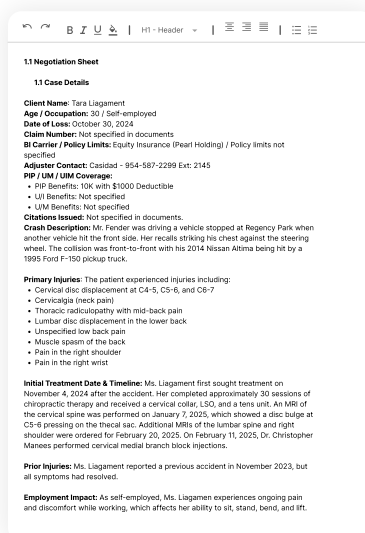


# Sample Negotiation Sheet for Attorneys

## What is an EvenUp Negotiation Sheet?

A template within the AI Drafts Suite that compiles synced treatment records into a structured summary of care, diagnoses, and impairment findings. Powered by Piai™, it offers line-level detail to support case valuation and strategy. Intended for attorney review, not final use.

A screenshot of a digital document titled '1.1 Negotiation Sheet' displayed on a computer monitor. The document is a template for case details, organized into sections with bold headers. The background of the monitor shows a blue abstract wave pattern.

**1.1 Negotiation Sheet**

**1.1 Case Details**

**Client Name:** Tara Liagament  
**Age / Occupation:** 30 / Self-employed  
**Date of Loss:** October 30, 2024  
**Claim Number:** Not specified in documents  
**BI Carrier / Policy Limits:** Equity Insurance (Pearl Holding) / Policy limits not specified  
**Adjuster Contact:** Casidad - 954-587-2299 Ext: 2145  
**PIP / UM / UIM Coverage:**

- PIP Benefits: 10K with \$1000 Deductible
- U/I Benefits: Not specified
- UIM Benefits: Not specified

**Citations Issued:** Not specified in documents.  
**Crash Description:** Mr. Fender was driving a vehicle stopped at Regency Park when another vehicle hit the front side. Her recalls striking his chest against the steering wheel. The collision was front-to-front with his 2014 Nissan Altima being hit by a 1995 Ford F-150 pickup truck.

**Primary Injuries:** The patient experienced injuries including:

- Cervical disc displacement at C4-5, C5-6, and C6-7
- Cervicgia (neck pain)
- Thoracic radiculopathy with mid-back pain
- Lumbar disc displacement in the lower back
- Unspecified low back pain
- Muscle spasm of the back
- Pain in the right shoulder
- Pain in the right wrist

**Initial Treatment Date & Timeline:** Ms. Liagament first sought treatment on November 4, 2024 after the accident. Her completed approximately 20 sessions of chiropractic therapy and received a cervical collar, LSO, and a tens unit. An MRI of the cervical spine was performed on January 7, 2025, which showed a disc bulge at C5-6 pressing on the thecal sac. Additional MRIs of the lumbar spine and right shoulder were ordered for February 20, 2025. On February 11, 2025, Dr. Christopher Manees performed cervical medial branch block injections.

**Prior Injuries:** Ms. Liagament reported a previous accident in November 2023, but all symptoms had resolved.

**Employment Impact:** As self-employed, Ms. Liagamen experiences ongoing pain and discomfort while working, which affects her ability to sit, stand, bend, and lift.

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## 1. NEGOTIATION SHEET

### 1.1. Case Details

**Client Name:** Ryan M. Calder.

**Date of Birth:** August 12, 1989.

**Date of Loss:** September 15, 2024.

**Property Damage Estimate:** \$8,000 – disabling damage to 2022 Toyota Camry requiring towing from scene.

**Liability/Citations Issued:** Opposing driver (Tyler Brennan) was arrested for driving under the influence (DUI) following the collision.

**Collision Description:** Mr. Calder was stopped at a red traffic signal. When the light turned green, he began to accelerate but had to stop again for pedestrians crossing against the signal. The opposing driver failed to maintain proper following distance and struck Mr. Calder's vehicle in the rear. The impact pushed Mr. Calder's vehicle forward approximately 6 feet.

