at his direction and in the presence of Defendant MICHAEL.

WHEREFORE, Plaintiff, RICQUAN JAMES, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues

so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT VII
(Vicarious Liability Against Defendant CAMEO
By Plaintiff RICQUAN JAMES For Assault And Battery)

46. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

47. At all times relevant herein, Defendant CAMEO's employees, security detail, and its agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant CAMEO.

48. Defendant CAMEO acted in contravention to its duty of care to Plaintiff JAMES, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

49. As a direct and proximate result of the acts and omissions of Defendant CAMEO, Plaintiff JAMES was wrongfully and unlawfully attacked and beaten by CAMEO's employees, security staff, agents or apparent agents at CAMEO's direction.

WHEREFORE, Plaintiff, RICQUAN JAMES, demands judgment against the Defendant CAMEO, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable.

Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT VIII
**(Vicarious Liability Against CAMEO for
Intentional Infliction of Emotional Distress By Plaintiff RICQUAN JAMES)**

50. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

51. At all times relevant herein, Defendant CAMEO's employees, security detail, and its agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control of CAMEO, and pursuant to the rules, regulations, policies and procedures put in place by Defendant CAMEO.

52. Defendant CAMEO acted in contravention to its duty of care to Plaintiff JAMES, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

53. Defendant CAMEO and its employees and agents intentionally caused severe emotional distress to Plaintiff JAMES by their intentional, willful, wanton, extremely reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of JAMES which directly caused his severe bodily injuries.

54. The intentional and malicious actions of Defendant CAMEO, its employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

55. The aforesaid actions by Defendant CAMEO, its employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

56. As a direct and proximate result of the Defendant CAMEO's extremely, reckless and indifferent conduct, Plaintiff JAMES suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, RICQUAN JAMES, demands judgment against the Defendant CAMEO, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT IX
(Negligent Security Against CAMEO
By Plaintiff RICQUAN JAMES)

57. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

58. On July 12, 2014, CAMEO owed a duty of ordinary care and diligence to maintain the premises in a safe condition.

59. At all material times, Plaintiff JAMES was a patron within the CAMEO nightclub.

60. CAMEO had a non-delegable duty to exercise reasonable care to protect against reasonable foreseeable criminal conduct and criminal acts committed by third parties.

61. Notwithstanding the duty owed, CAMEO breached its duty in one or more of the following ways:

- a. Failed to protect its patrons from criminal attacks;
- b. Failing to provide security, or in the alternative adequate/reasonable

security;

c. Failing to maintain the club area in a safe and reasonable manner;

d. Failing to retain adequate security personnel to monitor the entire club and prevent its patrons from being brutally attacked.

e. Failing to properly train, supervise, control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

62. At all material times hereto, the violent criminal attack on Plaintiff JAMES was reasonably foreseeable.

63. At all material times hereto, CAMEO knew or in the exercise of reasonable care should have known that it had inadequate security.

64. Based on the prior criminal incidents at CAMEO and other nightclubs owned and operated by the Opium Group, it was foreseeable that the criminal attack against JAMES would occur.

65. CAMEO through its agents and employees, was in a superior position to appreciate such hazardous conditions and take necessary steps to prevent harm to its patrons, including but not limited to JAMES.

66. At all material times hereto, the conduct of CAMEO directly lead to the criminal attack and injuries of JAMES in that:

a. There were inadequate security personnel and staff and or non-existing visible deterrents to inhibit said criminal attacks;

b. Offenders could successfully implement criminal and harmful acts on CAMEO's property without having fear of being apprehended, discovered, removed, denied entrance into CAMEO, and or prosecuted; and

c. Creating and fostering an atmosphere on the premises, which aids in the perpetration of crimes against patrons, invitees, and licensees.

67. As a direct and proximate result of the acts and omissions of CAMEO, Plaintiff, JAMES suffered pain and suffering, physical injuries, and other damages.

68. As a direct and proximate result of the acts and omissions of CAMEO, Defendant is liable to Plaintiff JAMES for all damages available under Florida law as a direct and proximate result of the acts and omissions of CAMEO.

