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# Profiles & Precedents

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

*This is the twenty third periodic  
report of Pajcic & Pajcic*

THIS SPECIAL 40TH ANNIVERSARY EDITION OUTLINES SOME OF THE HIGHLIGHTS AT PAJCIC & PAJCIC FROM 1974 TO TODAY

## PAJCIC & PAJCIC 40<sup>TH</sup> ANNIVERSARY EDITION

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. Gary came from the state attorney's office, and Steve from the city's largest law firm at the time. Pajcic & Pajcic got its first multi-million dollar verdict in Panama City in 1985 and has since handled more than 8,000 personal injury and wrongful death cases. Gary died unexpectedly seven years ago, but his brother Steve has carried on the practice with three of Gary's sons and his own. The firm includes seven other attorneys, all of whom except the youngest have attained the AV Preeminent Peer Review Rating by Martindale-Hubbell.



**Pajcic & Pajcic is one of the few firms on  
Martindale-Hubbell's list of Top Ranked Firms  
in the Southeastern United States to receive  
the perfect 5.0 rating in client satisfaction.**



Every case is unique, the results in one case do not necessarily indicate the value of another case, and most cases result in lower recovery. It should not be assumed that your case will have as beneficial a result. Recoveries are before deduction for attorneys' fees and expenses. Verdicts are before reduction for comparative negligence, setoffs, and high-low agreements. Safety changes can be the result of many factors other than the cases mentioned.

# - FINDING HIDDEN EVIDENCE THE KEY TO \$10 MILLION AWARDS -

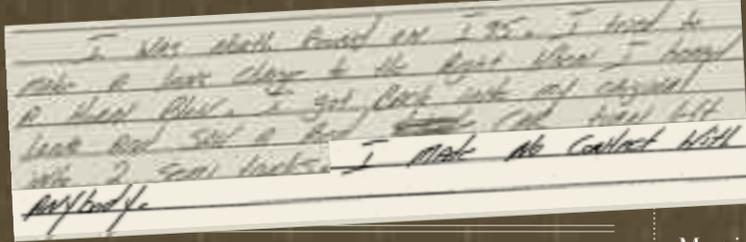
*It was only after the families of Jane Doe and John Doe hired Pajcic & Pajcic that the full truth became known and fair recoveries could be obtained of more than \$11 million for Jane and nearly \$10 million for John's widow and children.*

## THE SECRET TO JANE'S CASE

The accident left Jane Doe face down and barely breathing in the middle of I-95. The crash report put all the blame on Jane because her car had swerved across four lanes of traffic in front of oncoming tractor trailers. Jane could not dispute the report because she was comatose for several weeks and never regained any memory of the crash.

Pajcic & Pajcic could not believe that Jane Doe, a 36-year old mother of two, could be as reckless as the crash report concluded. The legal battle to unravel the enigma of how and why this tragedy occurred and to get justice for Jane involved eight different lawsuits, nine mediations, one jury trial and seven different settlements.

*The major recoveries came when Pajcic & Pajcic met with a traffic homicide investigator. Buried in his field notes was a witness statement with a suspicious denial of involvement:*



The whole accident sequence had been started by the armored car suddenly cutting in front of Jane and causing her to swerve and lose control of her car.

The armored car company only had \$1 million of insurance, but its insurance company refused to pay those limits when demanded by Pajcic & Pajcic. It ended up paying much more than that after a bad faith trial.



Pajcic & Pajcic also secured products liability recoveries – one because Jane's seat and seatbelt system allowed her to be ejected through a back window, and a second one because the armored car had a blind spot in its passenger's side view mirror.

*Jane was ejected through the back window into the middle of I-95.*

The recoveries have given Jane financial security and the ability to pay for the help she needs every day.

Most importantly, despite her profound impairments, Jane has been able to continue to provide motherly care to her daughters as they have grown into young adulthood.



## THE TRUTH ABOUT THE TRUCK DRIVER IN JOHN'S CASE

Eight years after Jane Doe's crash and one mile south on I-95, John Doe was killed in a fiery crash when a southbound tractor trailer hit the concrete divider and catapulted into the northbound lane on top of John's pick-up. The truck driver blamed a phantom vehicle and the investigating officers found him credible and unimpaired.

The truth about the driver who killed John Doe proved to be just as shocking as the fiery crash itself. While neither the accident investigator nor the trucking company who hired the driver found anything suspicious about the truck driver, Pajcic & Pajcic's investigation proved that he was a stay-up-all-night, sleep-all-day crack cocaine addict who had fallen asleep at the wheel in the middle of I-95 in downtown Jacksonville.

