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# PROFILES & PRECEDENTS

This 27th report of Pajcic & Pajcic - includes cases resolved in 2020

THE LAW FIRM OF  
**Pajcic & Pajcic**  
Since 1974



## SERVICE. EXPERIENCE. RESULTS.

PAJCIC & PAJCIC ATTORNEYS HAVE A COMBINED 400 YEARS OF EXPERIENCE RECOVERING MORE THAN \$1 BILLION FOR INJURED CLIENTS.

## MULTI-MILLION DOLLAR RECOVERIES AFTER TRACTOR-TRAILERS CLAIM LIFE OF YOUNG MOTHER

*Mercedes, a 27-year-old mother, lost her life when she rear-ended a tractor-trailer along a desolate, dark stretch of I-95 in St. Johns County just before dawn.*



Mercedes never reacted, swerved, or stepped on her brakes. The impact left her stranded in the middle lane in an unlit vehicle. Seconds later, another tractor-trailer, traveling below the speed limit, slammed into her. Mercedes left behind a beautiful, 5-year-old girl.

*Pajcic & Pajcic combed through company safety records, deposed ten eyewitnesses, and reconstructed the crash sequence. It became clear why Mercedes never saw the first truck. It had been traveling along the interstate at 37 mph on a flat tire.*

(continued on page 2)



INSURANCE COMPANIES FORCED TO PAY  
MULTIMILLION DOLLAR VERDICTS IN 2 CASES  
AFTER REFUSING PRE-SUIT OFFERS OF THEIR POLICY LIMITS

VERDICT PAID:  
\$3 MILLION TO WOMAN  
INITIALLY BLAMED  
FOR CAUSING CRASH

(story on page 4)



VERDICT PAID:  
\$1 MILLION IN PUNITIVE  
DAMAGES FROM  
INSURANCE COMPANY

(story on page 5)





# MULTI-MILLION DOLLAR RECOVERIES AFTER TRACTOR-TRAILERS CLAIM LIFE OF YOUNG MOTHER

(continued from cover)

The truck driver's supervisor told him not to fix the tire, testifying that a blowout was "not that big of a deal as far as a safety concern." Fixing the tire roadside was too costly.

Pajcic & Pajcic uncovered even more damning evidence against the first driver and company. The driver had previously served a 15-year prison sentence for a high-speed chase, and at the scene of the crash, he refused to cooperate with law enforcement because, as he admitted during his deposition: "if they had found anything on me or in me or whatever, I would have been arrested."

Once these facts emerged, the insurance company for that first truck paid its policy limits. But that was not enough for fair compensation.



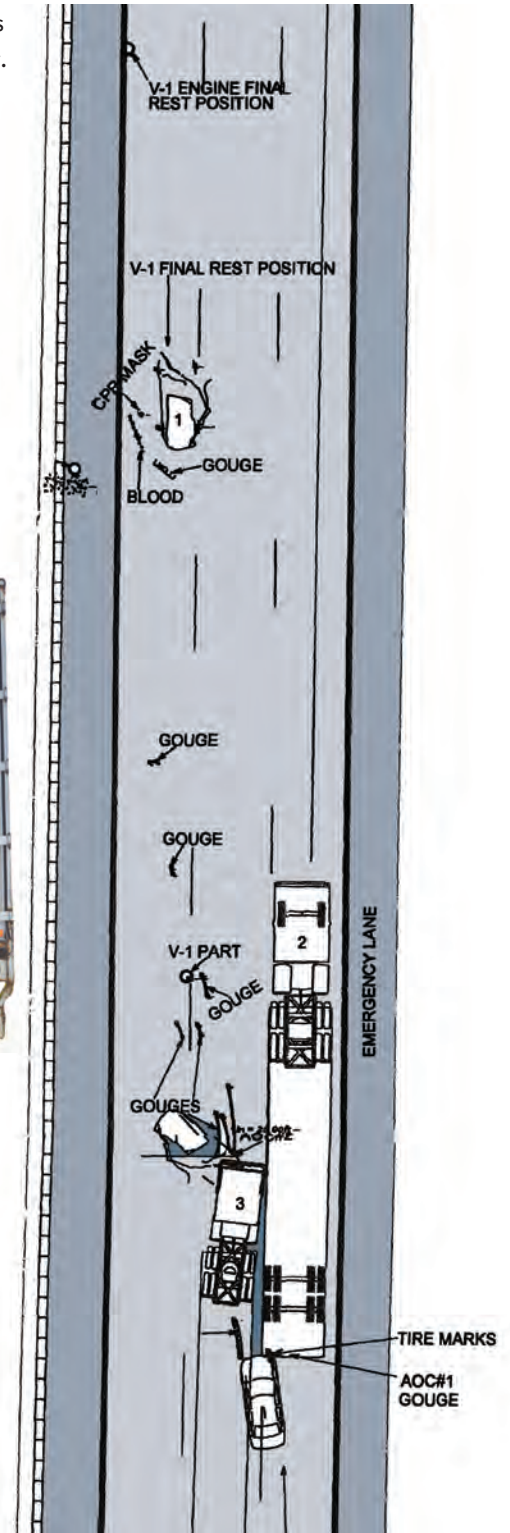
Pajcic & Pajcic next demonstrated that the second driver was pushed beyond his limits and had violated multiple trucking rules. Records revealed that his company required him to wake up at 4:00 am on the morning of the crash in order to drive two round-trips from St. Johns County to Vidalia, Georgia.



