

[Your Law Firm Letterhead]

[Date]

VIA CERTIFIED MAIL & EMAIL

Claims Department
Guardian Auto Insurance
Re: Claim No.: GA-987654321
Insured: Pedro Lopez
Date of Loss: November 21, 2023
Policy Limit: \$100,000

DEMAND FOR SETTLEMENT

Claimant: Isabella Moreno
DOB: June 14, 1990
Occupation: Dental Hygienist, Bright Smile Dental Clinic
Claim No.: CASE-001
Date of Loss: November 21, 2023
Time & Location: 17:42, 7th St & McDowell Rd, Phoenix, AZ

To Whom It May Concern:

INTRODUCTION

This letter serves as Isabella Moreno's formal demand for settlement arising from the rear-end motor vehicle accident caused by your insured, Pedro Lopez (AZ License: AZ-12345678), operating a 2015 Ford F-150 (Plate: AZ 8XZ-213, VIN: 1FTEW1EG5FFA12345). As a direct result of Mr. Lopez's negligence, Ms. Moreno has suffered significant injuries, incurred economic and non-economic damages, and endures ongoing pain and suffering.

FACTUAL BACKGROUND

On November 21, 2023, at approximately 5:42 PM, Ms. Moreno was lawfully stopped at the intersection of 7th St & McDowell Rd in Phoenix, AZ when her vehicle was struck from behind by your insured's truck. The police report and witness statements confirm Mr. Lopez's liability for this rear-end collision.

INJURIES & TREATMENT

Immediately following the incident, Ms. Moreno was evaluated and treated at **Phoenix General Hospital - Emergency Room** and subsequently received care at the following facilities:

- Costa Vista Chiropractic
- Prime MRI Center
- Valley Neurology Associates

A summary of documented injuries and findings includes:

- Cervical strain (whiplash) with limited range of motion and initial muscle spasms (Cervical ROM: 50% of normal)*
- Lumbar strain with restricted movement and muscle spasms (Lumbar ROM: 60% of normal)*
- Right shoulder contusion*
- Anxiety and emotional distress following the accident*

Objective medical records (see medical progression chart, Page 1):

- Initially, positive cervical compression test; muscle spasms noted in both cervical and lumbar regions.
- Improvement over time with reduced pain and gradual restoration of range of motion (Cervical ROM progressing from 50% to 100%; Lumbar ROM from 60% to 100%).
- MRI findings revealed mild disc bulges during the course of treatment.
- Final assessments confirm restoration of full function and near-complete resolution, but not without months of pain, discomfort, therapy, and disruption to daily life and work activities.

DAMAGES

- Medical Expenses:**
Ms. Moreno incurred substantial medical costs for emergency care, chiropractic therapy, neurological evaluations, and diagnostic imaging.
- Lost Wages & Earning Capacity:**
As a dental hygienist at Bright Smile Dental Clinic, Ms. Moreno was *unable to work* for several weeks due to physical restrictions, ongoing pain, and medically recommended rest, resulting in loss of income and occupational disruption.
- Pain, Suffering, and Emotional Distress:**
Ms. Moreno experienced persistent pain, limited mobility, anxiety, and distress interfering significantly with daily activities, work responsibilities, and quality of life.

DEMAND

Given Mr. Lopez’s clear liability, the nature and extent of Ms. Moreno’s injuries, the continuing pain and suffering, loss of income, and all documented damages, we hereby **demand the policy limits of \$100,000** in full and final settlement of this claim.

RESPONSE DEADLINE

Please submit your written response within **20 days** of the date of this letter. Should Guardian Auto fail to respond adequately, we are prepared to pursue all available legal remedies.

Please direct all future correspondence to my office. I look forward to your prompt and fair resolution of this matter.

Sincerely,

[Attorney Name]
[Law Firm Name]
[Address]
[Phone]
[Email]

Enclosures: Medical Records, Wage Loss Documentation, Photographs, Police Report, Treatment Summaries ``

References from provided documents:

- The *objective assessment chart* (see Page 1 of attached medical records) supports the progression and severity of Ms. Moreno’s injuries, with measurable limitations and documented improvement timelines.
- Treatment history and medical improvement based on provided summaries.