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FILED
SID J. WHITE
JUL 26 1996
CLERK, SUPREME COURT
By _____
Chief Deputy Clerk

A34735-7/SHL/vsc/250753

SUPREME COURT OF FLORIDA
CASE NO. 87,684
2nd District No. 95-00714

SPRINGTREE PROPERTIES, INC., SPRINGTREE PROPERTIES, INC., as General Partner of SPRINGTREE LTD., PHASE I, and HARDEE'S FOOD SYSTEMS, INC.

Petitioners,

vs.

JAMES P. HAMMOND, JR. and LUCY R. HAMMOND, his wife,

Respondents.
_____/

PETITIONERS' BRIEF ON THE MERITS

SHELLEY H. LEINICKE
WICKER, SMITH, TUTAN, O'HARA, McCOY, GRAHAM, & FORD, P.A.
Attorneys for Petitioners, Springtree Properties, Inc. d/b/a Hardee's
One East Broward Blvd., 5th Floor
P.O. Box 14460
Ft. Lauderdale, FL 33302
305/467-6405

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STATEMENT OF CASE AND FACTS[1]

This appeal arises from an interdistrict conflict as to the liability of a premises owner (restaurant) where a car unexpectedly jumps a curb and hits a patron on the sidewalk. The trial court granted summary final judgment in favor of the Hardee's Restaurant and its franchisor.[2] (R. 506-512, 522-523) This was overturned by the Second District Court of Appeal on the basis that questions of foreseeability precluded summary resolution of the case.

As Mr. Hammond exited a Hardee's Restaurant, he was hit when a customer's van jumped the six-inch curb onto the sidewalk in front of the building. Hammond's complaint alleges that the van's driver jumped this six-inch curb when she inadvertently stepped on the accelerator instead of the brake. (R. 286-342) Suit was filed against both the van's driver and the restaurant. The van's driver is not a party to this appeal.

The Hammonds allege that the restaurant breached its duty of care by failing to install bumper posts or other similar barriers to further protect the front door and

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[1]The symbol "R" refers to the Index to the Record on Appeal. The appendix attached to Appellees' brief in the Second District Court of Appeal contains defendants' motion for summary final judgment and supporting memo of law which were omitted from the Appellants' Designations in the district court.

[2]The Petitioners are Springtree Properties, Inc., Springtree Ltd., Phase I (the restaurant franchisee) and Hardee's Food Systems, Inc. (the restaurant franchisor). The franchisor and franchisee are parties to a license agreement. The Petitioners will be referred to collectively as "Hardee's" where appropriate.

raised sidewalk from cars using the front parking spaces. (R. 286-342) Hammond's Second Amended Complaint alleges that the restaurant failed to maintain the premises because it did not prohibit curb-side parking in front of the restaurant or otherwise correct an allegedly dangerous condition. (R. 286-342) The unrebutted evidence showed that there was no record evidence of any prior similar incident of a vehicle jumping a curb and causing either personal injury or property damage at either this specific location which was operated and controlled by Springtree or at any of the 1100 corporate operated Hardee's Restaurants through the nation.

After relevant discovery was completed, the trial court granted the restaurant's motion for summary judgment on the grounds that the accident was unforeseeable as a matter of law. (R. 506-512, 522-523; A. 1-14) The summary judgment motion was supported by an unrebutted affidavit of Thomas Floyd, one of the property owners and one of the principle parties who entered into the franchise agreement with Hardee's. (R. 185-204) Mr. Floyd said that since he has been associated with this particular location, there has been no instance of a motor vehicle jumping the curb and causing damage to property or personal injury. (R. 185-204; 349; 397) Mr. Floyd also said that he never received any complaints about the curb which at all times fully complied with the building code.

Hardee's also relied on the testimony of Susan Warner (Director of Risk Management for Hardee's) which established that there had been no prior incidents of a motor vehicle jumping the curb and damaging either property or persons. (R. 137-184) Ms. Warner testified that she conducted a country-wide computer search of incident reports dating back to 1985 from 1100 company-operated Hardee's restaurants. (R. 149) The records showed no similar incidents where a person was injured by a motor vehicle jumping the curb, no similar incidents where property damage was caused by a motor vehicle jumping the curb, and no lawsuits filed against any of the 1100 corporate operated Hardee's for such injuries or damage. (R. 159-160, 164, 165) The evidence also showed that both the curb and the method of ingress and egress to the building fully complied with the building code.

