

Congratulations Curry Pajcic!
ABOTA LAWYER OF THE YEAR

page 6

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.

PROFILES & PRECEDENTS

The twenty-sixth
periodic report of
Pajcic & Pajcic

THE LAW FIRM OF
Pajcic & Pajcic
Since 1974



SERVICE. EXPERIENCE. RESULTS.

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4.3 MILLION DOLLAR VERDICT IN DISTRACTED DRIVING CASE

*Julianna Dicks had just graduated
from Clay High School, where she had
been an honor student and a cheerleader.*

She and her friends from church were returning from watching 4th of July fireworks in St. Augustine, but she never made it home that night. Another teenager, who was driving while distracted, made a left turn in an intersection right in the path of Julianna's car. Julianna was buckled in the backseat. She suffered injuries that would change her life forever.

(continued on page 1)



MOCK TRIALS LEAD TO \$3.2 MILLION SETTLEMENT IN MEDICAL NEGLIGENCE CASE

*Mock trials are a standard part of trial preparation for
Pajcic & Pajcic. Sometimes their results can be surprising –
and so convincing that they make the real trial unnecessary.*

Victor and Judy were just teenagers when they met at a parade in upstate New York, fell in love and married in 1962. They had four loving children. After a lifetime of hard work and

government service, Victor and Judy retired to Florida where they hoped to enjoy their golden years. But medical negligence turned their lives upside down in the summer of 2015.

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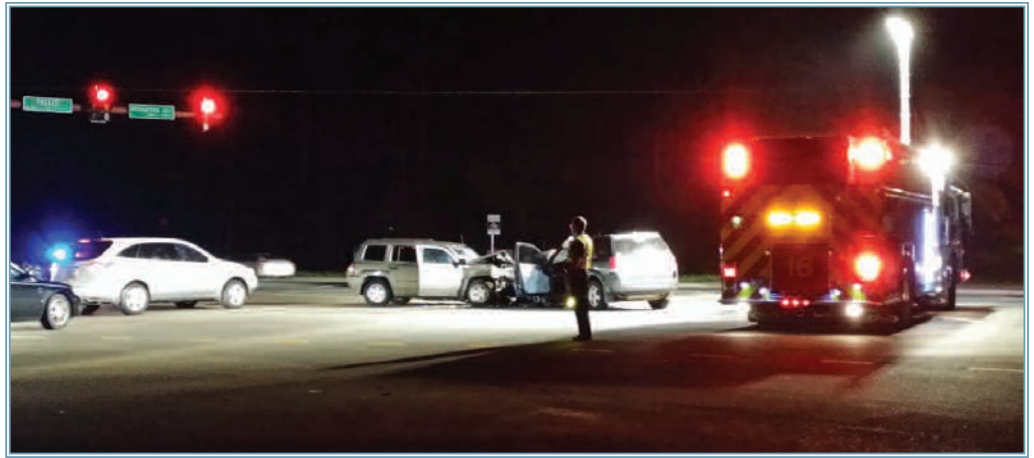
"NIGHT OF HEROES"

Curry Pajcic served as the honorary chairperson of a "Night of Heroes" to pay tribute to the doctors and hospital staff of UF Health.



Curry included Julianna in his emotional speech, thanking her team of doctors and nurses for saving her life that night.

4.3 MILLION DOLLAR VERDICT IN DISTRACTED DRIVING CASE

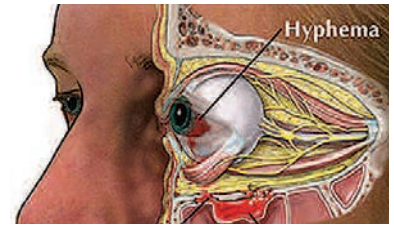


(continued from cover)

Julianna underwent emergency surgery that night and again the next day that included removing part of her intestines.