#### **Primary Injuries:**

- Right shoulder rotator cuff tear (supraspinatus), full-thickness, approximately 1.5 cm with mild retraction of the tendon.
- Right shoulder impingement syndrome.
- Right shoulder subacromial bursitis.
- Cervical sprain/strain.
- Thoracic sprain/strain.
- Lumbar sprain/strain.

#### **Initial Treatment Date and Timeline:**

- **ER Visit:** September 15, 2024 at Mercy Hospital Miami.
- **Chiropractic Treatment:** November 01, 2024 – February 05, 2025 at Miami Spine and Rehabilitation Center (28 total visits).
- **Physical Therapy:** November 04, 2024 - January 27, 2025 at Biscayne Physical Therapy and Rehabilitation (25 total visits).

- **MRI Dates and Regions:**
  - Right shoulder MRI on November 15, 2024 at South Florida Imaging Center.
- **Injections:** Three subacromial corticosteroid injections to the right shoulder on November 25, 2024, December 13, 2024, and December 30, 2024.
- **Surgical Recommendation:** Arthroscopic rotator cuff repair based on MRI findings and clinical presentation scheduled for February 20, 2025 with Dr. Jennifer Patel.
- **Permanent Impairment Rating:** Not Identified.

**Prior Injuries:** Motor vehicle collision (2014) with right ankle fracture requiring open reduction internal fixation (ORIF). No previous neck or back injuries were noted.

#### **Employment Impact:**

- **Occupation:** Marketing Director (primarily desk work).
- **Limitations:** Functional limitations with prolonged computer use, difficulty with prolonged sitting, and pain impacting work activities such as typing and computer use.

### **1.2. Potential Supporting Arguments**

| <b>Immediate</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Response</b> | <b>Demonstrates</b> | <b>Serious</b> | <b>Injury:</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------------|----------------|----------------|
| Mr. Calder was transported to Mercy Hospital Miami by Miami-Dade Fire Rescue immediately following the motor vehicle collision on September 15, 2024. Emergency responders documented that he reported neck and lower back pain immediately after impact, stating "My neck and lower back are really hurting. I felt a sharp pain right after the impact". This immediate medical attention and clear documentation establish a direct temporal relationship between the collision and Mr. Calder's injuries. |                 |                     |                |                |

| <b>Objective</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Imaging</b> | <b>Reveals</b> | <b>Structural</b> | <b>Damage:</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|----------------|-------------------|----------------|
| The MRI conducted on November 15, 2024 provides evidence of significant structural damage. Mr. Calder's right shoulder MRI showed a full-thickness tear of the supraspinatus tendon measuring approximately 1.5 cm, mild retraction of the tendon, moderate subacromial bursitis, mild acromioclavicular joint arthropathy, type II acromion, mild glenohumeral joint effusion, and mild degenerative changes of the glenoid labrum. These objective findings demonstrate the serious nature of his injuries. |                |                |                   |                |

| <b>Clear</b>                                                                                     | <b>Medical</b> | <b>Causation</b> | <b>Opinion:</b> |
|--------------------------------------------------------------------------------------------------|----------------|------------------|-----------------|
| Dr. Carlos Rivera, board certified in pain medicine and anesthesiology, stated that the shoulder |                |                  |                 |

injury and pathology is directly causally related to the motor vehicle collision of 09/15/2024. His statement references the mechanism of injury, the temporal relationship to symptom onset, physical examination findings, and diagnostic imaging results. This expert opinion establishes a clear causal link between the collision and Mr. Calder's injuries.

**Progressive Treatment with Appropriate Escalation:**

Mr. Calder followed a methodical treatment approach beginning with conservative care. Initial treatment included medications prescribed in the emergency room (naproxen and cyclobenzaprine) followed by chiropractic care starting November 01, 2024. When shoulder symptoms persisted, he was referred to orthopedic specialist Dr. Jennifer Patel and then to pain management with Dr. Carlos Rivera for injection therapy. Despite receiving three corticosteroid injections to the right shoulder, the structural damage necessitates surgical intervention for definitive treatment. This progression confirms the severity of Mr. Calder's injuries.

**Future Impact and Permanent Limitations:**

The records indicate that Mr. Calder will face ongoing challenges even after surgical intervention. Dr. Rivera indicated that full recovery may take four to six months and that the patient may experience permanent limitations in extreme ranges of motion or with heavy overhead activities. This professional opinion substantiates the long-term impact of Mr. Calder's injuries on his daily life.

