

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

ROCK FELLER SOREL,

CASE NO.:

Plaintiff,

11-11225 CA 3 2

vs.

GLORIA JAMES,

Defendant.

401
1-55
R# 2830008

CLERK - CIRCUIT COURT
MIAMI-DADE COUNTY

2011 APR 12 PM 1:11

FILED FOR RECORD

COMPLAINT

The Plaintiff, **ROCK FELLER SOREL**, by and through the undersigned attorney hereby
sues the Defendant, **GLORIA JAMES**, and alleges as follows:

1. That this is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00).
2. That at all times material hereto, the Plaintiff, **ROCK FELLER SOREL**, was and is a resident of Miami-Dade County, Florida, and is otherwise sui juris.
3. That at all times material hereto, the Defendant, **GLORIA JAMES**, was and is a resident of Miami-Dade County, Florida and is otherwise sui juris.
4. This cause of action arose in Miami-Dade County, Florida.

WONNE LOPEZ

COUNT I
NEGLIGENCE AGAINST GLORIA JAMES

5. Plaintiff realleges and reavers each an every allegation contained in paragraphs 1 through 4 as fully stated herein and further alleges:
6. On or about April 7, 2011, Plaintiff, **ROCK FELLER SOREL**, was working as a

parking attendant at the Fontainebleau hotel, located at [REDACTED] Miami Beach, Miami-Dade County, Florida.

7. That at said time and place, the Defendant, **GLORIA JAMES**, had requested her vehicle be retrieved by a parking attendant.

8. At said time and place **GLORIA JAMES** negligently struck or otherwise made physical contact with Plaintiff.

9. As direct and proximate result of **GLORIA JAMES**' negligence, Plaintiff, **ROCK FELLER SOREL**, suffered damages including but not limited to bodily injury and resulting pain and suffering, emotional distress, humiliation, mental anguish, loss of capacity for enjoyment of life, expense of medical care and treatment, loss of earnings, and loss of ability to earn money. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future.

WHEREFORE, the Plaintiff, **ROCK FELLER SOREL** demands judgment against the Defendant, **GLORIA JAMES**, for damages, costs and interest.

COUNT II
ASSAULT CLAIM AGAINST GLORIA JAMES

10. Plaintiff reaffirms and realleges each and every allegation in paragraphs 1-9 and further alleges:

11. At said time and place, the Defendant, **GLORIA JAMES**, verbally abused and threatened the Plaintiff, **ROCK FELLER SOREL**, creating a well founded fear in the Plaintiff that violence was imminent.

12. Defendant, **GLORIA JAMES**, fully intended and was capable of harming the Plaintiff.

13. As a direct and proximate result of the conduct and statements of the Defendant, **GLORIA JAMES**, the Plaintiff was placed in imminent fear that violence would happen to him.

14. In committing the acts alleged above, the Defendant, **GLORIA JAMES**, acted with intent and malice, without justification, and without provocation by the Plaintiff.

15. As direct and proximate result of **GLORIA JAMES'** actions, Plaintiff, **ROCK FELLER SOREL**, suffered damages including but not limited to bodily injury and resulting pain and suffering, emotional distress, humiliation, mental anguish, loss of capacity for enjoyment of life, expense of medical care and treatment, loss of earnings, and loss of ability to earn money. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future.

WHEREFORE, the Plaintiff, **ROCK FELLER SOREL** demands judgment against the Defendant, **GLORIA JAMES**, for damages, costs and interest.

Count III
BATTERY CLAIM AGAINST GLORIA JAMES

16. Plaintiff reaffirms and realleges each and every allegation in paragraphs 1- 9.

17. That at said time and place, Defendant, **GLORIA JAMES**, intentionally struck the Plaintiff, **ROCK FELLER SOREL**.

18. That Defendant, **GLORIA JAMES**, either intentionally or with such reckless and willful disregard for the Plaintiff's safety, either knew or should have known that her actions would cause Plaintiff injury and physical harm.

19. That Defendant, **GLORIA JAMES**, fully intended and did cause harm to the Plaintiff.

20. As a direct and proximate result of **GLORIA JAMES'** actions, Plaintiff, **ROCK**

FELLER SOREL, suffered damages including but not limited to bodily injury and resulting pain and suffering, emotional distress, humiliation, mental anguish, loss of capacity for enjoyment of life, expense of medical care and treatment, loss of earnings, and loss of ability to earn money. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future.

WHEREFORE, the Plaintiff, **ROCK FELLER SOREL** demands judgment against the Defendant, **GLORIA JAMES**, for damages, costs and interest.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury of all issues triable as a matter of right by a jury.

DATED this 11th day of April, 2011.

Law Offices of
COHN, SMITH & COHN, P.A.



BY: *Angela L. Cohn*
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