***Pajcic & Pajcic's expert reconstructionist made it obvious that the second trucker's eyes were not on the road. He did not even brake or leave his lane of travel. And he would have avoided the crash if he had only swerved three feet. In contrast, multiple eyewitnesses on the road testified that they were able to see Mercedes' disabled vehicle, react, and avoid a collision.***



The significant seven figure settlements will provide Mercedes' daughter a life-time of financial security, and her close, loving family will maintain the memory of Mercedes and continue her tradition of frequent trips to Chuck E. Cheese.



# INSURANCE COMPANY PAYS 40 TIMES POLICY LIMITS: CLIENT THEN DEDICATES HIS LIFE TO HELPING OTHERS

*Vaughn, a graduate of the Virginia Military Institute and a former Air Force Officer, was riding his motorcycle on a clear afternoon in Starke, when his world was suddenly shattered.*

A pickup truck driver distracted by his cell phone ran a stop sign and slammed into the left side of Vaughn's motorcycle, nearly severing Vaughn's left leg. Vaughn was rushed to UF Health Shands in Gainesville where doctors tried to save the leg, but the prognosis was bad, with necrosis, years of surgeries and likely loss of use. Vaughn could see his foot turning black and saw the extensive damage on the x-rays. Vaughn and his wife made the gut-wrenching decision to amputate.

A friend recommended Pajcic & Pajcic, and Vaughn says he will be forever grateful.

Pajcic investigators found witnesses who had information the police did not know and that helped prove the truck driver was driving while distracted by cell phone use. When the at-fault driver's insurance company hesitated about paying its meager policy limits, Pajcic & Pajcic filed suit and ultimately got the insurance company to pay more than 40 times the limit.



Vaughn now dedicates his life to counseling amputees in a support group. "You feel like you are the only one. I can tell them 'It is going to be okay and help them heal.'"



He also maintains a blog for amputees and is involved with the Challenged Athletes Foundation which provides adaptive equipment for the disabled.

The Pajcic Firm donated \$10,000 to the charity on Vaughn's behalf.



*Vaughn's youngest daughter has juvenile diabetes, so he is a staunch supporter of efforts to find a cure and he currently works in organ transplant recovery. He is also a licensed funeral director and is now pondering writing a book.*

*His motorcycle days are over, but the loss of his leg has not stopped Vaughn from riding the pedaling kind of bike.*





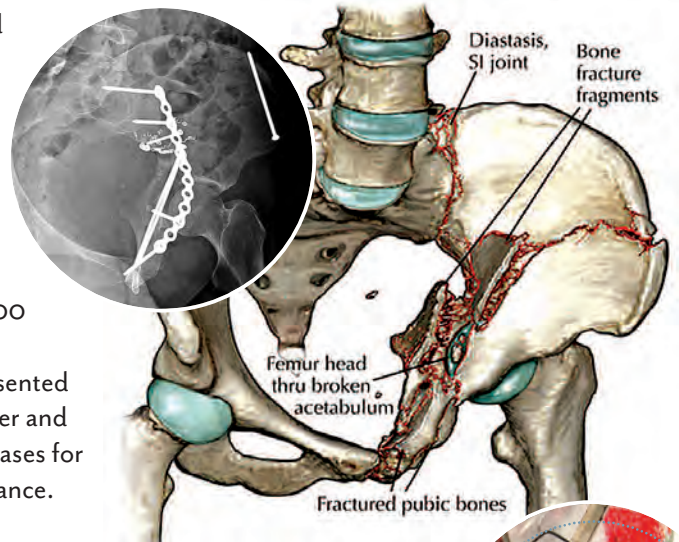
## VERDICT PAID: \$3.5 MILLION DOLLARS TO WOMAN INITIALLY BLAMED FOR CAUSING CRASH

