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IN THE CIRCUIT COURT OF THE 15<sup>TH</sup>  
JUDICIAL CIRCUIT, IN AND FOR PALM  
BEACH COUNTY, FLORIDA

CASE NO.:

DEBRA PETERS,

Plaintiff,

vs.

SYLVIA HOROWITZ,

Defendant.

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**COMPLAINT**

COMES NOW the Plaintiff, DEBRA PETERS, by and through undersigned attorney, and hereby sues the Defendant, SYLVIA HOROWITZ and alleges as follows:

**Jurisdictional Allegations**

1. This is an action for damages which exceeds the sum of Fifteen Thousand (\$15,000.00) dollars exclusive of fees and costs.
2. At all times material hereto, this action is filed within the relevant statute of limitations period.
3. At all times material hereto the Plaintiff, DEBRA PETERS, was a resident of Palm Beach County, Florida.
4. This motor vehicle crash occurred in Boca Raton, in Palm Beach County, Florida.
5. At all times material hereto, the Defendant, SYLVIA HOROWITZ, was a resident of Palm Beach County, Florida.
6. On or about February 10, 2014, the Plaintiff, DEBRA PETERS, operated her vehicle traveling westbound on Clint Moore Road in Palm Beach County, Florida.

7. DEBRA PETERS stopped at a red light.
8. At said time and place, the Defendant, SYLVIA HOROWITZ, was driving westbound on Clint Moore Road behind DEBRA PETERS' vehicle.
9. SYLVIA HOROWITZ's vehicle rear ended DEBRA PETERS' vehicle.
10. All conditions precedent to bringing this action have been met or waived.
11. This action is being made within the applicable statute of limitations.
12. Venue is appropriate in Palm Beach County, Florida as the parties reside in the County and the rear end crash occurred in Palm Beach County.

**COUNT I:**  
**DEBRA PETERS v. SYLVIA HOROWITZ**

Plaintiff re-alleges paragraphs 1 through 12 and further alleges:

13. At said time and place, SYLVIA HOROWITZ, negligently operated her vehicle in Palm Beach County, Florida, by rear ending the PETERS vehicle.
14. As a direct result of SYLVIA HOROWITZ's negligence, a car crash occurred, resulting in DEBRA PETERS's vehicle being struck at said time and location.
15. Specifically, SYLVIA HOROWITZ, was negligent by:
  - a. failing to stop the vehicle before causing a car crash;
  - b. failing to keep a proper look out;
  - c. failing to maintain control of the vehicle;
  - d. failing to prevent an automobile collision with DEBRA PETERS' vehicle;
  - e. failing to properly maintain distance from other vehicles;
  - f. failing to prevent an automobile collision with DEBRA PETERS's vehicle; and
  - g. failing to act reasonably under the circumstances.

16. As a direct and proximate result of the aforesaid negligence, DEBRA PETERS, 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 and DEBRA PETERS will suffer the losses in the future. Plaintiff's automobile was damaged and she lost the use of it during the period required for its repair or replacement.

WHEREFORE, the Plaintiff, DEBRA PETERS, demands judgment for damages and costs against the Defendant, SYLVIA HOROWITZ, and further demands a trial by jury of all issues so triable.

DATED this 8th day of June, 2017.

/s/ Michael J. Brevda

Michael J. Brevda

Florida Bar No.: 084048

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