

IN THE CIRCUIT COURT OF THE 17<sup>th</sup>  
JUDICIAL CIRCUIT IN AND FOR BROWARD  
COUNTY, FLORIDA

CASE NO.

11-31366

RONALD SHAURIS

Plaintiff,

vs.

PIKE ELECTRIC, LLC

Defendant

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COMPLAINT FOR DAMAGES

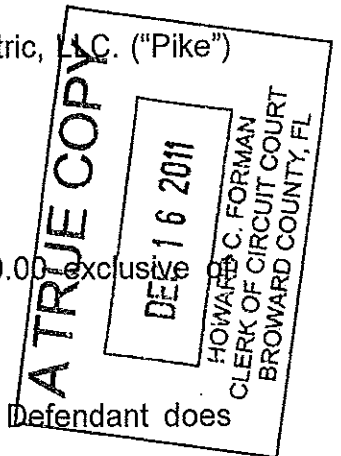
Plaintiff, Ronald Shauris ("Shauris"), sues Defendant, Pike Electric, LLC ("Pike")  
and states as follows:

Jurisdiction

1. This is an action for damages which exceeds \$15,000.00 exclusive of attorneys' fees, interest and costs.
2. Venue is proper in Broward County, Florida since the Defendant does business in Broward County.

The Parties/Participants

3. Shauris is an individual residing in Broward County, Florida and is *sui juris*. Shauris was an employee of Defendant in South Florida
4. Defendant, Pike is a North Carolina corporation working as a contractor for Florida Power and Light in South Florida.



### General Allegations

5. Shauris was an employee of Pike with satisfactory job performance.
6. On or about November 2, 2011, Shauris injured himself on the job.
7. When Shauris was injured on the job and attempted to file or filed a workers compensation claim, he was terminated from her job on or about November 2, 2011.
8. Shauris has retained the undersigned law firm in this matter and has agreed to pay it a reasonable fee for its services.

### Count I—Violations of Fla. Stat. §440.205

9. Plaintiff realleges and reavers the allegations contained in Paragraph 1 through 8 as if fully set forth herein.

10. Defendants have violated Fla. Stat. §440.205 in that it subjected Plaintiff to unfavorable treatment as a result of his attempts to make a valid claim for worker's compensation and pursuit of a worker's compensation claim under the Worker's Compensation Laws of Florida.

23. Due to Plaintiff's filing of a worker's compensation claim, he engaged in a statutorily protected activity. As a result of his engaging in a statutorily protected activity, Plaintiff suffered adverse employment actions including termination. The adverse actions suffered by Plaintiff were causally related to his valid worker's compensation claims and his intent to seek worker's compensation benefits

29. As a direct and proximate result of the actions of Defendant, Plaintiff has suffered pain and suffering, mental anguish, loss of capacity for the enjoyment of life, loss of earnings, loss of the ability to earn money and aggravation of an existing condition. The

losses are either permanent or continuing and Plaintiff will continue to suffer losses in the future.

WHEREFORE, Plaintiff, demands judgment for damages against Defendant, and for any other relief this Court deems just and proper.

**Demand for Jury Trial**

Plaintiff demands trial by jury on all issues so triable.

Behren Law Firm  
2893 Executive Park Drive, Suite 203  
Weston, FL 33331  
Phone: (954) 636-3802  
Facsimile: (954) 636-2153  
Scott@behrenlaw.com

By \_\_\_\_\_

Scott M. Behren  
Fla. Bar No. 987786

12/16/11