

IN THE CIRCUIT COURT OF THE
SEVENTH JUDICIAL CIRCUIT, IN AND
FOR VOLUSIA COUNTY, FLORIDA

CASE NO:

LINETTE QUINTANA and RADAMES
ESTRADA,

Plaintiffs,

v.

CITY OF DELTONA

Defendants.

_____ /

COMPLAINT

COME NOW the Plaintiffs, LINETTE QUINTANA and RADAMES ESTRADA, by and through the undersigned counsel, and sue the Defendant, CITY OF DELTONA, and state as follows:

1. This is an action for damages that exceed the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS.

2. At all times material to this action, Plaintiff, LINETTE QUINTANA, is a natural person residing in Deltona, Volusia County, Florida.

3. At all times material to this action, Plaintiff, RADAMES ESTRADA, is a natural person residing in Deltona, Volusia County, Florida.

4. At all times material to this action, Defendant, CITY OF DELTONA, is a Municipal Corporation authorized to and doing business in Volusia County, Florida and was put on notice through a statutory notice on February 10th, 2025 (Exhibit A).

5. All other conditions precedent to the bringing up of this action have been performed, have occurred or have been waived.

6. All actions giving rise to this claim occurred in Volusia County, Florida.

FACTS COMMON TO ALL COUNTS

7. On or about September 25, 2024, Plaintiff, RADAMES ESTRADA, was operating a motor vehicle also occupied by Plaintiff, LINETTE QUINTANA, traveling East on Saxon Blvd in Deltona, Volusia County, Florida.

8. At that time and place, the Defendant, THE CITY OF DELTONA, by and through it's agent, apparent agent, servant or employee, CHRISTOPHER ROBINSON, was operating a motor vehicle owned by the Defendant, THE CITY OF DELTONA, behind the Plaintiffs' vehicle in Volusia County, Florida.

9. At that time and place, CHRISTOPHER ROBINSON was acting as an employee of Defendant, THE CITY OF DELTONA, and operated the motor vehicle within the course and scope of his employment.

10. At that time and place, the Defendant, THE CITY OF DELTONA's, apparent agent, servant or employee, CHRISTOPHER ROBINSON, negligently and carelessly operated and/or maintained his vehicle so as to collide with the motor vehicle driven by Plaintiff, RADAMES ESTRADA and occupied by Plaintiff, LINETTE QUINTANA.

11. As a result of the collision caused by the negligence of agent, apparent agent, servant or employee of Defendant, THE CITY OF DELTONA, Plaintiffs, LINETTE QUINTANA and RADAMES ESTRADA, sustained serious and permanent injuries.

12. As the principal, master and/or employer of CHRISTOPHER ROBINSON, defendant, CITY OF DELTONA, is vicariously liable, due to Florida's Doctrine of Respondeat Superior, for the fault of CHRISTOPHER ROBINSON.

**COUNT I – ACTION BY PLAINTIFF, LINETTE QUINTANA, BASED ON FLORIDA’S
DOCTRINE OF RESPONDEAT SUPERIOR, AGAINST DEFENDANT, THE CITY OF
DELTONA**

13. Plaintiff, LINETTE QUINTANA, adopts and realleges Paragraphs 1 through 13 as fully set forth herein.

14. That on September 25, 2024, CHRISTOPHER ROBINSON, was working in the course and scope of his employment with defendant, CITY OF DELTONA.

15. Defendant’s employee, CHRISTOPHER ROBINSON, was negligent and careless in the operation of his motor vehicle as to collide with the vehicle operated by Plaintiff, RADAMES ESTRADA, in which Plaintiff, LINETTE QUINTANA was a passenger.

16. As the principal, master and/or employer of CHRISTOPHER ROBINSON, defendant, CITY OF DELTONA, is vicariously liable, due to Florida’s Doctrine of Respondeat Superior, for the fault of CHRISTOPHER ROBINSON.

17. As a direct and proximate result of the negligence of CHRISTOPHER ROBINSON, and defendant CITY OF DELTONA, Plaintiff, LINETTE QUINTANA, suffered significant bodily injury and resulting pain and suffering, impairment, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, loss of earnings, and loss of ability to earn money. The injuries to the Plaintiff are permanent and he will continue to suffer the losses in the future.

WHEREFORE, Plaintiff, LINETTE QUINTANA, demands judgment for damages against Defendant, THE CITY OF DELTONA, for personal injury including the losses enumerated herein, costs, interest and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT II – ACTION BY PLAINTIFF, RADAMES ESTRADA, BASED ON FLORIDA’S
DOCTRINE OF RESPONDEAT SUPERIOR, AGAINST DEFENDANT, THE CITY OF
DELTONA**

18. Plaintiff, RADAMES ESTRADA, adopts and realleges Paragraphs 1 through 13 as fully set forth herein.

19. That on September 25, 2024, CHRISTOPHER ROBINSON, was working in the course and scope of his employment with defendant, CITY OF DELTONA.

20. Defendant’s employee, CHRISTOPHER ROBINSON, was negligent and careless in the operation of his motor vehicle as to collide with the vehicle operated by Plaintiff, RADAMES ESTRADA.

21. As the principal, master and/or employer of CHRISTOPHER ROBINSON, defendant, CITY OF DELTONA, is vicariously liable, due to Florida’s Doctrine of Respondeat Superior, for the fault of CHRISTOPHER ROBINSON.

22. As a direct and proximate result of the negligence of CHRISTOPHER ROBINSON and Defendant CITY OF DELTONA, Plaintiff, RADAMES ESTRADA, suffered significant bodily injury and resulting pain and suffering, impairment, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, loss of earnings, and loss of ability to earn money. The injuries to the Plaintiff are permanent and he will continue to suffer the losses in the future.

WHEREFORE, Plaintiff, RADAMES ESTRADA, demands judgment for damages against Defendant, THE CITY OF DELTONA, for personal injury including the losses enumerated herein, costs, interest and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

DEMAND FOR JURY TRIAL

Plaintiffs, LINETTE QUINTANA and RADAMES ESTRADA, demand a trial by jury on all issues.

RESPECTFULLY submitted this 3rd day of September, 2025.

/s/ Fabio S. Duran

Fabio S. Duran, Esq.

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In compliance with (FL R. Jud. Admin. 2.516)

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Attorney for Plaintiff

EXHBIIT-A

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

City of Delton
2345 Providence Blvd.
Delton, FL 3725



9590 9402 8441 3156 9807 42

2. Article Number (Transfer from service label)

9589 0710 5270 2074 9928 44

PS Form 3811, July 2020 PSN

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A. Signature 	☐ Agent ☐ Addressee
B. Received by (Printed Name) J. D. A. X.	C. Date of Delivery 2/12
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3. Service Type

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Quintana, Linnette

