

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CASE NO.: _____

LAURIE A. MOORE,

Plaintiff,

vs.

WAWA, INC., a Foreign Profit Corporation
and COCA-COLA REFRESHMENTS USA,
INC, a Foreign Profit Corporation.

Defendants.

_____ /

COMPLAINT

Plaintiff, LAURIE A. MOORE, by and through the undersigned counsel, sues Defendants, WAWA, INC., a Foreign Profit Corporation (hereinafter “WAWA”) and COCA-COLA REFRESHMENTS USA, INC, a Foreign Profit Corporation, (hereinafter “COCA-COLA”) and alleges as follows:

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

2. The Sixth Judicial Circuit Court has venue pursuant to Florida Statute §47.011, because the cause of action accrued in Pinellas County, Florida.

3. The Sixth Judicial Circuit Court has personal jurisdiction over Defendants, EMBASSY WAWA and COCA-COLA, doing business in the State of Florida, and pursuant to Florida Statute §48.193. Furthermore, said company’s have or usually keep, and had or usually kept, at all times material to the matters alleged in this Complaint, an office for transaction of its customary business in

the State of Florida.

4. Plaintiff, LAURIE A. MOORE, is now, and was at the time of the subject incident, a resident of Pinellas County, Florida.

5. Defendant, WAWA, was at the time of the incident, a Foreign Profit Corporation, doing business in the State of Florida.

6. Defendant, COCA-COLA, was at the time of the incident, a Foreign Profit Corporation, doing business in the State of Florida.

7. That on or about May 9, 2024, Plaintiff, LAURIE A. MOORE was a business invitee at the WAWA store located at 2465 22nd Ave. N., S. Petersburg, FL 33713 and was lawfully on the premises for the purpose of shopping.

8. That at all times material hereto, Defendant, WAWA, owned and/or operated the store located at 2465 22nd Ave. N., S. Petersburg, FL 33713.

9. Defendant, WAWA, negligently maintained the store so that Plaintiff fell on the property.

10. Defendant, COCA-COLA, performed work on behalf of Defendant, WAWA, and negligently maintained the equipment located at the Defendant, WAWA store located at 2465 22nd Ave. N., St. Petersburg, FL 33713, so that Plaintiff fell on the property.

11. The negligent condition was known to the Defendants, WAWA and COCA-COLA, or had existed for sufficient length of time so that Defendants, WAWA and COCA-COLA, should have known of it.

12. As a direct, proximate, and foreseeable result of the aforementioned negligence of the Defendants, WAWA and COCA-COLA, Plaintiff, LAURIE A. MOORE was injured, suffering from bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of medical and nursing care 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, Plaintiff, LAURIE A. MOORE, demands judgment for damages against the Defendants, WAWA, INC. and COCA-COLA REFRESHMENTS USA, INC, plus an award of attorney's fees and costs, and hereby demands a trial by jury of all issues so triable.

McGUIRE LAW OFFICES, P.A.



John F. McGuire, Esq.

FBN: 0000401

1173 NE Cleveland Street

Clearwater, FL 33755

(727) 446-7659 fax: 446-0905

Counsel for Plaintiff