

CONFIDENTIAL SETTLEMENT COMMUNICATION

[Name] — Settlement Demand Packet

Claimant: [Name]

Defendant: [COUNSEL: Defendant name]

Date: 08/02/2026

Claim Number: [COUNSEL: Carrier / claim number]

Attorney: Counsel of Record

Firm: [COUNSEL: Law firm name]

Mechanism note: Records reflect differing mechanism accounts — counsel to confirm

Executive Summary

This demand packet summarizes treatment, damages, and settlement posture for [Name] in a credibility-forward tone. The record supports duty and causation are supported on the current extract; we recognize breach is not identified yet and welcome further review. The records show a primary causal factor: Contusion (01/08/2024) Medical specials total \$27,960.00. Claimant proposes Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00). (moderate tier) on a standard-multiplier footing and welcomes further review of the exhibits

- Claimant [Name] vs. [COUNSEL: Defendant name]
- Incident: Urgent Care Visit (01/08/2024)
- Primary injury: Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Index fall; mild shoulder/hip; no imaging; PCP f/u not booked FACILITY: Quick Care Urgent Clinic Visit Date: 01/08/2024 Provider: A. Nguyen, PA
- Liability framing (Moderate causal chain): duty and causation are supported on the current extract; we recognize breach is not identified yet and welcome further review
- Liability anchor: The records show a primary causal factor: Contusion (01/08/2024)
- Medical specials: \$27,960.00; outstanding: \$2,100.00
- Functional impact: 6 ADL/functional limitation signal(s) indexed. 2 work-capacity restriction signal(s) indexed. 13 pain-language entries indexed (5 with numeric scores)
- Claimant proposes Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00). (moderate tier) on a standard-multiplier footing and welcomes further review of the exhibits
- Case strength — liability: moderate based on available documentation; damages: moderate based on current records

1. Intro & Liability Summary

Claimant: [Name]

Defendant: [COUNSEL: Defendant name]

Claim type: Personal injury / medical-negligence demand support

Encounter range: 12/15/2023 to 04/10/2024

Liability summary: The records show a primary causal factor: Contusion (01/08/2024)

Damages summary

Medical Specials	\$27,960.00
Paid	\$25,860.00
Outstanding	\$2,100.00
Future Care	Future care anticipated but requires treating-provider confirmation
Non-Economic	Consistent with soft-tissue injury progression; severe pain excerpts documented
Suggested Demand Range	Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00)
Multiplier	2.5x–4.0x medical specials

This report provides deterministic demand-letter scaffolding only and does not opine on legal negligence findings, final causation opinions, impairment ratings, or expert dollar valuations. Final legal positions and demand amounts remain counsel-directed

2. Incident Overview

Incident date: 12/15/2023

Initial provider: Treating Provider (Name Not Provided in Extracted Records)

Initial facility: Not found in the extracted chronology

Claim type: Personal injury / medical-negligence demand support

Urgent Care Visit (01/08/2024)

3. Medical Chronology (Condensed)

Treatment progression: Presenting complaint: Left shoulder pain after slipping on ice. Course includes 22 chronology-linked treatment row(s) (13 with an attributed provider; visual timelines may collapse same-day rows). 9 key treatment flags identified in the record

Key dates

Date	Encounter	Source
12/15/2023	Primary Care — Pre-Existing — ENCOUNTER 01 — Primary Care — Pre-Existing Date: 12/15/2023 Pre-index chronic LBP (pre-existing condition module) FACILITY: Riverside Family Medicine Visit Date...	2023-12-15_58 bca 055
01/08/2024	Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Index fall; mild shoulder/hip; no imaging; PCP f/u not booked FACILITY: Quick Care Urgent Clinic Visit Date: 01/08/2024 Provider: A. Nguyen...	2024-01-08_fe 85a 096
01/12/2024	Primary Care Office — ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 NO-SHOW / MISSED APPOINTMENT (care-gap) FACILITY: Riverside Family Medicine Patient: [Name]	2024-01-12_c4 af 5662
01/19/2024	Radiology / Imaging Report — ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 Delayed XR left shoulder (delayed imaging key event) FACILITY: Metro General Imaging	2024-01-19_b1 bc 6979
01/20/2024	Pharmacy Fill Record — ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 CVS initial opioid + NSAID (days supply for early-refill math) PHARMACY FILL / DISPENSE RECORD Pharmacy: CVS Pharmacy #4821 — 1200 Oak Ave Patient: [Name]	2024-01-20_403400d7