The Hammonds countered the summary judgment motion with an affidavit from a registered professional engineer who opined that the design and construction were defective because a van could mount the curb traveling at four miles per hour. (R. 479-487) The Hammonds also submitted an affidavit from a local resident who provided photographs of 45 locations in Polk County where barricades were placed in front of a building. (R. 488-500) There was no evidence in the record regarding the owners' purpose for these barricades, or whether any of the photographed

establishments had a history of auto-related injuries on the premises.

On appeal the district court acknowledged that there are numerous cases finding no legal liability where the plaintiff alleges personal injury because a business failed to install bumper posts to protect pedestrians from motor vehicles. Despite these "on all fours" cases, the district court reversed the summary judgment based upon this Court's case of *McCain v. Florida Power Corporation*, 593 So.2d 500 (Fla. 1992) where a plaintiff was injured when a blade of a mechanical trencher struck an underground Florida Power Corporation electrical cable.

ISSUE

WHETHER THIS COURT SHOULD DISAPPROVE THE DISTRICT COURT DECISION IN THE INSTANT CASE AND AFFIRM WELL ESTABLISHED CASE LAW WHICH HOLDS THAT A PREMISES OWNER IS NOT LIABLE FOR THE UNFORESEEABLE INJURY TO A PATRON WHEN AN AUTOMOBILE JUMPS THE CURB ONTO A SIDEWALK. ANY CONTRARY RULING CREATES AN UNWORKABLE OBLIGATION TO BARRICADE ALL SIDEWALKS.

ARGUMENT SUMMARY

Multiple decisions hold that a store or restaurant owner is not liable to an individual who is injured by a car which unexpectedly jumps the curb and drives onto the sidewalk. Any contrary rule creates broad and unreasonable liability which can be avoided only by barricading all sidewalks throughout the state.

ARGUMENT

THIS COURT SHOULD DISAPPROVE THE DISTRICT COURT DECISION IN THE INSTANT CASE AND AFFIRM WELL ESTABLISHED CASE LAW WHICH HOLDS THAT A PREMISES OWNER IS NOT LIABLE FOR THE UNFORESEEABLE INJURY TO A PATRON WHEN AN AUTOMOBILE JUMPS THE CURB ONTO A SIDEWALK. ANY CONTRARY RULING CREATES AN UNWORKABLE OBLIGATION TO BARRICADE ALL SIDEWALKS.

While questions of foreseeability are often left for a jury's resolution, Florida courts have routinely upheld (but for the instant case) summary determination of foreseeability issues in the precise situation presented by this action. The courts have repeatedly stated that injuries caused by an automobile unexpectedly leaving the public roadway and striking an individual on a public sidewalk in front of a store are unforeseeable. *Winn-Dixie Stores, Inc. v. Carn*, 473 So.2d 742 (Fla. 4th DCA 1985); *rev. denied*, 484 So.2d 7 (Fla. 1986); *Schatz v. 7-Eleven, Inc.*, 128 So.2d 901 (Fla. 1st DCA 1960); *Cabals v. Elkins*, 368 So.2d 96 (Fla. 1979); *Molinares v. El Centro Gallego, Inc.*, 545 So.2d 387 (Fla. 3d DCA 1989). *Jones v. Dowdy*, 443 So.2d 467 (Fla. 2nd DCA 1984).

In the case of *Schatz v. 7-Eleven, Inc., supra*, the plaintiff was injured by a car that jumped a 5 3/4 inch curb onto the sidewalk in front of the store. The plaintiff asserted the store was at fault for allowing vehicles to park at right angles to the store and for failing to provide an adequate barrier. Summary final

judgment was affirmed in favor of 7-Eleven with an explanation that

> We are not unmindful of the obvious fact that at times operators lose control over the forward progress and direction of their vehicles either through negligence or as a result of defective mechanism, which sometimes results in damage or injury to others. In a sense, all such occurrences are foreseeable. They are not, however, incident to ordinary operation of vehicles, and do not happen in the ordinary and normal course of events. When they happen, the consequences resulting therefrom are matters of chance and speculation. If, as a matter of law, such occurrences are to be held foreseeable and therefore to be guarded against, there will be no limitation on the duty owed by the owners of establishments into which people are invited to enter. Such occurrences fall within the category of the unusual or extraordinary, and are, therefore, unforeseeable in contemplation of the law.

