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# PROFILES & PRECEDENTS

This 28th report of Pajcic & Pajcic - includes cases resolved or tried in 2021

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



## SERVICE. EXPERIENCE. RESULTS.

PAJCIC & PAJCIC ATTORNEYS HAVE MORE THAN 400 YEARS OF COMBINED EXPERIENCE AND ARE TRUSTED TO HANDLE THE BIGGEST, TOUGHEST CASES.

## \$1 BILLION VERDICT IN NASSAU COUNTY SENDS MESSAGE TO THE TRUCKING INDUSTRY



*The negligence of two dangerous and distracted truck drivers caused the death of a college freshman who was returning home on a holiday weekend. Jurors in Nassau County made it clear they have had enough of trucking companies flaunting the rules and wreaking havoc on the roadways.*

It was Labor Day in 2017 when an AJD Business Services driver was looking at his cell phone and slammed into the back of a car being trailed by an RV. The car flipped and burst into flames, causing a massive backup on Interstate 95. With only one lane of traffic open, the highway was like a parking lot.

Eighteen-year-old Connor was one of hundreds of drivers stopped and was waiting his turn to proceed. Flashing warning signs were turned on, alerting drivers to slow down ahead. But a Kakhkashan Carrier driver paid no attention, traveling on cruise control at 70 miles an hour when he slammed into 20 stopped cars.

(continued on page 8-9)

*Sadly, Connor's vehicle took the brunt of the force, crushing his sedan into a crumpled heap of metal.*



### THE LIFE TAKEN

CONNOR  
18-YEARS-OLD



### THE MESSAGE RECEIVED

TRUCKING INDUSTRY  
REACTS TO VERDICT



## ANNE PAJCIC 1945-2021

### THE HEART OF PAJCIC & PAJCIC

*The community has lost a true rare gem in the passing of Anne Kelley Pajcic.*

It was love at first sight when Steve met Anne more than five decades ago. It was Steve's brother Gary who introduced them. Anne put Steve through law school. She helped found Pajcic & Pajcic with Steve and Gary in 1974. She served as office manager and bookkeeper in those early days. From the very beginning, Anne was the heart and soul of the firm.

Anne and Steve were close and constant companions. Anne was the one who always gave sage advice and guidance to everyone in the family.

It was said that Steve never made a bad decision as long as he had time to ask Anne.



She had a heart of gold and was passionate about so many causes, including the arts, animals and children in need. She was a Guardian ad Litem volunteer and chaired multiple local non-profit boards. Her generosity was boundless, from helping to feed the hungry to ensuring that an untold number of young people were able to attend college.

Anne was also the consummate host, entertaining Governors, Senators and Presidents. But she loved nothing more than to spend time with Steve, their children Michael and Helen, their spouses, and her 4 beloved grandchildren.



*Anne will be missed by so many whose lives she touched, but the legacy she left will live on forever.*

## BACK IN THE SADDLE FOR INJURED COLLEGE STUDENT AFTER MORE THAN \$1 MILLION SETTLEMENT

*Lia was an accomplished athlete who excelled at every sport she tried. Her love of horses led her to become a competitive equestrian, racking up honors on a national level. Lia was also focused on academics. The Jacksonville teen was a Merit Scholar Finalist studying Information Systems Management at Auburn University with a goal of graduating in three years.*



Her hopes and dreams came to a halt not far from the campus in Alabama when a business van crossed the centerline and hit Lia's vehicle head-on. It took rescuers more than an hour to cut Lia out of her car.



Lia was rushed to a trauma center where she underwent operations to repair fractures in her hip and ankle. Surgeons inserted hardware to put her shattered bones back together. She was devastated that she was

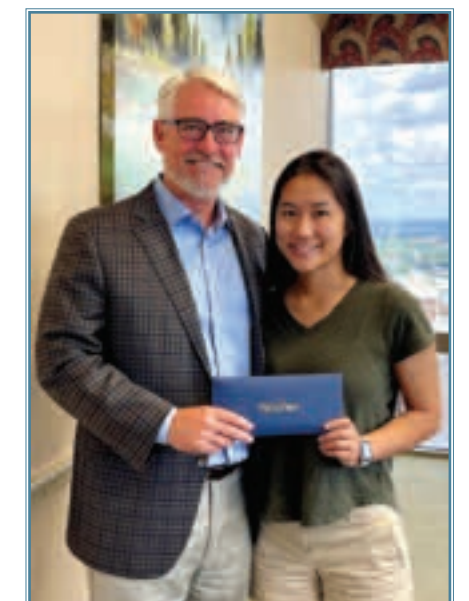
forced to withdraw from college as she began a long road to recovery.

Pajcic & Pajcic's team was brought in, and investigators were able to recover the black box from the defendant driver's van.