69. All of the aforementioned damages are permanent and continuing in nature.

70. As a direct and proximate result of Defendant CAMEO's extremely, reckless and indifferent conduct, Plaintiff JAMES suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff Ricquan James demands judgment against the Defendant Cameo, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable.

Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT X
(Assault & Battery As To Defendant
MAURKICE POUNCEY By Plaintiff NIYA PICKETT)

71. Plaintiff incorporates by reference paragraphs 1 through 21, as if fully set forth herein.

72. Defendant MAURKICE without proper grounds, willfully and maliciously attacked the JAMES in Cameo without just cause. The injuries suffered by Plaintiff PICKETT were inflicted while she was presenting no immediate threat to anyone.

73. As a direct and proximate result of the willful, wanton, malicious and intentional actions of Defendant MAURKICE and his employees and agents, Plaintiff PICKETT suffered severe bodily injuries, disfigurement, mental anguish, humiliation and embarrassment.

WHEREFORE, Plaintiff Niya Pickett demands judgment against the Defendant Maurkice Pouncey, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XI
(Intentional Infliction of Emotional Distress As To
MAURKICE POUNCEY By Plaintiff NIYA PICKETT)

74. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

75. Defendant MAURKICE and his employees and agents intentionally caused severe emotional distress to Plaintiff PICKETT by his intentional, willful, wanton, extremely reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of PICKETT which directly led to her severe bodily injuries.

76. The intentional and malicious actions of Defendant MAURKICE, his employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

77. The aforesaid actions by Defendant MAURKICE, his employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

78. As a direct and proximate result of the Defendant MAURKICE's extremely, reckless and indifferent conduct, Plaintiff PICKETT suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, NIYA PICKETT, demands judgment against the Defendant, MAURKICE POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XII
(Vicarious Liability Against
MAURKICE POUNCEY By Plaintiff NIYA PICKETT)

79. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

80. At all times relevant herein, the members of Defendant MAURKICE's employees, security detail, and his agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant MAURKICE.

81. Defendant MAURKICE acted in contravention to his duty of care to Plaintiff PICKETT, by negligently, carelessly and recklessly by failing to properly train, supervise,

control, direct and monitor his employees, security staff and agents in their duties and responsibilities.

82. As a direct and proximate result of the acts and omissions of Defendant MAURKICE, Plaintiff PICKETT was wrongfully and unlawfully attacked and beaten by MAURKICE's employees, security staff, agents or apparent agents at his direction and in the presence of Defendant MAURKICE.

WHEREFORE, Plaintiff, NIYA PICKETT, demands judgment against the Defendant, MAURKICE POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XIII
(Assault & Battery As To Defendant
MICHAEL POUNCEY By Plaintiff NIYA PICKETT)

83. Plaintiff incorporates by reference paragraphs 1 through 21 as if fully set forth herein.

84. Defendant MICHAEL without proper grounds, willfully and maliciously attacked the PICKETT in Cameo without just cause. The injuries suffered by Plaintiff PICKETT were inflicted while she was presenting no immediate threat to anyone.

85. As a direct and proximate result of the willful, wanton, malicious and intentional actions of Defendant MICHAEL and his employees and agents, Plaintiff PICKETT suffered severe bodily injuries, disfigurement, mental anguish, humiliation and embarrassment.

WHEREFORE, Plaintiff, NIYA PICKETT, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XIV
(Intentional Infliction of Emotional Distress As To
MICHAEL POUNCEY By Plaintiff NIYA PICKETT)

86. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

87. Defendant MICHAEL and his employees and agents intentionally caused severe emotional distress to Plaintiff PICKETT by his intentional, willful, wanton, extremely reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of PICKETT which directly to his severe bodily injuries.

88. The intentional and malicious actions of Defendant MICHAEL, his employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

89. The aforesaid actions by Defendant MICHAEL, his employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

90. As a direct and proximate result of the Defendant MICHAEL's extremely, reckless and indifferent conduct, Plaintiff PICKETT suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, NIYA PICKETT, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XV
(Vicarious Liability Against Defendant
MICHAEL POUNCEY By Plaintiff NIYA PICKETT)

91. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

92. At all times relevant herein, the members of Defendant MICHAEL's employees, security detail, and his agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant MICHAEL.