Date	Encounter	Source
01/24/2024	Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]	2024-01-24_4f 543a 45
02/05/2024	MRI Imaging — ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 Delayed MRI (~12 days after ortho) FACILITY: Mountain View Imaging Center Patient: [Name]	2024-02-05_2 cbdae 98
02/08/2024	Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 PT eval + multi-session plan (trajectory baseline) ===== PT EVAL / OUTPT REHAB ===== Facility: Peak Motion Physical Therapy Date of Service: 02/08/2024 PT: [Name]...	2024-02-08_371c 582c
02/12/2024	Physical Therapy Progress — ENCOUNTER 10 — Physical Therapy Progress Date: 02/12/2024 Session improvement Peak Motion Physical Therapy — PROGRESS NOTE DOS: 02/12/2024 Patient: [Name]	2024-02-12_bb 95c8 cc
02/14/2024	Pharmacy Fill Record — ENCOUNTER 11 — Pharmacy Fill Record Date: 02/14/2024 Walgreens early opioid refill + pharmacy hopping PHARMACY FILL / REFILL RECORD Pharmacy: Walgreens #2290 — different chain from prior CVS fill Patient: [Name]	2024-02-14_3 ad 83334
02/18/2024	Orthopedic Follow-up — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 MRI review; delayed neurology for hand tingling Harlan Shoulder Clinic — FOLLOW-UP Visit Date: 02/18/2024 Patient: [Name]	2024-02-18_ab 811 ef1

Date	Encounter	Source
02/22/2024	Physical Therapy Progress — ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 Missed appointment + regression language PT NOTE — Peak Motion Date: 02/22/2024 PT: [Name] — L shldr Scheduled session: MISSED APPOINTMENT — patient no-show...	2024-02-22_8726 caa7
03/01/2024	Urgent Care Visit — ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 Acute flare; abnormal vitals not escalated FACILITY: Quick Care Urgent Clinic Visit Date: 03/01/2024 Patient: [Name]	2024-03-01_66635856
03/02/2024	Pharmacy Fill Record — ENCOUNTER 15 — Pharmacy Fill Record Date: 03/02/2024 CVS refill; multi-pharmacy pattern continues PHARMACY DISPENSE LOG Pharmacy: CVS Pharmacy (OCR abbreviated — not #4821) Patient: [Name]	2024-03-02_eeb 399 fa
03/05/2024	Hospital Admission — Inpatient — [Name]	2024-03-05_a 84 ed8 be
03/11/2024	Neurology Consult — ENCOUNTER 18 — Neurology Consult Date: 03/11/2024 Delayed neuro consult (~7 weeks after paresthesias) FACILITY: Metro Neuro Associates Consult Date: 03/11/2024 Patient: [Name]	2024-03-11_667 cb6c7

4. Injury Summary

The records document 11 injury-related presentation(s), including Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Index fall; mild shoulder/hip; no imaging; PCP f/u not booked FACILITY: Quick Care Urgent Clinic Visit Date: 01/08/2024 Provider: A. Nguyen, PA

Documented injuries

- Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Index fall; mild shoulder/hip; no imaging; PCP f/u not booked FACILITY: Quick Care Urgent Clinic Visit Date: 01/08/2024 Provider: A. Nguyen, PA

- Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]
- MRI Imaging — ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 | Delayed MRI (~12 days after ortho) FACILITY: Mountain View Imaging Center Patient: [Name]
- Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | PT eval + multi-session plan (trajectory baseline) ==== PT EVAL / OUTPT REHAB ==== Facility: Peak Motion Physical Therapy Date of Service: 02/08/2024 PT: [Name]
- Orthopedic Follow-up — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | MRI review; delayed neurology for hand tingling Harlan Shoulder Clinic — FOLLOW-UP Visit Date: 02/18/2024 Patient: [Name]
- Urgent Care Visit — ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 | Acute flare; abnormal vitals not escalated FACILITY: Quick Care Urgent Clinic Visit Date: 03/01/2024 Patient: [Name]
- Hospital Admission — Inpatient — [Name]
- Neurology Consult — ENCOUNTER 18 — Neurology Consult Date: 03/11/2024 | Delayed neuro consult (~7 weeks after paresthesias) FACILITY: Metro Neuro Associates Consult Date: 03/11/2024 Patient: [Name]
- EMG / Nerve Study — ENCOUNTER 19 — EMG / Nerve Study Date: 03/15/2024 | Electrodiagnostics supporting CTS Metro Neuro Associates — EMG/NCS REPORT Study Date: 03/15/2024 Patient: [Name]
- MRI Hip (Out-of-Order Date Stress) — ENCOUNTER 20 — MRI Hip (Out-of-Order Date Stress) Date: 03/18/2024 | Hip MRI dated after shoulder saga (chronology ordering stress) FACILITY: Mountain View Imaging Center Patient: [Name]
- Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 | MMI reached; return to work; demand/damages facts Harlan Shoulder Clinic — MMI / WORK STATUS Date: 04/10/2024 Patient: [Name]

5. Treatment Course & Key Medical Findings

Causation sequence: Mechanism → symptoms → imaging → treatment → residuals, as reflected in date-sequenced records

Treatment progression: Presenting complaint: Left shoulder pain after slipping on ice. Course includes 22 chronology-linked treatment row(s) (13 with an attributed provider; visual timelines may collapse same-day rows). 9 key treatment flags identified in the record

