



Express Demand Package Sample for Attorneys

What is an EvenUp Express Demand Package?

An AI-only solution for firms that need a high-quality, comprehensive demand in minutes.



Express Demand Package

- Facts & Liability
- Injuries & Treatment
 - Objective Tests
 - Interventional Treatment
- Damages
 - Past Medical Expenses
 - Past and Future Pain and Suffering
 - Future Medical Expenses
- Demand to Settle
- Exhibit Mangement
- Version History

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“Express Demands is big.
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of manual work, cutting down attorney
drafting time and case manager workload
significantly. **Getting a comprehensive
demand in just minutes is a
game changer.”**

Ben Limbaugh

Attorney

Jeffcoat Injury and Car Accident 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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Atticus & Finch

March 11, 2025

VIA U.S. MAIL, FAX & EMAIL

Allstate Insurance Company
Will Pae
PO Box 54321
Dallas, TX 75266

Re: Our Client: Cash Settleman
Your Insured: James Greene
Date of Loss: January 26, 2024
Claim No.: 1234567

Dear Mr. Pae and All Insurance Company Decision-Makers,

Our firm represents Cash Settleman (“**Mr. Settleman**” or “**our client**”) regarding an incident on January 26, 2024, involving James Greene (“**Mr. Greene**” or “**your insured**”).

We are prepared to resolve our client’s claims and submit the enclosed information and documentation in good faith to avoid the cost and time of formal litigation. Under Fla. Stat. § 90.408, the enclosed materials are for settlement purposes only and cannot be used at trial unless obtained through legal proceedings. Please provide a list of any additional items needed to evaluate this settlement demand within 30 days of this letter.

Mr. Settleman sustained significant injuries in the collision on January 26, 2024. The immediate impact resulted in significant cervical, lumbar, shoulder, and knee injuries. These injuries have led to persistent pain and functional limitations that have substantially impacted Mr. Settleman’s life. In the aftermath of the collision, Mr. Settleman experienced substantial limitations in his daily activities. Simple tasks such as bending, lifting, and ambulation, which were previously effortless, now cause considerable pain and discomfort. This has directly affected Mr. Settleman’s capacity to maintain his normal daily routine and independence. Further, the harm to Mr. Settleman’s professional life has been particularly significant. His

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injuries have impacted his productivity and ability to fulfill his professional responsibilities. The ongoing pain and the demands of treatment have necessitated modifications to his work duties.

Beyond professional challenges, Mr. Settleman's recreational activities have also been significantly affected. Activities that once provided him joy are now limited due to his physical restrictions. The collision has also placed a strain on his family relationships. The limitations imposed by his injuries have altered his ability to participate in family activities and fulfill his usual roles within the family dynamic. Additionally, Mr. Settleman's injuries have limited his social life and made it difficult to participate in his community.

As a result of the January 26, 2024, collision, Mr. Settleman has endured months of medical treatment, and he continues to require ongoing care to manage pain and enhance function. The persistent pain, limitations, and medical treatments have led to emotional distress, and medical evidence suggests that long-term limitations and related challenges are likely to persist into the foreseeable future.

1.FACTS

On January 26, 2024, Mr. Settleman was the restrained driver of a vehicle traveling eastbound on West Hallandale Beach Boulevard in Hallandale Beach, Broward County, Florida. At the same time, the defendant was the driver of a vehicle also traveling eastbound on West Hallandale Beach Boulevard. Suddenly and without warning, the defendant negligently changed lanes without yielding, directly entering Mr. Settleman's path and causing a collision. Upon impact, Mr. Settleman's body was violently jostled about the interior of the vehicle, and his right knee hit the dashboard. The collision resulted in Mr. Settleman sustaining significant personal injuries and other damages.

2.LIABILITY

As exposed in the Traffic Crash Report, Officer R. Acosta of the Pembroke Park Police Department investigated the collision and determined that Mr. Greene was the sole party responsible for the collision due to his failure to perform a proper lane change. Furthermore, Mr. Greene was cited for improper lane change (Citation Number AJIPYNE).

