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Complaint - Walmart Substance on Floor in Frozen Food Dept.

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

CASE NO.: XXXXXXXX

B.O.G.
Plaintiff,

vs.

WAL-MART STORES, INC.,
Defendant.

COMPLAINT

The Plaintiff, XXXXXXXX, sues the Defendant, WAL-MART STORES, INC., and alleges:

1. This is an action for damages in excess of \$15,000.00, exclusive of interest, costs and attorney's fees.
2. Defendant, WAL-MART STORES, INC., is a foreign corporation which at all material times conducted business in the State of Florida and is subject to jurisdiction in Florida as it has committed a tort in Florida.
3. On or about June XX, 20XX, Defendant, WAL-MART STORES, INC., was the owner and operator of a Wal-Mart Super Center, Store #5325, in Broward County Florida.
4. On that date, Plaintiff went onto Defendant's premises to shop when she was caused to slip and fall as a result of water or some other transitory substance on the floor in the frozen food department.
5. Defendant knew, or, in the exercise of reasonable care should have known, of the condition, or Defendant created the condition either through the acts of its employees, in its negligent maintenance of equipment, or in its negligent method of operation, and Defendant should have

corrected the condition or warned Plaintiff of its existence. Additionally, Defendant should have had non-slip surface which would have prevented the fall which resulted from a foreseeable condition.

6. As a result of the negligence of the Defendant, Plaintiff suffered permanent bodily injury, and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care, treatment, and loss of earnings or loss of ability to earn money. As the injuries are permanent, Plaintiff will continue to suffer losses in the future.

WHEREFORE, the Plaintiff, XXXXXXXX, demand judgment for compensatory damages against the Defendant, WAL-MART STORES, INC., and further demands a trial by jury of all issues so triable.

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By: _____
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This is a sample lawsuit related to a specific set of facts and circumstances and should not be used or relied upon if you have been in a slip and fall accident. We recommend and urge you to consult with an experienced slip and fall lawyer for professional advice as each case is unique.

Quick Slip And Fall Facts:

Slip and falls are the second leading cause of injuries and deaths after car accidents. Every hour an older adult dies as a result of a fall. The most common injuries resulting from slip and falls include, herniated disc, head injury and/or a knee injury. Learn more from Alan Sackrin, an expert [slip and fall lawyer](#) .

Want to Know More?

Since 1982, Alan Sackrin has represented clients throughout Florida in recovering monetary damages for slip & fall, trip & fall, and other premises liability injuries. Alan is a Board Certified Civil Trial Expert that strives to maximize the amount of compensation his clients' receive for their claim. Alan brings a high-level of skill and knowledge to his slip and fall cases and he offers a free initial consultation.

See: Sample Case [Verdicts and Settlements](#)

Related Slip and Fall Topics

Please feel free to read our other slip and fall (trip and fall) related articles and fact sheets, including:

- [6 Environmental factors that can cause slip and fall accidents](#)
- [4 Factors that determine the types of injuries from a slip and fall](#)
- [Slip and Falls in Hotels and Motels](#)
- [Slippery Conditions in Restaurants](#)
- [Condominium and HOA Slip and Fall Injuries](#)
- [Nursing Home Slip and Fall](#)
- [Slip and Fall Case Checklist](#)
- [Sample Slip and Fall Lawsuit](#)

Do You Have a Question?

Please fill out the “Talk With An Attorney” form above to ask a question or you can call Alan Sackrin at 954-458-8655. He promises to get back to you promptly. [Ask now](#) .

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