A relative of Julianna's is an attorney in Georgia, who knew of the reputation of Pajcic & Pajcic and referred her to the firm. The insurance company did not meet Pajcic & Pajcic's offer of a presuit settlement for the policy limits. Then, after suit was filed, they turned down Pajcic & Pajcic's formal proposals for settlement, so the case proceeded to trial. The Duval County jury returned a verdict of \$4.327 million. Finally, at a post-trial appellate mediation early this year, the insurance company agreed to a settlement of just under \$4 million, way more than its policy limits and the Pajcic proposals for settlement.

Julianna was able to go to college, with the help of friends who carried her books for her. She is now an elementary school teacher.



Julianna's long list of injuries include:
elbow fractures, fractures of the orbital wall, and severe internal injuries.



Julianna survived, but both the physical scars and the emotional scars of that day will always remain.

She hopes this is a warning to all drivers to pay more attention.



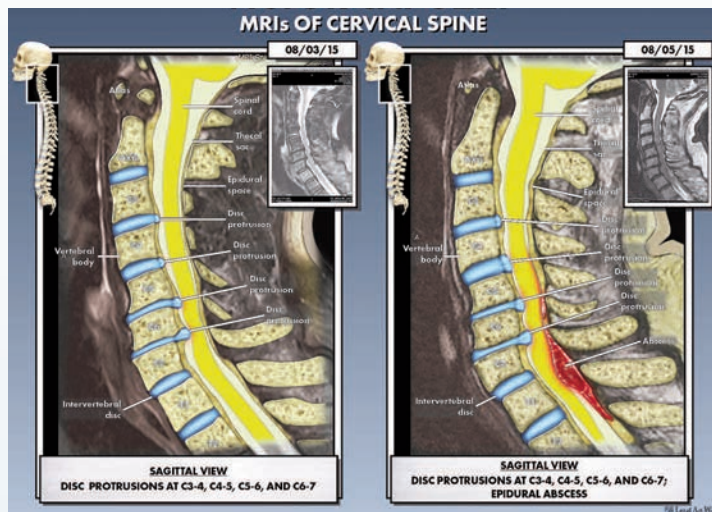
MOCK TRIALS LEAD TO \$3.2 MILLION SETTLEMENT IN MEDICAL NEGLIGENCE CASE

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Victor, experiencing the worst neck pain of his life, went to the emergency room. Despite blood tests consistent with an infection, he was diagnosed with arthritis and sent home by the attending doctor.

Within 16 hours of being sent home, Victor lost all feeling from his chest down. He was rushed back to the hospital and surgery was performed. Upon cutting Victor open, doctors found a large infection in his cervical spine. Unfortunately for Victor, by the time of the surgery, the infection had grown so large that the damage done to his spinal cord was irreversible. Victor was left permanently paralyzed. Judy became his caregiver, bathing, lifting and feeding him.

The Capozzis called Pajcic & Pajcic about a bedsore that developed in a rehab facility. Pajcic and Pajcic's medical negligence team determined that Victor should not have become paralyzed in the first place. On the first visit, the hospital should have suspected an infection in Victor's cervical spine and initiated prompt antibiotic therapy, which would have



stopped the growth of the infection and Victor would still be walking today. The defense experts argued that the blood test results were non-specific and that, even if infection had been diagnosed earlier, Victor's outcome would have been the same. Just prior to trial, Pajcic & Pajcic conducted six mock trials, which returned surprisingly favorable

results. Those were shared with the defense.

Upon learning of the results, they agreed to pay \$3.2 million, \$700,000 more than Pajcic & Pajcic demanded two months earlier and almost \$2 million more than the defense's previous "highest and best" offer.



Victor and Judy were very happy to achieve a hard won settlement. Victor explained, "Judy will have the help she needs and deserves." They are also grateful that with some of the settlement money they have purchased a handicapped accessible van to make transportation much easier.



FLORIDA SUPREME COURT DECISION GIVES JUSTICE MORE THAN A DECADE AFTER DRUNK DRIVING DEATH

It took over a decade and a decision from the Florida Supreme Court before Jo Bowen could get civil justice for the drunk driving death of her husband, a Navy veteran.