They discovered he actually increased his speed just before impact and intended to prove he fell asleep at the wheel, even though it was just 3:00 in the afternoon.

At mediation, the defendants agreed to a settlement totaling over \$1 million.

*With Lia's drive and work ethic, she found a way to still graduate from college early and is working in the Atlanta area. Despite her injuries, she was determined to get back in the saddle and she is now able to feel the joy and freedom of riding her beloved horse again.*





## WELCOMING THOSE IN NEED



Members of the Pajcic family have always had a special place in their hearts for immigrants and refugees who have come to our country from around the globe to build a new life. In many instances, they gave up everything in their homeland and came with only the belongings they could carry. Pajcic & Pajcic wanted to contribute to the 200 Afghans who are making Jacksonville their new home. The firm donated \$50,000 to Catholic Charities of Jacksonville for the Afghan relocation effort following the Taliban takeover in Afghanistan last summer.

The donation is being used for a multitude of items including medical needs, rent and furniture. Many of those who arrived were able to find immediate employment.

## 23 TIMES THE POLICY LIMITS FOR 6<sup>TH</sup> GRADER CRITICALLY INJURED

*Daniel was a typical 11-year-old who loved karate, biking, boogie boarding and golfing. He was getting a ride to school with a classmate one morning when a crash took away his ability to do all of those hobbies.*

A distracted driver was speeding through traffic, lost control, crossed the centerline on International Golf Parkway, and slammed head-on into the car where Daniel was a backseat passenger.

Daniel was hospitalized with a long list of injuries, including a neck fracture, traumatic brain injury, broken collarbone, torn ligaments, damaged lung and the loss of feeling in some extremities.



Daniel's parents offered to settle for the defendant driver's insurance policy limits, but the insurance company refused to tender its limits to the injured child, forcing a lawsuit by Pajcic & Pajcic. As the case neared trial, the insurance company had to fork over the full value of the claim. The \$2.3 million ultimately paid was more than 20 times the original offer that the insurance company had refused.

Daniel still struggles with migraines and pain, but he is making progress on his recovery every day.

*He and his family are grateful they trusted Pajcic & Pajcic with their case. Daniel wrote a sweet thank you card, and as his father put it, "Everyone at the firm goes out of their way to take care of you. We can't thank them enough for all they did to help our son."*



## 7-FIGURES IN PRODUCTS LIABILITY SETTLEMENTS FOR GEORGIA MAN CATAPULTED TO HIS DEATH ON FAULTY EQUIPMENT

*On the outside, Jack Doe was a strong and tough Marine who fought in Vietnam. To his loved ones, he was a kind and generous family man with a heart of gold. Jack's wife, children and grandchildren were his world. Even at age 66, he still was working hard at his job where he removed power poles.*

One day he was on a piece of industrial equipment that had just passed an annual safety inspection the day before. Yet when Jack was in the process of removing a pole, there was a catastrophic failure of the bolts on the machine and Jack was literally flung off the equipment and landed on the hard concrete 20 feet below.

His wife and son were notified and rushed from Georgia to the Jacksonville hospital where he was taken, but while enroute, they got the call that he did not survive. It was determined Jack died of blunt head trauma.

Pajcic and Pajcic's team went to work to figure out what went wrong. Pajcic investigators were able to track down a surveillance video that police did not find. The graphic video depicted Jack being vaulted off the faulty machinery. This was key to reaching 7-figures in confidential products liability settlements with three different defendants.

*Jack's devastated family will never get over the fact that he died so violently and senselessly. They will always regret that he never got to hold his first great-grandchild who was born the day before he died.*



## PAJCIC PROFILE | TONI DAVIS

Paralegal Toni Davis could never understand why her husband loved car racing. She always asked, "How can you enjoy watching cars going around in circles?" Then, he took her to The Daytona 500. "I fell in love with it." There was just something about seeing it in person that gave her chills. Now she can't get enough of witnessing speeding cars, from NASCAR to drag racing.

Toni started at the Pajcic Firm in March 2020. In the early days of the pandemic, she barely got to meet her fellow employees as many were working from home. But she was able to move flawlessly into the job. She had such depth of prior experience, including at a defense law firm and with



the Department of Children and Families, advocating for kids. As a Jacksonville native, she had always heard about the Pajcic Firm and felt fortunate to become part of the team.

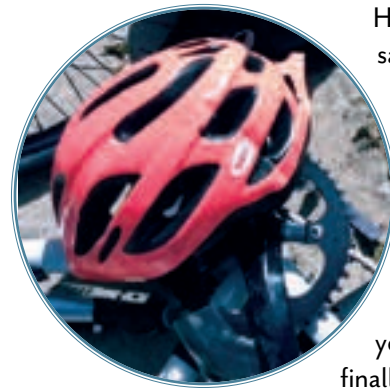
Toni talks to clients every day who are grappling with injuries and losses from car accidents. Even though she loves watching the professionals race on tracks, she is extremely conscious of the

dangers of speeders and distracted drivers on our roads and highways. She considers herself a very safe driver, but she admits, if she ever had the chance, she wouldn't mind getting behind the wheel of a real race car.