Interventions & key findings

Category	Finding
Intervention	Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic
Intervention	MRI Imaging — ENCOUNTER 08 — MRI Imaging
Intervention	Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation
Intervention	Physical Therapy Progress — ENCOUNTER 10 — Physical Therapy Progress
Intervention	Orthopedic Follow-up — ENCOUNTER 12 — Orthopedic Follow-up

Category	Finding
Intervention	Physical Therapy Progress — ENCOUNTER 13 — Physical Therapy Progress
Intervention	Urgent Care Visit — ENCOUNTER 14 — Urgent Care Visit
Intervention	Pharmacy Fill Record — ENCOUNTER 15 — Pharmacy Fill Record
Intervention	Hospital Admission — Inpatient — [Name]
Intervention	Neurology Consult — ENCOUNTER 18 — Neurology Consult
Intervention	
Key finding	Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit
Key finding	Radiology / Imaging Report — ENCOUNTER 05 — Radiology / Imaging Report
Key finding	EMG / Nerve Study — ENCOUNTER 19 — EMG / Nerve Study

Recovery trajectory: Recovery followed a non-linear course with documented setbacks

6. Treatment Burden Timeline

Ongoing care 12/15/2023 Primary Care — Pre-Existing — ENCOUNTER 01 — Primary Care — Pre-Existing Date: 12/15/2023 Pre-index chronic LBP	Acute / initial care 01/08/2024 Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Index fall; mild shoulder/hip; no imaging	Ongoing care 01/12/2024 Primary Care Office — ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 NO-SHOW / MISSED APPOINTMENT (care-gap)	Diagnostic workup 01/19/2024 Radiology / Imaging Report — ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 Delayed XR left shoulder
Acute / initial care 01/20/2024 Pharmacy Fill Record — ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 CVS initial opioid + NSAID (days	Diagnostic workup 01/24/2024 Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Ortho eval; MRI + PT ordered FACILITY	Diagnostic workup 02/05/2024 MRI Imaging — ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 Delayed MRI (~12 days after ortho) FACILITY: Mountain	Rehab / follow-up 02/08/2024 Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 PT eval + multi-session

Rehab / follow-up

02/12/2024
Physical Therapy
Progress — ENCOUNTER
10 — Physical Therapy
Progress Date:
02/12/2024 | Session
improvement Peak

Ongoing care

02/14/2024
Pharmacy Fill Record —
ENCOUNTER 11 —
Pharmacy Fill Record
Date: 02/14/2024 |
Walgreens early opioid
refill +

Summary: Ongoing care (12/15/2023) → Acute / initial care (01/08/2024) → Ongoing care (01/12/2024) → Diagnostic workup (01/19/2024) → Acute / initial care (01/20/2024) → Diagnostic workup (01/24/2024)

Date	Phase	Encounter
12/15/2023	Ongoing care	Primary Care — Pre-Existing — ENCOUNTER 01 — Primary Care — Pre-Existing Date: 12/15/2023 Pre-index chronic LBP
01/08/2024	Acute / initial care	Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Index fall; mild shoulder/hip; no imaging
01/12/2024	Ongoing care	Primary Care Office — ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 NO-SHOW / MISSED APPOINTMENT (care-gap)
01/19/2024	Diagnostic workup	Radiology / Imaging Report — ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 Delayed XR left shoulder
01/20/2024	Acute / initial care	Pharmacy Fill Record — ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 CVS initial opioid + NSAID (days
01/24/2024	Diagnostic workup	Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Ortho eval; MRI + PT ordered FACILITY
02/05/2024	Diagnostic workup	MRI Imaging — ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 Delayed MRI (~12 days after ortho) FACILITY: Mountain

Date	Phase	Encounter
02/08/2024	Rehab / follow-up	Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 PT eval + multi-session
02/12/2024	Rehab / follow-up	Physical Therapy Progress — ENCOUNTER 10 — Physical Therapy Progress Date: 02/12/2024 Session improvement Peak
02/14/2024	Ongoing care	Pharmacy Fill Record — ENCOUNTER 11 — Pharmacy Fill Record Date: 02/14/2024 Walgreens early opioid refill +

7. Functional Impact Snapshot

- 6 ADL/functional limitation signal(s) indexed. 2 work-capacity restriction signal(s) indexed. 13 pain-language entries indexed (5 with numeric scores)
- ADL (01/24/2024): Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Or
- ADL (02/08/2024): Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | PT eval + multi-session plan (trajectory baseline) BATES-00
- ADL (02/18/2024): Orthopedic Follow-up — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | MRI review; delayed neurology for hand tingling Harlan Shoul
- ADL (03/01/2024): Urgent Care Visit — ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 | Acute flare; abnormal vitals not escalated FACILITY: Quick Care Ur
- ADL (04/10/2024): Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 | MMI reached; return to work; demand/damages facts BATES-0
- Work restriction (01/24/2024): Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Or
- Work restriction (04/10/2024): Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 | MMI reached; return to work; demand/damages facts BATES-0
- Pain documentation (01/08/2024): Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Index fall; mild shoulder/hip; no imaging; PCP f/u not booked [PAT
- Pain documentation (01/20/2024): Pharmacy Fill Record — ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 | CVS initial opioid + NSAID (days supply for early-refill math)
- Pain documentation (01/24/2024): Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Or
- Pain documentation (02/08/2024) (8/10): Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | PT eval + multi-session plan (trajectory baseline) BATES-00

