Russell Chatman
1234 Main Street
Phoenix, AZ 85003

June 10, 2020

Classic Insurance Company
101 High Street, Suite 16
New York, NY 10002

Attn: Lou Jones

Your Insured: Alex Smith
112 Abbey Lane
Phoenix, AZ 85007

**Re: Auto Collision on March 15, 2020**

**Claim Number:  ABC000099**

FOR SETTLEMENT PURPOSES ONLY

Dear Mx. Jones:

As you know, on March 15, 2020, I was seriously injured in an automobile collision on the Maricopa Expressway caused by your insured, Alex Smith.

If not for the negligence of your insured, I would not have suffered my injuries and subsequent lost wages, pain and suffering.

My doctors say I’ve reached a level of maximum medical improvement. I still have painful symptoms that may continue for several more months. However, I’ve decided to bring this matter to a conclusion with a reasonable and equitable settlement of my injury claim.

**STATEMENT OF FACTS**

On March 15, 2020, at approximately 6:30 pm, I was headed home from work in my 2016 Honda Accord, traveling north in the far-right lane of the Maricopa Expressway. At all times, I was observing the posted speed limit of 65 miles per hour, wearing my seat belt, and fully aware of surrounding traffic.

As I was preparing to enter the exit ramp for Thunderbird Road, suddenly, and without notice, your insured moved from the center lane directly in front of my car. As he did, the right rear quarter panel of his 2018 Chevy Cruze slammed into the left front quarter panel of my Honda.

The brutal force of impact forced my Honda into the exit ramp’s concrete retaining wall. My head and neck violently jolted back and forth and side to side, and my left shoulder was slammed against the door.

After careening off the cement wall, my Honda finally came to an abrupt stop. I felt a searing and acute pain in my head, neck, and shoulder areas. Your insured pulled over in front of me. We got out of our cars and began to speak.

When I asked your insured why he cut in front of me, he said he was distracted. He explained that when he realized he was about to miss the Thunderbird Road exit, he quickly changed lanes to exit.

I called 911 and reported the collision. The Phoenix police and emergency medical services arrived within several minutes. Your insured stated he was not injured, but I was in excruciating pain. After evaluating me at the scene, the paramedics transferred me to the General Hospital’s emergency department.

As you know, Sam Shapley witnessed the collision. Mr. Shapley was traveling directly behind me in his car. He pulled over immediately after the collision. Mr. Shapely told the investigating officer that he saw your insured cut in front of me without signaling and smash into the front of my Honda.

You’ll see in the enclosed police crash report that Officer Jacobs issued two traffic citations to your insured for “Failing to Signal” and “Illegal Lane Change.” Officer Jacob’s drawing of the accident and his written narrative show conclusively that your insured was at fault.

The police report also shows that I had no part in causing the collision. The negligent driving of your insured, Alex Smith, was the direct cause of my damages.

**INJURIES AND TREATMENT**

Doris Waters, M.D. at Phoenix General Hospital’s Emergency Room, examined me the day of the collision. I was found to have severe neck strain, and an MRI confirmed that I sustained a Grade 3 left shoulder separation, involving ligaments connecting the scapula and clavicle.

I was prescribed Flexeril as a muscle relaxer and instructed to use over-the-counter pain relievers. I was referred to an Orthopedic surgeon, Dr. Wiseman, for follow-up. Two days after the accident, I was seen by Dr. Wiseman, who explained that my separated shoulder could heal without surgery but required me to keep my shoulder immobilized by wearing a sling and remain out of work for six to eight weeks.

As you’ll see in Dr. Wiseman’s notes, I was ordered not to return to my job as a sheet fitter until he released me, as doing so would likely exacerbate my injuries and prolong my recovery.

**OUT-OF-POCKET EXPENSES**

Driving distance to and from medical appointments totaled 200 miles, at the [standard mileage rate](https://www.ifebp.org/news/regulatoryupdates/Pages/2019-irs-mileage-rates.aspx), equals $116. Medications, bandages, and slings totaled $64.

My total out-of-pocket expenses are $180.

**LOST WAGES**

As detailed in the enclosed statement from my employer, I have worked as a sheet fitter for the CDP Company since 2008. At the time of the collision, I made $18 an hour. I did not receive any income during my recovery since my injury was not related to my job. As a result, I lost $4,320 in wages.

**PAIN AND SUFFERING**

This entire event has been devastating. I never asked for any of this. Before your insured crashed into me, I led a full life, free of pain and discomfort. But ever since the collision, I have suffered from extreme pain and discomfort, anxiety, guilt, and depression – all because of your insured’s negligence.

The loss of income placed a terrible financial burden upon my family. Without an income, I was forced to borrow money from family members and friends. The embarrassment of our financial situation strained my marriage. Moreover, because of the pain and suffering I’ve endured, I have also been unable to enjoy the intimacy I previously shared with my wife.

There is no way your company can fully compensate me for all I have suffered. At a minimum, I expect you as their representative to try to compensate me for my injuries and damages.

**ITEMIZATION OF DAMAGES**

Phoenix General Hospital

$3,000

Orthopedic Specialist

$2,500

Out-of-Pocket Expenses

$180

Lost Wages CDP Company

$4,320

Pain and Suffering

$20,000

**Total Damages**

$30,000

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To compensate me for the physical pain, emotional distress, and the financial costs I sustained because of the negligence of your insured, I demand the total amount of $30,000 to resolve my personal injury claim.

Please respond within fifteen (15) business days. I appreciate your prompt attention to this matter.

Sincerely,

Russell Chatman
Cell: (555) 587-5525
Email: russchatman@example.com

Enclosures