

Standard Demand Package Sample for Attorneys

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Demand Package

Facts and Liability

Damages

Elements of Damages	Amount
_____	_____
_____	_____
_____	_____

Injuries

Diagnosis	ICD Code
_____	_____
_____	_____
_____	_____

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“Knowing that it’s being reviewed not just by a person, but by someone who might be a former lawyer or a former adjuster gives us that satisfaction that **quality people are reviewing** this and making sure that the draft we get back is pretty much ready to go.”

Anthony Golden

Managing Partner
Anthem Injury Lawyers

Demands

	AI + You	AI + Expert Review		
Sections & Features	Express	Simple	Basic+	Standard
Turnaround Time	20-60 minutes	<2 days	2-4 days	5-7 days
Diagnosis/ICD Codes	✓	✓	✓	✓
Objective Tests	✓	✓	✓*	✓*
Interventional Treatments	✓	✓	✓*	✓*
Executive Medical Summary	✓	X	X	X
Detailed Medical Summaries	X	X	X	✓
Facts & Liability	✓	X	✓	✓
Exhibit Management	✓	✓	✓	✓
Past Medical Expenses	✓	✓	✓	✓
Future Medical Expenses	✓	X	✓	✓
Pain & Suffering Narrative	✓	X	✓	✓
Loss of Earnings	X	X	X	✓
Loss of Household Services	X	X	X	✓
Verdict Analysis	X	X	X	✓
Punitive Damages	X	X	X	✓
Per Diem Analysis	X	X	✓	✓
Red Flags, Problems, and Priors	X	X	✓	✓

*available upon request

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April [8], 2025

VIA CERTIFIED MAIL

VIA FAX

VIA EMAIL: [REDACTED]

GEICO County Mutual Insurance Company

[Carrier Address]

[NTD: Please note, we have partially completed the insurance information above based on the information included within exhibit 17, labelled Insurance Records. We recommend you review and revise as required.]

RE: My Client:

Date of Loss:

Your Insured:

Claim No.:

Policy No.:

August 13, 2024

Dear Ms. [REDACTED] and All Insurance Company Decision-Makers:

Your records should reflect that our firm represents [REDACTED] (“Ms. [REDACTED]” or “our client”) regarding her respective legal interests as to an incident that occurred on August 13, 2024, involving [REDACTED] (“Ms. [REDACTED]” or “your insured”).

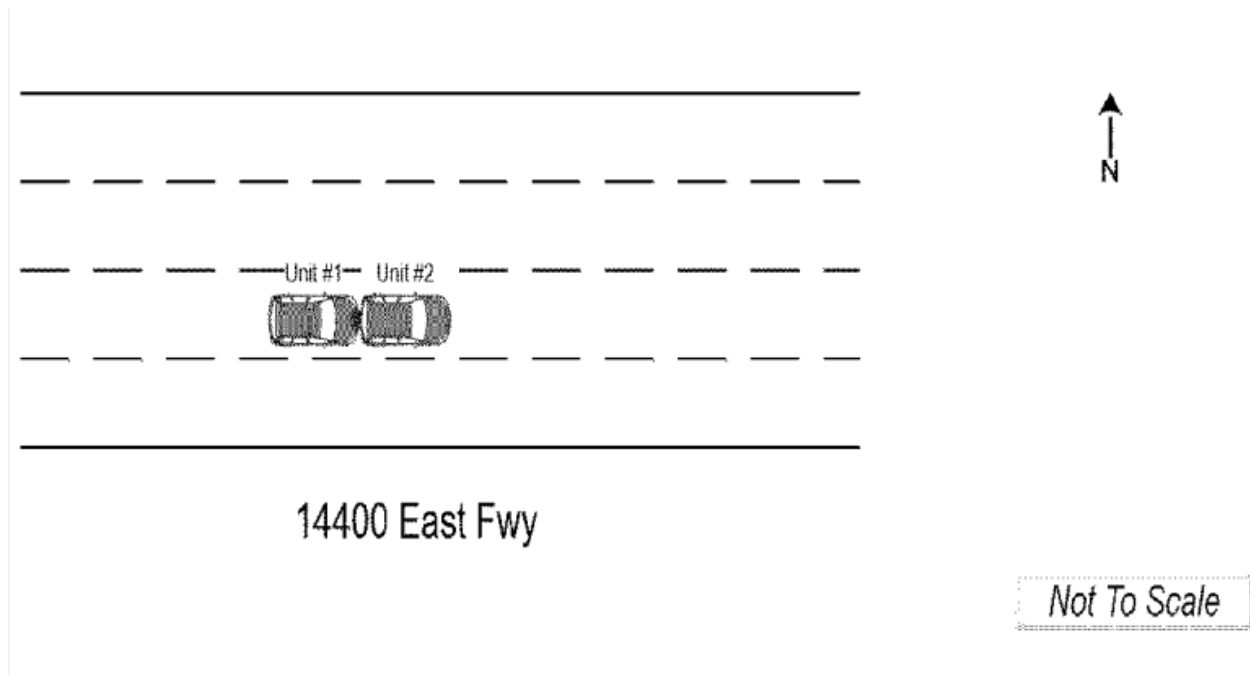
Our firm is currently in a position to resolve our client’s claims and, in connection therewith, submits the following information and documentation in a good-faith effort to resolve this matter.

