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IN THE CIRCUIT COURT OF THE 6TH JUDICIAL
CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.

SALVATORE BIANCO,

Plaintiff,

vs.

HARBOR FREIGHT TOOLS CORPORATE, LLC
and HARBOR FREIGHT TOOLS USA, INC.,

Defendants.

_____ /

COMPLAINT

Plaintiff, SALVATORE BIANCO, and by and through undersigned counsel, sues Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, and HARBOR FREIGHT TOOLS, USA, INC. and alleges as follows:

General Allegations

1. This is an action for damages in excess of Fifty Thousand Dollars (\$50,000.00) exclusive of attorney's fees, interest and costs and therefore, within the jurisdiction of this Court.

2. That at all times material hereto Plaintiff, SALVATORE BIANCO, was a resident of Pinellas County, Florida, and now is a resident of Shelby County, Alabama and is otherwise sui juris.

3. That at all times Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, was and is a foreign limited liability company doing business in Pinellas County, Florida and throughout the State of Florida and is otherwise sui juris.

4. That at all times Defendant, HARBOR FREIGHT TOOLS, USA, INC., was and is a foreign profit corporation doing business in Pinellas County, Florida and throughout the State of Florida and is otherwise sui juris.

5. The accident, which is the subject matter of this lawsuit, arose in Largo, Pinellas County, Florida. Therefore, venue remains in Pinellas County, Florida.

COUNT I - NEGLIGENCE AGAINST HARBOR FREIGHT TOOLS CORPORATE, LLC

6. Plaintiff, SALVATORE BIANCO, adopts and realleges all of the allegations in paragraphs 1 through 5 as though fully set forth herein.

7. That on or about April 1, 2024, Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, was in possession of, managed, maintained and/or controlled a property located at or near 3665 E Bay Dr #160, Largo, FL 33771.

8. That at said time and place, Plaintiff, SALVATORE BIANCO, was on said property as a customer, and therefore, was otherwise lawfully on the property.

9. That at said time and place, Plaintiff, SALVATORE BIANCO, was walking inside said property when Plaintiff, SALVATORE BIANCO's, arm got caught on a metal hook protruding out of a shelving unit.

10. That at all times material, Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, owed Plaintiff, SALVATORE BIANCO, the duty to use reasonable care.

11. Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, breached its duties to Plaintiff, SALVATORE BIANCO, in one or more of the following respects, including but not limited to:

- a. Failing to exercise reasonable care in maintaining the shelving unit;
- b. Failing to adequately conduct inspections to ensure that a dangerous, hazardous and unsafe condition such as protruding metal hooks did not exist on shelving units;
- c. Failing to warn Plaintiff, SALVATORE BIANCO, that the metal hooks on the shelving unit were unreasonably protruding;

- d. Failing to remove all dangerous items from the shelving units;
- e. Failing to periodically and properly check the shelving units so as to remove the protruding metal hooks;
- f. Failing to adequately train its staff in the reasonable and/or safe maintenance and/or display procedures where the metal hooks were located at the time of the subject incident; and/or
- g. Failing to exercise reasonable care in the hiring and/or retention of its staff with regard to experience in product display and/or maintenance of similar premises.

12. Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, had actual knowledge of the dangerous condition; or if Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, lacked such actual knowledge, this dangerous condition existed for such a length of time that, in the exercise of ordinary care, Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, should have known of the condition should have known of it; or in the alternative, the condition occurred with regularity and was therefore foreseeable.

13. That this condition was not readily apparent to someone who could get injured, such as Plaintiff, SALVATORE BIANCO.

14. At all times material, Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, had exclusive custody and control of the area where Plaintiff, SALVATORE BIANCO, was injured.

15. As a result of Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC's negligence, Plaintiff, SALVATORE BIANCO, was injured in and about his body and extremities, suffered pain therefrom, incurred medical expenses in the treatment of his injuries, suffered physical handicap, and his working ability was impaired; the injuries are

either permanent or continuing in nature and Plaintiff will suffer the losses and impairment in the future.