The drunk driver drifted into the break down lane on I-95 hitting and killing Billy Bowen while he changed a tire on his boat trailer as his wife looked on helplessly. The drunk driver kept right on going. A Good Samaritan took chase. Many miles and several U-turns later Mary Christensen was tracked down. She was pinned into a parking lot and a video shows her kicking the shins of the arresting officers.

The insurance on the car was not nearly enough to cover the judgments from trial of \$3 million for compensatory damages, plus \$3 million for punitive damages.

But Ms. Christensen was by then a supposedly penniless convict and the jury did not think her multi-millionaire ex-husband's name on the title was enough to hold him liable.



The appellate court initially agreed by a vote of 2-1. Then, in a highly unusual move the Fifth District granted "en banc" rehearing and voted 5-3 to reverse itself. It certified the question to the Florida Supreme Court as one of great public importance. In a unanimous decision, the Florida Supreme Court reaffirmed Florida law, that a certificate title holder like Robert Christensen is liable for the permissive use of the vehicle by another person and therefore, was required to pay the verdict.

Along the years four grandchildren have blessed the life of Jo Bowen and the legacy of Billy.

GIVING BACK

Jo Bowen has always kept in touch with Jim St. John, the Good Samaritan who tracked down the woman who killed her husband. All these years later, when Jim found himself in need, Jo was there to help. Jim's two granddaughters suffer from a rare genetic disease called Leukodystrophy. Jo made a large contribution to help with the medical expenses. The Pajcic Firm then matched her donation tenfold. As Jo put it, "It felt good to be able to give something back to him. It felt good to say 'thank you' with more than just words. He stopped his life that day and stood up for our family and I'll always appreciate that so very much."



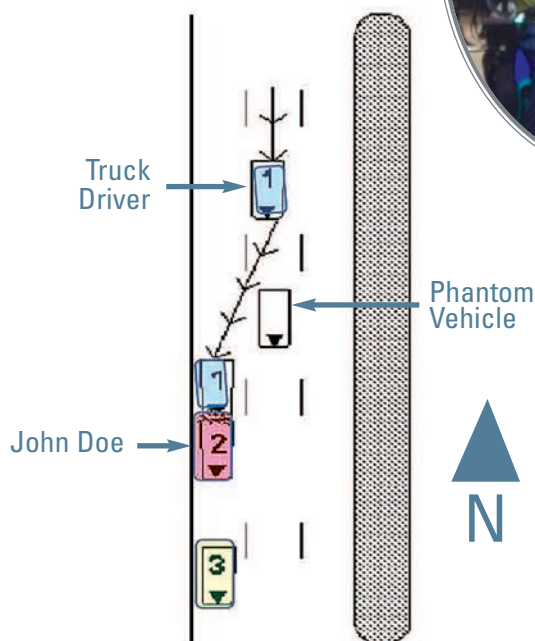
8 FIGURE SETTLEMENTS FOR QUADRIPLÉGIC JUST MONTHS AFTER CRASH

John Doe was 70 years old and enjoying retirement after 25 years as a truck driver, but he decided to take a part-time job just to keep busy.

One day while driving for his company, John stopped on a busy road in Central Florida, because of another car and a box in the road ahead of him. But a truck driver was not paying attention and slammed right into the back of John's vehicle.