The conditions for establishing liability in this case are clear. Mr. Greene owed a duty of care to the other drivers on the road. Florida law requires that all vehicles must be driven as nearly as practicable entirely within a single lane and must not be moved from that lane until the driver has first ascertained that the movement can be made with safety. **Fla. Stat. Ann. §§ 316.081, 316.089.** On the date of loss, Mr. Greene lacked attentiveness and all due care, improperly changed lanes, and failed to take reasonable evasive action to avoid the collision. As a result of Mr. Greene's acts and/or omissions on January 26, 2024, Mr. Settleman suffered significant personal injuries and damages for which Mr. Greene is undoubtedly liable.

3.INJURIES AND TREATMENTS

On January 26, 2024, Mr. Settleman's life was significantly impacted when Mr. Greene's negligent actions caused him serious injuries, including a partial tear of his right rotator cuff with bicipital tendinitis, a labral tear of the right shoulder, and complex tears of the medial and lateral meniscus in his right knee. The trauma required an emergency department evaluation on January 26, 2024, followed by a series of outpatient consultations, diagnostic imaging, a cervical epidural steroid injection, and a structured program of physical therapy.

Mr. Settleman's injuries have severely limited his ability to perform his physically demanding job, forcing him to avoid strenuous labor and routine activities involving prolonged standing and heavy lifting. The injuries have resulted in chronic shoulder and knee pain, as well as a limited range of motion that continues to impede Mr. Settleman's daily functioning. Mr. Settleman's medical team anticipates ongoing treatments, including physical therapy, pain management interventions, and potential surgery.

3.1.ICD Codes

ICD Code	Description
M50.2	Other cervical disc displacement
M54.1	Radiculopathy
M54.12	Radiculopathy, cervical region
M54.16	Radiculopathy, lumbar region
M67.411	Ganglion, right shoulder

M75.21	Bicipital tendinitis, right shoulder
M25511	Unspecified shoulder pain
M25561	Unspecified knee pain
M542	Cervicalgia
M5450	Lumbago
S13.4XXA	Sprain of ligaments of cervical spine, initial encounter
S16.1XXA	Strain of muscle, fascia and tendon at neck level, initial encounter
S33.5XXA	Sprain of ligaments of lumbar spine, initial encounter
S39.012A	Strain of muscle, fascia and tendon of lower back, initial encounter
S40.011A	Contusion of right shoulder, initial encounter
S43.431	Superior glenoid labrum lesion of right shoulder
S80.01XA	Contusion of right knee, initial encounter
S80.02XA	Contusion of left knee, initial encounter
S83.231	Bucket-handle tear of lateral meniscus, current injury, right knee

3.2.Interventional Treatments

- **Cervical Epidural Steroid Injection at C6-C7**
 - Date of Service: May 7, 2024
 - Provider: Dr. Joseph Rabi
 - Description: The procedure involved a cervical epidural steroid injection at the C6-C7 level, using fluoroscopic needle guidance. Mr. Settleman was sedated with MAC (Monitored Anesthesia Care); the procedure was performed to address cervical radiculopathy, and the medication injected included 2 mL of normal saline and 1 mL of Kenalog 40 mg.
- **(Referral) Right Knee High Tibial Osteotomy**
 - Referral Date: May 3, 2024
 - Provider: Dr. Gregory Markarian

- Description: This is a recommended treatment for Mr. Settleman's right knee pain and dysfunction. The procedure would involve surgery to realign the knee joint.
- **(Referral) Right Shoulder Arthroscopy with Rotator Cuff Repair and Labral Repair**
 - Referral Date: May 3, 2024
 - Provider: Dr. Gregory Markarian
 - Description: This is a recommended treatment for Mr. Settleman's right shoulder pain and dysfunction. The procedure would involve arthroscopic surgery to repair the rotator cuff and labrum.

3.3.Objective Tests

- **MRI Cervical Spine**
 - Date of Service: March 1, 2024
 - Provider: American Diagnostic MRI
 - Findings: Moderate spinal canal stenosis and mild spinal cord compression at C3/C4 and C5/C6, multilevel neural foraminal narrowing, severe bilaterally at C3/C4 and C6/C7, and severe on the right at C5/C6
- **MRI Lumbar Spine**
 - Date of Service: March 1, 2024
 - Provider: American Diagnostic MRI
 - Findings: Multilevel neural foraminal narrowing, severe bilaterally at L4/L5 and L5/S1, large 5-6 mm osteophyte disc complexes abutting both descending L5 and S1 nerve roots in the lateral recesses
- **MRI Right Knee**
 - Date of Service: March 4, 2024
 - Provider: American Diagnostic MRI
 - Findings: Anterior cruciate ligament fibers not identified normally, mild-to-moderate sprain of the PCL and lateral collateral ligamentous complex, diffuse maceration/complex tear in the lateral meniscus, complex tear in the posterior horn and posterior root insertion of the medial meniscus

