

**IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA**

MAZEN NAEIM,
An individual,

CASE NO.

Plaintiff,

vs.

FLOYD MAYWEATHER JR.,
An individual

Defendants.

COMPLAINT

COMES NOW, the Plaintiff, MAZEN NAEIM, by and through his undersigned counsel, and sues the Defendants, FLOYD MAYWEATHER JR., and alleges as follows:

1. This is an action for damages in excess of Fifty Thousand (\$50,000) Dollars but less than \$75,000, excluding interest, costs, and attorney's fees.
2. At all times relevant hereto, the Plaintiff, MAZEN NAEIM, was a resident of Florida.
3. At all times relevant hereto, the Defendant, FLOYD MAYWEATHER JR., was living in Miami-Dade County, FL.
4. Venue is proper in Miami-Dade County, Florida, because the action took place in Miami-Dade County.
5. At all times relevant hereto, Defendant, FLOYD MAYWEATHER JR., hired and employed bodyguards.

6. On or around September 27, 2020, Plaintiff, MAZEN NAEIM, saw Defendant, FLOYD MAYWEATHER JR., riding a bike in Miami-Dade County, Florida.

7. Plaintiff, MAZEN NAEIM, walked towards Defendant, FLOYD MAYWEATHER JR., and asked for a picture.

8. Defendant, FLOYD MAYWEATHER JR.'s, bodyguards beat up Plaintiff, MAZEN NAEIM, unprovoked.

COUNT I – NEGLIGENCE TRAINING, HIRING, SUPERVISION, AND/OR RETENTION

9. Plaintiff realleges, readopts, and reincorporates Paragraph 1 through 8 as though fully set forth herein.

10. At all times material hereto, Defendant, FLOYD MAYWEATHER JR., owed a duty to exercise reasonable care in training, hiring, supervising, and/or retaining their employees/agents to ensure that others, including the Plaintiff, were not exposed to unnecessary danger which was reasonably foreseeable had Defendant properly trained/hired/supervised/retained Defendant's employees/agents.

11. Defendant, FLOYD MAYWEATHER JR., breached the aforementioned duty and negligently failed to properly train/hire/supervise/retained Defendant's employees/agents.

12. As a result of Defendant, FLOYD MAYWEATHER JR.'s, negligent training, hiring, supervision, and/or retention of Defendant's employees/agents, Plaintiff, MAZEN NAEIM, suffered serious and permanent injuries.

13. As a direct and proximate result of Defendant, FLOYD MAYWEATHER JR.'s, negligence in training, hiring, supervising, and/or retaining his employees/agents, the Plaintiff, MAZEN NAEIM, has suffered permanent bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of

hospitalization, medical and nursing care and treatment, lost wages, loss of earnings, and aggravation of a previously existing condition. The losses are either permanent or continuing, and Plaintiff will continue to suffer these losses in the future.

WHEREFORE, Plaintiff demands trial by jury, judgment for damages, interest and costs, and for such other and further relief as the Court deems appropriate.

RESPECTFULLY submitted on this 24th day of March 2023.

Rosenfeld Law Group

Attorney for Plaintiff

66 W. Flagler St., Suite 900 -#1284

Miami, FL 33130

Toll Free: (833) MISHAPS

Telephone: (786) 668-3608

Fax: (786) 384-7394

Email:

Mrosenfeld@therosenfeldlawgroup.com

By: /s/Matthew Rosenfeld

Matthew Rosenfeld

Florida Bar No. 1018157

Not Official Court Document