The trucking company could easily have found out about the driver's prior problems with drugs and driving, but, instead of checking the driver's record, the terminal manager had actually fabricated a background check and made up a road test.

Angered by the egregious conduct, John's widow Jane had the courage to follow Pajcic & Pajcic's recommendation and hold out for the fair value of \$9,650,000.



*After the case was over Jane sent Pajcic & Pajcic a thank you that touched the hearts of all who worked on the case:*



RECOVERIES ARE BEFORE DEDUCTION FOR ATTORNEY'S FEES AND EXPENSES. MOST CASES RESULT IN A LOWER RECOVERY. IT SHOULD NOT BE ASSUMED THAT YOUR CASE WILL HAVE AS BENEFICIAL A RESULT. VERDICTS ARE BEFORE REDUCTION FOR COMPARATIVE NEGLIGENCE, SETOFFS, AND HIGH-LOW AGREEMENTS.

## PAJCIC & PAJCIC TIMELINE OF SERVICE CLIENTS, SAFETY & CHARITY



**1974**  
Gary and Steve Pajcic form Pajcic & Pajcic with a commitment to service to clients and the safety of the public with the faith that good results will follow.



**1985**  
\$2.5 million verdict for factory worker's loss of leg in product liability lawsuit for unsafe design of conveyor system.



**1991**  
\$8 million verdict for construction worker who suffered brain injury from fall because of third party negligence.



**1993**  
\$1 million charitable gift for scholarships for Paxon High School graduates. Within four years, UNF has 35 Pajcic Scholars.



**1997**  
After five successful appeals, \$7 million from seven different defendants for brain injury to young software executive. The lawsuit resulted in new signs marking the entrance and exit.

## SUVS SAFER AFTER DUVAL LAWSUITS AND \$10 MILLION VERDICT

The deadly combination of Firestone detreads and Ford Explorer rollovers existed for almost a decade before the fatal Jacksonville crashes involving Jane Doe on November 20, 1999, and John Doe on July 3, 2000. Even though there had been very little publicity about the problem at that time because of the manufacturers' efforts to keep it all quiet and confidential, Pajcic & Pajcic was able to recognize the defects when the families called about their tragedies. When Pajcic & Pajcic filed suit on July 24, 2000, newspapers across the country carried the Associated Press story, and Gary Pajcic appeared on The Today Show to publicize the danger to unsuspecting SUV owners. Two weeks later Ford issued a recall for the defective Firestone tires.

But detreading tires were not the only problem. One year after the recall, recently wed Jane and

John Doe were in their 2000 Explorer on I-95 when an RV forced Jane into a sudden maneuver and their Explorer rolled over five times.

Everyone was wearing a seatbelt, and John and Jane's sister Doe escaped with only minor injuries, but the roof over the driver's seat crushed in like a tin can, fracturing Jane's skull and killing her instantly. Jane's death devastated John. As an



engineer himself, John felt especially betrayed by deadly defects in the SUV design. He was determined to get justice for Jane and to do something to prevent others from suffering the same tragedy.

In taking on the case, Pajcic & Pajcic decided to focus attention on the weak roof structure and spent over half a million dollars on testing and experts to prove just how deadly the defect was. After four weeks of trial, the Duval jury returned a verdict of more than \$10 million against Ford. John has since gone on to complete his Ph.D. in engineering at UF and is now a professor at Valparaiso University.



*Dynamic tests clearly showed the roof defect.*

Since the Duval verdict, Explorers and other SUVs have much stronger roofs. Indeed, federal regulations have doubled the strength requirements for SUV roofs. SUVs also now have stability systems that greatly reduce the risk of rollover, and side curtain airbags that deploy in rollover situations to give additional protection to the occupant.

John Doe and Pajcic & Pajcic are proud of any small role they may have played in these safety enhancements. Pajcic and Pajcic is continuing its vigilant pursuit of other deadly defects with cases now pending against tire and car manufacturers.



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**1998**

\$3.4 million from sign companies because sign posts did not break away as intended. Lawsuit results in new DOT safety procedures throughout Florida.



**1999**

Recall of Firestone tires on Ford Explorers two weeks after nationwide publicity surrounding Pajcic & Pajcic's filing of two wrongful death lawsuits against Ford and Firestone.



**2000**

Multimillion dollar malpractice recovery for medication error from a decimal in wrong place. Surgeon agrees to change his discharge procedures as condition of settlement.

