

PROFILES & PRECEDENTS



29TH REPORT OF PAJIC & PAJIC - CASES RESOLVED OR TRIED IN 2022

INSIDE

Multimillion Dollar Settlement for Electrocuted Worker page 3

Paralyzed Newlywed Recovers for Flimsy ATV "Roll Cage" page 4

Pajic and Shorstein Families Reconnect The Link page 5

Liquor Store Held Accountable for Selling to Teen page 6

SERVICE.
EXPERIENCE.
RESULTS.

\$23 MILLION IN 2022 FOR SIX CASES OF MEDICAL MALPRACTICE

Hospitals and doctors have significant resources to fight back when they are accused of wrongdoing, and winning medical malpractice cases is never easy.

The Pajic team has the legal knowledge and its own resources to hold medical providers accountable when critical mistakes are made...



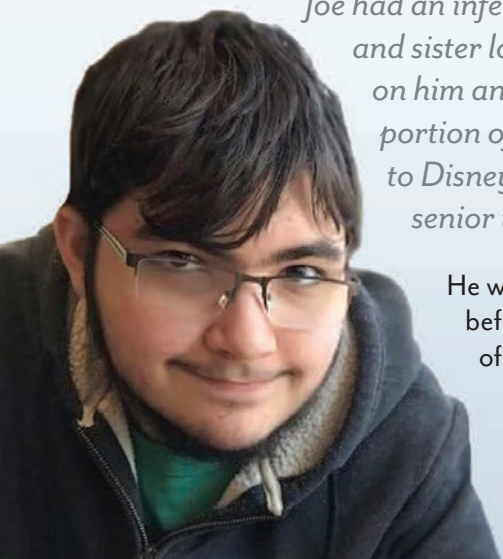
(continued on page 6)

\$26 MILLION LIMITS PAID ON DEMAND FOR DEATH CAUSED BY IMPAIRED TRUCKER

Joe had an infectious, goofy personality with a full body laugh. His younger brother and sister looked up to him; his baby sister adored him; and his parents depended on him and considered him their best friend. He studied hard in school, donated a portion of his wages to his church, and loved playing video games and taking trips to Disney with his close-knit family. But on a mundane Monday, the high school senior was suddenly, violently and unexpectedly taken from their lives.

He was heading home from school to watch his favorite YouTube show with his dad before heading off to work at Walmart. As he slowed to turn into his neighborhood west of Starke, a tractor trailer slammed into the rear of his PT Cruiser.

(continued on page 2)



KA SAUNDRA



Ka Sandra Hosea grew up in Selma, Alabama and was introduced at an early age to civil rights activism and a sense of justice. The significance of her hometown's place in history was instilled in her and helped to give her a keen sense of right and wrong.

Ka Sandra joined the Pajcic Firm in 2022 with a wealth of knowledge and experience handling complex medical malpractice cases. While she worked on the defense side for 20 years, she is grateful to now be in the plaintiff's corner. "It is so rewarding to have a direct impact on helping our clients in their time of need."

Ka Sandra earned her degree from the University of North Florida and once worked for the U.S. Department of Justice. She is proud of her two daughters, one of whom is a United States Marine.

No matter what she tackles in life, she will always carry a piece of Selma in her heart and draw from the strength of that foundation.

\$26 MILLION LIMITS PAID ON DEMAND FOR DEATH CAUSED BY IMPAIRED TRUCKER

(continued from cover)

His father started to worry when Joe had not shown up and drove toward his school. He didn't even get to the end of his street when law enforcement stopped him. He was told there was an accident. It was a black PT Cruiser. "We can't identify who was in it. You don't want to see the car. Go on home. We will be there shortly."

A parent's worst nightmare had come true. Their 18-year-old son was dead.

Initially, the family signed up online with another law firm.

But when the owner of a trucking company, where a relative worked, recommended Pajcic & Pajcic, they invited a Pajcic attorney to meet with them in their home. It was the first time they had spoken with a lawyer.



When law enforcement lacked the technology to download the semitruck's black box, Pajcic & Pajcic brought in an expert to complete the download and preserve this critical evidence. The firm also found multiple layers of insurance coverage, and, shockingly, discovered that the truck driver had alcohol in his system at a level that violated federal law. Pajcic & Pajcic produced a poignant video detailing Joe's virtuous life to give the defense a better understanding of the deep loss.

The Pajcics made a pre-suit demand for the \$26 million policy limits and the insurance companies asked to mediate. On behalf of the family, Pajcic & Pajcic declined a mediation and instead shared jury verdicts from recent Pajcic trials. That's when the policy limits were promptly tendered.