## INJURED BIKER SWITCHES TO PAJCIC FIRM & RECOVERS OVER \$ 1 MILLION MORE THAN PREVIOUS OFFER

*Eddie was just riding his bicycle in Jacksonville on a clear February day when his life changed forever.*



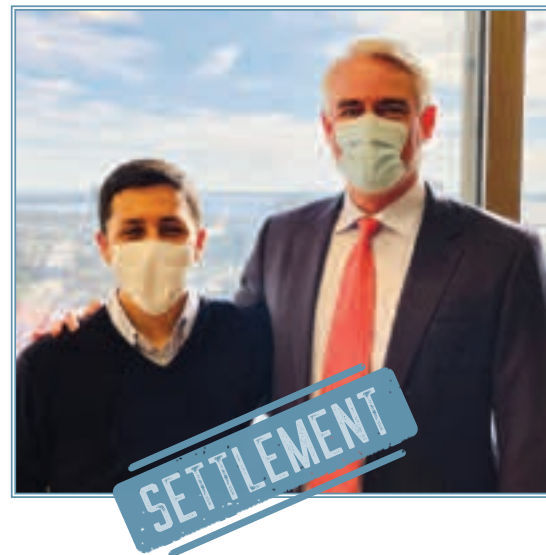
He was wearing a brightly colored helmet and saw that a car was just leaving a drive-through window. Eddie saw the driver's face.

The cyclist had the right-of-way, so Eddie proceeded. The driver claimed that he looked to his left for oncoming traffic, and he never saw Eddie on his bike.

The driver ran right over Eddie, dragging him beneath his car. A witness repeatedly yelled, "You've run him over!" and the driver finally stopped. Eddie was trapped beneath the car being burned by the hot underside.

Eddie had a long list of injuries, including multiple broken bones that needed surgery for the placement of hardware. He also had a collapsed lung and suffered first, second and third degree burns over many areas of his body, requiring painful debridement treatments.

Eddie hired an attorney to help him pursue legal remedies but grew dissatisfied and turned to Pajcic & Pajcic after seeing news coverage of one of their clients with similar injuries. Eddie explained that he felt all the stress was finally taken off of him. "The difference with the switch from my first attorney to Pajcic & Pajcic is night and day. They went above and beyond with making the right moves to both maximize my recovery and have us prepared for trial."



*In addition to suing the driver, Pajcic investigators found that the business he was leaving did not properly maintain hedges and bushes on its property, making it difficult for customers to see while exiting the premises, endangering bikers like Eddie.*

*Pajcic & Pajcic was able to reach a settlement for \$1.65 million with the defendants. Eddie was grateful he ended up finding the right legal team. "I hold them in the highest regard for pursuing the justice I deserved. I am tremendously blessed to have them take over my case when I needed them most."*

## THE PAJCIC FIRM'S NEWEST ATTORNEY PREDICTS THE FUTURE

*Janeen Kirch knew when she was in fifth grade that she wanted to be an attorney. In fact, there's evidence. She still has the picture to prove it.*



It depicts a stick figure of Janeen grilling a defendant on the witness stand in court. In a moment straight out of Law and Order, Janeen tells the witness, "Here is the paper to prove you are guilty."

That was just the beginning of Janeen's dramatic courtroom moments. The Pajcic Firm's newest attorney truly loves trying cases and feels like the courtroom is her wheelhouse. She has well over 100 jury trials to her credit.

Janeen is the Vice-President of the Hubbard House Board of Directors, an emergency shelter for domestic violence survivors.

She serves on the Board of Directors of Dreams Come True, a wish granting organization for terminally ill children. She is also a Board Member of the Jacksonville Women Lawyers Association and Jacksonville Justice Association. She often rallies fellow Pajcic employees to participate in the community events and fundraisers.

Running is one of Janeen's true passions. She has completed numerous marathons and half-marathons. In fact, the first marathon she ever ran happened to be with Seth and Kathleen Pajcic in Philadelphia in 2013.

Janeen will continue interrogating witnesses in many trials in the future. After all, she has literally been preparing for this her entire life.



## NEW HELMETS



The Law Firm of Pajcic & Pajcic is all about safety, whether on the roadways, in hospitals, and even on the football field. So, when given the chance for the Arlington Seminoles to get brand new football helmets, the Pajcics didn't hesitate to help.



