

Chen & Associates

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March 24, 2026

RE: Settlement Demand — Sofia Martinez · Date of Loss: January 15, 2024

1. REPRESENTATION AND PURPOSE

This firm represents Sofia Martinez in connection with personal injuries she sustained in a motor vehicle collision that occurred on January 15, 2024, on the 405 Freeway near the Culver Boulevard exit in Los Angeles County, California. This letter constitutes a formal demand for settlement of all personal injury claims arising from this incident.

2. LIABILITY

On January 15, 2024, Ms. Martinez was lawfully stopped in traffic on the southbound 405 Freeway when a commercial vehicle operated by your insured, Apex Logistics, Inc., failed to maintain a safe following distance and struck Ms. Martinez's vehicle from behind at approximately 35 mph. [4] The investigating officer, Officer M. Rodriguez (CHP Badge #7234), issued two citations to the driver: Vehicle Code § 22350 (Unsafe Speed for Conditions) and Vehicle Code § 21703 (Following Too Closely). [4]

Under California Civil Code § 1714(a), every person is responsible for injury caused by their want of ordinary care. The citations issued, the mechanism of collision, and the physical evidence conclusively establish that your insured's negligence was the sole proximate cause of all injuries sustained by Ms. Martinez.

3. INJURIES AND TREATMENT

Ms. Martinez was transported by ambulance to Cedars-Sinai Emergency Department on the date of the collision, where she presented with severe cervical and lumbar pain, rated 8/10. [1] Physical examination revealed tenderness over C5-C6, limited cervical range of motion (flexion 25°, extension 15°), and positive Spurling's test bilaterally. [1] She was diagnosed with cervical strain (ICD-10: S13.4XXA) and lumbar sprain (ICD-10: S33.5XXA). [1]

Lumbar MRI performed on February 3, 2024 at Advanced Imaging Center confirmed disc herniation at L4-L5 with moderate neural foraminal narrowing and mild impingement of the traversing L5 nerve root. [2] Ms. Martinez was referred to Dr. James Park at LA Spine & Orthopedic, where she underwent 24 sessions of physical therapy over the course of 8 months. [3] Her most recent functional assessment on October 28, 2024 documented persistent limitations in prolonged sitting (>30 minutes), lifting (>15 lbs), and bilateral grip strength deficit. [3]

4. SPECIAL DAMAGES

Itemized medical specials are set forth below. All charges traced to billing records and treatment notes from the listed providers.

2024-01-15 · 99284 · Cedars-Sinai ER — ER Visit Level 4	\$8,450.00
2024-02-03 · 72148 · Advanced Imaging Center — MRI Lumbar Spine	\$4,200.00
2024-02-03 · 72141 · Advanced Imaging Center — MRI Cervical Spine	\$3,800.00
2024-03-01 · 97110/97140 · LA Spine & Orthopedic — PT × 24 sessions	\$14,400.00
2024-03-01 · 99213 · LA Spine & Orthopedic — Office visits × 6	\$2,340.00
2024-01-20 · Walgreens Pharmacy — Medications (cyclobenzaprine,	\$842.00
Total Special Damages	\$34,032.00

5. SETTLEMENT DEMAND

Applying a general damages multiplier of 3.5× to special damages of \$34,032.00, general damages total \$119,112.00. The total demand is \$153,144.00 (Special Damages \$34,032 + General Damages \$119,112).

We demand payment of \$153,144.00 on or before April 23, 2026. This demand will expire without further notice on that date. We trust that your office will recognize the substantial liability exposure documented in this letter and respond with a good-faith offer prior to the deadline.

CITATIONS

- [1] Cedars-Sinai ER Records, p. 3 — "Patient presented with severe cervical and lumbar pain, rated 8/10. Cervical strain (S13.4XXA), lumbar sprain (S33.5XXA)." · EXCELLENT
- [2] Advanced Imaging Center — MRI Report, p. 1 — "Disc herniation at L4-L5 with moderate neural foraminal narrowing and mild impingement of the traversing L5 nerve root." · EXCELLENT
- [3] LA Spine & Orthopedic Treatment Notes, p. 12 — "24 sessions of physical therapy completed over 8 months. Functional assessment 10/28/2024 documents persistent limitations." · EXCELLENT
- [4] California Highway Patrol — Traffic Collision Report, p. 2 — "Officer M. Rodriguez (Badge #7234) issued two citations: VC § 22350 (Unsafe Speed) and VC § 21703 (Following Too Closely)." · EXCELLENT
- [5] Advanced Imaging Center — Billing Statement, p. 1 — "MRI Lumbar Spine CPT 72148: \$4,200.00. MRI Cervical Spine CPT 72141: \$3,800.00." · EXCELLENT

Respectfully submitted,

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