Pursuant to Tx. R. Evid. Rule 408, the information and materials accompanying this letter are for settlement purposes only and may not be used at trial unless obtained through the legal process.

We expect that you will provide our firm with a list of any additional items you need in order to properly and fully evaluate this settlement demand by [REDACTED]. We will make a good-faith effort to respond to any requests you make for additional information regarding this demand. **We also ask that this demand be immediately forwarded to all insurance company decision-makers and, of course, the insured policyholder.**

1. FACTS & LIABILITY

On August 13, 2024, Ms. [REDACTED] was the restrained driver of a vehicle traveling eastbound on East Freeway in Houston, Harris County, Texas. At the same time, Ms. [REDACTED] was the driver of a vehicle traveling directly behind Ms. [REDACTED]'s vehicle. Suddenly and without warning, Ms. [REDACTED] failed to control her speed and struck Ms. [REDACTED]'s vehicle from behind. Upon impact, Ms. [REDACTED] was violently jostled back and forth in a rapid motion and slammed the back of her head against the seat of the vehicle. The collision resulted in Ms. [REDACTED] sustaining significant personal injuries and other damages.



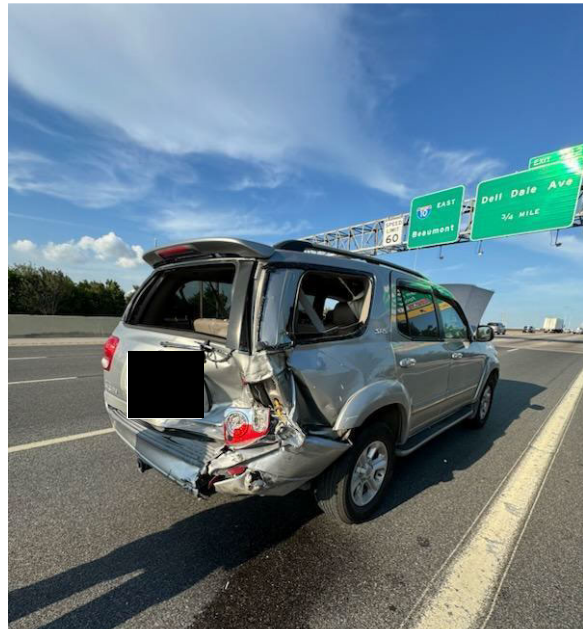
As exposed in the Texas Peace Officer's Crash Report,¹ Officer Jesika Wade of the Harris County Sheriff's Office investigated the collision and determined that Ms. [REDACTED] was the sole party responsible for the collision due to her failure to control speed, lack of attentiveness, and failure to maintain an adequate distance from the vehicle ahead.