WHEREFORE, Plaintiff, SALVATORE BIANCO, demands judgment for damages against Defendant, HARBOR FREIGHT TOOLS CORPORATE, LLC, in excess of the jurisdictional limits; compensatory damages; any and all taxable costs; and such other relief as this Court deems just and proper.

COUNT II - NEGLIGENCE AGAINST HARBOR FREIGHT TOOLS, USA, INC.

16. Plaintiff, SALVATORE BIANCO, adopts and realleges all of the allegations in paragraphs 1 through 5 as though fully set forth herein.

17. That on or about April 1, 2024, Defendant, HARBOR FREIGHT TOOLS, USA, INC., was in possession of, managed, maintained and/or controlled a property located at or near Harbor Freight, 3665 E Bay Dr #160, Largo, FL 33771.

18. That at said time and place, Plaintiff, SALVATORE BIANCO, was on said property as a customer, and therefore, was otherwise lawfully on the property.

19. That at said time and place, Plaintiff, SALVATORE BIANCO, was walking inside said property when Plaintiff, SALVATORE BIANCO's, arm got caught on a metal hook protruding out of a shelving unit.

20. That at all times material, Defendant, HARBOR FREIGHT TOOLS, USA, INC., owed Plaintiff, SALVATORE BIANCO, the duty to use reasonable care.

21. Defendant, HARBOR FREIGHT TOOLS, USA, INC., breached its duties to Plaintiff, SALVATORE BIANCO, in one or more of the following respects, including but not limited to:

- a. Failing to exercise reasonable care in maintaining the shelving unit;

b. Failing to adequately conduct inspections to ensure that a dangerous, hazardous and unsafe condition such as protruding metal hooks did not exist on shelving units;

c. Failing to warn Plaintiff, SALVATORE BIANCO, that the metal hooks on the shelving unit were unreasonably protruding;

d. Failing to remove all dangerous items from the shelving units;

e. Failing to periodically and properly check the shelving units so as to remove the protruding metal hooks;

f. Failing to adequately train its staff in the reasonable and/or safe maintenance and/or display procedures where the metal hooks were located at the time of the subject incident; and/or

g. Failing to exercise reasonable care in the hiring and/or retention of its staff with regard to experience in product display and/or maintenance of similar premises.

22. Defendant, HARBOR FREIGHT TOOLS, USA, INC., had actual knowledge of the dangerous condition; or if Defendant, HARBOR FREIGHT TOOLS, USA, INC., lacked such actual knowledge, this dangerous condition existed for such a length of time that, in the exercise of ordinary care, Defendant, HARBOR FREIGHT TOOLS, USA, INC., should have known of the condition should have known of it; or in the alternative, the condition occurred with regularity and was therefore foreseeable.

23. That this condition was not readily apparent to someone who could get injured, such as Plaintiff, SALVATORE BIANCO.

24. At all times material, Defendant, HARBOR FREIGHT TOOLS, USA, INC., had exclusive custody and control of the area where Plaintiff, SALVATORE BIANCO, was injured.

25. As a result of Defendant, HARBOR FREIGHT TOOLS, USA, INC.'s negligence, Plaintiff, SALVATORE BIANCO, was injured in and about his body and extremities, suffered pain therefrom, incurred medical expenses in the treatment of his injuries, suffered physical handicap, and his working ability was impaired; the injuries are either permanent or continuing in nature and Plaintiff will suffer the losses and impairment in the future.

WHEREFORE, Plaintiff, SALVATORE BIANCO, demands judgment for damages against Defendant, HARBOR FREIGHT TOOLS, USA, INC., in excess of the jurisdictional limits; compensatory damages; any and all taxable costs; and such other relief as this Court deems just and proper.

DEMAND FOR TRIAL BY JURY

Pursuant to Florida Rules of Civil Procedure 1.430, Plaintiff, SALVATORE BIANCO, demands a jury trial for all issues so triable.

Signed on 10/30/2025.

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