

CLAIM FOR BODILY INJURY SETTLEMENT PURPOSES ONLY

From: [REDACTED]
Claims Adjuster: [REDACTED]
To Insurance Co.: [REDACTED]
Claimant: [REDACTED]
Claim #: 32-56K0-45R
Date Of Accident: 2023-09-19
Number of days since the accident: 843
Date of this Request: 2025-12-10
Our Demand of: \$275,726.44
Date Response Due:

Dear [REDACTED],

Our firm has the pleasure of representing [REDACTED], a 63-year-old male. The injury to our client has resulted in significant losses across several aspects of his life, including the deprivation of the ability to benefit from various duties typically performed by a family member. This demand package is submitted to initiate negotiations for a bodily injury settlement. It is intended to serve as a structured and objective analysis to support the comprehensive evaluation of the claimant's economic, and non-economic damages.

The report includes a detailed analysis of the claimant's medical assessments, functional impairment ratings, economic loss calculations, and documented non-economic damages. It encompasses trauma inventories that highlight physical, emotional, socioeconomic and cognitive impacts, ensuring that often-overlooked non-economic damages are fully captured. The impairment ratings follow established methodologies, presenting a quantifiable measure of functional loss. Economic losses are calculated using standardized economic data, including federal expectancy metrics, Bureau of Labor Statistics (BLS) data, and present-day value assessments. Additionally, the analysis is conducted under recognized legal and clinical protocols, including the Abbreviated Injury Severity Scale (AIS) and New Injury Severity Score (NISS), ensuring the report's alignment with evidentiary standards.

This information is submitted solely to provide your company with a limited opportunity to offer to resolve this claim. All materials are provided strictly for settlement negotiation purposes and should not be utilized in any later trial or proceeding without our explicit consent. Furthermore, these materials remain the property of our client and must be returned upon request.

My client seeks fair compensation for injuries sustained as a result of the accident, including pain and suffering, loss of services, permanent impairment, medical expenses, and the adverse effect on the quality of living. It is important to note that the medical expenses provided do not fully reflect the severity of injuries or the damages suffered. Additional administrative claim considerations, sometimes external to the medical records, may need to be included in the settlement calculus to facilitate a fair and equitable resolution.

In the event of a settlement, any release shall include the following language:

"This demand package does not release any other parties except the releasee's insured(s) and their insurance company. Furthermore, this document does not extinguish any rights for the releasor's first-party benefits. Finally, this document does not release the releasor's rights or their insurance company's subrogation right for property damage."

Should the release fail to include this language, we will stamp the release accordingly. If you have any objections to this language, please state them in writing so that we may stipulate a mutually acceptable release.

This report is presented as a clear, concise, and evidence-backed perspective on the full scope of the claim's valuation. It is designed to enhance the documentation process by providing a methodical presentation of the injury claim's elements, ensuring all relevant factors are fully considered during evaluation and settlement discussions.

Sincerely,

[REDACTED]
[REDACTED]

Medical History

1.01 Medical Office records	X Reviewed	X Enclosed
1.02 Hospital Records	Reviewed	Enclosed
1.03 From Other Source	X Reviewed	X Enclosed
1.04 From Client	X Reviewed	X Enclosed
1.05 Delay in Seeking Care	Reviewed	Enclosed
1.06 Gaps in Treatment	Reviewed	Enclosed

Clinical Evaluation

2.01 Physical Examination	X Reviewed	X Enclosed
2.02 Injuries - ICD Codes Required	X Reviewed	X Enclosed
2.03 Symptoms Documented	X Reviewed	X Enclosed
2.04 Laboratory Tests	Reviewed	Enclosed
2.05 Special Tests	Reviewed	Enclosed
2.06 Diagnostic Procedures	X Reviewed	X Enclosed
2.07 Specialist's Evaluation	X Reviewed	X Enclosed
2.08 Medical Validation and Determination	X Reviewed	X Enclosed

Diagnoses

F43.2 Adjustment disorders in Enjoyment of Life
M99.84 - Other biomechanical lesions of the sacral region
S16.1XXA - CERVICAL SPINE SPRAIN, SUBSEQUENT ENCOUNTER
M54.9 - BACK PAIN
R45.86 Behavioral and Emotional Concussion
F98.9 Emotional Disorders
S06.0X0 Concussion without loss of consciousness
S09.90XA: Closed Head Injury
Concussions need not be visible on MRI's
Concussions can occur without loss of consciousness
The concussion has been determined by medically accepted standards
The patient exhibits Behavioral and Emotional Concussion symptoms
F43.11 Post-traumatic stress disorder, acute
G47.9: Sleep disturbance
The findings are found to include reasonable medical probability.
Symptoms, complaints and diagnoses are causally related to the accident
V43.5 Driver of a car driver injured in collision with another vehicle
M54.12 Cervical Radiculopathy
S13.4XXA Cervical Sprain/Strain