The conditions for establishing liability are clear. Ms. [REDACTED] owed a duty of care to the other drivers on the road. A driver of a motor vehicle shall not follow another vehicle more closely than is reasonable and prudent, having due regard for the speed of other vehicles, as well as traffic conditions and the condition of the roadway. **Tex. Transp. Code § 545.062(a)**. A driver who operates his or her vehicle in a careless or imprudent manner, or without due regard for road, weather and traffic conditions then existing, commits the act of careless driving. See, e.g., *In re Gamble*, 676 S.W.3d 760, 787 (Tex. App. 2023) (Texas drivers must exercise reasonable,

¹ Exhibit 1 - Texas Peace Officer's Crash Report

due care, and prohibits all drivers from operating motor vehicles upon public roadways in a manner that creates an unjustifiable risk of harm to other motorists, pedestrians, or property; this general duty includes compliance with Texas’s “rules of the road”). A driver who operates his or her vehicle and who fails to give full time and attention to the operation of his or her vehicle, or where a driver fails to maintain a proper lookout while operating his or her vehicle commits the act of inattentive driving. See, e.g., *Arcides v. Rojas*, 677 S.W.3d 154, 161 (Tex. App. 2023) (internal citations omitted) (“Every Texas motorist proceeding along a public roadway is under a duty, at all times, to maintain a proper lookout for his own safety, and may not proceed blindly and in disregard of dangers that might reasonably be anticipated to exist. ... The duty to maintain a proper lookout while driving encompasses the duty to observe, in a careful and intelligent manner, traffic and the general circumstances in the vicinity.”). On the date of loss, Ms. [REDACTED] failed to control speed, lacked attentiveness, and did not maintain an adequate distance from the vehicle ahead, which directly caused the collision. As a result of Ms. [REDACTED]’s acts and/or omissions on August 13, 2024, Ms. [REDACTED] suffered significant personal injuries and damages for which Ms. [REDACTED] is undoubtedly liable.

As evidenced by the photographs below,² the August 13, 2024, collision resulted in substantial property damage with resultant significant bodily injury.



2. INJURIES & TREATMENTS

² Exhibit 2 - Property Damage Photographs

The below tables are non-exhaustive lists/summaries of the injuries and treatments Ms. [REDACTED] sustained as a direct and proximate result of the August 13, 2024, collision.

ICD Code	Description
M25.521	Pain in Right Elbow
M25.522	Pain in Left Elbow
M47.812	Spondylosis Without Myelopathy or Radiculopathy, Cervical Region
M50.20	Other Cervical Disc Displacement, Unspecified Cervical Region
M51.24	Other Intervertebral Disc Displacement, Thoracic Region
M54.2	Cervicalgia
M54.6	Pain in Thoracic Spine
M99.07	Segmental and Somatic Dysfunction of Upper Extremity
S13.4XXA	Sprain of Ligaments of Cervical Spine
S16.1XXA	Strain of Muscle, Fascia and Tendon at Neck Level
S23.3XXA	Sprain of Ligaments of Thoracic Spine
S23.41XA	Sprain of Ribs
S29.012A	Strain of Muscle and Tendon of Back Wall of Thorax
S33.5XXA	Sprain of Ligaments of Lumbar Spine
S39.012A	Strain of Muscle, Fascia and Tendon of Lower Back

2.1. Objective Tests

MRI of the Cervical Spine - 10/01/2024 (Exhibit 11 - p. 111)

- Cervical kyphosis.
- C3-C4: 1 mm broad-based disc herniation that effaced the thecal sac.
- C4-C5: 1 mm broad-based disc herniation that effaced the thecal sac.
- C5-C6: 2 mm broad-based disc herniation causing central canal stenosis and bilateral neural foramina narrowing.
- C6-C7: 2 mm broad-based disc herniation causing central canal stenosis and bilateral neural foramina narrowing.

MRI of the Thoracic Spine - 10/01/2024 (Exhibit 11 - p. 112)

- T6-T7: 1 mm disc bulge that effaced the thecal sac.

