

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

CASE NO:

KAYLYN MURPHY,

Plaintiff,

vs.

VOLUSIA COUNTY SHERIFFS OFFICE,

Defendants.

_____ /

COMPLAINT

Plaintiff, **KAYLYN MURPHY**, files this complaint against Defendants, **VOLUSIA COUNTY SHERIFFS OFFICE** 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, **KAYLYN MURPHY**, 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, **KAYLYN MURPHY's** claim will be determined by a fair and just jury in accordance with Article 1, Section 21, Fla. Const.

2. The Seventh Judicial Circuit Court has venue pursuant to Florida Statutes, §47.011 because the cause of action occurred in Volusia County, Florida.

THE PARTIES

3. At all times material to this action, Plaintiff, **KAYLYN MURPHY**, was a natural person residing in Volusia County, Florida.

4. At all times material to this action, Defendant, **VOLUSIA COUNTY SHERIFFS OFFICE** was a Foreign Profit Corporation authorized to do business and doing business in Volusia County, Florida.

FACTS

5. On or about December 1, 2025, Plaintiff, **KAYLYN MURPHY**, operated a vehicle travelling Eastbound on Interstate 4 (State Road 400) in the eastbound inside lane in Volusia County, Florida.

6. At that time and place, Julia Curtin, was a servant, agent, and/or employee of Defendant, **VOLUSIA COUNTY SHERIFFS OFFICE** and was acting within the course and scope of said agency and/or employment and in furtherance of Defendant, **VOLUSIA COUNTY SHERIFFS OFFICE's** business interests.

7. At the time and place, Julia Curtin, operated a vehicle travelling Eastbound on Interstate 4 (State Road 400) in the eastbound inside lane approaching mile marker 121, in Volusia County, Florida.

8. At that time and place, Julia Curtin, negligently operated and or maintained the motor vehicle so that it collided with Plaintiff, **KAYLYN MURPHY**.

COUNT I
PLAINTIFF, KAYLYN MURPHY CLAIMS AGAINST
DEFENDANT, VOLUSIA COUNTY SHERIFFS OFFICE.

Plaintiff, **KAYLYN MURPHY** re-alleges and incorporates by reference paragraphs 1 through 13, above.

9. At that time and place, Julia Curtin, was operating the motor vehicle while in the course and scope of their employment with Defendant, **VOLUSIA COUNTY SHERIFFS OFFICE.**

10. At all relevant times, Julia Curtin, was the employee, agent, servant, and/or statutory employee for Defendant, **VOLUSIA COUNTY SHERIFFS OFFICE**, operating for the benefit of, in furtherance of the interests of and/or within the course and scope of their employment with Defendant, **VOLUSIA COUNTY SHERIFFS OFFICE.** Accordingly, Defendant, **VOLUSIA COUNTY SHERIFFS OFFICE**, is vicariously liable for the negligent acts of Julia Curtin, under the doctrine of respondeat superior.

11. As a direct and proximate result of the negligence of Julia Curtin, Plaintiff, **KAYLYN MURPHY**, suffered bodily injury including a permanent injury to the body as a whole, 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, aggravation of an existing condition, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money and loss of ability to lead and enjoy a normal life. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future. Plaintiff, **KAYLYN MURPHY**, will suffer or incur the injuries, expenses and impairment in the future.

WHEREFORE, the Plaintiff, **KAYLYN MURPHY**, demands judgment against the Defendant, **VOLUSIA COUNTY SHERIFFS OFFICE**, in an amount in excess of Fifty Thousand (\$50,000) Dollars and requests a trial by jury of all issues triable as of right by a jury.

RESPECTFULLY submitted this 31st day of July 2026.

/s/ Jeremy Skinner

Jeremy Skinner, Esquire

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CLERK OF THE CIRCUIT COURT

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