Pajcic & Pajcic gave the defense a powerful video detailing John's life before and after the crash. The primary liability issue was the percentage of blame that would be attributed to whoever dropped the box and to the car that had stopped in the road. To help combat these defenses, Pajcic & Pajcic obtained a persuasive affidavit from a key eyewitness. At an early mediation after a \$25 million

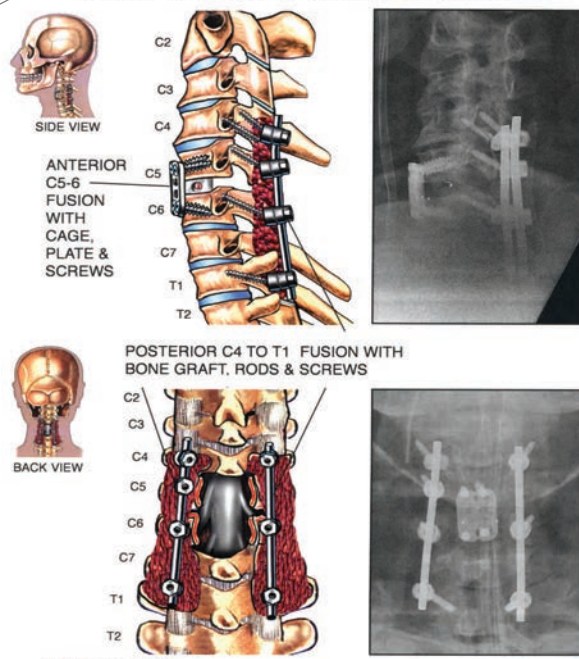


John had three surgeries to stabilize his spine, but doctors told him there was nothing they could do. He was paralyzed and would never walk again.

Despite the devastating turn of events that changed his life forever, John remained positive and was especially grateful for the daily visits from his family members.

One of John's relatives also happened to be a former Pajcic client who highly recommended Pajcic & Pajcic. The firm immediately secured the full amount of uninsured motorist coverage available and filed suit against the driver of the truck and his company.

POST-OP CONDITION OF CERVICAL SPINE, 11/13/18



demand, the defense agreed to pay a confidential amount, putting John's total settlement at eight figures. It is almost unheard of to reach settlements of this magnitude less than five months after the crash.

John will now be assured to have all the money he will need for his care for the rest of his life. John vows to be happy all the time. "If you start thinking about the sadness it will only bring you down."

THE JAGUARS AND PAJCIC & PAJCIC TEAM UP AGAIN



The Jaguars Foundation and Pajcic & Pajcic joined forces in the past to aid hurricane victims. They combined their efforts again to assist the Clara White Mission, which was facing drastic funding cuts. When The Jaguars Foundation donated \$75,000, Pajcic & Pajcic and Steve and Anne Pajcic immediately stepped in and matched that donation. The charitable organization that was founded in 1904 feeds the hungry, helps homeless veterans and offers job training courses.

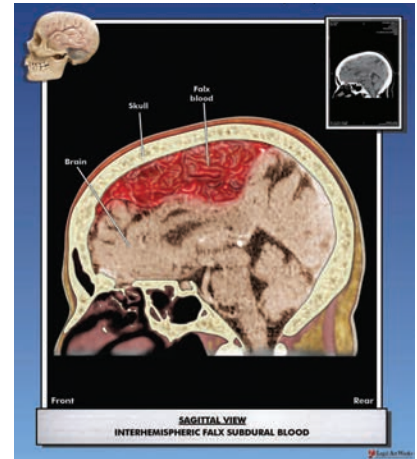
LOOSE ROOSTER LEADS TO \$1.25 MILLION SETTLEMENT



Imagine taking your dogs into the veterinarian's office when suddenly a rooster springs out of the bushes at the clinic entrance. Indra Chhabra's Greyhound and Doberman chased the rooster, all while Indra was gripping tightly to the dogs' leashes. During the commotion, Indra fell, smashed her head, and lost consciousness.

Indra was hospitalized for eleven days and she spent six months going through inpatient and outpatient rehabilitation.

The veterinarian's insurance company denied responsibility arguing that the rooster was a wild animal and that Indra contributed to her injuries by not letting go of the leashes. Pajcic & Pajcic's research proved the rooster was not so wild after all. He was somewhat of a mascot of the vet clinic and the staff even named him "Henry".