- T7-78: 1 mm disc bulge that effaced the thecal sac.
- T8-T9: 1 mm disc bulge that effaced the thecal sac.
- T9-710: 1 mm disc bulge that effaced the thecal sac.
- 1.6 cm left renal cyst.

2.2. Interventional Treatments

East Side Surgery Center

- Cervical Facet Joint Injection at C5-C6 - 11/25/2024 (Exhibit 15 - p. 130-131)

AFC Urgent Care	
Timeline	August 14, 2024
No. Visits	1
Summary	On August 14, 2024, Ms. [REDACTED] presented to Ms. Sharon Johnston, N.P., for urgent medical treatment and care. Upon arrival, Ms. [REDACTED] complained of pain in her right elbow and upper back. After a clinical examination, Ms. Johnston prescribed Naproxen and Methocarbamol and instructed Ms. [REDACTED] to follow up in three days.
Documents	• Exhibit 3 - AFC Urgent Care - Bills • Exhibit 4 - AFC Urgent Care - Records

Allied Medical Centers	
Timeline	August 28, 2024 - October 9, 2024
No. Visits	4
Summary	On August 28, 2024, Ms. [REDACTED] presented to Mr. Jason Lee, N.P., for medical treatment and care. Upon arrival, Ms. [REDACTED] complained of pain in her neck, back, and right elbow. After a clinical examination, Mr. Lee prescribed Ibuprofen and recommended a TENS unit, ice/heat pack, Biofreeze, and electrodes. Mr. Lee referred Ms. [REDACTED] to physical medicine and instructed her to return for a follow-up visit. Mr. Lee opined that it was medically probable that Ms. [REDACTED]'s injuries and associated limitations were a direct result of the August 13, 2024, incident at issue. On September 11, 2024, Ms. [REDACTED] returned to Mr. Lee for a progress examination. Upon arrival, Ms. [REDACTED] complained of pain in her neck, upper back, and middle back. After a clinical examination, Mr. Lee referred Ms.

██████ for an MRI of the cervical and thoracic spine, prescribed Ibuprofen, and recommended that Ms. ██████ continue her current treatment plan.

On September 25, 2024, Ms. ██████ presented to Mr. Lee, for a medical progress examination. Upon arrival, Ms. ██████ complained of pain in her neck, back, and right elbow. After a clinical examination, Mr. Lee recommended that Ms. ██████ continue her current treatment plan and return for a follow-up visit in two weeks.

On October 9, 2024, Ms. ██████ returned to Mr. Lee for a progress examination. After a clinical examination and review of her diagnostic imaging, Mr. Lee diagnosed Ms. ██████ with a herniated nucleus pulposus of the thoracic and cervical spine. Mr. Lee referred Ms. ██████ to pain management and recommended that she continue with her current treatment plan.

[NTD: Please note, the medical records appear to suggest Ms. ██████ refused a prescription for medication during the September 25, 2024, appointment. We have not included this information within the summary above but recommend you review and revise as required.]

Documents

- Exhibit 5 - Allied Medical Centers - Bills
- Exhibit 6 - Allied Medical Centers - Records

Qualcare Rehabilitation

Timeline September 3, 2024 - November 20, 2024

No. Visits 17

Summary On September 3, 2024, Ms. ██████ presented to Dr. Razak Balogun, D.C., for chiropractic evaluation and treatment. Upon arrival, Ms. ██████ complained of pain in her neck, middle back and lower back. After a complete and thorough physical examination, Dr. Balogun recommended a treatment plan that consisted of but was not limited to, the following: manual massage, electric stimulation and ultrasound therapy.

On November 20, 2024, Ms. ██████ returned to Dr. Balogun for a progress examination. Ms. ██████ received therapeutic exercises. Ms. ██████ remained symptomatic for pain in her neck. After completing the examination, Dr. Balogun recommended Ms. ██████ return for follow up treatment.