8. Mitigation & Compliance

Mitigation review documents 8 action(s) and 6 gap signal(s) on the available record

- 8 documented mitigation/compliance action(s) indexed from treating records
 - EMERGENCY Department Visit — ENCOUNTER 04 — EMERGENCY Department Visit Date: 01/19/2024 | ED: MOI contradiction; vitals...
 - Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | PT eval + multi-session plan...
 - Physical Therapy Progress — ENCOUNTER 10 — Physical Therapy Progress Date: 02/12/2024 | Session improvement Peak...
 - Orthopedic Follow-up — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | MRI review; delayed neurology for hand tingling...
 - Physical Therapy Progress — ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 | Missed appointment + regression language...
 - Hospital Admission — Inpatient — [Name]
 - Physical Therapy Progress — Plateau / MMI path — ENCOUNTER 23 — Physical Therapy Progress — Plateau / MMI path Date: 04/05/2024 | ...
 - Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 | MMI reached; return to work...
 - 6 mitigation gap signal(s) flagged for counsel review
-

9. Medical Specials Breakdown

Case billing ledger totals — paid/outstanding come from the billing engine summary, not from summing provider rows above (provider-level paid amounts were not itemized in the CPT timeline)

Provider	Date range	Billed	Paid	Outstanding	Notes
Unknown provider	2024-01-19 to 2024-03-28	\$8,570.00	Not itemized at provider level	Not itemized at provider level	—
A. Nguyen, PA-C	2023-12-15 to 2024-01-08	\$370.00	Not itemized at provider level	Not itemized at provider level	—
K. Patel, MD	2024-01-19 to 2024-01-19	\$210.00	Not itemized at provider level	Not itemized at provider level	—
L. Cho, MD	2024-02-05 to 2024-02-05	\$1,850.00	Not itemized at provider level	Not itemized at provider level	—
J. Ruiz, DPT	2024-02-08 to 2024-04-05	\$590.00	Not itemized at provider level	Not itemized at provider level	—
S. Bernstein, MD	2024-03-11 to 2024-03-11	\$375.00	Not itemized at provider level	Not itemized at provider level	—
M. Harlan, MD	2024-04-10 to 2024-04-10	\$15,995.00	Not itemized at provider level	Not itemized at provider level	—

Provider	Date range	Billed	Paid	Outstanding	Notes
Subtotal (case billing ledger)	—	\$27,960.00	\$25,860.00	\$2,100.00	Case billing ledger totals — paid/outstanding come from the billing engine summary, not from summing provider rows above (provider-level paid amounts were not itemized in the CPT timeline)

10. Billing Summary

Total billed: \$27,960.00
Total paid: \$25,860.00
Outstanding balance: \$2,100.00
Billing lines: 33

Provider table

Provider	Specialty	Date range	Billed	CPT justification
M. Harlan, MD	Specialty not extracted	04/10/2024 to 04/10/2024	\$15,995.00	Codes: 20610, 62323, 72148, 93000 Basis: ICD M 75.102; Arthrocentesis, ma[Name]r [Name]int; CPT 62323
Treating Provider (Name Not Provided in Extracted Records)	Specialty not extracted	01/19/2024 to 03/28/2024	\$8,570.00	Codes: 11042, 99233, 99239, 96372 Basis: ICD A 41.9; CPT 11042; CPT 99233

Provider	Specialty	Date range	Billed	CPT justification
L. Cho, MD	Specialty not extracted	02/05/2024 to 02/05/2024	\$1,850.00	Codes: 73221 Basis: ICD M 75.102; CPT 73221
J. Ruiz, DPT	Specialty not extracted	02/08/2024 to 04/05/2024	\$590.00	Codes: 97110, 97162 Basis: Therapeutic exercises; CPT 97162; Therapeutic exercises
S. Bernstein, MD	Specialty not extracted	03/11/2024 to 03/11/2024	\$375.00	Codes: 99243 Basis: ICD G 56.02; CPT 99243
A. Nguyen, PA-C	Specialty not extracted	12/15/2023 to 01/08/2024	\$370.00	Codes: 99213 Basis: Office/outpatient visit, established patient, low complexity; Office/outpatient visit, established patient, low complexity
K. Patel, MD	Specialty not extracted	01/19/2024 to 01/19/2024	\$210.00	Codes: 73030 Basis: ICD M 25.512; CPT 73030

11. Damages Analysis

Economic damages

- **Medical billed:** \$27,960.00
- **Medical paid:** \$25,860.00
- **Outstanding:** \$2,100.00
- **Wage-loss summary:** No wage loss, no employment records, no disability notes found in the extracted chronology