Now his family is honoring his legacy – his love for his church and community. Just as Joe always tithed a portion of his wages, his family made significant contributions to the institutions he valued. They have established scholarships for missions and trade schools. As a result, their son's life will touch many, and he will live on through them.

MULTIMILLION DOLLAR SETTLEMENT FOR ELECTROCUTED WORKER

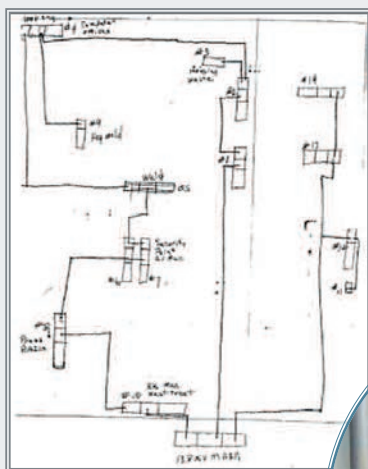
Paramedics gave a horrifying account of what they found on the scene at a factory. "Patient was on his knees yelling in pain... we could see skin hanging from his right arm." The rescuers were told he was working on a machine when someone turned the power back on. John Doe was hit with 12,000 volts of electricity and caught on fire.

The family called Pajcic & Pajcic who traveled with John's mother from Jacksonville to the burn unit in Jackson, Mississippi where he was being treated. She brought him love and support. The Pajcics got to work.

Most people injured on the job – and too many attorneys – assume that worker's compensation is all there is. When the injury is catastrophic, Pajcic & Pajcic prides itself on finding other avenues of recovery despite WC immunity.

Pajcic attorneys put together a team of liability experts from across the country, inspected the factory and deposed two dozen fact witnesses.

The findings were damning. The Pajcics presented a credible case for punitive damages: for decades, in violation of OSHA and other federal standards, the multi-national corporation had been utilizing a hand-drawn sketch to operate its industrial



factory. On the day of the incident, without notice, the facilities manager unilaterally drilled out and dismantled a safety lock which re-energized the high voltage system John was cleaning.

It resulted in his catastrophic and agonizingly painful burn injuries. John Doe underwent multiple surgeries including skin grafts.



The defense had a multi-pronged strategy: plead ignorance, shift blame, deny responsibility, claim worker's compensation immunity, and when all else failed, rely on an unfair \$1 million cap on pain and suffering damages.

But the threat of punitive damages, together with a determined client, resulted in the recovery of \$3.5 million.



John vowed to never let the horrific accident define him. He went back to work full-time starting a new career with the U.S. Postal Service. He is not planning to spend a penny of his settlement. Unless, of course, his mom wants a new house.

ALANA'S LOVE OF THE LAW & THE LAND



Alana Hartley Watson was just a teenager in high school when she landed her first job in a law firm, and she never looked back. To be fair, the law was in her blood. Her mother was a personal injury paralegal, and her grandmother was a judicial assistant for a judge in St. Johns County. Alana started at Pajcic & Pajcic in 2018 in the pre-suit department. She's known for her no-nonsense approach to dealing with insurance companies as she battles for her clients.

After hours, Alana and her husband love spending time on their acre of land. They grow vegetables, flowers, fruit and have a butterfly garden. They also raise 25 chickens. Alana's co-workers are often the beneficiaries of the beautiful blue and teal eggs. As Alana puts it, "After the daily grind at the office, there's nothing more peaceful than a bunch of squawking hens."

PARALYZED NEWLYWED RECOVERS FOR FLIMSY ATV "ROLL CAGE"

The newlyweds were out for a ride on their new ATV when their world fell apart. John was driving on the dirt road near their home when suddenly he hit soft sand, causing him to swerve into a ditch and hit a tree.

Both John and Jane were properly belted in. However, the Roll Protection System literally disintegrated and broke into pieces, giving them no roof protection at all. Jane suffered a broken neck and was left a quadriplegic.

Pajcic & Pajcic's crashworthiness team determined the ATV's roll cage was made of such flimsy material, there was no way it could keep them safe. Jane and John felt a false sense of security because the ATV was advertised as being sturdy and stable.



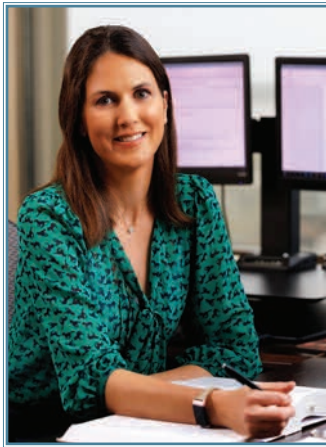
Shortly before trial, the ATV manufacturer agreed to a confidential settlement in the millions.

