Good a, Mike,

Thank you again for getting back to me — I completely understand the demands of trial and appreciate you following up when you're able.

I truly appreciate the trust you placed in me by asking for help with the balances. I know how important accuracy is when handling reductions, closing statements, and all the moving parts that go into resolving a case after settlement. While this was my first time managing that particular process, I relied on my prior experience where I handled complex pay applications and reconciliations with project owners and subcontractors. I’m happy to continue assisting while you search for someone in-office and would gladly remain available afterward should you ever need an extra hand.

As you are aware, I also provide some support to Citizens Insurance, assisting with administrative offboarding tasks that require approximately an hour and a half per day. The contract runs from August 2023 through August 2025, and the work is limited in scope, non-conflicting, and does not interfere in any way with my responsibilities to Cecere Santana. Your firm has always come first, and I’ve consistently structured my schedule to ensure that your matters receive my full focus and highest priority.

In terms of my current scope with the firm, I wanted to provide some helpful data. Since beginning demand work with Cecere Santana in April 2024, I have drafted 258 demand letters to date, representing the total number of individual clients served — including those written as part of global demands, each of which required separate medical review and individualized narrative. The monthly distribution reflects a consistent and dependable output, with eleven drafted so far in June.

Many of these demands extend well beyond templated or surface-level summaries — particularly those involving higher-value claims or medically complex injuries. These letters are fully structured and meticulously written, with some requiring the review of more than 500 pages of medical records, imaging studies, provider narratives, and billing statements. In such cases, I have carefully cross-referenced all dates of service to ensure that every billed encounter is accurately reflected and substantiated within the narrative of the demand letter.

To date, I have completed 23 Slip & Fall, 12 Trip & Fall, 3 Assault and Battery, 3 Scooter – Hit by MV, 2 Bump & Fall, 1 Bicycle Fall, 1 Bodily Injury – Water Park, 1 Hit Pole at Costco, and 1 Premises Liability demand letter involving a tire malfunction during vehicle operation. Several of these cases involved minor (child) claimants, which required additional sensitivity and precision in structuring the damages narrative.

For matters involving unique bodily injury claims, I have done my best to tailor each narrative with case-specific detail — even though I am not an attorney and recognize that Erick has likely had to make occasional revisions. Still, I consistently strive to apply legal phrasing with accuracy and care, often conducting research to ensure clarity, consistency, and alignment with the firm’s standards.

For your reference, I’ve attached the demand tracking spreadsheet I maintain, which provides a comprehensive overview of the volume and variety of matters I’ve handled. (As a side note — Tab Two also reflects the fourteen client balances you entrusted me to oversee.)

That said, I also recognize that some matters are more routine, particularly those involving familiar providers and policies capped at $10,000 in PIP. I’ve always calibrated the time and effort invested based on the complexity and value of each file, with the goal of producing consistent, high-quality work across the board.

On average, $240 per demand is the effective rate paid based on my current salary of $52,000 per year — a fair and industry-supported figure, especially given the range of complexity involved. Nationally, outsourced demand writing services typically range between $250.00 and $450.00 per letter, depending on volume and difficulty.

Outsourced demand writing services typically range between $250.00 and $450.00 per letter. These rates align with industry benchmarks published by reputable sources, including:

* LawClerk.Legal — a freelance attorney marketplace
* UpCounsel.com and Lawfecta.com — demand writing services priced between $300 and $450
* Legal Support World (2023 Pricing Guide) — listing rates from $250 to $400 per demand
* Clerky.com and ParalegalEDU.org — references for independent contractor compensation

To put the numbers in perspective, had the firm paid per-demand at typical market rates, the cost would have been significantly higher. For the 258 demand letters I’ve drafted since April 2024:

* At a conservative rate of $250 per demand, the total would have been $64,500, compared to the $62,115.07 paid — a savings of approximately $2,385.
* At a more representative rate of $350 per demand, the total would have been $90,300, reflecting a savings of approximately $28,185.

Given the potential for a high volume of demands, my fixed salary provides additional savings for the firm, as the cost per demand remains constant and does not increase regardless of workload.

Additionally, of the 258 total demands, thirteen involved high-complexity matters — including three Assault and Battery claims, three motor vehicle–scooter collisions, one water park injury, one premises liability case, one bicycle fall, one bump-and-fall incident, and three additional m **A close-up of a business card

AI-generated content may be incorrect.** atters of comparable complexity. If those thirteen letters were billed at $450 and the remaining 245 at $250, the total cost would have been approximately $67,100.00. Compared to the $62,115.07 paid, this would still reflect a cost savings of approximately $4,984.93.

These figures do not account for the asset affidavits I’ve completed — given their simplicity — nor do they include the balance tracking, reduction follow-ups, or closing statements I’ve prepared, which I’ve always been happy to assist with as a courtesy. Under a typical contractor arrangement, each of these services is usually billed separately.

Even if the firm hired a full-time W-2 employee at the same base salary of $52,000, the true cost would still be higher once employer payroll taxes and benefits are factored in — typically bringing the total to between $63,000 and $68,000 annually. By contrast, the current arrangement avoids those overhead expenses while still delivering consistent, timely, and high-quality work.

My suggestion would be simply to keep things as they are. You’ve expressed satisfaction with the work I produce, and I’m likewise happy with our current arrangement. The only small adjustment I’d recommend is for Cecere Santana to transition my full bi-weekly salary to direct deposit, rather than issuing half by paper check that I have to wait to receive from Ian. That change would streamline things on my end, but otherwise, I’m content to continue supporting the firm exactly as we’ve been doing.

I’m available anytime to discuss further and appreciate your continued consideration.

Sincerely,

A signature on a white background

AI-generated content may be incorrect.Joanna Hatch

Envisage Companies, LLC