

HARTMAN, LEE & PATEL, LLP
401 North Michigan Avenue, Suite 1600
Chicago, Illinois 60611
Tel: (312) 555-0821

January 27, 2026

Via Email and Certified Mail
Senior Claims Representative: Mark D. Stenson
Prairie Harbor Insurance
7700 W. 95th Street
Oak Lawn, IL 60453

Re: Our Client: Calvin Brooks
Date of Loss: May 2, 2025
Your Insured: Beacon Parcel Logistics, Inc. / Driver: Ryan McCall
Claim No.: PHI-CLM-992144

Mr. Stenson:

Our office represents Calvin Brooks regarding the serious injuries he sustained when your insured's delivery van struck his vehicle on May 2, 2025 in Oak Park, Illinois. We are prepared to file suit immediately; however, we will extend this pre-suit opportunity to resolve the claim if Prairie Harbor is willing to act reasonably.

Liability: Commercial Driver Error

This collision was preventable. Your driver, Ryan McCall, made an unsafe lane change while attempting to beat traffic at a merge point on I-290 near Harlem Avenue, sideswiping Mr. Brooks and pushing him into the barrier. The Illinois State Police report notes the van's improper lane change and includes witness statements confirming the van "cut across" without clearance.

This is not a he-said/she-said scenario. The physical evidence, the crash diagram, and witness accounts all align: your driver caused the impact.

Injuries: Objective Findings and Surgery

Mr. Brooks experienced immediate neck pain with radiating symptoms into his right arm, numbness in his hand, and loss of grip strength. He was transported by ambulance to West Suburban Medical Center the same day. Imaging later confirmed cervical pathology consistent with traumatic injury.

Conservative treatment failed. Mr. Brooks underwent:

- **Cervical epidural steroid injections (June–July 2025) with limited relief**
- **Continued neurological symptoms and progressive weakness**
- **Ultimately anterior cervical discectomy and fusion (ACDF) at C5–C6 on September 18, 2025 performed by Dr. L. Kwon, orthopedic spine surgeon**

Post-surgical records document ongoing restrictions, persistent pain, and the need for continued therapy. This is not a soft-tissue claim. It is a surgically-confirmed spinal injury with lasting functional impact.

Future Medical Care and Prognosis

Dr. Kwon's prognosis letter states Mr. Brooks will likely require:

- ongoing pain management,
- periodic imaging,
- possible hardware-related complications monitoring,
- and potential adjacent-level degeneration treatment over time.

A life-care cost projection is being finalized; however, even conservative estimates place future care in the mid-five-figure range.

Wage Loss and Diminished Earning Capacity

Mr. Brooks is a union electrician. Following the crash, he missed significant work and has been unable to return to full-duty electrical work due to lifting restrictions and impaired neck mobility. His earning capacity is not theoretical — it is tied to physical demands and hours available to him.

Documents enclosed include payroll records, union verification, and restrictions notes.

Damages Summary

Past Medical Expenses: \$86,740.00

Future Medical (conservative estimate): \$55,000.00

Past Lost Wages: \$24,360.00

Future Loss of Earnings / Earning Capacity (preliminary): \$180,000.00

Total Economic Damages (current): \$346,100.00

This does not include non-economic damages, which in a surgery case with permanent restrictions are substantial. Mr. Brooks has endured months of severe pain, invasive treatment, loss of normal life, and ongoing limitations that affect work, family responsibilities, and basic daily activities.

Demand and Time-Limit

Given the clear commercial liability and objectively serious injury, we hereby demand **\$950,000.00** to settle this claim. This demand is supported by current medical documentation and wage loss data and anticipates the cost of future care and permanent impairment.

This is a time-limited demand. Please provide written confirmation of your intent to tender policy limits (or the settlement amount available) no later than February 17, 2026. If Prairie Harbor will not resolve this matter in good faith, we will proceed with filing and pursue all available damages through litigation. Mr. Brooks is prepared for that path.

Sincerely,

/s/ Dana Hartman

Dana Hartman, Esq.

Hartman, Lee & Patel, LLP

Counsel for Calvin Brooks

Enclosures: ISP Report; ER Records; MRI Reports; Injection Records; Surgical Records; PT Notes; Wage & Union Verification; Photos