

Date: October 20, 2025

Claims Department  
Greenfield Logistics, Inc. / [Insurance Carrier Name]  
Attn: Adjuster  
[Address Line 1]  
[City, State ZIP]

Re: Settlement Demand – Bodily Injury Claim  
Our Client: Sarah Martinez  
Date of Loss: March 15, 2024  
Claim Number: [To Be Assigned]  
Your Insured: Greenfield Logistics, Inc. / Robert Chen

## I. INTRODUCTION

This correspondence serves as a formal demand for settlement on behalf of our client, Sarah Martinez, for the serious and permanent injuries she sustained in the motor vehicle collision on March 15, 2024, caused by your insured, Robert Chen, while operating a commercial vehicle for Greenfield Logistics, Inc.

Ms. Martinez's injuries include a displaced left humeral fracture requiring open reduction and internal fixation, multiple rib fractures, pulmonary contusion, and psychological trauma consistent with post-traumatic stress disorder. The medical evidence clearly establishes that all injuries and resulting impairments were directly and proximately caused by this collision.

## II. LIABILITY

The collision occurred at the signalized intersection of Harbor Boulevard and Maple Street in [City]. Ms. Martinez was traveling eastbound on Maple Street with a green light at approximately 22–25 mph. Your insured, operating a fully loaded Ford F-550 box truck southbound on Harbor Boulevard, ran a red light that had been red for over two seconds, striking Ms. Martinez's vehicle on the driver's side at approximately 40 mph.

Two independent eyewitnesses confirmed that the light was red when your insured entered the intersection. Officer Amanda Rodriguez cited Mr. Chen for failure to obey a traffic control device. No evidence of distraction or intoxication was found for either driver. The sole cause of this violent collision was your insured's negligent disregard for the traffic signal.

## III. INJURIES AND TREATMENT SUMMARY

Emergency Treatment (March 15–19, 2024)

Ms. Martinez was extricated by paramedics and transported to St. Joseph's Medical Center. Imaging confirmed:

Displaced fracture of the left humeral shaft  
Fractures of left ribs 6–8  
Pulmonary contusion and left shoulder soft-tissue trauma

She underwent open reduction and internal fixation (ORIF) surgery on March 16, 2024, performed by Dr. Michael P. Stevens, Orthopedic Surgeon. The procedure required placement of a titanium plate and eight screws. Postoperatively, she was hospitalized three days for pain management and pulmonary

monitoring.

#### Rehabilitation and Physical Therapy (April–October 2024)

Ms. Martinez completed 72 outpatient physical therapy sessions at Evergreen Physical Therapy Associates. Despite dedication to her rehabilitation, she continues to experience restricted range of motion (approximately 70% of pre-injury mobility) and intermittent pain rated 3–4/10 on average, with flares to 6–7/10.

#### Pain Management

Under Dr. Laura Chen, Pain Management Specialist, Ms. Martinez underwent three thoracic epidural steroid injections (August–December 2024) for residual neuropathic and myofascial pain related to her rib and shoulder injuries.

#### Psychological Treatment

Ms. Martinez was diagnosed with Post-Traumatic Stress Disorder and Adjustment Disorder with Anxiety by Dr. Jennifer Wong, Psy.D. She completed 26 cognitive-behavioral therapy sessions, addressing persistent anxiety when driving and intrusive recollections of the crash.

#### Permanent Impairment

Dr. Stevens assessed a 25% permanent partial impairment of the left upper extremity, consistent with trauma of this severity.

Life Care Planner Rebecca Morrison, RN, CLCP, projects future medical needs of approximately \$127,000 (present value) for ongoing orthopedic, pain management, and therapeutic care.

### IV. DAMAGES

Medical Expenses (Billed): \$113,220

Lost Wages (Past): \$37,477

Future Loss of Earning Capacity: \$387,000 (per economic expert Dr. Yamamoto)

Property Damage: \$20,950

Future Medical Care (Life Care Plan): \$127,000

Total Economic Damages: \$585,647

Beyond the economic losses, Ms. Martinez's pain, suffering, mental anguish, and loss of enjoyment of life are profound. Once an active mother and community participant, she can no longer play volleyball, coach her daughter's soccer team, or comfortably drive through intersections. Her physical limitations and emotional distress have permanently altered her quality of life and personal identity.

### V. SETTLEMENT DEMAND

Given the clear liability, severity of injury, permanent impairment, and documented economic and non-economic damages, Ms. Martinez hereby demands the sum of \$875,000 in full settlement of her claims against your insured.

This demand remains open for 30 days from the date of this letter. Should your office wish to discuss resolution prior to trial, please contact the undersigned promptly.

Sincerely,

Jon Dykstra, Esq.  
Attorney for Plaintiff  
[Law Firm Name]  
[Address Line 1]

[City, State ZIP]  
[Phone] | [Email]