	[NTD: Please note, the records are not very detailed with regards to the complaints of the patient, and medical opinions. We have gleaned all available information from the records. Moreover, there do not appear to be discharge records. Please review and supplement your records, or otherwise amend the summaries above, as required.]
Documents	• Exhibit 8 - Qualcare Rehabilitation - Bills • Exhibit 9 - Qualcare Rehabilitation - Records

One Step Diagnostic	
Timeline	October 1, 2024
No. Visits	1
Summary	On October 1, 2024, Ms. [REDACTED] underwent diagnostic imaging, which revealed, in relevant part, the following: • <u>MRI of the Cervical Spine:</u> ○ Cervical kyphosis. ○ C3-C4: 1 mm broad-based disc herniation that effaced the thecal sac. ○ C4-C5: 1 mm broad-based disc herniation that effaced the thecal sac. ○ C5-C6: 2 mm broad-based disc herniation causing central canal stenosis and bilateral neural foramina narrowing. ○ C6-C7: 2 mm broad-based disc herniation causing central canal stenosis and bilateral neural foramina narrowing. • <u>MRI of the Thoracic Spine:</u> ○ T6-T7: 1 mm disc bulge that effaced the thecal sac. ○ T7-T8: 1 mm disc bulge that effaced the thecal sac. ○ T8-T9: 1 mm disc bulge that effaced the thecal sac. ○ T9-T10: 1 mm disc bulge that effaced the thecal sac. ○ 1.6 cm left renal cyst.
Documents	• Exhibit 10 - One Step Diagnostic - Bills • Exhibit 11 - One Step Diagnostic - Records

Greater Houston Pain and Injury	
Timeline	October 22, 2024 - December 23, 2024

No. Visits	3
Summary	On October 22, 2024, Ms. [REDACTED] presented to Dr. Andrew McKay, M.D., for a pain management consultation and treatment. During the initial consultation, Ms. [REDACTED] complained of headaches and pain in her neck. After a clinical examination and review of Ms. [REDACTED]'s diagnostic imaging, Dr. McKay diagnosed Ms. [REDACTED] with cervical facet joint syndrome and recommended left-sided cervical facet joint injections at C5-C6 with intravenous sedation and post-injection physical therapy. Dr. McKay instructed Ms. [REDACTED] to follow up in one month. On December 23, 2024, Ms. [REDACTED] returned to Dr. McKay for a pain management progress examination. After a clinical examination, Dr. McKay recommended that Ms. [REDACTED] continue with her home exercise program and instructed her to return to the clinic as needed.
Documents	• Exhibit 12 - Greater Houston Pain and Injury - Bills • Exhibit 13 - Greater Houston Pain and Injury - Records

East Side Surgery Center	
Timeline	November 25, 2024
No. Visits	1
Summary	On November 25, 2024, Ms. [REDACTED] presented to Dr. Andrew McKay, M.D., at which time she underwent a left-sided cervical facet joint injection at the C5-C6 level. Ms. [REDACTED] tolerated the procedure well and was discharged in stable condition.
Documents	• Exhibit 14 - East Side Surgery Center - Bills • Exhibit 15 - East Side Surgery Center - Records

3. DAMAGES

3.1. Total Projected Claim Value

Elements of Damages	
Economic Damages	
Past Medical Expenses	\$29,775.99

Future Medical Expenses	\$39,690.00
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Non-Economic Damages

Pain and Suffering, Physical Impairment, and Mental Anguish	\$229,120.00
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Total Damages	\$298,585.99
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3.2. Past Medical Expenses

To date, Ms. [REDACTED] has incurred medical expenses as itemized below.

