

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

CASE NO.: 2025 27654 CODL

DONALD R. DEES,
Plaintiff,

v.

CITY OF DELTONA,
Defendant.

_____/

PLAINTIFF'S NOTICE OF FILING PROPOSED REVISED STATEMENT OF CLAIM

Plaintiff, DONALD RAY DEES, appearing pro se, hereby files this Notice of Filing Proposed Revised Statement of Claim in support of Plaintiff's Motion for Leave to File Revised Statement of Claim filed on December 30, 2025.

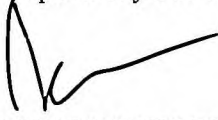
The Proposed Revised Statement of Claim is attached hereto as ****Exhibit A**** and is submitted for the Court's consideration pursuant to Florida Rule of Civil Procedure 1.190(a).

The proposed revision is limited solely to expressly alleging Plaintiff's standing as assignee of the claim and conforming the damages sought to the value of the assigned claim. The proposed revision does not assert a new cause of action, add new parties, or alter the factual basis of liability previously alleged.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-service and/or the Florida Courts E-Filing Portal to counsel for the City of Deltona on this 19th day of January, 2026.

Respectfully submitted this 19th day of January 2026.

A handwritten signature in black ink, appearing to read 'Donald Ray Dees', with a stylized, sweeping flourish extending from the end.

DONALD RAY DEES

Plaintiff, Pro Se

10016 Ainsworth Ave. S.

Tacoma, WA 98444

(253) 278-5784

ddees215@yahoo.com

EXHIBIT A
PLAINTIFF'S PROPOSED REVISED STATEMENT OF CLAIM

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

CASE NO.: 2025 27654 CODL

DONALD RAY DEES,
Plaintiff,

v.

CITY OF DELTONA,
Defendant.

_____ /

Plaintiff, DONALD RAY DEES ("Plaintiff"), appearing pro se, submits this Proposed Revised Statement of Claim pursuant to Florida Rule of Civil Procedure 1.190(a), subject to leave of Court, and states as follows:

1. This action arises from property damage caused by an alleged hazardous condition located within the Defendant City of Deltona's right-of-way.
2. The incident resulted in damage to a motor vehicle originally owned by Kevin Dees.
3. After commencement of this action, Kevin Dees executed a written assignment assigning to Plaintiff all rights, title, and interest in and to any and all claims arising from the loss and damage to the vehicle.
4. The written assignment has been filed in the docket of this action and was previously referenced in Plaintiff's response to Defendant's Motion to Dismiss.
5. By virtue of the assignment, Plaintiff is the real party in interest with standing to pursue this claim and is entitled to seek the full measure of damages held by the assignor.

6. Defendant City of Deltona owed a duty to maintain its right-of-way in a reasonably safe condition and to correct or warn of hazardous conditions it knew or should have known existed.
7. Defendant breached its duty by failing to remedy or warn of the hazardous condition, which directly and proximately caused damage to the vehicle.
8. As a direct and proximate result of Defendant's negligence, Plaintiff has suffered property damages in an amount exceeding the jurisdictional minimum of this Court, representing the full value of the assigned claim.
9. Plaintiff seeks judgment against Defendant for damages according to proof at trial, together with court costs and such other relief as the Court deems just and proper.

WHEREFORE, Plaintiff respectfully demands judgment against Defendant, CITY OF DELTONA, for damages in excess of the jurisdictional minimum of this Court, plus costs and such other relief as is just and proper.

Respectfully submitted,

DONALD RAY DEES
Plaintiff, Pro Se
10016 Ainsworth Ave. S.
Tacoma, WA 98444
(253) 278-5784
ddees215@yahoo.com