- **MRI Right Shoulder**
 - Date of Service: March 5, 2024
 - Provider: American Diagnostic MRI
 - Findings: Low-grade partial tear of the supraspinatus tendon, moderate-grade partial tear of the infraspinatus tendon, moderate-grade partial tear of the subscapularis tendon, SLAP tear extending to the posterior labrum, posterior ganglion cyst
- **X-ray Right Knee**
 - Date of Service: April 24, 2024
 - Provider: Sports Medicine Institute
 - Findings: Minimal narrowing of the medial and lateral compartments with osteophytic spurring, loose bodies within the posterior capsule, severe narrowing with osteophytic spurring in the lateral compartment
- **X-ray Right Shoulder**
 - Date of Service: April 24, 2024
 - Provider: Sports Medicine Institute
 - Findings: Slight narrowing with osteophytic spurring at the acromioclavicular articulation

4.DAMAGES

4.1.Past Medical Expenses

Provider	Treatment Period	Number of Visits	Amount Charged
Loyola Medicine	January 26, 2024	1	\$1,129.08
Advanced Physical Medicine	January 30, 2024, to July 16, 2024	40	\$17,390.23
American Diagnostic MRI	March 1, 2024, to April 24, 2024	4	\$11,325.00
Sports Medicine Institute	April 19, 2024, to May 31, 2024	3	\$2,060.00

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APM Surgical Group	May 7, 2024	1	\$2,342.00
Greater Anesthesia	May 7, 2024	1	\$1,307.50
Total		50	\$35,553.81

4.2.Future Medical Expenses

Procedure	Years	Per Year	Cost	Total
Primary Care Visit	1	1	\$303.00	\$303.00
Continued Physical Therapy	1	16	\$373.91	\$5,982.56
Continued Cervical Epidural Steroid Injections	1	2	\$5,249.50	\$10,499.00
Continued Pain Management Office Visits	1	4	\$199.11	\$796.44
Continued Orthopedic Office Visits	1	6	\$530.00	\$3,180.00
Right Knee High Tibial Osteotomy	1	1	\$20,436.00	\$20,436.00
Right Shoulder Arthroscopy	1	1	\$12,253.00	\$12,253.00
Total				\$53,450.00

5.CONCLUSION

In light of the foregoing, Mr. Settleman hereby offers to settle his claims for the policy limits. This demand shall remain open until **5:00 P.M. ET on the 30th day after receipt**, after which it will be automatically withdrawn if not accepted. Please do not hesitate to contact our firm should

Claim No.: 123456

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you wish to discuss this matter further. The demand term is set until 5:00 P.M. ET on the 30th day after receipt.

We trust that you will recognize the contractual obligation owed to the insured pursuant to the terms of the insurance policy in effect at the time of the incident on January 26, 2024. Your company has a legal duty to act in good faith to resolve this matter. The insured's rights are based on contractual obligations under the applicable policy.

Nothing herein shall be construed to limit or impair, in any way, any of our client's claims, rights, remedies, or defenses, all of which are expressly reserved. In a spirit of cooperation and with a view toward resolving these issues informally and amicably, if you have any further questions, please contact the undersigned upon receipt of this settlement demand so that we may discuss the foregoing. The reservation of all claims and rights is expressly maintained.

Sincerely,

Atticus & Finch

/s/Atticus Finch

Attorney at Law

Encl:

Exhibit List

No.	Description
1	Traffic Crash Report
2	Loyola Medicine - Records
3	Loyola Medicine - Bills
4	Advanced Physical Medicine - Records
5	Advanced Physical Medicine - Bills
6	American Diagnostic MRI - Records
7	American Diagnostic MRI - Bills
8	Sports Medicine Institute - Records
9	Sports Medicine Institute - Bills
10	APM Surgical Group - Records
11	APM Surgical Group - Bills
12	Greater Anesthesia - Records
13	Greater Anesthesia - Bills



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\$235M

Capital Raised

\$1B

Company valuation

1,500+

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MedChron's weekly

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Damages claimed

\$200M

Resolved from missing
documents

