



GONZALEZ & ASSOCIATES P.C.
LAW OFFICE

October 1, 2024

David Guerrero
TRISTAR INSURANCE
PO Box 2805
Clinton, Iowa 52733

RE: Our client: Alan Gonzalez
Claim No.: 23903716
D/Accident: March 16, 2023

Dear Mr. Guerrero:

This is a demand for full and final settlement of the above referenced claim. We have enclosed copies of our client's medical records and medical bills to assist you in the evaluation of the claim.

INJURIES AND DAMAGES

Alan Gonzalez

Our client sought medical treatment with Dr. Victor Manuel Melgoza Castillo, and his diagnosis was Cervical Spine Sprain, Thoracic Spine Sprain, and Lumbar Spine Sprain. Based on his diagnosis and clients' complaints Dr. Victor Manuel Melgoza Castillo recommended physical therapy and chiropractic treatment. Our client received 13 sessions of physical therapy from Dr. Arturo Briones, DC. Based on his diagnosis and clients' complaints Dr. Arturo Briones, DC recommended an MRI of the left shoulder. The left shoulder MRI indicates: Subacromial/subdeltoid bursitis, mild. Based on clients' complaints and his diagnosis, Dr. Victor Manuel Melgoza Castillo recommended a follow-up evaluation within 3-4 weeks. On July 01, 2023, our client returned for a follow up evaluation Dr. Victor Manuel Melgoza Castillo, due to clients ongoing pain to his lumbar spine radiating to his buttocks and cervical spine radiating to his shoulders with any movement series, Dr. Victor Manuel Melgoza Castillo recommended an MRI of his cervical and lumbar spine. The cervical MRI indicates: Disc C4-C5 there is a posterior protrusion-subligamentous disc herniation, right posterolateral in location, by as much as 3mm, which impinges upon the anterior thecal sac. Disc C5-C6 there is a posterior protrusion-subligamentous disc herniation, right posterolateral in location, by as much as 2-3mm, which impinges upon the anterior thecal sac. The lumbar spine MRI indicates: Dice L5-S1 there is a 1mm disc bulge, which impinges upon the thecal sac. There is mild narrowing of the left neural foramen. Based on MRI finding Dr. Victor Manuel Melgoza Castillo recommended a series of (3) steroid epidural injections to the C4-C5 and C5-C6 space at a cost of approximately \$3,500.00 dollars each. Dr. Victor Manuel Melgoza Castillo performed (3) epidural steroid injection to the C4-C5 and C5-C6 space on July 22, 2023, August 26, 2023, and September 30, 2023. In addition to the physical injuries, our client is also suffering from mental anguish over the severity of his injuries and his problems have continued until the present time. See enclosed the medical reports for a more detailed description of our clients' injuries and damages.

As a result of your insured's negligence, our client has incurred the following past reasonable and

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necessary medical expenses for the proper treatment of his injuries: Alan Gonzalez \$33,244.00. Furthermore, our client's medical expenses are expected to escalate as his medical treatment continues. Our client's injuries are real, as well as his damages and his future medical treatment are clearly and accurately detailed in the enclosed medical records.

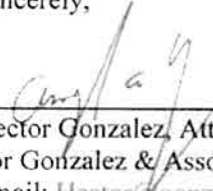
SETTLEMENT DEMAND

Therefore, based on the medical notes, the diagnostic reports enclosed, and the injuries and damages suffered by our clients in the accident, and in an effort to avoid the expenses and costs litigation, we hereby offer to settle our client's claims for Your Insured's Policy Limits for Alan Gonzalez in exchange for a full and final release from our client. It is our position that our client's proposed offers of settlement are fair, reasonable, and compatible with the nature of this case. Should your company be in agreement without assessment of the claim and if the case settles, our client will provide your insured an unconditional release from any and all claims and our client will pay any and all medical expenses and subrogation liens, if any, from said sum.

Our client's formal demand shall include the terms and concepts as defined under the "*Stower Doctrine*" as originally set out in *G.A. Stowers Co. vs American Indemnity Co.*, 15 S.W. 2nd 544, (Tex. Comm'n App. 1929, holding approved) and its progeny. This demand for settlement will be in effect until **5:00 p.m. C.S.T. on Tuesday, October 15, 2024**, at which time if no offers are made or if no settlement of this case is concluded, the offers will expire, and they will not be renewed in the future.

We look forward to hearing from you regarding our settlement proposal and should you have any questions, do not hesitate to contact our office. Awaiting your response, I remain,

Sincerely,



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AG/
Via Email: David.guerrero@tristargroup.net