*It was a dark December evening and Cindy was attempting to turn her Jeep left onto State Road 200 from a stop sign. Unbeknownst to Cindy, there was another Jeep traveling down State Road 200 at 45 mph that did not have a stop sign.*



When Cindy entered the intersection, the other Jeep collided with the driver's side of Cindy's vehicle. Cindy sustained severe injuries requiring multiple surgeries and incurred over \$200,000 in medical bills.

Pajcic & Pajcic represented Cindy and her passenger and offered to settle both cases for the total limits of insurance.



The insurance company refused and hotly contested liability at trial, blaming Cindy for the crash. Fortunately, Pajcic & Pajcic had the defendants' headlights examined shortly after the crash, by an expert who proved that the other Jeep did not have its lights on.



*After hearing all the evidence, the jury concluded that the defendant driver was 80% at fault and Cindy was 20% at fault and returned a verdict of \$3,500,000 for Cindy. The defendants appealed, asserting that the verdict should be reduced, but the appellate court affirmed the accuracy of the jury's decision in full. The insurance company ultimately paid settlements totaling more than 10 times its limits.*



Although Cindy's injuries cost her the career she loved, the economic security from the verdict has afforded her peace of mind. She still stays in frequent contact with the Pajcic staff and considers them members of her own family.



## PUNITIVE DAMAGES VERDICT PAID: \$1 MILLION FROM INSURANCE COMPANY

*Heather was driving her car through a construction zone on I-10 in 2010 when a semi-tractor trailer merged into her occupied lane and crushed her against the guardrail.*

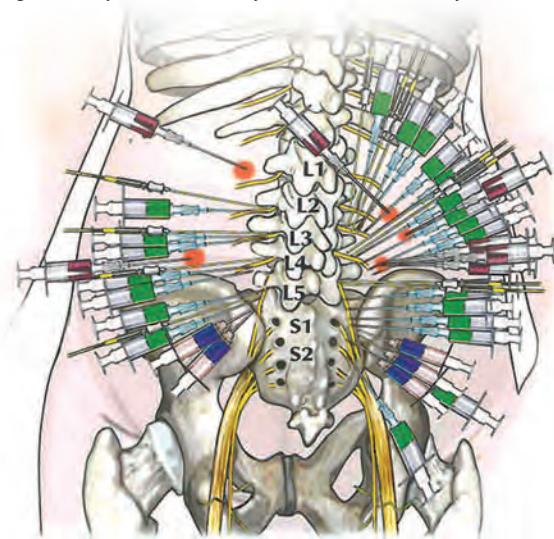
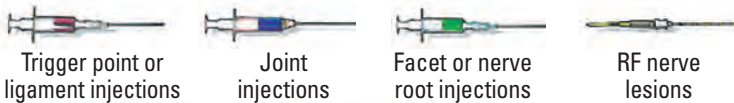
The semi — late for a delivery in Green Cove Springs— just kept right on driving like nothing happened. Construction workers called 911 while chasing down the fleeing trucker. When police brought the trucker back to the scene, he initially denied being involved in the crash. Then he changed his story, blaming Heather for the crash.

Although Heather sustained a painful bulging disc in her low back, she never went to the hospital after the crash or required surgery. She even continued to work full-time while undergoing pain management treatment. When the insurance company balked at fair compensation for her soft tissue injuries, Pajcic & Pajcic filed suit in 2011. The litigation was extremely contentious with 29 depositions and 35 contested hearings.



### HEATHER'S INJECTIONS

PAIN MANAGEMENT TREATMENT FOR BULGING DISC IN LOW BACK



*The jury awarded Heather compensatory damages for her injuries, putting 75% of the blame on the trucking company, 15% on the trucker, and 10% on Heather. Then the jury awarded \$1,000,000 in punitive damages against the trucking company for forcing the trucker to over-drive to the point of exhaustion and endangering everyone on the roadway.*



After the verdict, Pajcic & Pajcic successfully added the Michigan based insurance company to the judgment, including the punitive damages. The insurance company and both defendants appealed, but the verdicts were affirmed and paid. It took 10 years of combative litigation and six impartial jurors from the community, but Pajcic & Pajcic was ultimately able to obtain justice for Heather.