## MULTI-MILLION DOLLAR RECOVERIES TRANSFORM LIVES OF CATASTROPHICALLY INJURED CLIENTS

Jane Doe was a college freshman with a promising future headed to Atlanta, Georgia for Martin Luther King Day celebrations when a bale of hay fell out of a farm truck just ahead of her on I-20. Jane's classmate swerved to avoid the hay and the car slammed into the concrete median.

Although everyone in the car was wearing her seatbelt, Jane's three classmates suffered only minor injuries, while Jane hit her head on the ceiling of the car and broke her neck, leaving her a quadriplegic for the rest of her life.

Jane's crestfallen parents asked Pajcic & Pajcic for help. After some coverage disputes with the farm owner's insurance company, Pajcic & Pajcic secured those policy limits for Jane.



The wonderful news is that the lawsuit recoveries, combined with Jane's remarkable character and personality, have allowed Jane to live a rewarding and happy life despite her catastrophic injury. Of course, there is regret for what might have been, but now more than 20 years later Jane owns her own beautiful home, drives her own specially designed van and is able to pay for all the services and equipment she needs. Jane comes and goes as she pleases and is a productive member of her family, church and community. Jane's situation is



typical for catastrophically injured clients where Pajcic & Pajcic

is able to pursue multiple avenues and secure a just and fair recovery. The client would always pray that the accident had never happened, but the lawsuits pay for the expensive, but necessary, equipment and services that make such a difference to everyday life when every little task is a challenge. Just as important, a just and fair recovery helps restore independence and dignity to individuals who fear their lives will be a burden to loved ones.

*When investigation revealed a defect in the seatbelt buckle that had caused it to unlatch during impact, Pajcic & Pajcic sued the foreign car manufacturer and seatbelt maker. The cases resolved, and the design flaw in the buckle was later fixed.*



**(For other examples of how multi-million dollar recoveries can make such a difference in peoples' lives go to [www.pajcic.com](http://www.pajcic.com).)**

YOUR CASE WILL HAVE AS BENEFICIAL A RESULT. VERDICTS ARE BEFORE REDUCTION FOR COMPARATIVE NEGLIGENCE, SETOFFS, AND HIGH-LOW AGREEMENTS.



**2001**

\$2.1 million verdict for child's drowning due to inadequate fencing at apartment pool. Lawsuit gives needed publicity to number one killer of Florida children under five.



**2002**

\$2.5 million for 65 year old Jacksonville woman who burned to death in her car after a crash. Newer models have safer fuel tanks.



**2002**

\$1 million for teacher bonuses at Annie R Morgan Elementary School. Within two years school's FCAT grade goes from F to A.



Curry Gary Pajcic wants to continue the family tradition of public service. Curry is one of three persons whose names have been forwarded to President Obama for the position of U.S. Attorney for the Middle District of Florida, the second largest in the nation. The three were selected by the Federal Nominating Commission and approved by Senators Nelson and Rubio. Curry showed his leadership early as captain of his football, basketball and baseball teams at Episcopal High School. Despite being an ardent Seminole fan like all the Pajcics, Curry graduated with honors from the University of Florida Law School where he co-authored the Honor Code. Before joining Pajcic & Pajcic, he served in the State Attorney's Office, trying 23 major felony cases in his last year. If Curry is nominated by the President and confirmed by the Senate, Pajcic & Pajcic will welcome him back after he finishes his public service career.

## DESPITE MILLION DOLLAR VERDICTS LOG TRUCKS REMAIN A DARK AND DEADLY MENACE

*They are a calamitous curse of North Florida: poorly lit log trucks slowly pulling out onto rural highways in front of oncoming traffic in the darkness before dawn.*

### PUTNAM COUNTY, 1988

John Doe was a 30 year old son of migrant farmworkers, living in Crescent City, Florida, working nights to support his young family, and during the day attending community college in St. Augustine on veteran's benefits.

In the predawn hours of March 15, 1988, John was on his motorcycle headed up U.S. 17 to go to class when a log truck pulled onto the highway right in front of him. John's motorcycle hit the left rear tire of the truck and went down in the middle of the highway.

John was paralyzed and would have become road kill but for the heroic efforts of a Good Samaritan who stopped his car in the middle of the highway to direct traffic around John. The log truck never slowed down, but presumably ended up in one of those coveted places near the front of the line at the paper mill that morning.