Non-economic damages

Chronological pain complaints are documented from 01/08/2024 through 12/15/2023 (15 source-linked pain event(s)). Pain arc is predominantly persistent/plateaued on available chronology language. Severe-intensity language appears in 4 excerpt(s)

Functional limitations

Chronology documents functional-impact markers across documented limitations, work impacts, mobility / ROM limitations, neurologic symptoms. Source-linked entries span 01/19/2024 through 04/10/2024 with 10 documented

limitation signal(s). These entries support a day-in-the-life framing for demand drafting, but they remain deterministic extracts rather than an impairment opinion

- 6 ADL/functional limitation signal(s) indexed. 2 work-capacity restriction signal(s) indexed. 13 pain-language entries indexed (5 with numeric scores)
- ADL (01/24/2024): Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Or
- ADL (02/08/2024): Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | PT eval + multi-session plan (trajectory baseline) BATES-00
- ADL (02/18/2024): Orthopedic Follow-up — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 | MRI review; delayed neurology for hand tingling Harlan Shoul
- ADL (03/01/2024): Urgent Care Visit — ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 | Acute flare; abnormal vitals not escalated FACILITY: Quick Care Ur
- ADL (04/10/2024): Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 | MMI reached; return to work; demand/damages facts BATES-0
- Work restriction (01/24/2024): Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Or
- Work restriction (04/10/2024): Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 | MMI reached; return to work; demand/damages facts BATES-0
- Pain documentation (01/08/2024): Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Index fall; mild shoulder/hip; no imaging; PCP f/u not booked [PAT
- Pain documentation (01/20/2024): Pharmacy Fill Record — ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 | CVS initial opioid + NSAID (days supply for early-refill math)
- Pain documentation (01/24/2024): Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Or
- Pain documentation (02/08/2024) (8/10): Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 | PT eval + multi-session plan (trajectory baseline) BATES-00

Future medical needs

Future care anticipated but requires treating-provider confirmation

No extractable items in available records for this section.

12. Defense Themes & Rebuttals

Balanced defense/rebuttal matrix for documentation posture (moderate) — neutral, professional; gap handling: acknowledge

Defense theme	Anticipated argument	Rebuttal	Recommended action
Documentation gaps	Potential defense claim of incomplete support around witness statements, policy-limits disclosure	Acknowledge any discrete gaps neutrally, then tie each remaining assertion to exhibit-listed records and a short supplementation plan	Close missing-evidence checklist items before final demand service

Defense theme	Anticipated argument	Rebuttal	Recommended action
Pre-existing conditions	No pre-existing/comorbidity snapshot loaded; defense may raise baseline-condition arguments	Recognize baseline history may be raised; answer with measured pre/post comparison and date-linked treatment changes rather than categorical denial	Add prior-record timeline and aggravation comparison chart
Mitigation issues	Mitigation theme can be answered with dated restriction language and adherence records	Address mitigation neutrally: show adherence and restrictions where present, and note any open items without overclaiming	Attach compliance logs, therapy attendance, and work-status notes
Causation challenges	g. Temporal linkage screen: Contusion on 01/08/2024 is 0 day(s) from the index MOI date (01/08/2024)	Present mechanism, chronology, and objective findings in a credibility-forward sequence; invite review of the dated record rather than rhetorical overreach	Lead with injury mechanism + imaging sequence + symptom progression
Rebuttal framing	Global defense posture will likely test credibility, scope, and valuation assumptions	Measured posture: liability anchor first, then balanced answers to defense themes. The records show a primary causal factor: Contusion (01/08/2024)	Present a consistent narrative using the Balanced tone matrix: duty and causation are supported on the current extract; we recognize breach is not identified yet and welcome further review plus standard-multiplier valuation framing

13. Liability Argument

Duty: Providers owed a duty to evaluate, diagnose, and treat within accepted standards

Breach: Not identified in the extracted chronology

Causation: g. Temporal linkage screen: Contusion on 01/08/2024 is 0 day(s) from the index MOI date (01/08/2024)

Damages: 7/13 damages checklist signals found in chronology

Duty arises from the care relationship and accepted standards. Breach is not identified on the current extract (Not identified in the extracted chronology). We welcome further review if deviation-of-care materials supplement the record. Causation follows mechanism → symptoms → imaging → treatment → residuals (g. Temporal linkage screen: Contusion on 01/08/2024 is 0 day(s) from the index MOI date (01/08/2024)). Damages are supported by medical burden and functional losses (7/13 damages checklist signals found in chronology). We recognize the defense may contest scope; the enclosed chronology is offered for credibility-forward review

Mechanism / imaging / symptom progression: The records show mechanism and progression through early injury documentation (Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 | Index fall; mild shoulder/hip; no imaging; PCP f/u not booked FACILITY: Quick Care Urgent Clinic Visit Date: 01/08/2024 Provider: A. Nguyen, PA), subsequent intervention sequence (Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 | Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date: 01/24/2024 Patient: [Name]