Provider	Treatment Period	Amount Charged	Amount Accepted	Supporting Document(s)
AFC Urgent Care	8/14/2024	\$169.00	\$169.00	Exhibit 3
Allied Medical Centers	8/28/2024 - 10/9/2024	\$2,086.99	\$2,086.99	Exhibit 5
Simon's Pharmacy	8/28/2024	\$250.00	\$250.00	Exhibit 7
Qualcare Rehabilitation	9/3/2024 - 11/20/2024	\$4,285.00	\$4,285.00	Exhibit 8
One Step Diagnostic	10/1/2024	\$8,200.00	\$8,200.00	Exhibit 10
Greater Houston Pain and Injury	10/22/2024 - 12/23/2024	\$6,000.00	\$6,000.00	Exhibit 12
East Side Surgery Center	11/25/2024	\$5,985.00	\$5,985.00	Exhibit 14
US Anesthetic Services	11/25/2024	\$2,800.00	\$2,800.00	Exhibit 16
Total		\$29,775.99	\$29,775.99	

If you dispute any of Ms. [REDACTED]'s medical treatment or bills as unnecessary or unreasonable, please specify the disputed items in writing. Otherwise, we will assume you agree with the necessity and reasonableness of her medical treatments and bills.

3.3. Future Medical Expenses

Ms. [REDACTED] will require additional future treatment as identified below.

[NTD: Please note, to more appropriately justify the non-economic damages sought, we have extended the timeline of treatment for conservative care to two years. Please review and revise if required.]

Procedure	Years	Per Year	Cost	Total
Cervical Facet Joint Injection C5-C6 ³	1	2	\$12,685.00	\$25,370.00
Pain Management Visit ⁴	1	4	\$850.00	\$3,400.00
Continued Chiropractic Care ⁵	2	12	\$330.00	\$7,920.00
Primary Care Visits ⁶	2	6	\$250.00	\$3,000.00
Total				\$39,690.00

Healthcare and medication costs are expected to rise, and we reserve the right to update or extend our estimate to account for further care needs.

3.4. Past and Future Pain and Suffering

The State of Texas allows for our client to be compensated for non-economic damages. Non-economic damages as defined by **Texas Civil Practice and Remedies Code - CIV PRAC & REMS § 41.001 (12)** means damages awarded for the purpose of compensating a claimant for physical pain and suffering, mental or emotional pain or anguish, loss of consortium, disfigurement, physical impairment, loss of companionship and society, inconvenience, loss of

³ Exhibit 12 - Greater Houston Pain and Injury - Bills; Exhibit 14 - East Side Surgery Center - Bills; Exhibit 16 - US Anesthetic Services - Bills

⁴ Exhibit 12 - Greater Houston Pain and Injury - Bills

⁵ Exhibit 8 - Qualcare Rehabilitation - Bills

⁶ Exhibit 5 - Allied Medical Centers - Bills

enjoyment of life, injury to reputation, and all other nonpecuniary losses of any kind other than exemplary damages.

No set formula exists under Texas law by which an award of non-economic damages can be measured. Such decisions are left to the “common sense of the jury,” who enjoy wide latitude in determining the amount of non-economic damages to award. Therefore, “per diem” arguments (i.e., a certain monetary amount for each day our client suffered from the pain and suffering, physical impairment, and mental anguish as a result of the injuries sustained) are proper.

Ms. [REDACTED] a 41-year-old woman, has endured significant pain and suffering following a collision on August 13, 2024, where she was the restrained driver in a rear-end impact. The collision resulted in injuries to her neck, back, and right elbow, leading to persistent soreness, stiffness, sharp and dull pain, burning sensations, throbbing pain, and intermittent discomfort. These symptoms have disrupted her sleep and caused radiating pain, further compounding her distress. Ms. [REDACTED] has experienced dizziness, headaches, and muscle pain, which have significantly impacted her ability to perform daily activities and maintain her quality of life.

Diagnostic imaging revealed multiple disc herniations and bulges in her cervical and thoracic spine, causing central canal stenosis and neural foraminal narrowing. These conditions contribute to her ongoing pain and limited range of motion. Despite undergoing extensive physical therapy, chiropractic care, and pain management, including therapeutic exercises, manual therapy, and the use of a TENS unit, ice/heat packs, and Biofreeze, Ms. [REDACTED] continues to struggle with pain during activities such as bending, twisting, and looking up, particularly in the mornings. Her injuries have also led to financial stress, as she is a married mother of six children and has been advised to avoid aggravating factors at work.