## SIGNATURE CLIENT SERVICE EVEN DURING A GLOBAL PANDEMIC

*Dealing with a pandemic was certainly something no one expected.  
The Pajcic firm quickly got to work figuring out how to keep working through the ordeal.*

*Many employees were  
able to manage by turning  
their homes into offices.*



Navigating through Zoom court hearings and mediations was the new normal, as the staff made sure that taking care of clients' needs was the top priority. Pajcic masks were given to everyone. And for those who came to the office, the firm provided lunch every single day so employees could eat in their offices and not worry about leaving the building.

That also helped to support local restaurants that were struggling during these unprecedented times. And knowing that so many in our community were facing great hardship, Pajcic & Pajcic donated \$100,000 to the Clara White Mission, which provides meals and housing for veterans and those in need. The pandemic certainly changed everyone's lives in some way and our hearts go out to all those who have suffered during this time.



Visit [pajcic.com](http://pajcic.com) to see our employees unmasked.



## \$100,000 DONATED TO VETERANS AND THE HOMELESS





## SENIOR CITIZENS RECOVER MILLIONS

*Four family members had just left a retirement community in Clay County and were driving to a medical appointment. While turning on to US 17 from CR 315 in Clay County, a construction pick-up t-boned their small Toyota Prius at highway speeds.*

Two witnesses told the responding police officers that the pick-up “blatantly ran the red light” without ever even attempting to brake.

All the family members, including 88-year-old Arlene and her 91-year-old sister Phyllis were badly hurt. The jaws of life were needed to extricate the backseat passengers. Their injuries included fractured vertebra, herniated discs, a broken pelvis and ribs, and a closed head injury.

As soon as Pajcic & Pajcic began investigating the defendant driver’s background, it became clear that the construction worker never should have been entrusted with a commercial vehicle. Just a few months before, he had crashed another vehicle while incapacitated by illegal drugs.



*Shortly after filing suit against both the negligent driver and his employer, Pajcic & Pajcic was able to resolve the case with the insurance company for \$3.4 million. After a long recovery, the senior citizens are thankful for a return to their normal, busy lifestyle.*

### PAJCIC PROFILE

## NO TIME FOR REST

Weekends are not a time for rest and relaxation for paralegal Mathew Stilwell. He always has a major renovation project in the works. He is currently tackling his 1960’s home near the Trout River that he shares with his Dalmatian and will soon share with his fiancé when they get married this spring. That project includes refurbishing an old retro refrigerator to match the aesthetics of the kitchen.



Mathew grew up in Palatka in a home with a fully stocked workshop and he spent his younger days employed at various tool shops. He can do anything from replacing water pumps and car starters to building decks. He is also well versed in architectural styles.

Attorney Betsy Cardenas knew all about Mathew’s work ethic when they were at another law firm together. When she joined Pajcic & Pajcic in 2019, she made sure to bring him with her. Everyone in the firm has promised not to bother Mathew when things need fixing.



## \$2 MILLION FOR LEG INJURY IN MOTORCYCLE CRASH IS SECOND-BEST NEWS OF THE DAY

*It was 6am, the sun had not yet risen along US 1, and Kevin was on his way to work riding his Honda CRF250L and wearing a helmet. Yes, it was a dirt bike; yes, it was street legal.*



He lived a full life, working 50-hour weeks as a surveyor for one of the largest construction companies in the country and fishing the St. Augustine backcountry for reds, trout, and flounder. As happens all too often to bikers, the other motorist claimed that he saw a pair of headlights in the distance but never saw or heard Kevin approaching. Kevin collided with the rear passenger door of a Chevy Suburban. First responders air-lifted him to the Orange Park Trauma Center with an open left femur fracture.

Initially, the prospects for a monetary recovery looked bleak. The crash report listed Hertz as the owner of the vehicle, which brought with it the limitations of the Graves Amendment, meaning the rental company can't be held liable. But after some digging, Pajcic & Pajcic discovered the defendant driver was actually on the job. Still, the company's insurance representative affirmatively stated, "there is no excess/umbrella coverage."

Reading through the 800+ page insurance disclosure, Pajcic attorneys did not buy that story. And, after sending a carefully worded demand, the insurance company finally came clean, admitted that there was in fact excess/umbrella coverage, and asked for an early mediation.