93. Defendant MICHAEL acted in contravention to his duty of care to Plaintiff PICKETT, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor his employees, security staff and agents in their duties and responsibilities.

94. As a direct and proximate result of the acts and omissions of Defendant MICHAEL, Plaintiff PICKETT was wrongfully and unlawfully attacked and beaten by

MICHAEL's employees, security staff, agents or apparent agents at his direction and in the presence of Defendant MICHAEL.

WHEREFORE, Plaintiff, NIYA PICKETT, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XVI
(Vicarious Liability Against CAMEO
By Plaintiff NIYA PICKETT For Assault And Battery)

95. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

96. At all times relevant herein, Defendant CAMEO's employees, security detail, and its agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant CAMEO.

97. Defendant CAMEO acted in contravention to its duty of care to Plaintiff, PICKETT, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

98. As a direct and proximate result of the acts and omissions of Defendant CAMEO, Plaintiff PICKETT was wrongfully and unlawfully attacked and beaten by CAMEO's employees, security staff, agents or apparent agents at CAMEO's direction.

WHEREFORE, Plaintiff, NIYA PICKETT, demands judgment against the Defendant CAMEO, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XVII
(Vicarious Liability Against CAMEO for
Intentional Infliction of Emotional Distress By Plaintiff NIYA PICKETT)

99. Plaintiffs adopt and incorporate the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

100. At all times relevant herein, Defendant CAMEO's employees, security detail, and its agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control of CAMEO, and pursuant to the rules, regulations, policies and procedures put in place by Defendant CAMEO.

101. Defendant CAMEO acted in contravention to its duty of care to Plaintiff PICKETT, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

102. Defendant CAMEO and its employees and agents intentionally caused severe emotional distress to Plaintiff PICKETT by their intentional, willful, wanton, extremely reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of PICKETT which directly caused his severe bodily injuries.

103. The intentional and malicious actions of Defendant CAMEO, its employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

104. The aforesaid actions by Defendant CAMEO, its employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

105. As a direct and proximate result of the Defendant CAMEO's extremely, reckless and indifferent conduct, Plaintiff PICKETT suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, NIYA PICKETT, demands judgment against the Defendant CAMEO, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XVIII
(Negligent Security Against CAMEO
By Plaintiff NIYA PICKETT)

106. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

107. On July 12, 2014, CAMEO owed a duty of ordinary care and diligence to maintain the premises in a safe condition.

108. At all material times, Plaintiff PICKETT was a patron within CAMEO nightclub.

109. CAMEO had a non-delegable duty to exercise reasonable care to protect against reasonable foreseeable criminal conduct and criminal acts committed by third parties.

110. Notwithstanding the duty owed, CAMEO breached its duty in one or more of the following ways:

- a. Failed to protect its patrons from criminal attacks;
- b. Failing to provide security, or in the alternative adequate/reasonable security;
- c. Failing to maintain the club area in a safe and reasonable manner;
- d. Failing to retain adequate security personnel to monitor the entire club and prevent its patrons from being brutally attacked.
- e. Failing to properly train, supervise, control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

111. At all material times hereto, the violent criminal attack on Plaintiff PICKETT was reasonably foreseeable.

112. At all material times hereto, Defendant CAMEO knew or in the exercise of reasonable care should have known that it had inadequate security.

113. Based on the prior criminal incidents at CAMEO and other nightclubs owned and operated by the Opium Group, it was foreseeable that the criminal attack against Plaintiff PICKETT would occur.

114. Defendant CAMEO through its agents and employees, was in a superior position to appreciate such hazardous conditions and take necessary steps to prevent harm to its patrons, including but not limited to Plaintiff PICKETT.

