

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

ADAM SINN,

CASE NO.:

Plaintiff,

vs.

CAMDEN CENTRAL, LLC d/b/a
CAMDEN PROPERTY TRUST, and
NICHOLAS BRETON, as Multi-Site General
Manager of CAMDEN PROPERTY TRUST,

Defendants.

_____ /

COMPLAINT AND DEMAND FOR A JURY TRIAL

Plaintiff, ADAM SINN, by and through his undersigned counsel, and sues the Defendants, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST, and NICHOLAS BRETON, as Multi-Site General Manager of CAMDEN PROPERTY TRUST, and alleges as follows:

1. This is an action for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of costs, interest and fees.

2. At all times material to this cause of action, the Defendant, CAMDEN CENTRAL, LLC, a Foreign Limited Liability Company, doing business as CAMDEN PROPERTY TRUST, and was doing business in Pinellas County, Florida.

3. At all times material to this cause of action, the Defendant, NICHOLAS BRETON, was the Multi-Site General Manager for CAMDEN PROPERTY TRUST.

4. On or about April 29, 2025, the Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST, a Foreign Limited Liability Company, owned, operated,

maintained, and managed an apartment complex known as CAMDEN CENTRAL, located at 855 Central Ave, St. Petersburg, FL 33701.

5. At all times material to this cause of action, the Plaintiff, ADAM SINN, was and is a lawful tenant and resident of an apartment unit at CAMDEN CENTRAL, located at 855 Central Ave, St. Petersburg, FL 33701, which is owned, operated, and maintained by the Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST.

6. On or about April 29, 2025, the Plaintiff, ADAM SINN, had entered the stairwell's entrance to the apartment building when he suddenly slipped and fell due to water on the floor causing him to sustain serious injuries.

COUNT I
NEGLIGENCE OF DEFENDANT, CAMDEN CENTRAL, LLC d/b/a
CAMDEN PROPERTY TRUST

Plaintiff, ADAM SINN, realleges and incorporates herein all the allegations in paragraphs 1 through 6 of this Complaint as if fully stated herein.

7. At the aforesaid time, the Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST, negligently and carelessly maintained the premises by allowing water to exist on the floor of the apartment building's stairwell.

8. The Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST, owed a non-delegable duty to the Plaintiff to maintain said premises in a reasonable safe condition, and to warn Plaintiff of any dangers or hazards which existed.

9. The Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST had a non-delegable duty to ensure that all areas of the premises were kept in a reasonably safe condition.

10. The Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST, a Foreign Limited Liability Company, doing business as CAMDEN CENTRAL, breached its non-delegable duty to the Plaintiff by allowing water to exist on the floor of the apartment building's stairwell, in such a manner that it could easily and foreseeably cause a business invitee to fall, and by unreasonably allowing such condition to exist caused the Plaintiff, to fall and sustain injury.

11. The unsafe condition of the stairwell was actually known to the Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST, or had existed for a sufficient length of time in that the Defendant should have known of it.

12. The Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST, was negligent in the following respects:

- a. Allowing the premises to exist in a hazardous and dangerous state.
- b. Failing to properly warn its clientele of the dangerous condition.
- c. Failing in its duty to have a reasonably safe mode of operation in the maintenance of its premises so as to avoid dangers to invitees who use their premises; and
- d. Creating the hazardous and dangerous condition.

13. As a direct and proximate result of the Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST's negligence, Plaintiff, ADAM SINN, 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/or aggravation of a previously existing condition. The losses are either permanent or continuing to Plaintiff, and its will suffer such losses in the future.

WHEREFORE, the Plaintiff, ADAM SINN, demands judgment for damages and from the Defendant, CAMDEN CENTRAL, LLC d/b/a CAMDEN PROPERTY TRUST, in an amount in excess of Fifty Thousand Dollars and 01/100 (\$50,000.01), together with costs and interest, and demands a trial by jury on all issues so triable.

COUNT II
NEGLIGENCE OF DEFENDANT, NICHOLAS BRETON, as
Multi-Site General Manager of CAMDEN PROPERTY TRUST

Plaintiff, ADAM SINN, alleges and incorporates herein all the allegations contained in paragraphs 1 through 6 of this Complaint as if fully stated herein.

14. That Defendant, NICHOLAS BRETON, who was in control of the premises of CAMDEN CENTRAL, owed a duty to Plaintiff, to exercise reasonable care in the maintenance, inspection, repair, warning, and mode of operation of the subject premises.

15. Defendant, NICHOLAS BRETON, breached these duties to the Plaintiff, and acted negligently by personally failing to exercise reasonable care in the maintenance, inspection, repair, warning, and mode of operation of the subject premises.

16. Defendant, NICHOLAS BRETON's job responsibilities in regard to mode of operation of the business premises included implementation of CAMDEN CENTRAL's policies and procedures and was responsible for implementation of routine employee visible inspections of the subject premises to prevent fall hazards.

18. Defendant, NICHOLAS BRETON's job responsibilities in regard to mode of operation of the subject premises also included ensuring that employees followed CAMDEN CENTRAL's policies and procedures for inspecting the subject premises for potential hazards.

19. Defendant, NICHOLAS BRETON's job responsibilities in regard to mode of operation of the subject premises also included following the CAMDEN CENTRAL's

procedures in place and ensuring routine inspections of the subject premises for hazards such as foreign substances accumulating in the subject premises.

20. Defendant, NICHOLAS BRETON, knew or should have known that the foreign substance in question was in the subject premises and / or through the exercise of reasonable care would have known that the foreign substance was on the subject premises if the proper mode of operation was in place, and / or through a proper mode of operation of the subject premises would have known that any foreign object on subject premises would create a risk of injury to the Plaintiff.

21. Defendant, NICHOLAS BRETON, was negligent in the following respects:

- a. Allowing the premises to exist in a hazardous and dangerous state.
- b. Failing to properly warn its clientele of the dangerous condition.
- c. Failing in its duty to have a reasonably safe mode of operation in the maintenance of its premises so as to avoid dangers to invitees who use their premises; and
- d. Creating the hazardous and dangerous condition.

22. That as a result of the negligence and carelessness of Defendant, NICHOLAS BRETON, the Plaintiff, ADAM SINN, slipped and fell due to water on the floor of the stairwell's entrance which resulted in serious injuries at CAMDEN CENTRAL managed by Defendant, NICHOLAS BRETON.

23. That as a direct and proximate result of Defendant, NICHOLAS BRETON's aforementioned negligence, the Plaintiff, ADAM SINN, suffered bodily injury, resulting in 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/or aggravation of a previously existing condition. The losses are either permanent or continuing to Plaintiff and she will suffer such losses in the future.

WHEREFORE, Plaintiff, ADAM SINN, demands judgment for damages of and from the Defendant, NICHOLAS BRETON, Individually, and as Multi-Site General Manager of CAMDEN PROPERTY TRUST, in an amount in excess of FIFTY THOUSAND DOLLARS and 01/100 (\$50,000.01), together with interest and costs, and demands a trial by jury on all issues so triable.

Dated this 31st day of October 2025.

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