

4. At all times material hereto, the Defendant, SIMON, owned, operated, controlled, managed and/or maintained a mall known as TOWN CENTER at BOCA RATON located in Boca Raton, Florida.

5. On or about August 7, 2007 the Plaintiff, JANE DOE, was violently abducted while on the Defendant's property in Boca Raton, Florida.

COUNT I
NEGLIGENCE-LACK OF SECURITY AGAINST SIMON PROPERTY GROUP

Plaintiff restates and realleges paragraphs 1 through 5 as if fully set forth herein and further state:

6. At all times material hereto, the Defendant, SIMON, owned, operated, controlled, managed and/or maintained the premises located at TOWN CENTER AT BOCA RATON in Boca Raton, Florida

7. Plaintiff, JANE DOE was lawfully on the premises at all times.

8. At said time and place, the Defendant, SIMON, by and through its agents, servants and/or employees, carelessly and negligently maintained the said premises by not providing adequate security measures for business invitees, including, but not limited to, Plaintiff, JANE DOE.

9. As a result of the lack of security provided by the Defendant, the Plaintiff, JANE DOE, was left unprotected when approached and was violently abducted by an unknown assailant.

10. At all times material hereto, the Defendant, SIMON, by and through its agents, servants, and/or employees, had a duty to maintain and control its premises in a safe and careful manner.