In the end, the insurance company accepted responsibility and the firm negotiated a fair settlement of \$1.25 million. Indra was able to return to her job of 30 years in technology solutions for a global bank. She has since retired, enjoying her days with her pups and making sure her surroundings are fowl free.

FAYE BELVIN THE WEDDING SINGER

Faye Belvin started at the Pajcic Firm in 2016, after a 30 year career in the daycare industry. She recalls her job interview when Michael Pajcic joked it was a perfect pre-requisite. "Now you get to work with grown children." Faye also has a side gig as a wedding singer that gives her much fulfillment. She has performed in literally hundreds of weddings over the years. She started singing in church when she was six years old and eventually, fellow church members begged her to sing at their weddings.

She's known for pouring her heart and soul into each melody and is often called an anointed songbird. Her favorite wedding song is "At Last", the Etta James classic. Faye also sings at funerals, but she definitely prefers the happier occasions and seeing tears of joy.



BETSY CARDENAS SEEKS JUSTICE

As a child, Betsy Cardenas had great admiration for her grandmother, who was a social worker, and her mother, who was a mental health counselor. Betsy wanted to follow their path, with her burning desire to help others, so she majored in social work at the University of Georgia. A professor encouraged her to go to law school, where she could have an even greater impact. While at Florida Coastal School of Law, the honor student worked as a law clerk at Pajcic & Pajcic for three years. After graduation, Betsy cut her teeth on the defense side, working for a premier insurance defense firm in Jacksonville.



Betsy married her high school sweetheart, Andres, seven years ago. Andres worked to put Betsy through law school. She is now returning the favor; he is pursuing his goal of earning his college degree. Andres is originally from Bogota, Colombia and they often speak Spanish at home so she can try to learn the language. They stay busy raising their three rescue dogs. Betsy is thrilled to be back at the Pajcic Firm.

"It is such a great place to work. I know why people never leave. I was spoiled to have this as my first law firm experience when I was a student."

Betsy is now achieving her original dream of helping people in need.

CURRY PAJCIC

NAMED FLORIDA TRIAL LAWYER OF THE YEAR

There are some 100,000 lawyers in the state of Florida, but only one can be The ABOTA Trial Lawyer of the Year. In 2019, that one is Curry Pajcic. ABOTA, the American Board of Trial Advocates, announced their selection of Curry as Trial Lawyer of the Year at a conference in Orlando. Curry said, "It is truly humbling to be recognized by your peers in this way." ABOTA is a selective organization founded in 1958 and is dedicated to defending the American civil justice system. Steve Pajcic said Curry's father Gary would be so proud. "This ABOTA award shows the respect of defense attorneys and judges, as well as fellow plaintiff attorneys."

Curry thanked the entire office. "We are a great team and every employee in the firm has an important role in our success."



CONVICTION INTEGRITY UNIT

Working for Justice Outside the Office



The Pajcic Firm is proud of our own Raymond Reid for his part in helping to secure the release of two men who spent 43 years behind bars. As a former prosecutor, Raymond was one of five panelists on Florida's first-ever Conviction Integrity Unit, established by State Attorney Melissa Nelson. The panel painstakingly reviewed evidence from a 1976 case and determined the men were wrongfully convicted. Raymond found it extremely rewarding to watch these men regain their freedom. Jailed since age 18, upon release, Nathan Myers registered to vote and proudly showed his registration card to Raymond during a recent meeting where the two got to visit for the first time since gaining his freedom.

MORE THAN \$5 MILLION FOR FATAL MOTORCYCLE WRECK DURING BIKE WEEK

Three good friends came down to St. Augustine to take in Bike Week, escape the Connecticut winter, and ride across Florida. Jim, Rodney and Kevin had spent the day at a Harley-Davidson dealership, collecting t-shirts and seeing the sights. As they rounded a curve on rural US1 in a safe, staggered formation, all of a sudden out of the darkness loomed a big delivery truck blocking both northbound lanes.



All of the bikers took immediate, evasive action. Kevin and Rodney skirted the front of the truck. Jim was not so lucky. He had a direct impact between the cab and the box and did not survive.