115. At all material times hereto, the conduct of Defendant CAMEO directly lead to

the criminal attack and injuries of PICKETT in that:

- a. There were inadequate security personnel and staff and or non-existing visible deterrents to inhibit said criminal attacks;
- b. Offenders could successfully implement criminal and harmful acts on Defendant CAMEO's property without having fear of being apprehended, discovered, removed, denied entrance into CAMEO, and or prosecuted; and
- c. Creating and fostering an atmosphere on the premises, which aids in the perpetration of crimes against patrons, invitees, and licensees.

116. As a direct and proximate result of the acts and omissions of Defendant CAMEO, Plaintiff PICKETT suffered pain and suffering, physical injuries, and other damages.

117. As a direct and proximate result of the acts and omissions of Defendant CAMEO, is liable to Plaintiff PICKETT for all damages available under Florida law as a direct and proximate result of the acts and omissions of Defendant CAMEO.

118. All of the aforementioned damages are permanent and continuing in nature.

119. As a direct and proximate result of Defendant CAMEO's extremely, reckless and indifferent conduct, Plaintiff PICKETT suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, NIYA PICKETT, demands judgment against the Defendant CAMEO, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable.

Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT IXX
(Assault & Battery As To Defendant
MAURKICE POUNCEY By Plaintiff BRENTLEY WILLIAMS)

120. Plaintiff incorporates by reference paragraphs 1 through 21, as if fully set forth herein.

121. Defendant MAURKICE without proper grounds, willfully and maliciously attacked Plaintiff WILLIAMS in Cameo without just cause. The injuries suffered by Plaintiff WILLIAMS were inflicted while she was presenting no immediate threat to anyone.

122. As a direct and proximate result of the willful, wanton, malicious and intentional actions of Defendant MAURKICE and his employees and agents, Plaintiff WILLIAMS suffered severe bodily injuries, disfigurement, mental anguish, humiliation and embarrassment.

WHEREFORE, Plaintiff, BRENTLY WILLIAMS, demands judgment against the Defendant, MAURKICE POUNCEY, who is jointly and severally liable with all other Defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XX
(Intentional Infliction of Emotional Distress As To
MAURKICE POUNCEY By Plaintiff BRENTLY WILLIAMS)

123. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

124. Defendant MAURKICE and his employees and agents intentionally caused severe emotional distress to the Plaintiff WILLIAMS by his intentional, willful, wanton, extremely

reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of WILLIAMS which directly lead to her severe bodily injuries.

125. The intentional and malicious actions of Defendant MAURKICE, his employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

126. The aforesaid actions by Defendant MAURKICE, his employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

127. As a direct and proximate result of the Defendant MAURKICE's extremely, reckless and indifferent conduct, Plaintiff WILLIAMS suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, BRENTLEY WILLIAMS, demands judgment against the Defendant, MAURKICE POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XXI
(Vicarious Liability Against
MAURKICE POUNCEY By Plaintiff BRENTLEY WILLIAMS)

128. Plaintiffs adopt and incorporate the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

129. At all times relevant herein, the members of Defendant MAURKICE's employees, security detail, and his agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant MAURKICE.

130. Defendant MAURKICE acted in contravention to his duty of care to Plaintiff WILLIAMS, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor his employees, security staff and agents in their duties and responsibilities.

131. As a direct and proximate result of the acts and omissions of Defendant MAURKICE, Plaintiff WILLIAMS was wrongfully and unlawfully attacked and beaten by MAURKICE's employees, security staff, agents or apparent agents at his direction and in the presence of Defendant MAURKICE.

WHEREFORE, Plaintiff, BRENTLEY WILLIAMS, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XXII
(Assault & Battery As To Defendant
MICHAEL POUNCEY By Plaintiff BRENTLEY WILLIAMS)

132. Plaintiff incorporates by reference paragraphs 1 through 21, as if fully set forth herein.

133. Defendant MICHAEL without proper grounds, willfully and maliciously attacked Plaintiff WILLIAMS in CAMEO without just cause. The injuries suffered by WILLIAMS were inflicted while she was presenting no immediate threat to anyone.