Schatz, supra, at 743. (Emphasis added)

In the case of *Winn-Dixie v. Carn, supra*, the Fourth District quoted from the *Schatz* decision and held that the trial court erred in failing to grant a directed verdict in favor of defendant, Winn-Dixie, when a plaintiff was injured by a car while standing on a public sidewalk in front of the store.

In the case of *Cabals v. Elkins, supra*, this Court affirmed an order granting a defendant's motion to dismiss a suit where a plaintiff was injured by a motorcycle which was negligently driven on the premises of an automobile dealership.

In the case of *Molinares v. El Centro Gallego, Inc., supra*, the plaintiff was hit by a third-party motorist and

was pinned against the building. Just as in the instant case, the driver apparently hit the accelerator by mistake instead of the brake. Summary judgment was affirmed by the Third District, which found that the defendant did not breach any duty to the patron because it provided a protective sidewalk with a two-inch curb (the instant curb is six inches) between the business entrance and the parking lot. The *Molinares* court also stressed the importance of the absence of any prior motor vehicle accidents involving customers in front of the store. The court said that in the absence of any history of similar accidents, the store had no duty to place bumper guards, guardrails, warning signs, etc. The court noted that the result would have been different if the sidewalk had been level with, or flowed into, the asphalt parking lot, or if there had been a history of similar accidents. There can be no meaningful distinction made between *Molinares* and the instant case with one exception -- in *Molinares* no liability was permitted despite a two-inch curb whereas here, a six-inch curb is at issue.

These cited decisions all mesh with the equally well-settled law that where there is no building code requirement for a business to place a barrier to stop the progress of vehicles, the business is not negligent in failing to erect such a barrier. *Krispy Kreme Doughnut Co. v. Cornett*, 312 So.2d 771 (Fla. 1st DCA 1975), *cert. denied*, 330 So.2d 16 (Fla. 1976).

In a factually identical case, a Georgia court has also ruled that there is no "legally attributable causal connection between the defendant's conduct and the alleged injury." *Southern Bell Telephone and Telegraph Co. v. Dolce*, 342 S.E. 2d 497, 744 (Georgia, App. 1986). In the *Dolce* case, the Georgia court recognized that the circumstances of this type of accident are "so remote and improbable as not reasonably to be anticipated by a merchant in the exercise of ordinary care." *Dolce* at 499.

The four cases cited by the district court which appear to reach a contrary decision (at first blush) are all factually dissimilar to the instant action. In the case of *Grissett v. Circle K Corp. of Texas*, 593 So.2d 291 (Fla. 2nd DCA 1992) and *Cohen v. Schrider*, 533 So.2d 859 (Fla. 4th DCA 1988), the premises owners were aware of multiple prior instances of cars jumping curbs. While these two decisions do not so state, one can infer that such problems arose because of unique circumstances in the location or layout of the premises. In the case of *Thompson v. Ward Enterprises*, 341 So.2d 837 (Fla. 3d DCA 1977), there were no curbs to divide the sidewalk from the pavement. Similarly, in the case of *Johnson v. Hatoum*, 239 So.2d 22 (Fla. 4th DCA 1970), there were no marked parking spaces and "vehicles were permitted to drive onto the premises and park anywhere and at any angle. . . as the operator wished." *Id.* at 24. All of these decisions are in marked contrast to the facts of the instant case (no

prior accidents, clearly marked parking spaces, and a six-inch curb) and the case law cited by Hardee's.

Any decision which would permit liability under the facts of the instant case would open a pandora's box of problems. The district court's decision, if allowed to stand, mandates every premises owner to erect barriers between all sidewalks and paved areas -- even if there is a sterling safety record -- or have liability imposed as a matter of law in the event that a motor vehicle ever jumps the curb. Such a rule of law runs afoul of equal protection laws. The South Florida Building Code has enacted an ordinance preventing the use of "shopping cart corrals" (which typically use identical store front barriers as urged by the Hammonds) because such blockades hinder ingress and egress by persons in wheelchairs.[3] See also: Fla. Stat. § 553.303, 553.504. Such a rule as adopted by the district court would arguably require the Department of Transportation and all municipalities to barricade any sidewalks which are contiguous to roadways;

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[3]Section C-50 of the 1988 South Florida Building Code provides, in pertinent part:

> (g) OBSTRUCTION OF ENTRANCES AND EXITS, PROHIBITED:
>
> Posts, bars, railings and other similar barricades or pedestrian control devices shall not be permitted in the common or emergency entranceway or exitways to buildings nor in the exterior sidewalks, walkways or publicways serving them which are located on private property.

a curb alone is no longer sufficient protection for any pedestrian.

