

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
CIVIL DIVISION**

ERIC ADESON,

Plaintiff,

CIRCUIT CIVIL NO:

v.

SHELLEY NICOLE VAUGHN,

Defendant.

_____ /

COMPLAINT

Plaintiff, ERIC ADESON, by and through the undersigned attorneys, hereby sues the Defendant, SHELLEY NICOLE VAUGHN, and alleges as follows:

1. This is an action for damages in excess of Thirty Thousand Dollars (\$30,000.00), exclusive of interest and costs.
2. The Sixth Judicial Circuit Court has venue pursuant to Florida Statutes, Section 47.011 because the cause of action accrued in Pinellas County, Florida.
3. The Sixth Judicial Circuit Court has personal jurisdiction over Defendant, SHELLEY NICOLE VAUGHN, pursuant to Florida Statutes, Section 48.193 because she committed a tortious act within the State of Florida.
4. Plaintiff, ERIC ADESON, is now, and was at the time of the incident, a resident of Pinellas County, Florida.
5. Defendant, SHELLEY NICOLE VAUGHN, is now, and was at the time of the incident, a resident of Pinellas County, Florida.
6. At all times material hereto, Plaintiff, ERIC ADESON, owned a small pug-beagle mix dog (“puggle”) named “Bucky,” as his personal pet and companion.

7. Plaintiff, ERIC ADESON, and Defendant, SHELLEY NICOLE VAUGHN, were in a romantic relationship that ended in February 2022.

8. On or about the morning of February 27, 2022, Defendant, SHELLEY NICOLE VAUGHN, went to the home of Plaintiff, ERIC ADESON. Plaintiff's home is located on the 7th floor of a twelve-story condominium building.

9. When Defendant, SHELLEY NICOLE VAUGHN, entered Plaintiff's home, Plaintiff immediately detected the smell of alcohol and noticed that Defendant appeared intoxicated. In addition, Defendant was verbally aggressive towards Plaintiff, ERIC ADESON, in his home.

10. Due to Defendant's intoxication and aggressive conduct, Plaintiff, ERIC ADESON, requested that Defendant, SHELLEY NICOLE VAUGHN, leave his home and that he would speak with her at a later, more appropriate, time.

11. Defendant, SHELLEY NICOLE VAUGHN, refused to leave Plaintiff's home and proceeded to throw Plaintiff's personal property, including his cell phone and keys, over the 7th floor exterior balcony railing of Plaintiff's home.

12. Plaintiff, ERIC ADESON, then again instructed Defendant, SHELLEY NICOLE VAUGHN, to leave his home.

13. Upon Plaintiff's final request to leave his home, Defendant SHELLEY NICOLE VAUGHN, stopped, smiled at Plaintiff, picked up his small puggle dog "Bucky," and threw him over the exterior balcony railing to the concrete parking lot below, resulting in the death of Plaintiff's pet dog and companion.

14. As a result of Defendant, SHELLEY NICOLE VAUGHN's conduct Plaintiff, ERIC ADESON, suffered (and is currently suffering) severe emotional distress.

COUNT I – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

15. Plaintiff, ERIC ADESON, hereby states and realleges paragraphs one through fourteen as if set out in full hereafter.

16. Defendant, SHELLEY NICOLE VAUGHN's conduct was intentional and intended, and she knew or should have known that her conduct would result in emotional distress to the Plaintiff.

17. Defendant, SHELLEY NICOLE VAUGHN's conduct was so outrageous in character and so extreme in degree as to go beyond all bounds of decency and regarded as atrocious, odious and utterly intolerable in a civilized community.

18. As a direct and proximate result of Defendant, SHELLEY NICOLE VAUGHN's conduct, Plaintiff, ERIC ADESON, suffered (and is currently suffering) severe emotional distress.

WHEREFORE, Plaintiff, ERIC ADESON, demands a trial by jury and judgment against the Defendant, SHELLEY NICOLE VAUGHN, in an amount within the jurisdictional limits of this Court, to wit: More than Thirty Thousand (\$30,000.00) Dollars plus costs, and for such other relief to which Plaintiff may be justly entitled.

DATED this 28th day of February, 2022, in Clearwater, Pinellas County, Florida.

CAREY LEISURE & NEAL

622 Bypass Drive
Clearwater, Florida 33764
Phone: (727) 799-3900
Fax: (727) 295-2921
Service Email:
docservice@careyandleisure.com



KATHERINE NEAL, ESQ.

Florida Bar #11642
Attorneys for Plaintiff