134. As a direct and proximate result of the willful, wanton, malicious and intentional actions of Defendant MICHAEL and his employees and agents, Plaintiff WILLIAMS suffered severe bodily injuries, disfigurement, mental anguish, humiliation and embarrassment.

WHEREFORE, Plaintiff, BRENTLEY WILLIAMS, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other Defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XXIII
(Intentional Infliction of Emotional Distress As To
MICHAEL POUNCEY By Plaintiff BRENTLEY WILLIAMS)

135. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

136. Defendant MICHAEL and his employees and agents intentionally caused severe emotional distress to the Plaintiff WILLIAMS by his intentional, willful, wanton, extremely reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of Plaintiff WILLIAMS which directly lead to her severe bodily injuries.

137. The intentional and malicious actions of Defendant MICHAEL, his employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

138. The aforesaid actions by Defendant MICHAEL, his employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

139. As a direct and proximate result of the Defendant MICHAEL's extremely, reckless and indifferent conduct, Plaintiff WILLIAMS suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, BRENTLEY WILLIAMS, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other Defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable.

Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XXIV
(Vicarious Liability Against Defendant
MICHAEL POUNCEY By Plaintiff BRENTLEY WILLIAMS)

140. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

141. At all times relevant herein, the members of Defendant MICHAEL's employees, security detail, and his agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant MICHAEL.

142. Defendant MICHAEL acted in contravention to his duty of care to Plaintiff WILLIAMS, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor his employees, security staff and agents in their duties and responsibilities.

143. As a direct and proximate result of the acts and omissions of Defendant MICHAEL, Plaintiff WILLIAMS was wrongfully and unlawfully attacked and beaten by MICHAEL's employees, security staff, agents or apparent agents at his direction and in the presence of Defendant MICHAEL.

WHEREFORE, Plaintiff, BRENTLEY WILLIAMS, demands judgment against the Defendant, MICHAEL POUNCEY, who is jointly and severally liable with all other Defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XXV
(Vicarious Liability Against Defendant
CAMEO By Plaintiff BRENTLEY WILLIAMS For Assault And Battery)

144. Plaintiffs adopt and incorporate the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

145. At all times relevant herein, Defendant CAMEO's employees, security detail, and its agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control, and pursuant to the rules, regulations, policies and procedures put in place by Defendant CAMEO.

146. Defendant CAMEO acted in contravention to its duty of care to Plaintiff, WILLIAMS, by negligently, carelessly and recklessly by failing to properly train, supervise, control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

147. As a direct and proximate result of the acts and omissions of Defendant CAMEO, Plaintiff WILLIAMS was wrongfully and unlawfully attacked and beaten by CAMEO's employees, security staff, agents or apparent agents at CAMEO's direction.

WHEREFORE, Plaintiff Brentley Williams demands judgment against the Defendant CAMEO, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XXVI
(Vicarious Liability Against CAMEO for
Intentional Infliction of Emotional Distress By Plaintiff BRENTLEY WILLIAMS)

148. Plaintiffs adopt and incorporate the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

149. At all times relevant herein, Defendant's CAMEO's employees, security detail, and its agents or apparent agents, were acting within in the scope of their employment and acting under the direction and control of CAMEO, and pursuant to the rules, regulations, policies and procedures put in place by Defendant CAMEO.

150. Defendant CAMEO acted in contravention to its duty of care to Plaintiff, WILLIAMS, by negligently, carelessly and recklessly by failing to properly train, supervise,

control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

151. Defendant CAMEO and its employees and agents intentionally caused severe emotional distress to the Plaintiff WILLIAMS by their intentional, willful, wanton, extremely reckless and indifferent conduct, including but not limited to engaging in a senseless physical attack upon the person of PICKETT which directly caused his severe bodily injuries.

152. The intentional and malicious actions of Defendant CAMEO, its employees and agents go well beyond all bounds of decency and were done with the purpose of inflicting extreme emotional distress and fear.

