

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS

SUPERIOR COURT
C.A. NO.

NAKITA RAPOSO,
Plaintiff,

v.

NEVAEH RAYNE MAURICIO-BENTING
and JAMES BENTING,
Defendants.

COMPLAINT

1. Plaintiff, Nakita Raposo (“Raposo” or “Plaintiff”), is an individual residing at 26 Birchfield Street, Fairhaven, Massachusetts.
2. Defendant, Naveah Rayne Mauricio-Benting (“Mauricio-Benting”), is an individual residing at 107 Precinct Street, Lakeville, Massachusetts 02347.
3. Defendant, James J. Benting (“James Benting”), is an individual residing at 107 Precinct Street, Lakeville, Massachusetts 02347.

FACTUAL ALLEGATIONS

4. On or about April 29, 2023, the Plaintiff was lawfully operating a motor vehicle, a 2007 Honda bearing Massachusetts registration 3FYT34, on Bedford Street (Route 18) in the area of 330 Bedford Street in Lakeville, Massachusetts.
5. Upon information and belief, Defendant Mauricio-Benting was operating a 2011 BMW bearing Massachusetts registration 2AMF86.
6. Upon information and belief, Defendant Benting was the owner of said motor vehicle operated by Defendant Mauricio-Benting.

7. At said time and place, Defendant Mauricio-Benting negligently operated the motor vehicle by pulling into the Plaintiff's lane of travel while attempting to merge into the northbound lane.
8. As a result of said negligent operation, the Defendant's vehicle collided with the Plaintiff's vehicle.
9. As a direct and proximate result of the Defendant's negligence, the Plaintiff sustained serious personal injuries and damages.
10. The Plaintiff required ambulance transport to St. Luke's Hospital for emergency medical treatment.
11. As a direct and proximate result of the Defendant's negligent operation of the vehicle, Raposo sustained injuries that required medical treatment.
12. The Plaintiff has suffered pain, suffering, and other damages.
13. As a further result of the Defendants' negligence, the Plaintiff was unable to work for an extended period of time.
14. At the time of the incident, the Plaintiff was employed in landscaping and painting.

CAUSES OF ACTION

COUNT I- NEGLIGENCE
(Raposo Naveah Rayne Mauricio-Benting)

15. The Plaintiff repeats and realleges paragraphs 1 through 16 as if fully set forth herein.
16. Defendant Mauricio-Benting owed a duty to operate their motor vehicle with reasonable care.
17. Defendant Mauricio-Benting breached that duty by negligently operating their vehicle and crashing into Plaintiff's vehicle.

18. As a direct and proximate result of said negligence, the Plaintiff sustained personal injuries and damages.

19. As a result of the Defendants' conduct, the Plaintiff has suffered bodily injuries, pain and suffering, medical expenses, lost wages and impairment of earning capacity.

COUNT II- VICARIOUS LIABILITY (OWNER LIABILITY)
(Raposo v. James Benting)

20. The Plaintiff repeats and realleges paragraphs 1 through 19 as if fully set forth herein.

21. Upon information and belief, the Defendant James Bentin was the owner of the motor vehicle operated by Defendant Mauricio-Benting.

22. Defendant Benting is liable for the negligent operation of said vehicle pursuant to G.L. c. 231 section 85A.

23. As a direct and proximate result of the negligence of Defendant Mauricio-Benting, for which Defendant James Benting is legally responsible for, the Plaintiff sustained injuries.

24. As a result of the Defendants' conduct, the Plaintiff has suffered bodily injuries, pain and suffering, medical expenses, lost wages and impairment of earning capacity.

PRAYER FOR RELIEF

WHEREFORE, Nakita Raposo respectfully requests that this Honorable Court:

- A. Award compensatory damages in an amount to be determined at trial;
- B. Award costs and interest; and
- C. Grant such other relief as this Court deems just and proper.

JURY DEMAND

The Plaintiff hereby demands a trial by jury on all issues so triable.

The Plaintiff,
By her Attorneys,

/s/Ronald W. Dunbar, Jr.

Ronald W. Dunbar, BBO # 567023

Jaffar Bari Shick, BBO #711916

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Dated: April 17, 2026