Consolidated causation rebuttal

Consolidated causation rebuttal: we recognize the defense may raise pre-existing or alternative-etiology themes; the record supports post-incident escalation with date-linked treatment changes. Mechanism continuity is supported by symptom onset after the incident; imaging and objective findings align with the treatment course; residuals remain documented (Chronology documents functional-impact markers across documented limitations, work impacts, mobility / ROM limitations, neurologic symptoms. Source-linked entries span 01/19/2024 through 04/10/2024 with 10 documented limitation signal(s). These entries support a...). We recognize witness corroboration remains outstanding and should be supplemented

Topic	Anticipated defense argument	Rebuttal
Pre-existing / baseline condition	No pre-existing/comorbidity snapshot loaded; defense may raise baseline-condition arguments	Recognize baseline history may be raised; answer with measured pre/post comparison and date-linked treatment changes rather than categorical denial

14. Why This Demand Is Reasonable

Why early settlement is appropriate: the records support duty and causation are supported on the current extract; we recognize breach is not identified yet and welcome further review (The records show a primary causal factor: Contusion (01/08/2024)), ongoing treatment burden, and Chronology documents functional-impact markers across documented limitations, work impacts, mobility / ROM limitations, neurologic symptoms. Source-linked entries span 01/19/2024 through 04/10/2024 with 10 documented limitation signal(s). These entries support a.... Claimant proposes Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00). (moderate tier) on a standard-multiplier footing and welcomes further review of the exhibits. Early resolution limits litigation cost while the chronology remains fresh

- Documented medical specials of \$27,960.00 with outstanding balance \$2,100.00
- Liability framing (Moderate causal chain): duty and causation are supported on the current extract; we recognize breach is not identified yet and welcome further review. Record anchor: The records show a primary causal factor: Contusion (01/08/2024)
- Non-economic harm reflected in 4 severe pain/functional excerpt(s)

- Claimant proposes Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00). (moderate tier) on a standard-multiplier footing and welcomes further review of the exhibits
- Early resolution avoids litigation expense; we welcome further review while records remain fresh

15. Human Impact Narrative

On January 8, 2024, [Name] visited the Quick Care Urgent Clinic after experiencing a fall that resulted in mild shoulder and hip injuries. Despite these symptoms, no imaging was conducted during this visit, and follow-up with a primary care provider (PCP) was not scheduled. This initial delay may have impacted timely diagnosis and treatment [1]. Following the urgent care visit, [Name] sought further medical attention on January 12, 2024, but missed a scheduled appointment with Riverside Family Medicine. On January 19, 2024, an X-ray of the left shoulder was finally conducted at Metro General Imaging, which had been delayed since the initial visit. [Name] then visited the Harlan Shoulder Clinic on January 24, 2024, where an MRI was ordered and physical therapy (PT) sessions were recommended. The MRI was conducted on February 5, 2024, approximately twelve days after the order

16. Settlement Demand

Total demand: To be set by counsel

Recommended valuation tier: moderate

Recommended demand range: Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00)

The enclosed records support duty, causation, and damages through date-sequenced treatment, objective findings, and functional impact. We recognize the defense may contest scope or baseline; claimant proposes valuation at Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00). (moderate tier) and welcomes further review of the exhibits, updated records, and limits confirmation

Response deadline: 15 business days

Basis for valuation

- Liability framing: see Executive Summary and Liability Argument sections
- Medical specials (billed): \$27,960.00
- Supported paid amount: \$25,860.00
- Outstanding balance: \$2,100.00

Settlement strategy

- **Early-resolution posture:** Pursue near-term negotiated resolution before discovery costs escalate
- **Anchor strategy:** Open with the documented range (Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00).) and reserve adjustment discretion for counsel
- **Expected negotiation trajectory:** Likely iterative negotiation with documentation follow-ups

17. Policy Limits Request

Please provide written confirmation of policy limits within 10 days

Statutory reference: Where applicable under state insurance disclosure statutes (e.g., Cal. Ins. Code § 790.03(h) for California claims), carrier should provide written policy-limits confirmation upon request

Policy limits disclosure is appropriate because the record documents hospitalization, surgical or injection escalation, advanced imaging, 7 severity/pain signal(s). Documented medical specials (\$27,960.00) and demand range (Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00).) may bear on available coverage

Signal	Date	Evidence	Source
Surgical / injection escalation	01/19/2024	EMERGENCY Department Visit — ENCOUNTER 04 — EMERGENCY Department Visit Date: 01/19/2024 ED: MOI contradiction	(Contradicts 01/08 MOI — hip vs shoulder / left vs right / kitchen vs ice) Symptoms: • Severe left shoulder pain •
Surgical / injection escalation	02/18/2024	Orthopedic Follow-up — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 MRI review; delayed neurology for	Discussed PT vs injection vs surgery. PT continues intermittent left hand tingling — NEUROLOGY consult recommended
Hospitalization	03/05/2024	Hospital Admission — Inpatient — [Name]	Admission Time: 03/05/2024 09:10 Chief Complaint: Fever, chills, progressive SOB, left shoulder erythema. ED Course
Surgical / injection escalation	03/05/2024	Hospital Admission — Inpatient — [Name]	Admission Time: 03/05/2024 09:10 Chief Complaint: Fever, chills, progressive SOB, left shoulder erythema. ED Course
Hospitalization	04/10/2024	Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 MMI reached; retu	Harlan, MD Impression: Partial-thickness left RTC tear status post injection and PT. MMI reached as of 04/10/2024

