

To

Ms. Jane Lindley
National Insurance
P.O. Box 990
Chicago, IL 60007

May 8, 2024

Re: Your insured, William Hodge
Claimant: John Doe
Date of loss: Oct 4, 2022

Dear Ms. Lindley:

I (John Doe) have finished my medical treatment, and so I am enclosing all of my medical records and bills on this case.

As you know, I was injured when your insured, Mr. Hodge, ran a red light and hit my BMW car while I was going through the intersection at 4th and Main Streets. The police came to the accident scene and cited Mr. Hodge for going through a red light. I understand that he subsequently paid the ticket and did not try to appeal it. He was clearly negligent and at-fault for the accident.

I was in extreme pain and had to be cut out of my car with the fire department's "jaws of life" tool. I was taken to Community Hospital by ambulance where they told me that I needed emergency surgery. Not only had I suffered herniated discs at L4-5 and L5-S1, but I also had lacerated my left kidney due to the force of the impact. The kidney required emergency surgery. I was in the hospital for five days on serious pain medication the entire time.

When I was released, I began seeing three different doctors: my general practitioner, Dr. Melton, who kept track of and prescribed my medications, and oversaw my recovery in general; the kidney specialist, Dr. Frederick; and the orthopedist, Dr. Albert. Dr. Frederick pronounced me recovered from the lacerated kidney in a month.

I had several X-rays, MRIs, and CT scans of my back to determine the severity of the injury. I couldn't start physical therapy (PT) as soon as Dr. Albert would've liked because Dr. Frederick wouldn't let me do PT until I recovered from the

kidney surgery. I finally started PT two months post-accident, on June 17, but I got nowhere. The disc injuries were too severe. So, Dr. Albert decided that he would do fusion surgeries on both discs.

I had the surgery on August 30 and restarted physical therapy at the end of September. Please see the attached spreadsheet for a summary of all of my treatments.

Finally, after six months more of physical therapy, pain management, and hard work, I reached a point in my recovery where I could start doing physical things again. It has now been 18 months post-accident, and I am not where I want to be in my recovery, but I am getting there. The recovery has been very painful. I took prescription pain medication until October, and I still take Tylenol daily.

I am a software designer and sit at a desk all day. I could not sit comfortably for months. I was unable to work until the beginning of November. However, my company could not wait for me to recover and was not able to provide me with my job back.

Before the accident, I was a regular bicyclist. I generally rode five days per week, probably 60 miles per week. I have not yet gotten back onto a bike. I have not gone dancing with my girlfriend. Nor did we do any traveling this summer or fall. I did not rake any leaves this fall and did not shovel any snow this winter. This was a serious accident, and it has prevented me from doing the things that I like to do and the chores I have to do for myself and my family.

My medical bills total \$25,200.00. I paid \$1,000 in co-pays. My health insurance paid the remainder of the bills, but they have sent me a letter in which they claim a lien of \$14,000.00 on any settlement that I may get in this case.

My medical bills were as follows:

- City Radiology 3,000.00
- Dr. Albert 7,000.00
- Dr. Frederick 5,000.00
- Dr. Melton 2,000.00
- Community Hospital 25,000.00

- Physical Therapy 5,000.00

TOTAL \$47,000.00

Before the accident, I worked for Richardson Software earning \$2,000 per week. As stated above, I claim nine months (38 weeks) of lost earnings. My medical records clearly state that I was unable to work until November. Accordingly, my lost earnings claim is \$76,000.

My total special damages are \$123,000.00 (\$47,000 in medical bills and \$76,000 in lost earnings).

Taking into account your insured's clear liability and my serious damages, I demand \$425,000.00 to settle this case.

I hope to hear from you soon, no longer than 30 days from the date of this letter.

Thank you.

Respectfully,

John Doe