The Second District's decision could potentially impact premises liability considerations in "slip and fall" claims. Now, the law holds that a person who slips or trips off an ordinary, unpainted curb has no liability claim against the premises owner because there is no inherent danger in an ordinary sidewalk. *Aventura Mall Venture v. Olson*, 561 So.2d 319 (Fla. 3d DCA 1990). This rule cannot stand if barricades are required. All pedestrians would be able to claim liability because a failure to have the required barriers would equate to a failure to properly delineate the location of the curb. The thousands of miles of sidewalks that are now safe, *Bowles v. Elks Pontiac Co.*, 63 So.2d 769, 772 (Fla. 1953), would immediately become unsafe because of a lack of a protective barrier.[4]

The district court in the instant case has based its ruling on the factually distinguishable case of *McCain v. Florida Power Corp.*, 593 So.2d 500 (Fla. 1992). In the *McCain* case, the plaintiff was injured when the blade of a mechanical trencher he was operating struck an underground electrical cable. Respectfully, foreseeability considera-

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[4]Patrons injured when a car jumps a curb would not be left without a remedy if the well established law precluding owner liability is upheld. Suit could still be maintained against the vehicle driver as well as the patron's own uninsured motorist carrier under many circumstances.

tions from a product liability claim have no relevance to the instant premises liability case.

CONCLUSION

For the reasons set forth herein, it is respectfully urged that this Court quash the decision of the Second District and reinstate the summary judgment in favor of Defendants/Petitioners, which was entered where a review of all evidence in the record established that there were no genuine issues of material fact and that summary judgment was proper as a matter of law.

Respectfully submitted,

SHELLEY H. LEINICKE, ESQ.
WICKER, SMITH, TUTAN, O'HARA,
McCOY, GRAHAM, & FORD, P.A.
Attorneys for Petitioners,
Springtree Properties, Inc.
d/b/a Hardee's
One East Broward Blvd., Fifth Floor
P.O. Box 14460
Ft. Lauderdale, FL 33302
305/467-6405

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true copy of the foregoing was mailed this 24th day of July, 1996, to: Charles B. Draper, Esq., 705 West Emmett Street, P.O. Drawer 422084, Kissimmee, Florida 34742-2084, Attorney for James P. Hammond and Lucy R. Hammond; A. Craig Cameron, Esq., 15 West Church Street, Orlando, Florida 32801, Attorney for Gretel G. Ashley.

WICKER, SMITH, TUTAN, O'HARA,
McCOY, GRAHAM, & FORD, P.A.
Attorneys for Petitioners,
Springtree Properties, Inc.
d/b/a Hardee's
One East Broward Blvd., Fifth Floor
P.O. Box 14460
Ft. Lauderdale, FL 33302
305/467-6405

By: _____
SHELLEY H. LEINICKE
Florida Bar No. 230170

A34735-7/SHL/vsc/251339

SUPREME COURT OF FLORIDA
CASE NO. 87,684
Second District Court No. 95-00714

SPRINGTREE PROPERTIES, INC., SPRINGTREE PROPERTIES, INC., as General Partner of SPRINGTREE LTD., PHASE I, and HARDEE'S FOOD SYSTEMS, INC.

Petitioners,

vs.

JAMES P. HAMMOND, JR. and LUCY R. HAMMOND, his wife,

Respondents.

_____/

APPENDIX
TO
PETITIONERS' BRIEF ON THE MERITS

SHELLEY H. LEINICKE, ESQUIRE
WICKER, SMITH, TUTAN, O'HARA, McCOY, GRAHAM, & FORD, P.A.
Attorneys for Petitioners
5th Floor, Barnett Bank Plaza
One East Broward Boulevard
Ft. Lauderdale, FL 33301
(305) 467-6405

SUPREME COURT CASE NO. 87,784
Second DCA Case No. 95-0714

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NOT FINAL UNTIL TIME EXPIRES TO FILE REHEARING
MOTION AND, IF FILED, DETERMINED.

