

IN THE CIRCUIT COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
FLAGLER COUNTY, FLORIDA

CASE NO.: 2016 CA 000127

VASSILI MIRONOV,

Plaintiff,

v.

EUROPA LOUNGE, LLC.,

Defendant.

COMPLAINT

COMES NOW, Plaintiff, VASSILI MIRONOV, by and through the undersigned attorney, and sues Defendant, EUROPA LOUNGE, LLC. ("Europa Lounge"), as follows:

1. At the time of the incident upon which this Complaint is based, Plaintiff was a resident of Flagler County, Florida.

2. Europa Lounge is a Limited Liability Company located and operating in Flagler County, Florida.

3. The incident upon which this Complaint is based occurred in Flagler County, Florida.

4. The amount in controversy, exclusive of attorney's fee, costs and interest exceeds the sum of \$15,000.00.

GENERAL ALLEGATIONS

5. On March 15, 2014, Plaintiff and a few of Plaintiff's friends visited Europa Lounge.

6. Europa Lounge is a bar and lounge located in Palm Coast, Florida.

7. At the same time, an individual named Daniel Noble was at Europa Lounge.

8. For some unknown reason, Mr. Noble began to act in an aggressive, belligerent and disrespectful manner towards various staff members and patrons, including Plaintiff.

9. Due to the fact that Europa Lounge does not employ security personnel, Plaintiff and his friends asked Mr. Noble to leave. Mr. Noble became enraged and attempted to initiate a physical altercation with Plaintiff.

10. Plaintiff refused to engage Mr. Noble in a physical altercation, and Mr. Noble subsequently left the area.

11. Mr. Noble then went to his residence and retrieved a loaded .22 caliber UZI Israeli Assault Rifle and two (2) hunting knives.

12. Mr. Noble returned to Europa Lounge a short time later. He entered Europa Lounge through an unlocked rear door and then walked to the front door of the business.

13. Upon reaching the front door, Mr. Noble exited and made a left hand turn. He immediately initiated another verbal altercation with a group of patrons, which included Plaintiff.

14. Mr. Noble then lifted his UZI and pointed it at Plaintiff.

15. Plaintiff immediately grabbed the muzzle of the UZI and pointed in towards the ground. During the struggle, at least one (1) round was fired from the UZI. However, Plaintiff was able to wrestle the UZI away from Mr. Noble.

16. Mr. Noble then grabbed one (1) of his hunting knives and began to slash and stab at Plaintiff. Plaintiff sustained significant injuries to several body parts as a result of the attack, including his face and both hands.

17. At that time, Plaintiff's friends were able to wrestle Mr. Noble to the ground and render him unconscious.

NEGLIGENT SECURITY

18. Plaintiff realleges and reincorporates the allegations contained in paragraphs 1 through 17 above.

19. Europa Lounge is a bar and lounge which makes a large portion of its income from the sale of alcohol.

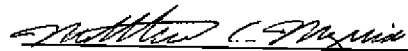
20. As such, Europa Lounge owes a duty of reasonable care to protect the safety of its patrons.

21. Europa Lounge breached this duty by failing to employ security guards or to have any security measures in place to protect the safety of its patrons.

22. As a direct and proximate result of Europa Lounge's breach of its duty of reasonable care, Plaintiff sustained significant damages.

23. Plaintiff demands a trial by jury.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter Judgment in favor of Plaintiff and against Defendant in the full jurisdictional amount, exclusive of attorney's fee, interest and costs.


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