Signal	Date	Evidence	Source
Surgical / injection escalation	04/10/2024	Orthopedic MMI / RTW Summary — ENCOUNTER 24 — Orthopedic MMI / RTW Summary Date: 04/10/2024 MMI reached; retu	Harlan, MD Impression: Partial-thickness left RTC tear status post injection and PT. MMI reached as of 04/10/2024
Imaging escalation	01/08/2024	Imaging documented on 01/08/2024, 01/19/2024, 01/24/2024, 02/05/2024	Chronology imaging entries
Severity signals	—	7 encounter(s) with severe pain or numeric pain-score language	Chronology pain documentation

18. Settlement Rationale

Settlement rationale: medical specials, non-economic harm, and duty and causation are supported on the current extract; we recognize breach is not identified yet and welcome further review support measured resolution. Specials total \$27,960.00 with Chronology documents functional-impact markers across documented limitations, work impacts, mobility / ROM limitations, neurologic symptoms. Source-linked entries span 01/19/2024 through 04/10/2024 with 10 documented limitation signal(s). These entries support a.... Claimant proposes Suggested settlement range: \$69,900–\$111,840 (2.5x–4.0x medical specials of \$27,960.00). (moderate tier) on a standard-multiplier footing and welcomes further review of the exhibits. See liability summary in Executive Summary and Section 1. This structure allows efficient resolution without duplicative litigation

19. Negotiation Posture

Negotiation voice: defense balanced

Liability strength is documentation-dependent; damages posture is conservative based on current records. Credibility-forward tone: lead with objective treatment chronology, acknowledge the defense may raise pre-existing, mitigation, or documentation themes, answer with exhibits, then state the demand anchor. Welcome further review of the dated record

Why early settlement: Early settlement avoids discovery expense, preserves claimant recovery bandwidth, and resolves exposure before litigation posture hardens

20. Discovery Cost & Litigation Risk

21. Closing

We request prompt settlement engagement based on the enclosed records and demand basis. Please respond within 15 business days. Please provide written confirmation of policy limits within 10 days. Please preserve all relevant internal communications, triage notes, and claim-handling materials regarding this incident. We welcome further review of the enclosed exhibits

22. Exhibit Index

Carrier: Commercial

Claim number: [COUNSEL: Carrier / claim number]

Adjuster: Not found in the extracted chronology

Policy limits: Not found in the extracted chronology

Exhibit	Category	Description	Date	Bates range	Attachment type
Exhibit A	Imaging Records	Urgent Care Visit — ENCOUNTER 02 — Urgent Care Visit Date: 01/08/2024 Index fall; mild shoulder/hip; no imaging; PCP f/u not booked	01/08/2024	Bates range not extracted	Certified Medical Record
Exhibit B	Medical records	Primary Care Office — ENCOUNTER 03 — Primary Care Office Date: 01/12/2024 NO-SHOW / MISSED APPOINTMENT (care-gap) FACILITY: Riverside Family Medicine Patien	01/12/2024	Bates range not extracted	Certified Medical Record

Exhibit	Category	Description	Date	Bates range	Attachment type
Exhibit C	Imaging Records	Radiology / Imaging Report — ENCOUNTER 05 — Radiology / Imaging Report Date: 01/19/2024 Delayed XR left shoulder (delayed imaging key event) FACILITY: Metro	01/19/2024	Bates range not extracted	Certified Medical Record
Exhibit D	Medical records	Pharmacy Fill Record — ENCOUNTER 06 — Pharmacy Fill Record Date: 01/20/2024 CVS initial opioid + NSAID (days supply for early-refill math) PHARMACY FILL / D	01/20/2024	Bates range not extracted	Certified Medical Record
Exhibit E	Imaging Records	Orthopedic Clinic — ENCOUNTER 07 — Orthopedic Clinic Date: 01/24/2024 Ortho eval; MRI + PT ordered FACILITY: Harlan Shoulder Clinic — Orthopedics Visit Date	01/24/2024	Bates range not extracted	Certified Medical Record

Exhibit	Category	Description	Date	Bates range	Attachment type
Exhibit F	Imaging Records	MRI Imaging — ENCOUNTER 08 — MRI Imaging Date: 02/05/2024 Delayed MRI (~12 days after ortho) FACILITY: Mountain View Imaging Center Patient: [Name]	02/05/2024	Bates range not extracted	Certified Medical Record
Exhibit G	Therapy records	Physical Therapy Evaluation — ENCOUNTER 09 — Physical Therapy Evaluation Date: 02/08/2024 PT eval + multi-session plan (trajectory baseline) ==== PT EVAL /	02/08/2024	Bates range not extracted	Certified Medical Record
Exhibit H	Therapy records	Physical Therapy Progress — ENCOUNTER 10 — Physical Therapy Progress Date: 02/12/2024 Session improvement Peak Motion Physical Therapy — PROGRESS NOTE DOS	02/12/2024	Bates range not extracted	Certified Medical Record