Jane will never return to her life as a nurse, but she will now have all the care she needs. The couple is staying true to their wedding vows, to be there for each other, in sickness and in health, though they could never imagine when they spoke those words what a tragic turn their life would take.

MEREDITH ROSS: THE BRAINS BEHIND THE SCENES

When most people think of a dramatic courtroom moment, they picture something like Tom Cruise and Jack Nicholson going head-to-head or Cousin Vinny grilling a witness. But for Meredith Ross, the law isn't about theatrics—it's about the hard work behind the scenes. Meredith specializes in legal research to provide the Pajcic firm with the ammunition to make their cases succeed.

Meredith came to the Pajcic Firm in 2022 with a wealth of experience and knowledge as an appellate attorney. While serving as a



law clerk for the Honorable Susan H. Black of the U.S. Court of Appeals, Meredith found her niche. "Research and writing may not be the most glamorous aspect of the law, but it's where many cases are won or lost," Meredith explains.

Meredith and her husband Trevor enjoy spending time in the North Carolina mountains. Trevor and Michael Pajcic coach their 10-year old daughters' basketball team. They don't have the same winning record as Meredith and Pajcic & Pajcic but they have just as much fun.

THE PAJCIC AND SHORSTEIN FAMILIES

The Pajcic and Shorstein families are reforging the bond they have had for over half a century. Fifty-one years ago Gary Pajcic started his law career working as an Assistant State Attorney under Harry Shorstein who was the Chief Assistant at the time. Gary then followed Harry to the City General Counsel's Office before he and Steve started Pajcic & Pajcic. Ann Shorstein helped manage Steve's political campaigns.

When Harry and Ann's son Paul moved back to Jacksonville as a standout young attorney, he joined Pajcic & Pajcic and was an instant star. But when Harry retired as State Attorney, Paul left Pajcic & Pajcic to open up a new firm with his father.

Fifteen years later, Harry fully retired from the practice and Paul has rejoined the Pajcic Firm. Paul is happy to be able to focus exclusively on personal injury cases again, and he swears Steve is easier to work for than his dad.



THE JAGUARS

What a ride it was for fans of the Jacksonville Jaguars this past year.

To go from the worst record in the NFL to the verge of the AFC championship game was an amazing feat. The Pajcics love cheering for the team, and twice treated all employees and their families to games, including the thriller playoff game where the Jags overcame a 27-point deficit to edge the Chargers.



The Pajcics support and applaud what the players do for the community, like this event at Ronald McDonald

House where Curt Pajcic joined punter Logan Cooke and former center Brandon Linder to help put smiles on the faces of kids undergoing medical treatments.



\$23 MILLION IN 2022 FOR SIX

The recoveries would have been millions of dollars more in several of these cases but for the legislatively imposed caps on non-economic damages where arbitration is requested by the defendant. The caps are especially bad since they significantly limit recovery and accountability in the most appalling cases of malpractice.



» A newborn died because of hospital staff blunders in the administration of oxygen, while her mother was still in the hospital with her. The devastated parents still have their baby's crib set up in their home.



» An 18-year-old died during wisdom teeth removal because of inattention in the administration of anesthesia. His unknowing father was in the waiting room when he heard the siren of the arriving ambulance.



» A 33-year-old mechanic died because he was not given the right medication while hospitalized for surgery, leaving a wife, a toddler and an infant.

LIQUOR STORE HELD ACCOUNTABLE FOR SELLING TO TEEN



On a Friday night in June a 17-year-old driver collided head-on with Jane Doe, a pregnant on-duty St. Johns County Sheriff's Officer.

It was like an explosion. She could not move her right arm or shoulder. She could not move her legs. Worst yet, she did not know if her baby was okay. The teenager was drunk, speeding, and criminally charged, and his car insurance immediately tendered its inadequate policy limits. But for Pajcic & Pajcic, the case was not over. Pajcic investigators were able to identify the local liquor store the minor frequented. Store receipts and credit card records confirmed the illegal purchases.

Confronted with this evidence, a part-time employee admitted that she had sold alcohol to him on 15 occasions.

Shortly thereafter, the case against the liquor store was resolved for a confidential amount. But, more importantly, the officer's baby was born healthy, and Jane is back at work protecting our community.

