

Lit 08-410

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT OF THE STATE OF FLORIDA, IN AND FOR PASCO COUNTY CIVIL DIVISION

CANDY BLISS,

51 - 2008 CA 8222 ES

Plaintiff,

CASE NO.:

vs.

DIVISION: Y

MIKE OLSEN, PASCO COUNTY TAX COLLECTOR and ZEPHYRHILLS COMMERCIAL PROPERTIES, L.L.C.,

Defendants.

(asst. TAX collector) SERVED Tom Stearns 10/3/08 Month Day Year Time 1045 AM BOB WHITE, Sheriff Pasco County, Florida By B. George Name 1287 C.JIS / Employee #

SUMMONS

THE STATE OF FLORIDA: TO ALL AND SINGULAR THE SHERIFFS OF SAID STATE: GREETINGS:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the Complaint or Petition in the above styled cause upon the Defendant(s)

MIKE OLSEN, PASCO COUNTY TAX COLLECTOR 14236 6TH Street, Room #100 Dade City, Florida 33523-3411

Each Defendant is hereby required to serve written defenses to said complaint or petition or Plaintiff's attorney, whose name and address is:

Drew Ben Hudgins, Esquire 38453 Fifth Avenue Zephyrhills, Florida 33542

within 20 days after service of this summons upon that Defendant, exclusive of the day of service, and to file the original of said written defenses with the clerk of said court either before service on Plaintiff's attorney or immediately thereafter. If a Defendant fails to do so, a default will be entered against that Defendant for the relief demanded in the complaint or petition.

WITNESS my hand and the seal of said court on 26 SEP 2008, 2008.

By: /s/ Samantha Herrington DEPUTY CLERK

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT OF THE STATE  
OF FLORIDA, IN AND FOR PASCO COUNTY  
CIVIL DIVISION

CANDY BLISS,

Plaintiff,

CASE NO.: 51-2208CA 822ES

vs.

DIVISION: 4

MIKE OLSEN, PASCO COUNTY TAX  
COLLECTOR and ZEPHYRHILLS  
COMMERCIAL PROPERTIES, L.L.C.,

Defendants.

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C O M P L A I N T

COMES NOW the Plaintiff, CANDY BLISS, by and through her undersigned attorney, and sues the Defendant, MIKE OLSEN, PASCO COUNTY TAX COLLECTOR and ZEPHYRHILLS COMMERCIAL PROPERTIES, L.L.C., and will show unto this Honorable Court as follows:

1. That this is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00).
2. On or about June 5, 2007, Defendant, ZEPHYRHILLS COMMERCIAL PROPERTIES, L.L.C., was the owner of a building located at 4904 Allen Road, Zephyrhills, Pasco County, Florida.
3. On or about June 5, 2007, Defendant, MIKE OLSEN, PASCO COUNTY TAX COLLECTOR, was in possession, custody, and control of the property located at 4904 Allen Road, Zephyrhills, Pasco County, Florida, that was used primarily as the Pasco County Tax Collectors office.

4. On or about June 5, 2007, Plaintiff, CANDY BLISS, was on the property as a business invitee.

5. On or about June 5, 2007, Defendants, one or both of them, failed to provide a safe walking path by allowing a rug that was placed at the entrance/exit door to become wadded and bunched up and/or folded over thereby creating an unsafe walking path for patrons/users, so that Plaintiff, CANDY BLISS, fell on the property.


6. The Defendants, MIKE OLSEN, PASCO COUNTY TAX COLLECTOR and ZEPHYRHILLS COMMERCIAL PROPERTIES, L.L.C., one or both of them, did not take the appropriate precautions to make a safe and secure place for its patrons and failed to warn patrons/users of this condition. The Defendants knew or should have known about this condition prior to this accident and took no affirmative action to correct the condition.

7. Plaintiff, CANDY BLISS, has completed all conditions precedent to bringing this suit under Florida Statute 768.28, and the Notice Provisions therein (see attached copy letter dated July 25, 2007).

8. As a result of Defendants' negligence, Plaintiff, CANDY BLISS, suffered 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 and treatment, loss of earnings, loss of ability to

earn money, and aggravation of a previously existing condition. The losses are either permanent or continuing in nature and Plaintiff will suffer the losses in the future.

WHEREFORE, the Plaintiff, CANDY BLISS, sues the Defendants, MIKE OLSEN, PASCO COUNTY TAX COLLECTOR and ZEPHYRHILLS COMMERCIAL PROPERTIES, L.L.C., for all damages allowable under Florida Law, a sum in excess of Fifteen Thousand Dollars (\$15,000.00) and respectfully demands a trial by jury.



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**DREW BEN HUDGINS, ESQUIRE**  
Florida Bar No. : 325351  
38453 5th Avenue  
Zephyrhills, FL 33542  
Telephone: (813) 788-5534  
Attorney for Plaintiff



## HUDGINS LAW FIRM

*Personal Injury • Wrongful Death • Civil Trial Practice*

38453 Fifth Avenue • Zephyrhills, Florida 33542  
813-788-5534 • Fax 813-783-6764

DREW BEN HUDGINS\*  
\*Also Admitted in Colorado

KENNETH A. MINIO

### FORMAL NOTIFICATION OF CLAIM PURSUANT TO F.S. 768.28

July 25, 2007

RE: Our Client(s) : Candy Bliss  
Municipality/  
State Agency involved: Pasco County Tax Collector,  
Mike Olsen, Zephyrhills, Florida  
Date of Accident : June 5, 2007

Dear Sirs:

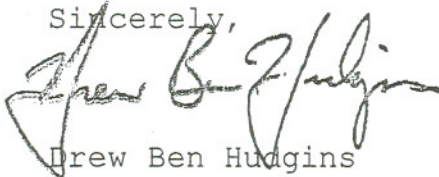
Please accept this letter as formal notification pursuant to Florida Statute 768.28 that the above captioned client intends to institute a claim for personal injuries suffered as a result of the negligence of the above captioned Municipality/State Agency.

On June 5, 2007, our client, Candy Bliss, was injured when she tripped and fell over the rug in front of the entrance/exit door at the Pasco County Tax Collector's office in Zephyrhills, Florida.

INJURIES: Ms. Bliss' injuries are primarily to her left and right knee.

If there are any questions, or if any additional facts are needed, please do not hesitate to call my office at (813) 788-5534. My client can be made available to provide further information, if necessary.

Sincerely,



Drew Ben Hudgins

DBH/tdp

CERTIFIED MAIL: 7006 3450 0001 6992 8790

CC: State of Florida (Department of Insurance)  
Mike Olsen, Pasco County Tax Collector