153. The aforesaid actions by Defendant CAMEO, its employees and agents were so outrageous in character and were so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

154. As a direct and proximate result of the Defendant CAMEO's extremely, reckless and indifferent conduct, Plaintiff WILLIAMS suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, BRENTLEY WILLIAMS, demands judgment against the Defendant Cameo, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

COUNT XXVII
(Negligent Security Against CAMEO
By Plaintiff BRENTLEY WILLIAMS)

155. Plaintiff adopts and incorporates the allegations of complaint paragraphs 1 through 21 as if fully set forth herein.

156. On July 12, 2014, CAMEO owed a duty of ordinary care and diligence to maintain the premises in a safe condition.

157. At all material times, Plaintiff WILLIAMS was a Patron within the CAMEO nightclub.

158. CAMEO had a non-delegable duty to exercise reasonable care to protect against reasonable foreseeable criminal conduct and criminal acts committed by third parties.

159. Notwithstanding the duty owed, CAMEO breached its duty in one or more of the following ways:

- a. Failed to protect its patrons from criminal attacks;
- b. Failing to provide security, or in the alternative adequate/reasonable security;
- c. Failing to maintain the club area in a safe and reasonable manner;
- d. Failing to retain adequate security personnel to monitor the entire club and prevent its patrons from being brutally attacked.
- e. Failing to properly train, supervise, control, direct and monitor its employees, security staff and agents in their duties and responsibilities.

160. At all material times hereto, the violent criminal attack on Plaintiff WILLIAMS was reasonably foreseeable.

161. At all material times hereto, CAMEO knew or in the exercise of reasonable care should have known that it had inadequate security.

162. Based on the prior criminal incidents at CAMEO and other nightclubs owned and operated by the Opium Group, it was foreseeable that the criminal attack against WILLIAMS would occur.

163. CAMEO through its agents and employees, was in a superior position to appreciate such hazardous conditions and take necessary steps to prevent harm to its patrons, including but not limited to WILLIAMS.

164. At all material times hereto, the conduct of CAMEO directly lead to the criminal attack and injuries of WILLIAMS in that:

a. There were inadequate security personnel and staff and or non-existing visible deterrents to inhibit said criminal attacks;

b. Offenders could successfully implement criminal and harmful acts on CAMEO's property without having fear of being apprehended, discovered, removed, denied entrance into CAMEO, and or prosecuted; and

c. Creating and fostering an atmosphere on the premises, which aids in the perpetration of crimes against patrons, invitees, and licensees.

165. As a direct and proximate result of the acts and omissions of CAMEO, Plaintiff, WILLIAMS suffered pain and suffering, physical injuries, and other damages.

166. As a direct and proximate result of the acts and omissions of CAMEO, Defendant is liable to Plaintiff WILLIAMS for all damages available under Florida law as a direct and proximate result of the acts and omissions of CAMEO.

167. All of the aforementioned damages are permanent and continuing in nature.

168. As a direct and proximate result of the Defendant CAMEO's extremely, reckless and indifferent conduct, Plaintiff WILLIAMS suffered severe pain, emotional distress, mental anguish, physical injuries and disfigurement.

WHEREFORE, Plaintiff, BRENTLEY WILLIAMS, demands judgment against the Defendant CAMEO, who is jointly and severally liable with all other defendants, for all damages allowable under the law, interest, and costs of these proceedings, requests this Court grant any other relief it deems just and equitable, and requests a trial by jury on all issues so triable. Plaintiff hereby reserves the right to amend this Complaint to add a claim for punitive damages upon a showing of the applicable prerequisites.

GLOBAL PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs, RICQUAN JAMES, NIYA PICKETT and BRENTLEY WILLIAMS pray as follows:

1. For all counts for judgment against the Defendants, MARQUICE POUNCEY, MICHAEL POUNCEY and CAMEO MANAGEMENT, LLC, jointly and severely, as prayed for above in each Count in an amount to be determined at trial, but which is not less than Fifteen Thousand (\$15,000.00).

JURY DEMAND

The Plaintiffs hereby respectfully and formally request that this matter be heard and adjudicated by a jury as per the rules, which govern the same in the State of Florida.

THE PORTER LAW FIRM

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Dated: 7/25/14

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