IN THE DISTRICT COURT OF APPEAL

OF FLORIDA

SECOND DISTRICT

JAMES F. HAMMOND, JR., and LUCY M. HAMMOND, his wife,

Appellants,

v.

SPRINGTREE PROPERTIES, INC., a Florida corporation; SPRINGTREE PROPERTIES, INC., as General Partner of SPRINGTREE LTD., PHASE I, a Florida Limited Partnership; JOSEPH M. NOLEN; THOMAS C. FLOYD; and HARDEE'S FOOD SYSTEMS, INC., a North Carolina corporation,

Appellees.

CASE NO. 95-00714

Opinion filed January 26, 1996.

Appeal from the Circuit Court for Polk County; Susan Wadsworth Roberts, Judge.

Charles B. Draper of Draper Law Office, Kissimmee, for Appellants.

Shelley H. Leinicke of Wicker, Smith, Tutan, O'Hara, McCoy, Graham, Lane & Ford, P.A., Ft. Lauderdale, for Appellees.

BLUE, Judge.

James and Lucy Hammond appeal from the trial court's order granting summary judgment to the appellees, defendants below. They argue that a jury question was presented on the issue of foreseeability. We agree and reverse.

This case involves an accident at a Hardee's restaurant where a customer's van jumped the curb and hit Mr. Hammond after he exited the restaurant. The Hammonds filed suit against the van driver and the appellees. The van driver is not a party to this appeal. The Hammonds alleged that the appellees breached their duty of care by failing to install bumper posts or other barriers between the front parking spaces and the front door and sidewalk. The appellees sought summary judgment, arguing that the accident was unforeseeable as a matter of law.

In support of their motion for summary judgment, the appellees submitted the deposition of Susan Werner, Hardee's Director of Risk Management. She conducted a computer search of incident reports dating back to 1985 from 1,100 company-operated Hardee's restaurants. The records revealed no similar incidents where a person was injured by a motor vehicle jumping the curb, no similar incidents where property damage was caused by a motor vehicle jumping the curb, and no lawsuits filed against Hardee's for such injuries or damage.

The Hammonds submitted an affidavit from a registered professional engineer who opined that the design and construction were defective because the van could mount the curb travelling only four miles per hour. The engineer concluded that the absence of adequate car stops constituted a defective design. A second affidavit identified forty-five locations, with pictures attached, of Polk County establishments that use vertical bumper posts.

There are numerous cases involving accidents where a business allegedly breached its duty of care by failing to install bumper posts or otherwise to protect pedestrians from motor vehicles.[1] These cases differ slightly, depending on

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[1] See, e.g., Grissett v. Circle K Corp. of Texas, 593 So. 2d 291 (Fla. 2d DCA 1992) (reversing summary judgment for Circle K; although no evidence of prior incidents at that store, similar accidents had occurred at other Circle K stores); Molinares v. El Centro Gallego, Inc., 545 So. 2d 387 (Fla. 3d DCA) (affirming summary judgment for restaurant based in part on lack of prior similar accidents), review denied, 557 So. 2d 866 (Fla. 1989); Cohen v. Schrider, 533 So. 2d 859 (Fla. 4th DCA 1988) (reversing summary judgment for store which had past history of ten similar incidents); Winn-Dixie Stores, Inc. v. Carn, 473 So. 2d 742 (Fla. 4th DCA 1985) (ordering directed verdict for Winn-Dixie in case arising from injury after auto left public roadway and struck plaintiff who was standing on public sidewalk in front of store), review denied, 484 So. 2d 7 (Fla. 1986); Jones v. Dowdy, 443 So. 2d 467 (Fla. 2d DCA 1984) (affirming summary judgment for store; customer inside when car crashed through front window); Cabals v. Elkins, 368 So. 2d 96 (Fla. 3d DCA 1979) (affirming dismissal for failure to state a cause of action); Thompson v. Ward Enters., 341 So. 2d 837 (Fla. 3d DCA) (reversing directed verdict for supermarket), cert. denied, 351 So. 2d 409 (Fla. 1977); Krispy Kreme Doughnut Co. v. Cornett, 312 So. 2d 771 (Fla. 1st DCA 1975) (reversing judgment for plaintiff; parking lot met all building codes), cert. denied, 330 So. 2d 16 (Fla. 1976); Johnson v. Hatoum, 239 So. 2d 22 (Fla. 4th DCA 1970) (reversing summary

whether the customer was inside or outside the business, whether similar accidents had occurred in the past, and what type of curbs, barriers or parking the business provided. Based on the majority of these cases, the appellees argue that the issue of foreseeability is determined by a business' history with similar incidents. They argue that the absence of prior similar incidents at Hardee's restaurants makes Mr. Hammond's accident unforeseeable as a matter of law, thus entitling them to summary judgment. We have concluded, however, that the lack of similar incidents in the past is not dispositive on the threshold issue of foreseeability.