Diagnoses

M53.0: Cervical Spinal Sympathetic Syndrome

M67.40 Chain Ganglia Injury/Sympathetic Syndrome

M54.5 Lumbar pain/ lumbalgia

M 99.03 Lumbar Segmental Dysfunction

M54.17 Radiculopathy Lumbosacral

M99.05 SI Segmental Dysfunction lumbar

M54.32 Sciatica Left

S33.6XXA Sprain of Sacroiliac joint

S13.101A Cervical Subluxation

S33.101A Lumbar Subluxation

M54.12 Cervical Radiculopathy

M54.16 Lumbar Radiculopathy

S33.5XXA Lumbar Sprain (initial encounter)

S43.422A Sprain of left rotator cuff capsule

S13.4XXA Sprain of ligaments of cervical spine, initial encounter

M53.82 Diminished Range of Motion / Spine

G89.11A Acute Nociceptive Pain

M79.89: Dense connective tissue / Collagen tissue disorder contusion

M25.512 Left Shoulder Pain

M75.00 Shoulder Capsulitis

M25.611 Shoulder Loss of Motion

S46.919A Shoulder Strain

S43.432A Superior glenoid labrum lesion of left shoulder, initial encounter

S46.012D: Strain of muscle(s) and tendon(s) of the rotator cuff of left shoulder

S46.012A Strain of muscle(s) and tendon(s) of the rotator cuff of left shoulder, initial encounter

M66.822 Spontaneous rupture of the other tendons left arm

S46.212A Initial encounter strain of the muscle, fascia and tendon left Biceps

24342 Reinsertion of ruptured Biceps tendon, distal, with or without tendon graft at the elbow

729.82 Cramp of lower limb

Radiculopathy

M54.12 Cervical Radiculopathy

M54.2 Cervicalgia - Pain in neck

M54.16 Radiculopathy, lumbar region

Complaints

Body Parts

Neck

Pain Type:
- Aching

Worsening Effects:
- Any Movement

Intensity:
- 4-6 Moderate

Location:
- Left Side

Frequency:
- Frequent 51-75% of the day

Shoulder

Pain Type:
- Dull

Worsening Effects:
- Any Movement

Intensity:
- 4-6 Moderate

Location:
- Left Side

Frequency:
- Intermittent 0-25% of the day

Low-back

Pain Type:
- Aching

Worsening Effects:
- Any Movement

Intensity:
- 4-6 Moderate

Location:
- Left Side

Frequency:
- Occasional 25-50% of the day

Concussions

Indicates R45.86 Behavioral and Emotional Concussion

- Feeling depressed or tearful

Ganglia Nerve Involvements	
M67.40 Chain Ganglia Injury/Sympathetic Syndrome	<ul style="list-style-type: none"> - Stiffness and pain in the neck - Localized tender areas that follow a pattern
M67.40 (C5) Ganglia Level	<ul style="list-style-type: none"> - Pain at the tip of the shoulder - Weakness of the arm when combing the hair, fastening a bra or reaching into pocket - Stiffness of the shoulder
M67.40 (C6, C7) Ganglia Level	<ul style="list-style-type: none"> - Pain in the shoulder

Stress Disorders & Syndromes	
Post-traumatic Stress Disorder Symptoms	<ul style="list-style-type: none"> - Contacted an attorney or intend to pursue litigation

Impairment Rating According to AMA Guide

All impairment findings in this report are identified, categorized, and assigned in accordance with the **American Medical Association's Guides to the Evaluation of Permanent Impairment, Fifth Edition**. Individual clinical findings are documented separately for clarity; however, when multiple findings affect the same body system or impairment category, they are consolidated and expressed as a single impairment value in accordance with AMA methodology, to avoid duplication or overstatement of impairment.

Unless otherwise clinically indicated, impairment ratings are derived using the **Diagnosis-Related Estimates (DRE) Model**, the AMA's preferred method when objective diagnostic criteria and corresponding clinical findings support its application. When an alternative AMA-approved rating method more accurately reflects the nature or functional impact of an impairment, that method is applied and explicitly identified.

