

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY  
FLORIDA CIVIL DIVISION

RONAL EMILIEN,

Plaintiff,

vs.

Case No.

Division:

HARVEY ROTH,

Defendant.

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**COMPLAINT**

The Plaintiff, RONAL EMILIEN, by and through his undersigned attorney, hereby sues the Defendant, HARVEY ROTH, severally and states:

**GENERAL ALLEGATIONS**

1. This is an action for damages that exceeds Fifteen Thousand Dollars (\$15,000.00)
2. That at all times material hereto, the Defendant, HARVEY ROTH, resided in Broward County, Florida.
3. That at all times material hereto, the Plaintiff, RONAL EMILIEN, resided in Broward County, Florida.
4. That on or about March 30<sup>th</sup>, 2015, the Defendant, HARVEY ROTH, was the owner of a 2013 Lexus, and driver on W. Hallandale Beach Blvd and SW 58<sup>th</sup> Avenue, West Park, Florida
5. That at said time and place, Defendant, HARVEY ROTH, did operate, maintain and/or control the motor vehicle in such a negligent manner so as to cause motor vehicle to collide with Plaintiff, RONAL EMILIEN.