

DEMAND LETTER

Date: 2024-03-15

To: ABC Insurance Company

Re: Claim for Damages – Case 2024-PI-001 (Personal Injury - Motor Vehicle Accident)

Please accept this demand letter on behalf of our client, John Smith, arising from the motor vehicle collision that occurred on 2024-03-15. Liability is clear based on the police report and admissions by the defendant.

Facts and Liability

According to the police report and witness statements, liability rests with the defendant.

- **Police Report - SPD Report #789 - Traffic Collision - police_report_incident_789.pdf, p.6:** This report may be used in civil proceedings. Any questions regarding this report should be directed to the Springfield Police Department Traffic Division at (555) 555-0123. OFFICER: Jennifer Martinez, Badge #2847 SUPERVISOR REVIEW: Sergeant Robert Thompson, Badge #1234 DATE COMPLETED: March 16, 2024 CASE CLOSED: March 20, 2024 End of Report
- **Police Report - SPD Report #789 - Traffic Collision - police_report_incident_789.pdf, p.1:** SPRINGFIELD POLICE DEPARTMENT TRAFFIC COLLISION REPORT REPORT NUMBER: SPD-2024-789 DATE/TIME OF ACCIDENT: March 15, 2024 / 15:30 hours REPORTING OFFICER: Officer Jennifer Martinez, Badge #2847 REPORT DATE: March 15, 2024 INCIDENT LOCATION Address: 1200 Block of Main Street City: Springfield, CA County: Central Valley County Weather: Clear, dry Road Conditions: Dry pavement, good visibility Traffic Control: Traffic signal (functioning normally) VEHICLES INVOLVED VEHICLE #1 (VICTIM) Driver: John S...

Injuries and Medical Treatment

Our client suffered injuries including those diagnosed and treated by Dr. Jones. Medical expenses and treatment chronology are summarized below.

- **Insurance Correspondence - ABC Insurance Communications - insurance_correspondence.pdf, p.4:** Dear Mr. Smith, We have received and reviewed the following medical expenses related to your March 15, 2024 accident: Medical Bills Received: 1. Springfield General Hospital (ER visit): \$1,200.00 2. Central Valley Medical Group (Dr. Jones): \$450.00 3. Advanced Imaging Center (MRI): \$1,400.00 4. Medications (pharmacy receipts): \$200.00 Total Medical Bills Reviewed: \$3,250.00 Medical Review Findings: Our medical consultant has reviewed your treatment records and confirms that all treatment receive...
- **Medical Records - Dr. Michael Jones - Central Valley Medical Group - medical_records_dr_jones.pdf, p.4:** Significantly improved lumbar strain Mild residual right shoulder dysfunction Final Prognosis: Patient has reached maximum medical improvement. May experience occasional flare- ups with heavy activity or weather changes. Permanent partial impairment estimated at 5% whole person. Work Status: Cleared for return to full duty with restrictions: No lifting >50 lbs (previous capacity 100+ lbs), frequent breaks for back stretching. Future Medical Needs: Possible future flare-ups requiring occasional t...
- **Insurance Correspondence - ABC Insurance Communications - insurance_correspondence.pdf, p.8:** 1. Objective Medical Findings: MRI shows only mild disc bulge with no nerve compression 2. Treatment

Duration: 12 weeks of treatment with good recovery 3. Return to Work: Full return to work duties with minimal restrictions 4. Future Medical: Conservative estimate of future treatment needs Comparable Settlements: Based on our claims experience with similar soft tissue injuries in Central Valley County, settlements typically range from \$15,000 to \$30,000 for comparable injuries and treatment. Cou...

Wage Loss

Our client missed time from work and incurred lost wages.

- **Insurance Correspondence - ABC Insurance Communications - insurance_correspondence.pdf, p.5:**
FROM: Michael Rodriguez, Claims Adjuster RE: Wage Loss Documentation - Claim #ABC-2024-789456 Dear Mr. Smith, To properly evaluate your lost wage claim, we need the following documentation from your employer: Required Documentation: 1. Employment Verification Letter confirming: Your position and hire date Regular hourly wage and overtime rate Normal work schedule and average hours worked Dates you were unable to work due to accident injuries 2. Payroll Records showing: Pay stubs for 3 months pri...
- **Wage Statements and Employment Records - Pacific Construction - wage_statements_2024.pdf, p.4:**
June 16-30, 2024 (Modified duty continues) Regular Hours: 75.0 hours @ \$32.50 = \$2,437.50 Overtime Hours: 3.0 hours @ \$48.75 = \$146.25 Gross Pay: \$2,583.75 Net Pay: \$1,937.81 Lost Opportunity: \$390.00 (Normal 10 hours overtime not worked) WAGE LOSS SUMMARY Total Time Off Work: 10.5 weeks (March 16 - May 15, 2024) Direct Wage Loss: March 16-31, 2024: \$1,625.00 (2 weeks normal wages) April 1-30, 2024: \$3,250.00 (4 weeks normal wages) May 1-15, 2024: \$1,625.00 (2 weeks normal wages) Sick/Vacation P...

Pain and Suffering

Our client experienced pain, limitations in activities of daily living, and ongoing symptoms.

- **Medical Records - Dr. Michael Jones - Central Valley Medical Group - medical_records_dr_jones.pdf, p.4:** Significantly improved lumbar strain Mild residual right shoulder dysfunction Final Prognosis: Patient has reached maximum medical improvement. May experience occasional flare- ups with heavy activity or weather changes. Permanent partial impairment estimated at 5% whole person. Work Status: Cleared for return to full duty with restrictions: No lifting >50 lbs (previous capacity 100+ lbs), frequent breaks for back stretching. Future Medical Needs: Possible future flare-ups requiring occasional t...
- **Medical Records - Dr. Michael Jones - Central Valley Medical Group - medical_records_dr_jones.pdf, p.1:** MEDICAL RECORDS CENTRAL VALLEY MEDICAL GROUP Dr. Michael Jones, MD 123 Medical Center Drive Springfield, CA 90210 Phone: (555) 123-4567 PATIENT: John Smith DOB: June 15, 1985 CASE #: 2024-PI-001 DATE RANGE: March 16, 2024 - June 10, 2024 INITIAL EXAMINATION - March 16, 2024 Chief Complaint: Patient presents with severe lower back pain, neck stiffness, and right shoulder pain following motor vehicle accident on March 15, 2024. History of Present Illness: Mr. Smith was the driver of a vehicle that...

Damages Summary

Medical expenses (known)	\$7300.00
Lost wages (known)	\$4940.00
Total economic damages (known)	\$12240.00

Demand

In light of the clear liability and the documented damages, we hereby demand a settlement in the amount of \$36720.00. This figure reflects medical expenses, lost wages, and a reasonable sum for pain and suffering given the injuries and impairment.

Please respond within 15 days from the date of this letter. If we do not receive a timely response, we will proceed accordingly, including filing a lawsuit to protect our client's rights.

Sincerely,

Attorney for Plaintiff

Citations Index

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