This format is intended to provide a clear, reproducible, and medically appropriate impairment assessment that permits independent verification by other physicians and facilitates accurate interpretation by non-clinical reviewers. The impairment values reported represent the permanent functional impact of the documented conditions as defined by the AMA Guides and do not constitute a cumulative tally of diagnoses, symptoms, or treatment history.

Body Part, Function or System	AMA Edition	Chapter	Table	Page	DRE/Class	Impairment%
Feeling depressed or tearful Emotional Disorders Anxiety Emotional Or Behavioral Disorders Sleeping more than usual	5	13	13-8	325	1	14
Radiculopathy	5	13	13-23 13-24	346-348	2	10-25
Sleep Disorders Loss of Motion in Spine	5	15	15-7 IB	404	1	10-15
Upper extremity impairment due to Grade 4 strength deficit of the left biceps muscle affecting elbow flexion Upper extremity impairment due to Grade 4 strength deficit of the left biceps muscle affecting forearm supination	5	16	16-35	510		5
Loss of Motion Shoulder	5	16	38-46	477	2	3

Medical Determination of Future Treatment

Future Treatment

Future treatment is definite, with a 76-100% medical certainty of occurring.

Prognosis Overall

The prognosis requires the need for treatment due to neurological findings.

The prognosis requires the need for treatment due to type and frequency of pain.

The prognosis requires the need for treatment due to complaints.

Patient has attained MMI under my scope of practice in the body parts indicated.

The prognosis requires the need for treatment due to loss of range of motion

Future Treatment Plan

Future treatment is determined necessary when there is the presence of moderate injuries; limitation of motion; ligamentous injury; neurological findings and by type and frequency of pain.

Treatment is determined necessary due to limited range of motion.

Grade 4 CAD Injury /future care up to 107 times up to 2 years + monthly or prn

According to the Croft Guidelines, this injury would fall into Grade IV: Moderate/Severe; Limitations of motion; ligamentous instability; neurological findings present. Fracture or disc derangement.

Stability of Medical Condition

The patient's medical records reveal a documented showing of ongoing complaints and treatment with progressive improvement and the time period for stabilization ranges;

18 to 24 months

Prognosis of Probability for Future Recurrence

To clearly convey the likelihood of future recurrence or the need for future care, please indicate which body parts are categorized as either Static or Stable as follows:

STATIC: This indicates that a significant period has passed since treatment stopped, and there has been no movement or change in that body area. The need for future care is considered static, meaning it is unlikely to increase despite ongoing medical measures. There is less than a 50% chance that future care will be needed.

STABLE: This indicates that the condition has stabilized, showing no changes, variations, or fluctuations. However, continued care may be prescribed at stable Maximum Medical Improvement (MMI) if it is believed that further care will reduce future pain or prevent worsening. Stable means there is a greater than 51% chance of future recurrence or the need for future care.

Neck	26-50%/ Possible
Nerve	51-75%/ Probable
Low back	76-100%/ Definite
Shoulder	26-50%/ Possible
Elbow	26-50%/ Possible

MMI for each Body Part

Neck	Static
Nerve	Static
Low back	Stable
Shoulder	Static
Elbow	Static

Diagnostic Related Estimate Category

Spine % Impairment	40%
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Cervical Diagnostic Related Estimate

DRE Category 4: 25-28% Impairment - Loss of motion segment integrity, bilateral or multi-level radiculopathy, compression fracture greater than 50%, developmental fusion.

Lumbar Diagnostic Related Estimate

DRE Category 4: 20-23% Impairment - Loss of motion segment integrity, multilevel radiculopathy, compression fracture greater than 50%, disc derangement.

Whole Person Impairment (WPI)

The impairment rating expressed in this report reflects the examining physician's application of clinical judgment as permitted by the American Medical Association's Guides to the Evaluation of Permanent Impairment, Fifth Edition. Consistent with AMA principles, the final whole person impairment represents a medically appropriate synthesis of the applicable impairment findings, considering their combined functional impact and overlap. Given the close proximity to values derived through formal combination methods, the final rating is presented as a reasoned medical estimate rather than a strictly formulaic calculation, in order to avoid artificial precision or overstatement.

Total % Whole Body Impairment	39%
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Treatment

98940 Chiropractic Manipulation Treatment CMT 1-2

97265 Joint Mobilization

97034 Contrast Bath

97014 Elec. Stimulation (Unattended)

99203: Initial Examination Level 3

Home Exercise

97010 Hot or Cold Packs

97140 Massage Increase Range of Motion/ Manual Therapy

97124 Therapeutic Procedures

97110 Therapeutic Exercises

97799 Rehab (musculoskeletal)

X-rays

Orthopedic Expert

Medical Determination

Medical Validation (99080)

Surgical Consult.