### **1.3. Potential Opposing Arguments**

**Delayed Development of Shoulder Symptoms:**

1. *Defense:* The shoulder injury is claimed to be unrelated to the collision because shoulder pain was not reported initially in the emergency room.
2. *Rebuttal:* Mr. Calder developed right shoulder pain approximately three weeks post-collision. The shoulder injury was first documented during chiropractic treatment on November 09, 2024 when he reported new discomfort when reaching overhead. Most importantly, Dr. Carlos Rivera certified that the shoulder injury and pathology is directly related to the collision based on the mechanism of injury, temporal relationship, physical exam, and imaging results.

**Pre-existing Degenerative Conditions:**

1. *Defense:* The shoulder findings are attributed to age-related degenerative changes rather than acute trauma.

2. *Rebuttal:* While imaging showed mild acromioclavicular joint arthropathy and mild degenerative changes of the glenoid labrum, the primary injury was a full-thickness tear of the supraspinatus tendon measuring approximately 1.5 cm. This acute injury aligns with the traumatic forces from the collision. Dr. Rivera confirmed that the mechanism of injury and diagnostic imaging support the causal relationship.

### **Low-Speed Impact Defense:**

1. *Defense:* The collision was minor with minimal force, making serious injury implausible.

2. *Rebuttal:* The impact caused disabling damage to Mr. Calder's vehicle estimated at \$8,000 and required towing. Additionally, the impact pushed his vehicle forward approximately six feet. The unexpected rear impact, while Mr. Calder stopped for pedestrians, created acceleration-deceleration forces known to produce the diagnosed injuries.

### **Unremarkable Initial Imaging:**

1. *Defense:* Initial X-rays showed no significant injuries.

2. *Rebuttal:* X-rays cannot visualize soft tissue injuries such as rotator cuff tears. The initial cervical X-rays showed mild straightening of the normal lordotic curve and mild degenerative changes at C5-C6. Similarly, lumbar X-rays showed straightening of the normal lumbar lordosis and mild degenerative disc disease at L4-L5 and L5-S1. The subsequent detailed MRI revealed the full-thickness tear of the supraspinatus tendon, which cannot be detected on X-ray.

### **Gaps in Treatment Defense:**

1. *Defense:* There are claims of significant gaps between the collision date and the start of formal treatment.

2. *Rebuttal:* Mr. Calder sought care immediately. He was transported by Miami-Dade Fire Rescue to Mercy Hospital Miami on the day of the collision. He was prescribed

naproxen and cyclobenzaprine and given a referral to chiropractic care. When symptoms persisted, he began chiropractic treatment on November 01, 2024. This sequence of events represents appropriate and timely management of his injuries.

### **Exhibit List**

| <b>No.</b> | <b>Description</b>                                 |
|------------|----------------------------------------------------|
| 1          | Police Report                                      |
| 2          | Mercy Hospital - Bills                             |
| 3          | Miami-Dade Fire Rescue - Bills                     |
| 4          | Mercy Hospital - Records                           |
| 5          | Miami-Dade Fire Rescue - Records                   |
| 6          | Miami Spine & Rehabilitation Center - Bills        |
| 7          | Miami Spine & Rehabilitation Center - Records      |
| 8          | Biscayne Physical Therapy & Rehabilitation - Bills |
| 9          | Miami Pain Specialists - Records                   |
| 10         | Miami Pain Specialists - Bills                     |
| 11         | Carlos Rivera, MD - Records                        |
| 12         | South Florida Orthopedic Specialists - Bills       |
| 13         | South Florida Orthopedic - Bills                   |

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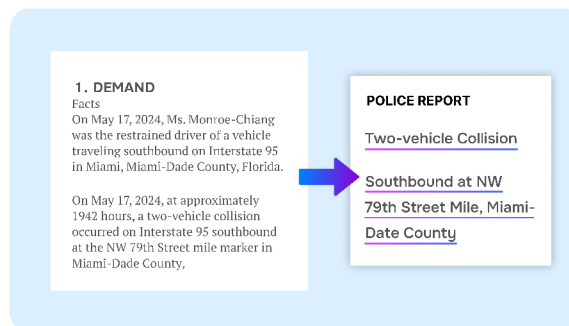
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