

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

REBEKAH NORRELL as Parent and Natural Guardian of B.N., a Minor,

Plaintiff,

-v-

CASE NO.:

CHEER EXPRESS ALLSTARS AND TUMBLING, INC.,

Defendant.

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COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, REBEKAH NORRELL as Parent and Natural Guardian of B.N., a Minor, by and through the undersigned counsel, hereby sues Defendant, CHEER EXPRESS ALLSTARS AND TUMBLING, INC., and alleges as follows:

1. This is an action for damages that exceeds the sum of FIFTY THOUSAND DOLLARS (\$50,000.00), exclusive of costs, interest and attorneys' fees.

2. At all times materials hereto, Plaintiff, REBEKAH NORRELL, has been a natural person residing in Pinellas County, Florida, and has been the mother and natural guardian of B.N, a fifteen year old minor, who has at all times material hereto resided with her mother, REBEKAH NORRELL.

3. At all times material to this action, Defendant, CHEER EXPRESS ALLSTARS AND TUMBLING, INC., has been a corporation licensed and doing business in Manatee County, Florida.

4. At all times material hereto, Defendant, CHEER EXPRESS ALLSTARS AND TUMBLING, INC., was the owner, operator, manager, and in possession and control of that certain

cheerleader instruction/coaching business known as CHEER EXPRESS, located at 640 Douglas Rd. E., Oldsmar, Pinellas County, Florida.

5. At all times material hereto, Plaintiff, B.N., was a student/enrollee/participant of Defendant's aforesaid cheerleader instruction/coaching business.

**COUNT I NEGLIGENCE CLAIM AGAINST DEFENDANT, CHEER EXPRESS
ALLSTARS AND TUMBLING, INC.**

Plaintiff realleges and reasserts the allegations contained within paragraphs one (1) through five (5) above as if fully set forth herein

6. At all times material hereto, Defendant, CHEER EXPRESS ALLSTARS AND TUMBLING, INC., owed Plaintiff, REBEKAH NORRELL and her minor daughter, B.N. a non-delegable duty to exercise reasonable care in its business operations for their safety, including but not limited to its coaching, instruction, and supervision of B.N.

7. On or about August 23, 2025, Defendant, CHEER EXPRESS ALLSTARS AND TUMBLING, INC., breached these duties to Plaintiff, REBEKAH NORRELL and her minor daughter, B.N., by committing the following omissions or commissions at the aforesaid CHEER EXPRESS premises located at 640 Douglas Rd. E., Oldsmar, Pinellas County, Florida:

- a) Negligently failing to have a coach/instructor present during the performance of dangerous aerial routines at cheer practice,
- b) Negligently failing to provide instruction to participants/enrollees regarding how to safely perform dangerous aerial routines during cheer practice,
- c) Negligently failing to provide physical assistance to participants/enrollees performing dangerous aerial routines at cheer practice,
- d) Negligently failing to supervise participants/enrollees performing dangerous aerial routines during cheer practice,
- e) Negligently failing to warn parents such as Plaintiff, REBEKAH NORRELL, that minors such as fifteen year old B.N. were allowed to performing dangerous aerial routines at cheer practice without coaching/instruction, supervision, or physical assistance,
- f) Negligently failing to notify and inform parents such as Plaintiff, REBEKAH NORRELL, that minors such as fifteen year old B.N., of the extent of injuries sustained by students such as B.N.

8. As a result of Defendant's aforesaid negligence, On or about August 23, 2025 fifteen year old B.N. sustained significant personal injuries when she was struck in the head by a fellow student while performing aerial routines with fellow students during cheer practice.

9. As a direct and proximate result of the negligence of Defendant, CHEER EXPRESS ALLSTARS AND TUMBLING, INC., suffered bodily injury, pain and suffering, disability, disfigurement, permanent and significant scarring, mental anguish, loss of the capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of the ability to earn money, aggravation of previously existing condition, and activation of a latent condition. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future.

WHEREFORE, the Plaintiff, REBEKAH NORRELL as Parent and Natural Guardian of B.N., a Minor, sues the Defendant, CHEER EXPRESS ALLSTARS AND TUMBLING, INC., for damages and demands judgment in excess of Fifty Thousand Dollars (\$50,000.00), plus interest and costs, and demands trial by jury of all issues so triable.

RESPECTFULLY submitted this 31st day of October, 2025

/s/Robert McLaughlin
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