

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY, FLORIDA

SYLVIA LUCAS, as Personal Representative¹
of the Estate of Passion Lucas,

Plaintiff,

vs.

Case No. _____

SUZANNA PAIGE NORRIS,

Defendant.

_____ /

COMPLAINT

Plaintiff, SYLVIA LUCAS, as Personal Representative of the Estate of Passion Lucas, sues
Defendant, SUZANNA PAIGE NORRIS, and alleges:

GENERAL ALLEGATIONS

1. This is a claim for damages in excess of \$30,000.00, exclusive of costs and interest.
2. SYLVIA LUCAS is a resident of Brevard County, Florida, and the personal representative of the Estate of Passion Lucas, deceased. Passion Lucas was thirty-seven (37) years of age when she died.
3. At all relevant times, Defendant, SUZANNA PAIGE NORRIS, was *sui juris* and was a resident of Brevard County, Florida.
4. The events giving rise to this cause of action occurred and accrued in Brevard County, Florida.
5. Plaintiff has retained counsel for representation in the prosecution of this action and is obligated to pay them a reasonable fee.

¹ Sylvia Lucas has submitted the estate administration paperwork and expects to have the letters of administration imminently.

6. Venue is proper in this Court pursuant to section 47.051 of the Florida Statutes.

7. Plaintiff reserves the right to amend the Complaint to include an action seeking Punitive Damages.

**COUNT I
WRONGFUL DEATH**

8. Plaintiff, SYLVIA LUCAS, as Personal Representative of the Estate of Passion Lucas, realleges and hereby incorporates by reference each and every allegation set forth in paragraphs 1 through 7 inclusive, as though fully set forth herein.

9. On or about June 20, 2021, at approximately 2:20 a.m., the decedent, Passion Lucas, was a pedestrian traveling northbound on East Industry Road in Brevard County, Florida.

10. At the aforementioned time and place, Defendant SUZANNA PAIGE NORRIS, was operating her motor vehicle while under the influence of alcohol.

11. At the aforementioned time and place, Defendant SUZANNA PAIGE NORRIS, negligently operated or maintained her motor vehicle so as to collide with Passion Lucas, causing injuries to Ms. Lucas.

12. Ms. Passion Lucas died on June 20, 2021.

13. Ms. Passion Lucas' death was caused by wrongful acts by and the negligence of the Defendant, as set forth in further detail in this Complaint.

14. Ms. Passion Lucas would have been entitled to institute an action for damages against Defendant had death not occurred.

15. The survivors eligible to recover under Florida's Wrongful Death Act are as follows:

- a. Messiah Williams, a minor child.
- b. Isreal Williams, a minor child.

- c. Pharoah Williams, a minor child.
- d. Khiyesha Braithwaite, a minor child.
- e. Corde Williams, a minor child.
- f. Love Williams, a minor child.

WHEREFORE Plaintiff demands judgment for any and all damages, costs, and fees recoverable against Defendant, and for such other and further relief to which Plaintiff may be justly entitled.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable as a matter of right.

Respectfully Submitted this 27th day of May, 2022.

By: 

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