

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MARIA DE LOURDES RAMOS

Plaintiff,

v.

EL LAUNDROMAT DE CAGUAS; ABC
INSURANCE COMPANIES; DOES I-X and
any other joint tortfeasors.

Defendants.

CIVIL NO. 25-1602

RE: TORT ACTION FOR
NEGLIGENCE PURSUANT TO
ARTICLES 1536 & 1540, 31
L.P.R.A, 31 L.P.R.A §§ 10801,
10805.

JURY TRIAL DEMANDED

COMPLAINT

TO THE HONORABLE COURT:

APPEARS NOW the Plaintiff, MARIA DE LOURDES RAMOS (hereinafter referred to as “Plaintiff” or “Mrs. Ramos”), through the undersigned counsel, and hereby states, alleges, and requests as follows:

JURISDICTIONAL BASIS

1. This case is based upon diversity jurisdiction under 28 U.S.C. §1332.
2. Plaintiff is a citizen of and resides in the state of Massachusetts.
3. All Defendants are individuals, corporations, business entities, or partnerships who are citizens of Puerto Rico or of a state other than Massachusetts.

4. The matter in controversy exceeds the sum of SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), exclusive of interest and costs, thus vesting jurisdiction on this Honorable Court pursuant to 28 U.S.C. § 1332.
5. Venue is proper in the District of Puerto Rico pursuant to 28 U.S.C. § 1391, since the events and acts or omissions giving rise to this claim occurred in this district.

THE PARTIES

6. Plaintiff **MARIA DE LOURDES RAMOS** (hereinafter “Mrs. Ramos” or “Plaintiff”) is of legal age, a citizen and resident of the state of Massachusetts.
7. Defendant **EL LAUNDROMAT DE CAGUAS** (hereinafter “El Laundromat” or “Laundromat”) is a company located at 32 Avenida Luis Muñoz Marín, Caguas, PR 00725 and incorporated under the laws of the Commonwealth of Puerto Rico, which upon information and belief owns, operates, and/or manages the property, and facilities known as El Laundromat de Caguas.
8. Defendants **ABC INSURANCE COMPANIES** are corporations organized or operating under the laws of the Commonwealth of Puerto Rico, which insure one or more co-defendants for the acts and/or omissions described herein or that insure the laundromat facilities and as such are contractually liable for the injuries and damages sustained by Plaintiff.
9. Defendants **DOES I-X** are individuals, corporations, or entities that are citizens or Puerto Rico or a state other than Massachusetts who are unknown and are jointly and severally liable for Plaintiff’s damages.

GENERAL ALLEGATIONS

10. Plaintiff, Mrs. Ramos is a 64-year-old woman who was on vacation and visiting her family in Puerto Rico.
11. At around 11:00 AM on February 13th, 2025, Plaintiff was visiting El Laundromat de Caguas.
12. Mrs. Ramos was accompanied by her husband, Pedro Correa; and her son, Jomar Rosario.
13. Mrs. Ramos proceeded to exit the establishment through the front door entrance, which also served as an exit.
14. Although there is another door at the side of the laundromat, this door is blocked off to prevent its use.
15. Upon exiting through the front door, Mrs. Ramos slipped and fell on the steep exit ramp.
16. The ramp did not have any warning signs, no railings, and had no slip prevention stick-ons on the surface.
17. The ramp only had a rug at the bottom.
18. Plaintiff fell backwards, severely injuring her right ankle. The right foot bent backwards, immediately causing excruciating pain and swelling.
19. Mrs. Ramos recalls hearing her bone break from the inside of her ankle during the fall.
20. Both her husband and son witnessed her fall.
21. Plaintiff was unable to stand or walk after the fall since her right foot could not bear any weight upon it.

