

Statement of Facts

On November 21, 2023, at approximately 5:42 PM, Isabella Moreno, a 33-year-old dental hygienist employed by Bright Smile Dental Clinic, was involved in a rear-end automobile collision at the intersection of 7th St & McDowell Rd, Phoenix, AZ. Ms. Moreno was lawfully stopped at a red light when her vehicle was violently struck from behind by a 2015 Ford F-150, driven by Pedro Lopez (DOB: 03/22/1985; AZ License: AZ-12345678), whose vehicle was insured through Guardian Auto, policy number GA-987654321. The impact resulted from Mr. Lopez's failure to maintain a safe stopping distance. He is solely liable for the ensuing damages.

Injuries

As a direct and proximate result of the collision, Ms. Moreno sustained the following injuries:

- Cervical strain (whiplash)
- Lumbar strain
- Right shoulder contusion
- Anxiety and emotional distress

Physical Examination

Upon immediate presentation at Phoenix General Hospital's Emergency Room, Ms. Moreno reported acute cervical pain, lower back pain, and right shoulder soreness. The physical exam revealed muscle spasms and tenderness along her neck and lumbar region, with limited range of motion. Palpable bruising was noted over the right shoulder. Follow-up examinations at Costa Vista Chiropractic documented persistent cervical and lumbar dysfunction, as well as ongoing right shoulder pain. Neurological assessments revealed intermittent paresthesia and heightened anxiety responses.

Diagnoses

- Acute cervical strain (whiplash injury)
- Acute lumbar strain
- Contusion of the right shoulder
- Acute anxiety and emotional stress disorder secondary to motor vehicle accident

Findings

Medical imaging and clinical observation confirmed:

- Spasm and swelling in the cervical and lumbar paraspinal musculature
- Soft tissue contusion present on the right shoulder with localized edema
- No evidence of fracture or dislocation on plain films and MRI
- Persistent muscle stiffness, pain, and anxiety during recovery

Damages

Below is an itemized chart of economic losses (from *payroll chart on page 1 of [23]* and assessments):

Category	Amount (\$)	Notes
Medical bills (ER/hospital)	\$2,800.00	Phoenix General Hospital
Chiropractic care	\$1,250.00	Costa Vista Chiropractic
Neurological consult	\$700.00	Valley Neurology Associates
MRI scans	\$1,300.00	Prime MRI Center
Prescriptions/Medication	\$150.00	Analgesics, muscle relaxants
Lost wages	\$3,300.00	See chart on [23], 70 hours missed
Transportation (medical)	\$175.00	10 trips to facilities, average \$17.50
Total Economic Damages	\$9,675.00	

Future Medical Expenses

Ms. Moreno will require additional follow-up, physical therapy sessions, and ongoing medication refills. Conservative projections for continued care are:

- Physical therapy (8 sessions at \$110 each): \$880.00
- Follow-up with neurologist: \$200.00
- Medication refills (2 months): \$60.00

Estimated Future Medical Expenses: \$1,140.00

Duties Under Duress and Loss of Enjoyment

Since the accident, Ms. Moreno has been unable to perform her professional duties as a dental hygienist for multiple weeks, affecting her career and livelihood. At home, her ability to care for her young child and participate in family activities has been severely restricted due to pain and physical limitations. She reports a significant loss of enjoyment of life and psychological distress, requiring ongoing anxiety management.

Per Diem Assessment

A reasonable per diem for pain and suffering, physical discomfort, and emotional distress is \$125/day. Assuming 60 days of significant impairment post-accident:

- \$125 x 60 days = \$7,500.00

Summary of Damages

Category	Amount (\$)
Total Economic Damages	\$9,675.00
Future Medical Expenses	\$1,140.00
Per Diem (Pain/Suffering)	\$7,500.00
Total	\$18,315.00

Similar Case Verdicts

Research into similar cases reveals precedents that support our valuation of this claim. Notably:

Based on the search results, I can provide you with several recent personal injury settlements and verdicts for cases involving injuries similar to Ms. Moreno's condition, including whiplash, lumbar strain, and shoulder injuries.

Recent Significant Personal Injury Settlements for Similar Injuries

Washington State (2024) - \$100,000 Verdict This case involved a plaintiff who was rear-ended at a stop sign. The plaintiff suffered whiplash which aggravated a pre-existing sciatica condition, along with shoulder injuries. The jury awarded a total of \$100,000, which included \$39,000 specifically for medical expenses[1]. This case is particularly relevant as it shares both the whiplash and shoulder injury components with Ms. Moreno's case. **Pennsylvania (2023) - \$45,000 Verdict** In this case, a 60-year-old male who was stopped at a red light was rear-ended by the defendant. The plaintiff claimed to suffer whiplash along with back and shoulder sprains, which closely mirrors Ms. Moreno's injuries. The verdict included compensation for medical expenses and pain and suffering[1]. **Washington State (2023) - \$33,640 Verdict** Another rear-end collision case resulted in a verdict of \$33,640 for a plaintiff who suffered whiplash, back sprain, and shoulder sprain. The jury awarded \$15,000 for medical expenses and \$18,000 for pain and suffering[1]. This case shares all three injury components with Ms. Moreno's situation. **California (2025) - \$9,460 Verdict** A more recent but smaller verdict was awarded in California where the plaintiff was struck at an intersection. The plaintiff suffered whiplash, bulges at L4-S1, and cervical, thoracic, and lumbar sprains/strains with radiculopathy. This was considered an "aggravated whiplash" case, but the jury awarded a relatively modest amount of \$4,490 for medical expenses and \$5,000 for pain and suffering[1].

Settlement Range Information

For context, the average settlement payout for whiplash injuries in car accident cases typically ranges between \$12,000 and \$30,000, assuming there are no permanent impairments[1]. More specifically, neck sprain or whiplash injury settlements in auto accident cases average between \$6,000 to \$22,000[2]. For cases involving multiple injuries similar to Ms. Moreno's situation, settlement amounts can vary significantly based on factors such as: In 2025, cases involving minor to moderate injuries like soft tissue injuries, whiplash, and broken bones typically settle for between \$3,000 and \$100,000, with more severe cases reaching higher amounts[3]. For truly exceptional cases with multiple serious injuries,

settlements can reach much higher. One example from 2021 resulted in a \$1,600,000 settlement for a passenger who suffered multiple injuries including a broken pelvis, broken leg, neck fracture, and closed head injury in a head-on collision[4].

These precedents establish a framework for valuing the present claim, which involves similar injuries and circumstances.

ASK

Based on the above-documented losses, past and future medical costs, lost wages, loss of enjoyment of life, and a fair per diem for pain and suffering, a reasonable settlement offer in this matter is **\$25,000**. This amount accounts for all economic and non-economic damages suffered by Ms. Moreno as a result of Mr. Lopez's negligence, as well as room for negotiation while reflecting the full impact on her health, career, and daily life.

Should you require any further documentation or substantiation regarding the above itemizations, please notify me immediately. This demand is made in good faith and with the expectation of timely and fair resolution.