Loss of Service

The number of days [REDACTED] is reasonably expected to endure future estimates for care requirements or the likelihood of ongoing pain, suffering, and emotional and cognitive distress, are based on the AMA Guidelines' "Diagnostic Related Estimates" (DRE). The DRE is the principal methodology used to evaluate individuals who have sustained distinct injuries. For further details, please refer to the impairment rating table.

WEEKLY HOUSEHOLD MANAGEMENT	Loss of Days Claimed	Loss of weekly household management hours	Loss of total hours claimed	Hourly BLS Wage	Total Loss
	843	1.00	843	\$14.22	\$11,987.46
WEEKLY POOL, LAWN, GARDEN CARE	Loss of Days Claimed	Loss of weekly pool, lawn, garden care hours	Loss of total hours claimed	Hourly BLS Wage	Total Loss
	843	1.00	843	\$16.94	\$14,280.42
LOSS OF FOOD, COOKING AND CLEANUP	Loss of Days Claimed	Loss of food, cooking and cleanup hours	Loss of total hours claimed	Hourly BLS Wage	Total Loss
	843	0.50	421.5	\$9.63	\$4,059.05
LOSS OF OBTAINING SERVICES	Loss of Days Claimed	Loss of obtaining services hours	Loss of total hours claimed	Hourly BLS Wage	Total Loss
	843	0.50	421.5	\$12.65	\$5,331.98
LOSS OF HOUSEHOLD SERVICES	Loss of Days Claimed	Loss of household services hours	Loss of total hours claimed	Hourly BLS Wage	Total Loss
	843	0.25	210.75	\$10.00	\$2,107.50

Pain and Suffering

PAIN & SUFFERING PAST	Loss of Days Claimed	Loss of pain & suffering past hours	Loss of total hours claimed	Hourly BLS Wage	Total Loss
	843	16	13488	\$14.22	\$191,799.36
PAIN & SUFFERING FUTURE	Loss of Days Claimed	Loss of pain & suffering future hours	Loss of total hours claimed	Hourly BLS Wage	Total Loss
	365	16	5840	\$3.00	\$17,520.00

Karnofsky Performance Status Scale

No change since last visit

100 - Normal, no evidence of disease

90 - Able to perform normal activity with only minor symptoms

80 - Normal activities with effort, some symptoms

70 - Able to care for self but unable to do normal activities

>>> 60 - Requires occasional assistance (duties or household), cares for most needs

50 - Requires considerable assistance

40 - Disabled, requires special assistance

30 - Severely disabled

20 - Very sick, requires active supportive treatment

10 - Moribund

Property Damage

Vehicle Repair Cost:	\$19,405.89
Deductible Paid To 1st Party Insurer:	\$500.00
Total Property Damage for: Vehicle totaled or repaired/Rental/Diminution/Deductible/Other property losses:	\$19,905.89

Medical Expenses

Chiropractor Expenses:	\$3,053.65
Orthopedic Expenses:	\$272.14
Radiology Expenses:	\$803.03

Medical Expenses

Total Current Medical Expenses:	\$4,128.82
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Future Medical Expenses

Based on the Grade of the CAD injury, reasonable probability estimates the patient will be required to be seen for a total of visits:	107
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Reasonable probability estimates for charges per visit for the future primary treatment to be \$	\$0.00
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Future Treatment Cost	\$0.00
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Reasonable probability estimates the patient will be required to be seen for therapies/modalities for a total of visits:	0
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Future Surgical Cost	\$0.00
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Future Medications	\$0.00
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Future Surgeries	\$0.00
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Future Injections	\$0.00
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Future Physical Therapy	\$0.00
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Reasonable probability with supportive data, letter, prescription, or invoice from other medical professionals that future medical expenses may include those for: Labs, Diagnostics, Radiographs, MRI's, DME, or CRMA.

