

**LAW OFFICES OF RIVERA & KLINE**

1220 West Adams Street, Suite 410

Chicago, Illinois 60607

Tel: (312) 555-0148

February 4, 2026

**Via Email and U.S. Mail**

Claims Adjuster: **Hannah P. Whitaker**

MidStates Casualty Insurance Company

P.O. Box 1189

Naperville, IL 60566

Re: **Our Client:** Marisol Ortega

**Date of Loss:** August 18, 2025

**Your Insured:** Daniel R. Harper

**Claim No.:** MSC-IL-4582197

Dear Ms. Whitaker:

Our firm represents **Marisol Ortega** for injuries sustained in the **rear-end collision** caused by your insured, **Daniel Harper**, on **August 18, 2025**, near the intersection of **W. Diversey Ave. and N. Clark St., Chicago, Illinois**. We are submitting this demand package to resolve Ms. Ortega's claim without litigation.

**Liability**

This crash is straightforward. Ms. Ortega was stopped in traffic when Mr. Harper's vehicle struck her from behind. The Chicago Police Report reflects rear-end impact and does not assign any fault to Ms. Ortega. Multiple witnesses reported Ms. Ortega's vehicle was stationary when it was hit. There is no viable comparative negligence argument here.

**Injuries and Treatment**

Immediately following impact, Ms. Ortega experienced neck and mid-back pain with headaches that worsened over the next 24–48 hours. She presented to **Northside Immediate Care** on **August 19, 2025**, and was diagnosed with cervical and thoracic strain/sprain with post-traumatic headaches.

Ms. Ortega was referred for conservative care and completed **14 sessions of physical therapy** at **Lakeshore Rehab** from **August 26, 2025 through October 10, 2025**. Therapy records document muscle spasm, reduced range of motion, and ongoing pain with prolonged sitting and lifting. Ms. Ortega also required prescription anti-inflammatories and a short course of muscle relaxants.

She improved, but not instantly. She missed family obligations, avoided driving for several weeks due to anxiety and pain, and her sleep was disrupted for months. She continued to experience flare-ups with extended desk work and household chores, which is well documented in her PT discharge summary.

**Wage Loss**

Ms. Ortega works as a billing coordinator. Her employer confirmed she missed **5 full workdays** immediately after the crash and worked partial days for the following week. Supporting payroll documentation is enclosed.

### **Damages**

Enclosed, please find medical records and billing statements establishing the following economic losses:

### **Medical Specials**

- Northside Immediate Care: **\$682.00**
  - Radiology (X-rays): **\$410.00**
  - Lakeshore Rehab Physical Therapy: **\$4,980.00**
  - Follow-up visits / medications: **\$338.00**
- Total Past Medical: \$6,410.00**

### **Wage Loss**

- Verified lost wages: **\$1,245.00**

**Total Special Damages: \$7,655.00**

Ms. Ortega is also entitled to reasonable compensation for **pain, suffering, inconvenience, and loss of normal life**. Although her injuries were treated conservatively, she dealt with months of pain, sleep disruption, and limitations that affected her work, driving, and daily functioning.

### **Demand**

Based on clear liability and documented damages, we hereby demand **\$38,500.00** to resolve this claim in full, inclusive of specials, general damages, and any lien resolution.

Please provide your response within **21 days** of receipt. If we do not receive a timely and reasonable offer, we will recommend filing suit to protect Ms. Ortega's interests.

Sincerely,

**/s/ Elena Rivera**

Elena Rivera, Esq.

Law Offices of Rivera & Kline

Counsel for Marisol Ortega

Enclosures: Police Report; Medical Records & Bills; Wage Verification; Photographs