The physical and emotional toll of her injuries has been profound. Ms. [REDACTED] faces ongoing challenges in regaining her strength, mobility, and ability to perform daily tasks without pain. The impact of her injuries extends beyond the physical, affecting her emotional well-being and financial stability. As she navigates these challenges, the support and understanding of her situation are crucial in helping her seek the compensation she deserves for the pain and suffering she has endured.

Verdict Analysis

Ms. [REDACTED] is entitled to past and future pain and suffering, physical impairment, and mental anguish damages as supported by the following verdict analysis rendered under similar circumstances.

<i>Adan Obdulio Jimenez Lopez v. Fadi Ataa Shati</i>	
Citation	2015 Jury Verdicts Lexis 5108
Jurisdiction	Harris County, Texas
Award	\$378,205.00 (\$350,000.00 apportioned to non-economic damages)
Case Facts	On January 2, 2012, Fadi Ataa Shadi was driving a 2011 BMW 320i, and the plaintiff, Adan Obdulio Jimenez Lopez, was a back seat passenger. Shadi was traveling southbound on State Highway 6, and entered an intersection that was controlled by a stoplight. An oncoming driver in a Toyota 4Runner attempted a left turn and struck Shadi's car. Shadi's car then hit three other vehicles ,a Nissan 350Z, a Nissan Pathfinder and a Ford Explorer, before coming to rest. The investigating officer concluded that Shadi ran a red light. Lopez sued Shadi for negligence and negligence per se.
Injuries	Lopez sustained neck sprains and strains and lumbar disc bulges. He was treated by a chiropractor for about a couple of months and also underwent a lumbar epidural steroid injection.

Non-Economic Damages - Pain and Suffering, Physical Impairment and Mental Anguish

As illustrated in the below per diem analysis, Ms. [REDACTED]'s claim for pain and suffering, physical impairment, and mental anguish is conservatively valued at **\$229,120.00**.

- \$20.00/hr. for initial pain and suffering, physical impairment, and mental anguish from August 13, 2024, to December 23, 2024; and
- \$16.00/hr. for subsequent pain and suffering, physical impairment, and mental anguish from December 23, 2024, to December 23, 2026.

Pain & Suffering, Physical Impairment and Mental Anguish	
Initial Pain & Suffering, Physical Impairment and Mental Anguish	
Initial Period (in Days)	132
Waking Hours/Day	16.0
Reasonable Compensation/Hour	\$20.00
Total Initial Pain & Suffering, Physical Impairment and Mental Anguish	\$42,240.00

Subsequent Pain & Suffering, Physical Impairment and Mental Anguish	
Subsequent Years with Pain	2
Waking Hours/Day	16.0
Reasonable Compensation/Hour	\$16.00
Total Subsequent Pain & Suffering, Physical Impairment and Mental Anguish	\$186,880.00
Total Pain & Suffering, Physical Impairment and Mental Anguish	\$229,120.00

In light of the per diem and representative verdict analyses above, Ms. [REDACTED] is entitled to **\$229,120.00** as compensation for her pain and suffering, physical impairment, and mental anguish.

4. DEMAND TO SETTLE

This demand is made pursuant to the *Stowers* doctrine first espoused in *G.A. Stowers Furniture Co. v. American Indemnity Co.* 15 S.W. 2d 544 (Tex. Comm’n. App. 1929, holding approved). Under the *Stowers* doctrine, an insurer owes an implied duty of ordinary care to its insured to accept a reasonable settlement demand that is within policy limits. *Id.* at 547 (holding that an insurer “is held to that degree of care and diligence which a man of ordinary care and diligence would exercise in the management of his own business.”). In *Bramlett v. The Medical Protective Company of Fort Wayne, Indiana*, the Court found that there is not a *per se* requirement “that an insurer know all, or even most, of the facts of the case in order to have a *Stowers* duty. Indeed, early settlement is encouraged.” 2013 WL 796725 (N.D. Tex. March 5, 2013).

