

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION
CASE NO:

PAUL KUCIK,
Plaintiff,

2012 CA 000970XXXX

① v.
JOHN CASTLE, individually,
Defendant.

AF

COMPLAINT

OC Y

Plaintiff PAUL KUCIK sue Defendant JOHN CASTLE and states:

COUNT I

1. This is an action for damages that exceeds \$15,000.00.
2. Plaintiff Paul Kucik is a resident of Palm Beach County.
3. Defendant John Castle resides at 1095 North Ocean Blvd, Palm Beach, Florida.
4. On or about January 7, 2012, plaintiff was working as a waiter at Club Colette located at 215 Peruvian Avenue., Palm Beach, Florida.

5. At that time and place defendant JOHN CASTLE was dining with his wife. After the meal Defendant's wife requested Plaintiff bring the bill to the table. Plaintiff did as requested and attempted to hand the bill to Defendant Castle.

6. Defendant Castle, without provocation or warning, intentionally grabbed Plaintiff Paul Kucik's left hand and began twisting, bending and squeezing Kucik's fingers causing a fracture.


7. Defendant Castle's conduct was of gross and flagrant character, evincing a reckless disregard for plaintiff 's safety, and a complete disregard for the consequences of defendant's conduct. Defendant Castle behaved with a reckless indifference to the rights and welfare of Plaintiff Kucik.

FILED
2012 JAN 17 PM 2:11
SHARON R. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL/PROBATE

8. As a result, the Plaintiff PAUL KUCIK suffered bodily injury, and resulting pain and suffering, disability, disfigurement, permanent impairment, mental anguish, loss of capacity of enjoyment of life, expense of medical care and treatment, and loss of earnings. The losses are either permanent or continuing and Plaintiff will continue to suffer the losses in the future.

WHEREFORE, Plaintiff PAUL KUCIK demands judgment for damages against Defendant JOHN CASTLE and a trial by jury of all issues so triable.

VASSALLO, BILOTTA,
FRIEDMAN & DAVIS

By:  _____

JOSEPH BILOTTA, ESQUIRE
Florida Bar No.: 0881414
Attorney for Plaintiff
1655 Palm Beach Lakes Blvd.
Tenth Floor, Suite 1000
West Palm Beach, FL 33409
Telephone: (561) 471-2800
Facsimile: (561) 471-2818

R E C E I P T

PALM BEACH CTY CIR CT JISPROD

Receipt Number: CAMB638146

Date: 18-JAN-2012

Cashier: CMMAY

Payor: VASSALLO LAW GROUP LLC

Addr:

Violation/Docket	Description	Amount
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Party: PAUL KUCIK		
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CAFF		401.00
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CAFF		10.00
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CHECK RECEIVED GENERAL ACCT		-411.00
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Total Fees:		411.00
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Total Payment:		411.00
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