Exhibit	Category	Description	Date	Bates range	Attachment type
Exhibit I	Medical records	Pharmacy Fill Record — ENCOUNTER 11 — Pharmacy Fill Record Date: 02/14/2024 Walgreens early opioid refill + pharmacy hopping PHARMACY FILL / REFILL RECORD P	02/14/2024	Bates range not extracted	Certified Medical Record
Exhibit J	Imaging Records	Orthopedic Follow-up — ENCOUNTER 12 — Orthopedic Follow-up Date: 02/18/2024 MRI review; delayed neurology for hand tingling Harlan Shoulder Clinic — FOLLOW	02/18/2024	Bates range not extracted	Certified Medical Record
Exhibit K	Therapy records	Physical Therapy Progress — ENCOUNTER 13 — Physical Therapy Progress Date: 02/22/2024 Missed appointment + regression language PT NOTE — Peak Motion Date: 0	02/22/2024	Bates range not extracted	Certified Medical Record

Exhibit	Category	Description	Date	Bates range	Attachment type
Exhibit L	Medical records	Urgent Care Visit — ENCOUNTER 14 — Urgent Care Visit Date: 03/01/2024 Acute flare; abnormal vitals not escalated FACILITY: Quick Care Urgent Clinic Visit Da	03/01/2024	Bates range not extracted	Certified Medical Record
Exhibit M	Medical records	Pharmacy Fill Record — ENCOUNTER 15 — Pharmacy Fill Record Date: 03/02/2024 CVS refill; multi-pharmacy pattern continues PHARMACY DISPENSE LOG Pharmacy: CVS	03/02/2024	Bates range not extracted	Certified Medical Record
Exhibit N	Procedure records	Hospital Admission — Inpatient — [Name]	03/05/2024	Bates range not extracted	Certified Medical Record
Exhibit O	Medical records	Neurology Consult — ENCOUNTER 18 — Neurology Consult Date: 03/11/2024 Delayed neuro consult (~7 weeks after paresthesias) FACILITY: Metro Neuro Associates C	03/11/2024	Bates range not extracted	Certified Medical Record

Exhibit	Category	Description	Date	Bates range	Attachment type
Exhibit P	Imaging Records	EMG / Nerve Study — ENCOUNTER 19 — EMG / Nerve Study Date: 03/15/2024 Electrodiagnostics supporting CTS Metro Neuro Associates — EMG/NCS REPORT Study Date	03/15/2024	Bates range not extracted	Certified Medical Record
Exhibit Q	Witness testimony	No witness statements extracted — placeholder for affidavits/depositions	Not found in the extracted chronology	To be assigned by counsel	Copy

23. Client Narrative (Appendix)

Editable claimant narrative for counsel review. Source anchors appear below.

On January 8, 2024, [Name] visited Quick Care Urgent Clinic after falling and sustaining injuries to the shoulder and hip. Despite the severity of the injury, no imaging was conducted during this visit, and a follow-up with a primary care provider was not scheduled. This delay in proper evaluation and treatment set the stage for further complications [1]. Following the initial urgent care visit, [Name] continued to experience significant pain and functional limitations. On January 19, 2024, an X-ray of the left shoulder was finally conducted, revealing further issues that required immediate attention. On January 24, 2024, [Name] visited Harlan Shoulder Clinic for an orthopedic evaluation, where MRI and physical therapy were ordered. However, the MRI was delayed until February 5, 2024, which further exacerbated [Name]’s condition and prolonged recovery [2] [3] [4]. The

Source anchors

- On January 8, 2024, [Name] visited the Quick Care Urgent Clinic after experiencing a fall that resulted in mild shoulder and hip injuries. Despite these symptoms, no imaging was conducted during this visit, and fol

24. Settlement Conditions (Optional)

Policy-limits demand option: none

Policy-limits demand language: No policy-limits tender request included in this draft

Release expectations: Settlement is conditioned on a mutually acceptable release limited to claims arising from this incident

Payment timeline: Payment expected within 20 calendar days of executed release. Please respond to this demand within 15 business days

Preservation notice: Defendant and carrier are expected to preserve all claim-handling, incident, and communication records

- Written settlement acceptance and release terms
- Payment issuance timeline confirmation
- Policy disclosure / tender response (when requested)

QUALITY ASSURANCE: WARN — PROVISIONAL

RITA V1.3.1 - (Provisional) · Protocol v1.3.1 · Generated 2026-08-02T 19:15:16+00:00

QA checks flagged 1 issue(s), or billing QA is provisional. Review before relying on this report in litigation deliverables.

- Pod billing: upstream billing qa gate=warn. Certification cannot be VERIFIED

Pod billing · ledger sha256:a25623db · quality=provisional · qa_gate=warn