John's surgeon referred him to Pajcic & Pajcic to try to find the log truck and hold it accountable. Pajcic & Pajcic obtained the list of the first trucks at the Palatka mill that morning, identified which trucks might have been coming from the direction of San Mateo, and then obtained scrapings from a left rear tire rim that showed evidence of impact with John's motorcycle.

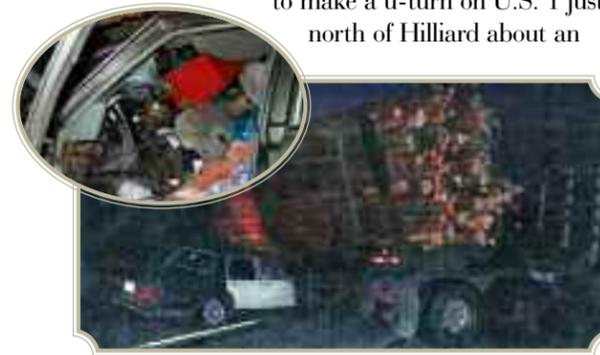
The paper mill settled presuit for its role in the case, but the logging company continued to deny involvement. After the jury returned a verdict for John, its insurance company voluntarily paid its limits plus the excess verdict.

John has gone on to live a happy and productive life in Palm Coast. In fact, the local newspaper honored John for his role in fashioning a political compromise on the racially heated issue of a new name for the city's elementary school.



### NASSAU COUNTY, \$12.9 MILLION VERDICT

Jane Doe suffered a catastrophic brain injury when the car she was in slammed into the side of the log truck trying to make a u-turn on U.S. 1 just north of Hilliard about an



hour before sunrise. Jane recovered enough to superficially look and seem normal and to complete her senior year at Hilliard Senior High, but the crash left her with diminished capacity for judgment and the need for around the clock supervision of her activities.

The insurance company for the log truck declined to pay its policy limits on demand, and Pajcic & Pajcic filed suit. After a three week trial in March 2011, a Nassau County jury returned a verdict of \$12.9 million.

Jane did not get all of that because the jury did assign some blame to her and some to DOT. Nevertheless, she ended up with far more than the logging company's insurance limits. With the recovery Jane and her family were able to preserve the family's 100 acres in the backwoods near the weigh station. More important, the recovery has allowed Mrs. Doe and Jane to live together, but still enjoy full and independent lives.

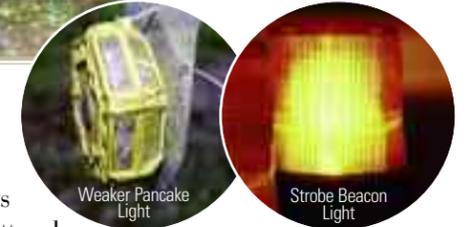


### ANOTHER DEADLY LOG TRUCK

One year later another poorly lit log truck claimed yet another victim, a young father on his way to work at the JEA plant in Jacksonville.



The log truck did not have a strobe beacon light but only a weaker pancake light. The truck was going less than 45 mph because it had just turned back onto U.S. 1 after bypassing that same Hilliard weigh station.



The young father did not see the truck in time and plowed into its rear. The logs shattered the windshield and impaled the father of four children.

The defense had strong arguments for comparative negligence based on speed, seatbelt usage and read-end impact. Nevertheless, perhaps knowing about the \$13 million verdict after the insurance company refused to pay in Jane's case, the insurance company in the latest case timely tendered its policy limits on demand by Pajcic & Pajcic. Regrettably, the traffic homicide report cleared the log truck of any fault because the state's legal counsel concluded that the weak pancake light was all that the law requires from log trucks.



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**2003**  
Florida Supreme Court decision that utility company can be liable for inoperable streetlight. Utility companies adopt new procedures to keep lights working.

**2004**  
Federal Court verdict holding FAA 65% responsible for plane crash in fog enveloped Jacksonville International Airport.

**2005**  
\$10 million verdict for a young wife's death from Ford Explorer roof crush. Federal regulations have since doubled the strength requirements for SUV roofs.

**2006**  
Georgia doctors pay \$1.2 million for ignoring CT scan that could have saved life of young father.

**2007**  
Homebuilder agrees to confidential settlement for quadriplegic Mexican laborer. Enables him to return home to live with his family.

**2008**  
\$8 million in settlements for paralyzed young man. Signs have since been changed to provide earlier warning of the dangerous overpass.

## TRIUMPH OR TRAGEDY

The lives of Atreus ("Pedro") Bell and Reggie Wilson graphically illustrate the thin line between triumph and tragedy for African American males in contemporary culture. Pedro and Reggie were cousins who grew up in the same house. As teenagers both Pedro and Reggie were star athletes in the basketball program run by Gary and Steve Pajcic in their North Riverside neighborhood.



