6/26/2025

Via Certified Mail

NAME

F: FAX NO

Our Client: Jane Roe

Date of Incident: February 14, 2025

NAME,

As you are aware, our office represents Jane Roe, who suffered a broken clavicle, extensive bruising on her back, multiple lacerations on her legs, and additional minor injuries following a collision with a snowplow. Please allow the following to serve as our client’s demand to resolve this matter prior to litigation.

Facts of the Occurrence

Our client, Jane, was the pedestrian victim of a snowplow accident resulting from the operator's failure to exercise the necessary degree of care required in populated areas. The operator's breach of duty was the direct and proximate cause of Jane's severe orthopedic trauma, including a broken clavicle, significant bruising on her back, and multiple lacerations on her legs. This breach of duty also caused Jane significant emotional distress, as evidenced by her panic attack at the scene.  
  
Jane and her friends were returning from a daytime event, opting to walk in the street due to the clearer path compared to the sidewalks. The snowplow operator, failing to maintain adequate awareness of his surroundings, struck Jane. This conduct violated the operator's duty of care and applicable safety protocols.  
  
Jane's friend, who witnessed the incident and pulled her from beneath the vehicle, will corroborate this account. We anticipate further corroboration through the police who arrived on the scene approximately five minutes after the incident and interacted with both Jane and the operator. Furthermore, surveillance footage from a nearby sorority house is being secured, which we expect to provide additional evidence of the operator's breach of duty.  
  
Jane's injuries required immediate medical attention, and she was promptly taken to the emergency room. Despite the necessity of her quick departure for a scheduled flight, Jane has been diligent in her follow-up care. She has an upcoming medical appointment and continues to report symptoms consistent with her initial injuries, indicating ongoing harm.  
  
Jane has been advised to collect the police report, secure any available video footage, retain all medical records, and document her injuries through photographs. These steps will further substantiate her claim and demonstrate the extent of her harm.  
  
The snowplow operator's failure to exercise the necessary precautions in a populated area resulted in a clear violation of his duty of care. This breach was the direct and proximate cause of Jane's significant physical and emotional harm. Liability is well-supported by the available evidence, including witness testimony, police interaction, and anticipated surveillance footage.  
  
We invite resolution of this matter without the need for litigation. Should you fail to respond by the specified date, we are prepared to proceed accordingly.

Damages

Our client, Jane, has incurred substantial financial and emotional hardship due to the injuries she sustained. The total cost of her treatment thus far is $100,000, a sum that includes ambulance services, hospital care, surgical procedures, and specialized dermatological treatments. This figure represents not only the immediate medical response to Jane's injuries but also the ongoing care required to address her orthopedic trauma and disfigurement.  
  
The financial strain of these medical expenses is considerable. Jane has been forced to divert significant resources to manage her medical disruption, which includes numerous follow-up appointments, ongoing physical therapy sessions, and a long-term orthopedic care plan. The cost of these treatments, based on available billing records and projected from current provider estimates, forms a substantial portion of the total damages.  
  
In addition to her medical expenses, Jane has also suffered a material loss of income. As a result of her injuries, she has been unable to work, causing a marked decrease in her earnings. This loss, coupled with the financial burden of her medical expenses, has created a significant financial strain.  
  
Beyond the economic harm, Jane has experienced considerable emotional hardship. She reports persistent symptoms consistent with post-traumatic stress disorder, anxiety, and depression. The trauma of the incident and the ongoing physical complications have had a lasting impact on her mental health, contributing to her overall non-economic damages.  
  
In light of the above, we demand compensation in the amount of $100,000 to cover Jane's medical expenses, lost wages, and pain and suffering. We invite resolution of this matter without the need for litigation. Should you fail to respond by the stipulated date, we are prepared to proceed accordingly.

Settlement Demand

On the day of the incident, Jane and her friends were returning from a daytime party. They opted to walk in the street as it was clearer than the sidewalks. Jane did not hear the approaching snowplow and was struck, resulting in her being pinned beneath the vehicle. This event has led to Jane suffering significant physical harm.  
  
The driver of the snowplow had a legal duty to operate his vehicle in a manner that would not endanger pedestrians. This duty was breached when he failed to notice Jane walking in the street and subsequently struck her. The causation is clear, as Jane's injuries directly resulted from the snowplow's impact. The harm is significant, with Jane suffering a severely broken clavicle, extensive bruising on her back, multiple cuts on her legs, and ongoing symptoms of additional minor injuries.  
  
There are witnesses and potential evidence that corroborate Jane's account of the incident. Jane's friend, who pulled her from beneath the vehicle, can provide a firsthand account of the incident. The snowplow driver's interaction with the police, who arrived on the scene approximately five minutes after the incident, further supports Jane's account. Surveillance footage from the sorority house, which is being secured, is anticipated to provide additional evidence of the incident.  
  
Following the incident, Jane was taken to the emergency room. Due to her scheduled flight back to Georgia, her stay was brief. She has an upcoming appointment with a doctor and has been advised to collect the police report, obtain any available video footage, retain all medical records, and take photographs of her injuries for documentation.  
  
Given the severity of Jane's injuries and the clear liability of the snowplow driver, we are seeking damages in the amount of $100,000. This figure takes into account Jane's medical expenses, pain and suffering, and potential future treatment costs.  
  
The strength of Jane's position is well-supported by the available evidence, the consistency of her account, and the nature of her injuries. The risk of litigation is high should this matter not be resolved. We invite resolution of this matter without the need for formal litigation. Should you fail to respond by [insert date], we are prepared to proceed accordingly.

Sincerely,

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| --- |
| /s/ Michael R. Grieco |

Michael R. Grieco

Stinar Gould Grieco & Hensley

101 N. Wacker Drive, Suite 100

Chicago, IL 60606

P: (312) 748-7338

[Mike@sgghlaw.com](mailto:Mike@sgghlaw.com)