***Mediation day was one Kevin will never forget. Sitting in the Pajcic conference room with the mediator and defense counsel, almost a year to the day from the crash, Kevin, again, had to rush to the hospital.***

But this time, it was for good news. Fifteen hours later, he became a first-time father! It was the perfect ending to a year where he also bought his first house, got promoted at work, and settled for \$2 million, double the amount of the underlying commercial automobile insurance limits.



### PAJCIC PROFILE

## JOINING THE "GOOD GUYS"



LaTesha O'Neal-Austin was a savvy senior insurance adjuster facing Pajcic attorney Tom Slater on a significant case. Tom was extremely impressed with LaTesha's ability. So, after the case resolved, he decided to see if she would be willing to leave her job and join the "good guys!" LaTesha was intrigued with the idea. "I'd always admired the Pajcic firm for all their good works in the community."

So, in 2019, she took the plunge and became a case manager on the Pajcic team.



## PAJCIC FIRM REPRESENTS A DOZEN FIREFIGHTERS INJURED IN SHIP EXPLOSION



*It was described as a “recipe for disaster” when a 600-foot cargo ship burst into flames while docked at Blount Island in June 2020.*



The Pajcic Firm filed suit on behalf of firefighters injured during an explosion on the ship. The crew turned off the fire alarm system while the ship was being loaded with junked cars, so the flames spread unabated. The Coast Guard found vehicles leaking fuel, trunks filled with live ammunition, and vehicles filled with

flammable cardboard. The crew members only spoke Chinese, so when rescue arrived, they could not even communicate with the crew. That forced rescuers to go blindly onto the vessel to find the location of the blaze as temperatures reached more than 1,000 degrees Fahrenheit. One client described the scene on the ship as a “living hell.”

Some firefighters suffered serious burns and others faced emotional trauma, fearing they would be trapped aboard the burning ship. The first responders' quick action averted a potential environmental disaster in the St. Johns River.



“It’s been such a blessing. I am able to utilize my past experiences from my work with insurance carriers to assist our clients in navigating the claims process. What a privilege it is to help our clients on their path to recovery, while earning their trust and developing long-lasting relationships.”

LaTasha is also a big proponent of giving back to the community. She is a Girl Scout troop leader who inspires girls to be confident and courageous. LaTasha is a graduate of Florida A & M and enjoys spending time with her husband and their talented daughter, who plays the violin.

LaTasha said she never could have imagined that her opponent would one day lead to such a great opportunity.

### PAJCIC PROFILE

#### CAMERON CRAWFORD



When your father runs the jail, it is highly recommended that you follow the rules and behave. That’s how life was for Cameron Crawford growing up. Cameron said she couldn’t get away with anything. Thomas Kent was in charge of Baker County’s jail security and court services and he was a Captain in the Florida Department of Corrections, among other high-level justice system posts. Cameron joked, “I really had no choice but to be good because my dad always knew where to find me.”

Cameron, an intake specialist at the Pajcic firm, remembers hearing “nightmarish stories” from her dad that certainly left an impression, including when he witnessed Ted Bundy’s execution.

It was her father who actually convinced her to work at the Pajcic firm, because he had seen Steve and Gary in court over the years and he told her they were “good people.”

Not only does Cameron’s broad range of experience with people and the law make her the perfect person for intake, she also has a kind-heart for everyone.





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Gary C. Pajcic (1947-2006)

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Stephen J. Pajcic, III  
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**To see more case results and to  
learn more about the Pajcic team  
visit [www.pajcic.com](http://www.pajcic.com).**

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Gary and Steve Pajcic started Pajcic & Pajcic in 1974, the year Steve was elected to the Florida Legislature representing the south half of Duval County. Pajcic & Pajcic obtained its first multi-million dollar verdict in Panama City in 1985 and has since handled more than 10,000 personal injury and wrongful death cases, recovering more than 1 billion dollars for clients. Gary died unexpectedly in 2006, but Steve has carried on the practice with three of Gary's sons and his own. The firm includes eight other attorneys. Twelve of Pajcic and Pajcic's attorneys have attained the "AV Preeminent" Peer Review Rating from Martindale-Hubbell. They have amassed more than 400 years of combined legal experience and zealously represent clients in their time of need. Some of the firm's practice areas include car, motorcycle and truck crashes, medical malpractice and nursing home neglect cases, as well as litigation concerning dangerous consumer products and unsafe motor vehicles. From the beginning, outstanding service was a signature of the firm and it remains so today. Pajcic & Pajcic's ultimate goal is to obtain a full and fair recovery for every client.