Itemized Explanation of Future Surgical Costs	
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Future Cost	\$0.00
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Case costs and Expenses

Administrative Costs:	\$4,313.22
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Mediation:	\$42.75
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Special Independent Medical Validation of Records:	\$250.00
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Total Total Administrative Case Costs and Expenses:	\$4,605.97
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Non-Economic Damage Elements

Loss of Weekly Household Management	11,987.46
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Loss of Household Services	\$2,107.50
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Loss of Pool, Lawn, Garden Care	\$14,280.42
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Loss of Food, Cooking and Cleanup	\$4,059.05
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Loss of Obtaining Services	\$5,331.98
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Total Medical expenses	\$4,128.82
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Total Pain and Suffering Past	\$191,799.36
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Total Pain and Suffering Future	\$17,520.00
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Non-Economic Damage Elements

Total Non Economic Damages	\$251,214.58
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Total Damages

Total damages comprise all applicable monetary categories as: Non Economic Damages, Property Damages, Mileage Costs, Administrative Case Costs, Medical Expenses, Future Medical Expenses, Surgical Expenses and Future Surgical Expenses	\$275,726.44
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Per Diem Analysis

An analysis determines the claim for past and future pain & suffering has a valuation of \$209,319.36. The figures are based on per diem analysis as both conservative and reasonable value vs the market value or the replacement value.

Elements of Damage

Using standardized biological and psychosocial function measures, [REDACTED] life has permanently and dramatically changed since the accident.

The injuries [REDACTED] suffered have impaired his ability in a range of basic and fundamental activities of daily living as well as performing specific duties while under duress. Functional loss of services interferes with activities, causing a loss of enjoyment of [REDACTED] life before the accident. Assessments made also allow for predictors of future losses.

Assessments reveal that [REDACTED] has a projected value for damages as described in the categories listed below to which [REDACTED] has not been able to contribute to labor due to injuries sustained in the accident.

Estimates and calculations are made using categorized tables of values from large sample research and applying a reasonable deviation from a standard mean value. We strive to minimize the effects of bias and make as perfect or 'intelligible' determination as possible while remaining subject to reasonable budget constraints and considering the variables listed here:

1. Approximations are that [REDACTED] contributed an average of 2.00 hours of services listed per day before the accident, which is in concert with the U.S. Bureau of Labor Statistics National average household contributions of persons of similar gender and age. 6
2. The monetary value of [REDACTED] work performed at home was determined by the Time Use Survey and Dollar of the Day values for Loss Of Services in the categories listed below. As reported in May 2021 by the Bureau Of Labor Statistics and Occupational Employment Survey, such findings reveal the average hourly wages for the individual categories . 7,8,9 3.
3. The overall determination is that there was a total loss in the categories excluding the activities from 05/01/2021, lasting 444 claimable days.

1. Katz S, Ford A, Moskowitz R, Jackson B, Jaffe M. Studies of illness in the aged: the index of ADL, a standardized measure of biological and psychosocial function. JAMA. 1963;914 919. (PubMed) (Google Scholar)
2. Analysis of Variance (ANOVA) and The Abbreviated Injury Scale (AIS)33 to code injuries and The Injury Severity Score (ISS) and New Injury Severity Score (NISS) are used as measures of injury severity.
3. Association for the Advancement of Automotive Medicine. The Abbreviated Injury Scale, 1990 Revision, Update 98. Barrington, Illinois: Association for the Advancement of Automotive Medicine; 1998.
4. Baker SP, O'Neill B, Haddon W, Jr, Long WB. The injury severity score: a method for describing patients with multiple injuries and evaluating emergency care. J Trauma. 1974;14(3):18796. doi: 10.1097/00005373-197403000-00001. (PubMed) (CrossRef) (Google Scholar)
5. Motor vehicle related orthopaedic trauma contributes significantly to the burden of disease and injury. World Health Organization; 2009. (Google Scholar)
6. U.S. Bureau of Labor Statistics - Charts by Topic; Household activities - Last online update = December 20, 2016, @<https://www.bls.gov/tus/charts/household.htm>
7. May 2021 Survey Methods and Reliability Statement @ www.bls.gov/oes/methods_21.pdf .

8. Occupational Employment And Wages - MAY 2021 <https://www.bls.gov/news.release/pdf/ocwage.pdf>
9. Occupational Employment and Wage Statistics - May 2021 <https://www.bls.gov/oes/tables.htm>

Demand for Settlement

Based upon the liability, impact, well documented objective medical findings inclusive of; Injury Severity Types, Diagnoses, Complaints by; intensity, frequency, type, radiation, and further effects on the individual, including the documented permanent impact and effect upon my client's Loss of Enjoyment of Life, Duties under Duress, Loss of Service, Pain and Suffering and given consideration to the treatment plan, prescriptive recommendations, stability of the medical condition, prognosis, future treatment, current and future medical costs, economic losses, MMI, percentage of whole person impairment, total elements of damages and total monetary factors, please indicate your willingness to offer to tender \$275,726.45 of your insured's policy limits by forwarding a release and settlement check made payable to our firm.