22. Her husband, Mr. Correa, promptly went inside the Laundromat to inform an employee of what had happened.
23. Mr. Correa and the employee went outside and saw the plaintiff on the ground.
24. Upon seeing the plaintiff, the employee stated dismissively that a rug or carpet was already placed there to prevent accidents.
25. Plaintiff's son helped her get up, without any help from the laundromat employee, and proceeded to carry her to their car.
26. The plaintiff's family then drove Mrs. Ramos to the emergency room of Menonita Hospital in Caguas, Puerto Rico.
27. She was examined and had x-rays taken of her right foot which confirmed fractures.
28. The x rays confirmed multiple fractures.
29. The plaintiff also complained of painful bruising in her lower back, while being examined.
30. Her right ankle was placed in a cast and she was administered morphine, Demerol, and other medication for pain management.
31. Plaintiffs decided to leave the hospital since her medical insurance did not cover any surgical intervention in Puerto Rico.
32. On February 28th, 2025, once back in Massachusetts, plaintiff visited Dr. Craig Lareau, an orthopedic specialist, who reviewed her x-rays and recommended surgery.
33. On March 5th, 2025, plaintiff underwent the following type of surgery: right open reduction internal fixation lateral malleolus and syndesmosis.

34. During the surgery eight (8) screws and one (1) plate were inserted in her right ankle.
35. This surgery also revealed ligament damage on both sides of her right ankle which was also treated.
36. These plates and screws were placed to treat her displaced bimalleolar ankle fracture, distal tibiofibular joint injury (syndesmotic injury), as pointed out in the postoperative report.
37. Dr. Lareau's instructed Plaintiff not bear any weight on her right leg.
38. During her post surgery recovery, Plaintiff was unable to walk and since then has had to learn how to properly walk again.
39. Mrs. Ramos used a wheelchair initially as a means of transportation through her house.
40. Later, Mrs. Ramos began using to a walker with knee support and a black recovery boot for further mobility in her home.
41. Since April 22, 2025, Plaintiff has been attending her physical therapy sessions at Northeast Orthopedic Alliance, P.L.L.C.
42. She has been attending physical therapy sessions twice a week.
43. On June 17, 2025, on her scheduled follow-up appointment with Dr. Lareau, her doctor advised her to continue to attend her physical therapy.
44. On September 5th, 2025, Mrs. Ramos had an appointment with her orthopedic surgeon.

45. In this appointment, Dr. Lareau ordered additional weeks of physical therapy, since Mrs. Ramos continues experiencing pain on her ankle and top of her right foot.
46. Plaintiff currently wears an ankle brace to aid with stability.
47. Plaintiff has also continued to experience back pain as a result from her fall and was ordered physical therapy to address this ongoing pain.
48. As a result of her fall and surgery, Mrs. Ramos now experiences many challenges and hurdles in her daily activities.
49. Plaintiff cannot stand for too long, meaning she needs to be seated when showering or when handling house chores.
50. Mrs. Ramos has also been unable to cook and clean her house.
51. Mrs. Ramos is unable to independently transport herself to her appointments or other locations due to her inability to use her right foot in the car accelerator pedal.
52. Plaintiff also experiences ongoing pain and a burning sensation when standing for long periods of time.
53. As a result of her fall, Mrs. Ramos has had to endure physical therapy sessions for over five months now, which cause her discomfort and pain.
54. In addition to all this, Mrs. Ramos also has been handling back pain that has been lingering since her fall at the Laundromat.

FIRST CAUSE OF ACTION – NEGLIGENCE OF EL LAUNDROMAT DE CAGUAS; UNDER ARTICLES 1536 & 1540, 31 L.P.R.A §§ 10801, 10805

55. The allegations contained above are incorporated by reference as if again fully set forth herein.
56. Defendant, through their acts or omissions caused damage to Plaintiff through

fault or negligence in violation of 31 L.P.R.A. § 10801, 10805.

57. On or about February 13th, 2025, Defendant owned and/or operated EL LAUNDROMAT DE CAGUAS.
58. Defendant, as the owners and operators of the Laundromat had a duty to Plaintiff to keep the area safe and free from dangerous conditions, so that Plaintiff and other guests would not suffer harm.
59. Defendant breached their duty of care to Plaintiff by failing to keep their premises free from dangerous conditions so that Plaintiff and other guests would not suffer harm or damage.
60. Defendant failed to properly inspect and/or maintain their facilities and door entrance areas where Plaintiff was injured.
61. Defendant knew or should have known that the steep ramp in their door entrance was not up to code or building regulations in Puerto Rico.
62. Defendant should have known the ramp was negligently designed as was evident given its steep and dangerous slope.
63. Defendant knew or should have known of the dangerous conditions present in the door entrance area for clients trying to enter and do their laundry or other activities.
64. It was reasonably foreseeable to defendants that the dangerous condition of the steep ramp posed a threat to the safety and well-being of its clients and did not take any measures to eliminate the dangerous condition.
65. Defendant failed to adequately and safely prevent and/or mitigate incidents in in the ramp with caution signs so as to avoid this dangerous and foreseeable situation

from happening and causing serious injury such as that suffered by Plaintiff.