Pursuant to the Texas Supreme Court’s decision in *Trinity Universal Insurance Company v. Bleeker*, we note that our client offers to provide your insured with an unqualified, unconditional, and full release of all actual, accrued, pending, potential, or otherwise existing bodily injury claims in exchange for the foregoing stated sums of money. 966 S.W.2d 489, 491 (Tex. 1998). Our client will assume responsibility for all outstanding liens including, but not limited to, all hospital, Workers’ Compensation, Medicare, Medicaid, subrogation, or other liens, if any. *Id.* Furthermore, our client agrees to indemnify your insured against any claims made by any healthcare provider(s) or insurer(s) for reasonable and necessary medical expenses arising from the incident made the basis of this lawsuit.

In light of the foregoing, Ms. [REDACTED] hereby offers to settle her claims for **\$298,585.99**. If this amount exceeds the policy limits, please consider this a request for policy limits under the

applicable policy providing coverage for the August 13, 2024, incident at issue. This demand will remain open until **5:00 P.M. Central Time on [REDACTED]**, upon which it will be automatically withdrawn if not accepted. Please do not hesitate to contact our firm if you would like to discuss this matter further.

We do not doubt that you will recognize the contractual obligation owed to the insured pursuant to the terms of the insurance policy maintained with your company at the time of the August 13, 2024, incident. Your company has a legal duty to act in good faith to resolve this matter.

While this correspondence is subject to Tx. R. Evid. Rule 408, nothing contained herein shall be construed to limit or impair, in any way, any of our client's claims, rights, remedies, or defenses in this matter, all of which are hereby expressly reserved. In the spirit of cooperation and in a further attempt to resolve these issues informally and amicably, if you have any further questions, please feel free to contact the undersigned upon receipt of this settlement demand so that we may discuss the foregoing.

Very truly yours,

[REDACTED]

[REDACTED]

Exhibit List

Exhibit No.	Description
1	Texas Peace Officer's Crash Report
2	Property Damage Photographs
3	AFC Urgent Care - Bills
4	AFC Urgent Care - Records
5	Allied Medical Centers - Bills
6	Allied Medical Centers - Records
7	Simon's Pharmacy - Bills
8	Qualcare Rehabilitation - Bills
9	Qualcare Rehabilitation - Records
10	One Step Diagnostic - Bills
11	One Step Diagnostic - Records
12	Greater Houston Pain and Injury - Bills
13	Greater Houston Pain and Injury - Records
14	East Side Surgery Center - Bills
15	East Side Surgery Center - Records
16	US Anesthetic Services - Bills
17	Insurance Records

[NTD: Please review the records enclosed and labeled under Exhibit 17. You may wish to review and include or exclude them from the final demand submission.]



Demands™

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Medical summaries with ICD codes, robust damage calculations, and strategic demand structuring ensure no money is left on the table.

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Save time and accelerate settlements

Let us do the heavy lifting so you can focus on what really matters, your clients and case management.

FACTS & LIABILITY	
DAMAGES	
Elements of Damages	Amount
Past Medical Expenses	\$45,700.34
Future Medical Expenses	\$173,655.02
Loss of Income	\$16,350.47
Loss of Household Services	\$8,450.51
Past and Future Pain and Suffering	\$730,505.88
Total Damages	\$974,662.22
INJURIES	
Diagnosis	ICD Code
Cervicgia	M54.2
Sprain of joints and ligaments of unspecified parts of neck	S1.9XXA
Radiculopathy of thoracic region	M54.14
Lumbar radiculopathy	M54.16
TREATMENT	
Provider	Chiropractic & Wellness
Dates of Treatment	6/22/2022 - 11/13/2022

69%

more likely to achieve
policy limit settlements

\$200M

resolved from
missing documents

1,500+

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The most funded Legal AI company to invest in Legal AI and product innovation

\$235M

Capital Raised

\$1B

Company valuation

1,500+

Law firms using EvenUp

1,600+

Demands and
MedChron's weekly

\$7B+

Damages claimed

\$436M

Resolved from missing
documents

