

12.1 SAMPLE DEMAND LETTER

Dear D. H. Racer:

As you are aware, this firm represents Lisa Nevin. Ms. Nevin suffered serious injuries when a cable on a cable car owned and operated by your client Amber Ski Lodge Corporation broke, causing Ms. Nevin to fall from a runaway cable car. Her injuries include not only fractures to her right leg and arm and permanent loss of mobility in two fingers of her right hand, but also Post Traumatic Stress Disorder.

As a direct result of Lisa Nevin plunging from the cable car when the cable broke, Lisa incurred damages as follows:

- Special damages (medical expenses): \$300,000
- Non-market services: \$500,000 (caring for her mother)
- Loss of earnings: \$300,000 (lost wages)
- Pain and suffering: \$900,000

Accompanying this letter you will find medical bill documentation, an economic loss report supporting the \$300,000, jury verdicts up to \$3.5 million in similar cases and *Fletcher v. Ryan*, with which I am sure you are familiar.

We have conferred with Ms. Nevin and have her authority to accept the sum of \$2 million in full settlement of her claims against Amber Ski Lodge Corporation.

It is obvious that a trial of this case will result in the usual financial risks that any trial might have, in addition to adverse publicity for the resort.

This offer to settle for \$2 million expires 30 days from your receipt of this letter. If you do not accept the offer, my client will have no other choice but to proceed to trial.

Thank you for your cooperation. You may reach me during business hours at 206-328-6601. I look forward to speaking with you and hope we can amicably resolve this dispute.

Sincerely,

JM Galvin

J. M. Galvin
Attorney at Law
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