Pajcic & Pajcic teamed up with the Jacksonville Jaguars to surprise the 10-year-old players with helmets to replace the old ones they had been using. Former Jaguar linebacker Kevin Hardy and attorney Curry Pajcic spoke to the players about the value of hard work and discipline, not just on the athletic field, but in everyday life.



## A LIFE TAKEN TOO SOON

*Connor was smart, athletic, and just an all-around good person with a big heart. He graduated magna cum laude from Creekside High School in 2017.*

Connor had just started his freshman year at the University of North Florida where he hoped to one day earn a doctorate degree in Physical Therapy, but his life was tragically cut short. Connor was returning from visiting his girlfriend in South Carolina on Labor Day when he was killed due to the negligence of two distracted truck drivers who violated the rules of the road that we all live by.

Connor's mother gave him the nickname Peanut. He had a keen sense of humor and a quick wit. He was a four-year varsity letterman on his high school golf team and was a member of the North Florida Junior Golf Foundation and the North Florida Professional Golf Association Junior tour. He collected many wins and trophies along the way. He was also a valued employee at The Slammer and Squire golf course.

Connor's devastated parents still struggle to comprehend their loss.

His father David described him as very thoughtful. "He did things right, took things seriously, he took good care of his car, took good care of his room. When he did something, he did it right. He was determined to do whatever he set his mind and heart to. That's why this hurts so bad."

Connor's mother Melissa does her best to get through each day by focusing on all that he achieved in his short life. "My son was a shining star who worked hard and was always kind. There will forever be an empty place in my heart that can never be filled."



*The toughest part for Connor's loved ones is that this talented and bright young man will never have a future. He never had the chance to earn his degrees, get married, or become a father. He will never meet his nephew and never know the ups and downs of growing old.*

*All of his hopes and dreams were dashed in an instant because of two distracted drivers.*



## MESSAGE RECEIVED

### TRUCKING INDUSTRY REACTION TO VERDICT

Word of the verdict spread quickly through the trucking industry and multiple trucking publications reported the news. Many of the articles focused on the facts of the case and detailed the dangerous behaviors of the defendant drivers. Some were sharply critical. Still others pointed out the possibility of future federal legislation that would require automatic emergency braking technology in trucks, which if in place, could have prevented this tragedy. Pajcic and Pajcic granted interviews to several of the publications, explaining that the trucking industry is an important part of the fabric of our country and vital to all of us, but they must hire safe drivers and follow the law.

*"This is a message to all those bad trucking companies: play by the rules the good trucking companies play by. Follow the laws that are in place to protect us all."*

## FREIGHT WAVES

### BILLION-DOLLAR LAWYER SPEAKS: Here's What Happened In Tragic Florida Wreck

Pajcic recaps version of events he laid out to jury that handed down ultimate nuclear verdict



## Transport Topics

### Jury Issues \$1 Billion Verdict Against Two Carriers in Fatal Crash



### INSIDE A NUCLEAR VERDICT: Florida Jury Renders \$1 Billion Ruling

### HDT | Truckinginfo 5 Takeaways From a Billion-Dollar Verdict

## \$1 BILLION VERDICT IN NASSAU COUNTY SENDS MESSAGE TO THE TRUCKING INDUSTRY

(continued from cover)

Connor's mother was waiting for him to return home and when she couldn't reach him, she checked an app that was able to find his location. She went to the scene, going from car to car trying to find her son. She found his body under a sheet on the side of the road, a moment that will haunt her forever.

Pajcic & Pajcic was hired and immediately got to work to find out how this could happen. The Pajcic team determined the first trucker did not even have a commercial driver's license. He was hired without a proper background check and AJD kept putting him behind the wheel despite a horrendous driving record, including a similar accident just months before Connor was killed.



## ALTHOUGH THE VERDICT WILL BE REDUCED IN ACCORDANCE WITH FLORIDA LAW, THE JURY'S MESSAGE WAS RECEIVED.

The company also paid cash under the table and encouraged its driver to skip weigh stations and drive over hours. Pajcic investigators also obtained the black box of the Kahkashan trucker, and it revealed that the first time he ever hit his brakes was just one second before impact, clearly showing he did not have his eyes on the road. He was on the 25th hour of a road trip from Quebec heading to South Florida and it was determined that he could not read the warning signs. After a week of dramatic testimony, the jury returned a verdict totaling just over \$1 Billion – \$100 million in compensatory damages and \$900 million in punitive damages.

*Connor's mother said she will be forever grateful for the lengths the Pajcic team went to in order to get justice for her son, though she adds no amount of money will ever give her what she wants the most, to be able to hug Connor one more time.*





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Gary C. Pajcic (1947-2006)

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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 nine other attorneys. The 14 Pajcic & Pajcic attorneys 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.