In McCain v. Florida Power Corp., 593 So. 2d 500 (Fla. 1992), the supreme court examined the different ways that foreseeability relates to duty versus proximate causation.

> The duty element of negligence focuses on whether the defendant's conduct foreseeably created a broader 'zone of risk' that poses a general threat of harm to others. The proximate causation element, on the other hand, is concerned with whether and to what extent the defendant's conduct foreseeably and substantially caused the specific injury that actually occurred. . . . [T]he former is a minimal threshold legal requirement for opening the courthouse doors, whereas the latter is part of the much more specific factual requirement that must be proved to

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judgment for restaurant; plaintiff struck by car while waiting at outside walk-up counter), cert. dismissed, 244 So. 2d 740 (Fla. 1971); Schatz v. 7-Eleven, Inc., 128 So. 2d 901 (Fla. 1st DCA 1961) (affirming summary judgment for 7-Eleven, holding that automobiles losing control is unforeseeable).

> win the case once the courthouse doors are open.

593 So. 2d at 502 (citations and footnote omitted).

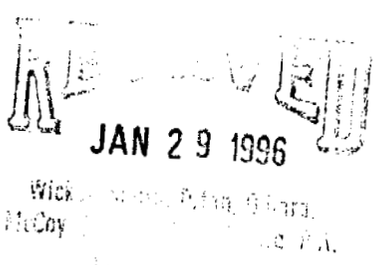
Based on our reading of McCain, we hold that the trial court erred by granting summary judgment on the threshold issue of foreseeability. Just as Florida Power had the ability to foresee the zone of risk that was created when people worked near or around electric lines, the appellees here had the ability to foresee the zone of risk created by the presence of both pedestrian and vehicular traffic. Just as Florida Power would be entitled to offer proof regarding intervening causes, precautions, lack of similar occurrences in the past, etc., so too the appellees here would be entitled to offer proof that this type of incident had never occurred. This evidence, however, is relevant to determine the fact-based element of whether there has been a breach of duty, not whether the duty existed in the first place.

We conclude that the supreme court's decision in McCain requires that we reverse and remand. Even without McCain, however, we would be inclined to reverse. As a test of foreseeability, the appellees' reliance on their own lack of experience with this type of accident is misplaced. As shown by the cases reaching the appellate courts, this type of accident is not without precedent. We believe there is a sufficient history of the type of accident alleged in this case to create a factual

question as to whether the appellees knew or should have known of the risk, irrespective of their own experience.

We hold that the absence of similar accidents at Hardee's company-operated restaurants does not make this accident unforeseeable as a matter of law. Instead, it presents a matter for the jury to consider. Accordingly, we reverse and remand for further proceedings.

DANAHY, A.C.J., and SCHOONOVER, J., Concur.



IN THE SECOND DISTRICT COURT OF APPEAL, LAKELAND, FLORIDA

FEBRUARY 28, 1996

JAMES P. HAMMOND, JR. and LUCY R. HAMMOND, Appellant(s),	)	
v.	)	Case No. 95-00714
GRETEL G. ASHLEY, etc., Appellee(s).	)	

BY ORDER OF THE COURT:

Counsel for appellees having filed a motion for rehearing in this case, upon consideration, it is

ORDERED that the motion is hereby denied. It is further

ORDERED that appellants motion to strike or dismiss appellees' motion for rehearing and appellants motion for attorney's fees is hereby denied.

I HEREBY CERTIFY THE FOREGOING IS A TRUE COPY OF THE ORIGINAL COURT ORDER.

WILLIAM A. HADDAD, CLERK

c: Charles Draper, Esq.
Shelley H. Leinicke, Esq.
Craig Cameron, Esq.

/PM

DISTRICT COURT OF APPEAL SECOND DISTRICT SAT: CITO SI RECTE NET STATE OF FLORIDA