

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FL

CIVIL DIVISION

CASE NO.:

STEWART GORENBERG, as Personal
Representative of the Estate of RANDI
ANN GORENBERG,

Plaintiff,

vs.

SIMON PROPERTY GROUP, INC.
d/b/a TOWN CENTER AT BOCA RATON,

Defendant.

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SHARON R. BOCK
CLERK & COMPTROLLER
CIRCUIT CIVIL DIVISION

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COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, STEWART GORENBERG, as Personal Representative of the Estate of RANDI ANN GORENBERG, hereby sues Defendant, SIMON PROPERTY GROUP, INC. d/b/a TOWN CENTER AT BOCA RATON ("TOWN CENTER"), and alleges:

Allegations Common to All Counts

1. This is an action for damages that exceed the sum of \$15,000.00 exclusive of interest and costs.
2. At all times material hereto, RANDI ANN GORENBERG was a citizen of the State of Florida and a resident of Palm Beach County, Florida.
3. At all times material hereto, TOWN CENTER was authorized to transact business in the State of Florida, including Palm Beach County.
4. At all times material hereto, TOWN CENTER owned, operated and/or maintained business premises ("PREMISES") located on Glades Road in Boca Raton,