66. Defendant failed to provide a second entrance or exit door for clients entering and exiting their facilities.
67. Defendant had a duty towards its clients like Plaintiff to keep the door entrance area in a reasonably safe condition and to adequately inspect it to prevent foreseeable risks or accidents.
68. Defendant's employees negligently ignored the accident caused by their steep ramp and failed to provide assistance to the injured Plaintiff.
69. The dangerous conditions of the door entrance directly and proximately caused Mrs. Ramos' injuries and damages.
70. Defendants failed to take all reasonable safety measures to ensure that Plaintiff was not injured in their premises.
71. As a direct and proximate result of Defendant's negligence and carelessness, Plaintiff sustained physical, emotional, mental, and economic damages.

SECOND CAUSE OF ACTION –
ABC INSURANCE COMPANIES

72. The allegations contained above are incorporated by reference as if again fully set forth herein.
73. Defendants ABC Insurance Companies were, at the time herein pertinent, authorized to do business as such in Puerto Rico, and issued an insurance policy on behalf of Defendants or another tortfeasor.
74. Pursuant to 26 P.R. Laws Ann. § 2001, an insurance company is directly liable for the negligence or fault of its insured.
75. Pursuant to 26 P.R. Laws Ann. § 2003, an action against an insurer may be brought

separately or may be joined together with an action against its insured.

76. As a result, Defendants ABC Insurance Companies are liable to Plaintiff for the damages caused to her by Defendants, facility operators, and staff.

THIRD CAUSE OF ACTION - DOES I-X

77. The allegations contained above are incorporated by reference as if again fully set forth herein.
78. Defendants Does I-X caused damages to Plaintiff through fault or negligence in violation of 31 L.P.R.A. §§ 10801, 10805 via their employees, agents, or assignees.
79. Defendants Does I-X are jointly and severally liable for the damages caused to Plaintiff.

DAMAGES

80. The allegations contained above are incorporated by reference as if again fully set forth herein.
81. As a result of the negligent acts and/or omissions of Defendants, Mrs. Ramos has suffered physical, emotional, mental, and economic damages.
82. As a result of the negligent acts and/or omissions of Defendants, Mrs. Ramos' vacation was ruined as a result of the pain, discomfort, emotional distress and physical impairment because of her ankle fracture.
83. Mrs. Ramos' life was upended as she was required to seek urgent medical care, interventional surgery, physical therapy, and other forms of treatment for her injuries and subsequent symptoms from February 2025 to present day, all as a result of Defendants' negligent acts.

84. Mrs. Ramos is still experiencing mild swelling, pain and general discomfort in her ankle as a result of the fall, requiring additional medical care, therapies, and treatment as a result.
85. Mrs. Ramos is still experiencing back pain as a result of the fall which has required additional medical care, therapies, and treatment.
86. Mrs. Ramos has physically and emotionally suffered for many months as a result of the injuries sustained by defendants' negligence.
87. Mrs. Ramos' physical impairment due to her injuries sustained at El Laundromat de Caguas have resulted in loss of enjoyment of life.
88. Plaintiff's physical, emotional and mental damages as a result of the injuries sustained in the incident have a reasonable value of no less than \$850,000.00.
89. As a result of the negligent acts, omissions, or misrepresentations of Defendants, Plaintiff has suffered economic damages in the form of out-of-pocket medical expenses.
90. Plaintiff's damages as a result of the injuries sustained in the incident have a reasonable value of no less than \$850,000.00.
91. Defendants or their employees acted knowingly, intentionally or with gross negligence or disregard to the safety of Plaintiff. Pursuant to Article 1538 of the Puerto Rico Civil Code, plaintiff requests that the total amount of compensation be doubled.

TRIAL BY JURY DEMANDED

92. Plaintiff hereby demands trial by jury.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and

severally, in the amount of no less than \$850,000.00 plus costs incurred, reasonable attorneys' fees, and such other and further relief as to this Honorable Court may deem just and proper under the law.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of November 2025.

Plaintiff's Counsel:

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