As a natural leader and gifted athlete, Pedro took full advantage of the Pajcic grade incentives, tutoring program and scholarship pledge to become a captain of the FSU football team and then go on to attain post graduate degrees.

*If anything Reggie was an even more gifted athlete, but never even got to play high school sports because he never got his grades high enough. In tragic contrast to Pedro's success, Reggie got three bullets that ended his life at age 24.*

Reggie left a younger brother Bobby who now faces the same challenges and dangers that Pedro and Reggie did. Last year Bobby's father called Steve Pajcic and asked if Bobby could have a summer job with the firm the way Pedro did in the hope that he would follow Pedro's instead of Reggie's path. Bobby now wants to become a lawyer, and the firm has pledged scholarship support and summer jobs.



## "PAJCIC FAMILIES"

Pajcic is not the only family connection at Pajcic & Pajcic. Gary and Steve always took special pride in the other families at the firm.

Steve noticed the poise and professionalism of Teddy Scott at the JCCI office and hired her to be one of his assistants. Gary noticed the personality and diligence of Harvetta Jackson at his golf course and hired her. The principal at Gary and Steve's old high school told them about the ambition and intelligence of Inga Rease, who became Steve's personal assistant for years.



With these hires and others like them, Pajcic & Pajcic started building new networks and new families that reflect the same values and qualities as the Pajcics. Teddy brought in her daughter Catrina Stewart. Inga - her sister Michelle Sweeney. Harvetta - her nephew Antonio Kirkland.

*New networks and larger "families" have brought a greater pool of talent to*

*Pajcic & Pajcic that makes the whole work experience more rewarding for everyone.*

— RECOVERIES ARE BEFORE DEDUCTION FOR ATTORNEY'S FEES AND EXPENSES. MOST CASES RESULT IN A LOWER RECOVERY. IT SHOULD NOT BE ASSUMED THAT YOUR CASE WILL HAVE AS



**2009**  
Apartment complex pays \$1.7 million for teen killed by stray bullet.



**2010**  
\$5.2 million verdict is double the insurance company's final offer for a truck crash in Flagler County that killed an elderly woman.



**2011**  
\$12.9 million verdict for injuries to high school student from log truck U-turning on U.S. 1.

## HABIJAX HOUSE PROVIDES FOUNDATION FOR NEW LIFE

Seven years ago Shanna Carter was a single mother struggling to pay the rent and make ends meet. Then Sallyn and Anne Pajcic asked the firm to co-sponsor a new Habijax home with the Jacksonville Bar Association. Shanna got the home and transformed her life. She got control of her credit, earned a college degree and even lost 100 pounds. Shanna is now in her last year of law school and clerked at Pajcic & Pajcic this past summer. She also runs a non-profit for youth, works as a guardian ad litem and finds time to perform with young Christian artists.



## HISTORIC CAMPAIGNS



Although Steve never ran for office again after losing the general election for Governor in 1986, the Pajcics are proud of their involvement in the historic campaigns of others. Gary Pajcic was the chairman for Nat Glover's campaign for Sheriff of Duval County. In March 2007 Anne and Steve Pajcic hosted Senator Barack Obama at their home in one of the early fundraisers in his candidacy for President. Last year the family celebrated his reelection with a visit to the Oval Office.

BENEFICIAL A RESULT. VERDICTS ARE BEFORE REDUCTION FOR COMPARATIVE NEGLIGENCE, SETOFFS, AND HIGH-LOW AGREEMENTS. —



**2012**  
Consumers burned by explosions of liquid candles receive settlements. All manufacturers recall their products, but some retailers continue to sell containers and fuel resulting in horrific injuries and another lawsuit.



**2013**  
\$2 million recovery for family of young wife and mother killed by a big truck that recklessly swerved to avoid a car entering U.S. 1 from a convenience store.

## — 2014 — ANOTHER \$2 MILLION GIFT FOR EDUCATION



This year the Pajcic family doubled down on its charitable giving in pursuit of educational opportunity for all Jacksonville youth. In previous years the family has given \$1 million to fund scholarships at UNF for students of Gary and Steve's old high school Paxon and an additional \$1 million for teacher bonuses at their old elementary school Annie R. Morgan. The latest contribution is a gift of \$2 million from Anne and Steve Pajcic to Edward Waters College, whose current president is Nat Glover, a longtime friend of Gary and Steve.