CASES OF MEDICAL MALPRACTICE

The details of each case remain confidential, but all are gut-wrenching stories of death or life-changing injury caused by egregious medical negligence. Pajcic & Pajcic is proud that taking on these cases has led to changes that will save lives and help avoid future tragedies.



» A pilot suffered a heart attack and died while driving because of a misread EKG, leaving a wife and two young daughters.



» A 67-year-old retired law enforcement official suffered cardiac arrest and death because of anesthesia failures during a catheter placement for dialysis, leaving his wife of 46 years.



» A woman is now disabled for life because of a failure of medical attention and care after surgery and discharge.

STEVE & MICHAEL'S KAYAK EXCURSION



It was not a typical 40th birthday celebration, but it was just perfect for Michael Pajcic. Michael and his father Steve kayaked up the St. Johns River from Avondale to Amelia Island.

A few dolphins joined them on part of their 35-mile trek. There may have been a few wrong turns along the way, but they made it safely. They woke up the next morning, and rode their bikes all the way back home.



PAJCIC ATTORNEYS

PAJCIC ATTORNEY RAYMOND REID INDUCTED AS THE 2023 PRESIDENT OF THE JACKSONVILLE CHAPTER OF ABOTA

The American Board of Trial Advocates is a highly selective organization of preeminent attorneys (equal numbers of both plaintiff and defense) plus judges. One of the pillars of ABOTA is preserving one's right to trial by jury.



Raymond is passionate about safeguarding constitutional rights.

Raymond's family roots give him a true appreciation of honoring the rule of law. His own mother had to flee a

dictatorship and political turmoil at a very young age. "Preservation of the law is critical. This is what makes ABOTA so important and worthy."



ATTORNEY CURRY PAJCIC SWORN IN AS THE PRESIDENT OF THE FLORIDA JUSTICE ASSOCIATION

"Help us be mindful of those less fortunate."

Curry Pajcic spoke his grandfather's words on the day he was sworn in as President of the Florida Justice Association. Curry explained that his grandfather's call to help those in need was a weekly refrain before the family Sunday dinner. Curry said that is what formed his family's beliefs and is why we are so passionate about seeking justice.

TAKING THE LEAD

PAJCIC ATTORNEY JANEEN MIRA INDUCTED AS THE PRESIDENT OF THE HUBBARD HOUSE BOARD OF DIRECTORS

Domestic violence is especially dangerous as it is almost always kept a dark secret. Pajcic attorney Janeen Mira spent her early days prosecuting domestic violence cases and has always felt a calling to help those who face the terrors of abuse in their own homes.



Janeen now serves as President of the Board of Directors of Hubbard House, a shelter and resource for domestic violence survivors.

Anne and Steve Pajcic were early, strong supporters of Hubbard House, and Janeen's involvement has been a perfect partnership in helping continue this important cause. The Pajcics are the main sponsor of the Hubbard House walk to raise awareness and funds for the charity.



That is also the mission of the FJA, protecting the rights of Florida's citizens and consumers. Curry is the 63rd President of the FJA.

The FJA is comprised of three thousand attorneys working to force powerful corporate special interests to accept responsibility for their actions.





PRSRT STD
U.S. POSTAGE
PAID
PERMIT #450
JACKSONVILLE, FL

PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW

One Independent Drive, Suite 1900
Jacksonville, Florida 32202
Ph: (904) 358-8881
Fax: (904) 354-1180
Email: attorneys@pajcic.com

Gary C. Pajcic (1947-2006)

William S. Burns, Jr.
Elizabeth T. Cardenas
Lee T. Griffin
Janeen M. Mira
Curry G. Pajcic
Curtis S. Pajcic
Michael S. Pajcic
Seth A. Pajcic**
Stephen J. Pajcic, III
Raymond P. Reid, Jr.
Benjamin E. Richard
Meredith A. Ross
Paul A. Shorstein*
Thomas F. Slater**^

William A. Bald, of Counsel
Robert J. Link, of Counsel

*Also licensed in Georgia
^ Also licensed in Virginia
** Also licensed in Vermont

**To see more case results and to
learn more about the Pajcic team
visit www.pajcic.com.**

SERVICE. EXPERIENCE. RESULTS.

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 12,000 personal injury and wrongful death cases, recovering more than \$1.5 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 11 other attorneys. The 16 Pajcic & Pajcic attorneys have amassed almost 500 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. Pajcic & Pajcic's ultimate goal is to obtain a full and fair recovery for every client.

Every case is unique, the results of one case do not necessarily indicate the value of another case, and most cases result in a lower recovery. It should not be assumed that your case will have as beneficial a result.