Their original attorney obtained a favorable statement from a key eyewitness who said that the bikers were not speeding and had no chance to avoid the truck. But when he demanded \$5 million to settle all the cases, the insurance company, relying on a 0.181 blood alcohol level of the motorcyclist who was killed, only offered \$325,000.

With the statute of limitations approaching, their attorney brought in Pajcic & Pajcic, whom he had watched win a big wrongful death trial in Flagler County.

Pajcic & Pajcic turned the focus to the delivery company, which, like many “gig” companies denied any responsibility. Pajcic & Pajcic showed that the company demanded excessive hours and controlled every aspect of his employment.

After Pajcic & Pajcic survived 10 motions for summary judgment and the judge determined that punitive damages would be determined by the jury, the case resolved after a second mediation, for more than the original offer. While everyone was happy to settle the case, no one will ever fully recover from the tragedy and the loss of a friend, father and husband.

OVER \$25 MILLION FROM GIG COMPANIES

Many companies deny any responsibility for their drivers, claiming that they are not employees, but only doing a gig. Pajcic & Pajcic will not accept that fiction. In the last year and a half, Pajcic & Pajcic has made gig companies pay over \$25 million in damages to its clients.

\$1.5 MILLION SETTLEMENT FOR SCOOTER DRIVER AND HIS CANINE PASSENGER

J.J. Galasso was just driving his moped down A1A in Flagler County with his golden retriever "Doc" on board, when suddenly a driver hit them from behind.



The scooter caught on fire and J.J. suffered 3rd-degree burns on the lower half of his body and broken facial bones. Miraculously, Doc was not seriously injured, though his eyelashes and whiskers were singed.

J.J. contacted Pajcic & Pajcic whose investigators took immediate action to preserve crucial evidence, canvassing the area and finding witnesses, including some who had taken valuable pictures of the scene. Pajcic & Pajcic was able to secure a \$1.5 million settlement from the defendant driver's insurance company. J.J. appreciated how this was all done in a very timely matter. "It allowed me to move on with my life." J.J.'s days of riding a moped are over. He bought a van and he and Doc traveled across the country together, including a trip to Yellowstone National Park and Vancouver. Doc proved to be the ultimate companion and comfort dog and as far as J.J. is concerned he truly is man's best friend. And J.J. knows he can now count on members of the Pajcic firm to also be his friends for life.



PAJCIC ANIMATION USED IN NATIONAL GEOGRAPHIC DOCUMENTARY

When National Geographic produced a documentary on El Faro, the cargo ship that sank during Hurricane Joaquin, they included an animation Pajcic & Pajcic created for its clients.



The Pajcic & Pajcic animation showed how all the other ships fled the Category 4 storm, while El Faro headed directly into its path.

The ship was using antiquated weather equipment. All 33 crewmembers aboard were killed. National Geographic included the visual demonstration in their powerful documentary that aired in August.

TOUGH TIFFANY



The toughness of Tiffany Hendrix was certainly tested this year. The strong mother of two young children was stunned when her husband, Clint, was diagnosed with ocular melanoma, a rare eye cancer. "When faced with the possibility that it could have been a terminal disease, your perspective on everything shifts so dramatically." Now from her personal experience, she feels like she can relate to her clients on a deeper level. "We all have a 'new normal' that you don't want to have to deal with, but you have no choice." Exercise has been Tiffany's salvation. She tries to work out for one hour every day, lifting weights, running or doing high intensity interval training. Clint has been through proton treatments and is doing well. And even though sometimes Tiffany feels like she has the weight of the world on her shoulders, she knows she is strong enough to handle it.



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To see more case results and to
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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 our 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. They have amassed more than 350 years of combined legal experience and zealously represent clients in their time of need. Some of our 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 our firm and it remains so today. Pajcic & Pajcic's ultimate goal is to obtain a full and fair recovery for every client.