

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

CASE NO:

MICHAEL BROWN,

Plaintiff,

vs.

CITY OF DELAND,

Defendant.

COMPLAINT

COMES NOW, Plaintiff, **MICHAEL BROWN**, by and through the undersigned counsel, brings this action against Defendant, **CITY OF DELAND**, and alleges:

1. This is an action for damages that exceeds the sum of Fifty Thousand Dollars (\$50,000.00), exclusive of costs, interest and attorneys' fees (The estimated value of Plaintiff's claim is in excess of the minimum jurisdictional threshold required by this Court). Accordingly, Plaintiff has entered "\$50,001" in the civil cover sheet for the "estimated amount of the claim" as required in the preamble to the civil cover sheet for jurisdictional purposes only (the Florida Supreme Court has ordered that the estimated "amount of claim" be set forth in the civil cover sheet for data collection and clerical purposes only). The actual value of Plaintiff's claim will be determined by a fair and just jury in accordance with Article 1, Section 21, Fla. Const.

2. That at all times material hereto Plaintiff, **MICHAEL BROWN**, was and is a resident of Volusia County, Florida.

3. That at all times material hereto Defendant, **CITY OF DELAND**, a governmental entity, is authorized to do and doing business in Volusia County, Florida.

4. The Plaintiff has complied with all provisions of Florida Statute 768.28, and specifically Florida Statute 768.28(6) relating to presenting a claim in writing and notice of the action. The appropriate governmental agencies have denied the claim presented by the Plaintiff or, and failed, in the alternative, to respond within six (6) months after it was filed. Pursuant to the above statute, the claim has been either affirmatively denied or deemed denied. A copy of the notice letter is attached hereto as Exhibit A.

5. At all times material hereto, Anthony Doti, a non-party, was an agent and/or employee of Defendant, **CITY OF DELAND**.

6. Venue is proper as the incident occurred in Deland, Volusia County, Florida.

7. On or about September 21, 2025, Plaintiff, **MICHAEL BROWN**, operated a motor vehicle travelling Northbound on Woodland Blvd., in Deland, Volusia County, Florida.

8. At said time and place, Defendant, **CITY OF DELAND**, owned a motor vehicle that was operated with its permission and consent by Anthony Doti, a non-party, operated a motor vehicle travelling Northbound on Woodland Blvd., in Deland, Volusia County, Florida.

9. At said time and place, Anthony Doti, a non-party, was an employee of Defendant, **CITY OF DELAND**, and was in the course and scope of employment at the time of the subject crash.

10. At said time and place, Anthony Doti, a non-party, negligently operated or maintained the motor vehicle owned by Defendant, **CITY OF DELAND**, so that it collided with the Plaintiff's motor vehicle.

11. Defendant, **CITY OF DELAND**, was the employer of Anthony Doti, a non-party, and is therefore vicariously liable for the negligent act of its employee, Anthony Doti, a non-party.

12. As a direct and proximate result of Anthony Doti's, a non-party, negligence to which Defendant, **CITY OF DELAND**, is variously liable, Plaintiff, **MICHAEL BROWN**, suffered bodily injury including a permanent injury to the body as a whole, aggravation of a pre-existing condition and/or activation of a latent condition, pain and suffering of both a physical and mental nature, disability, physical impairment, disfigurement, mental anguish, inconvenience, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money, and other legal damages that are yet to be determined. These losses are either permanent or continuing and Plaintiff will suffer these losses in the future. Plaintiff will suffer or incur injuries, expenses and impairment in the future. Plaintiff's motor vehicle was also damaged, and Plaintiff lost the use of it during the period required for its repair or replacement. Additionally, the value of Plaintiff's motor vehicle was diminished as a result of the negligence of the Defendant.

WHEREFORE the Plaintiff, **MICHAEL BROWN**, demands judgment against the Defendant, **CITY OF DELAND**, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars and requests a trial by jury of all issues triable as of right by a jury.

Respectfully submitted this 22nd day of May 2026.

/s/ **Jeremy Skinner**

Jeremy Skinner, Esquire

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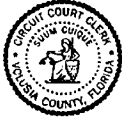
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CLERK OF THE CIRCUIT COURT

SEVENTH JUDICIAL CIRCUIT - VOLUSIA COUNTY
P.O. BOX 6043 DELAND, FLORIDA 32721-6043 - WWW.CLERK.ORG

Filing #: [REDACTED]

Filer: Jeremy Patrick Skinner

Payment: \$410.00

- 1 Filing Fee: \$400.00
- 2 Summons Issuance: \$10.00
- 3 Complaints/Petitions Complaint: \$0.00
- 4 Complaints/Petitions Request that Summons be Issued: \$0.00
- 5 Miscellaneous Other Document: \$0.00
- 6 Complaints/Petitions Civil Cover Sheet: \$0.00

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