

SETTLEMENT DEMAND

Settlement Demand Letter — Reyes v. Delgado

Demand on behalf of Camila A. Reyes for injuries sustained in the collision of 03/14/2025.

CASE OVERVIEW	
CASE NO.	MR-2026-0418
PATIENT	Reyes, Camila A.
DOB	04/18/1986
DATE OF LOSS / SERVICE	03/14/2025
MATTER TYPE	Personal injury — motor vehicle collision
PREPARED FOR	Mercer & Hale LLP
ATTORNEY	J. Alvarez, Esq.
PREPARED BY	S. Okafor, RN
DATE PREPARED	08/13/2026

AI does the reading. You make the calls — always.

VIA CERTIFIED MAIL AND EMAIL

Claims Department
Summit Mutual Insurance Company
4500 Trinity Parkway
Dallas, TX 75207

Re: Reyes v. Delgado — Claim No. CL-2026-0418

Our client: Camila A. Reyes, DOB 04/18/1986

Liability

On 03/14/2025, Ms. Reyes was a restrained front-seat passenger in a vehicle struck from behind on the I-35 frontage road. The at-fault driver, Mr. Delgado, was cited for failure to control speed. Liability is not in genuine dispute: the collision report, witness statements, and our client's contemporaneous complaints are consistent [p.001].

Injuries

As a direct result of the collision, Ms. Reyes sustained an acute lumbar strain and a 4.2 mm posterolateral disc herniation at L4-L5 with left L5 nerve-root contact [MRI-s3-sl18], confirmed by EMG on 10/15/2025 [p.268]. She has permanent restrictions — no lifting over 20 lb, no prolonged sitting — and an 8% permanent impairment of the left lower extremity agreed upon by the treating orthopedist and your own IME [p.348, p.364]. The treating orthopedist attributes the herniation to the collision within reasonable medical probability; there was no prior lumbar treatment for nine years [p.006].

Damages

Special damages to date total \$51,360.00 billed, with an outstanding balance of \$15,408.00 (reconciliation attached):

PROVIDER / SERVICE	CHARGES	PAID	BALANCE
St. Mary's Medical Center — ED (03/14/2025)	\$18,400.00	\$12,880.00	\$5,520.00
St. Mary's Imaging — MRI lumbar (04/05/2025)	\$3,900.00	\$2,730.00	\$1,170.00
OrthoWest Spine — consults & follow-ups	\$4,800.00	\$3,360.00	\$1,440.00
Meridian Physical Therapy — 20 sessions	\$6,240.00	\$4,368.00	\$1,872.00
North Texas Pain & Spine — 2x ESI + visits	\$8,600.00	\$6,020.00	\$2,580.00
North Texas Neurology — consult	\$1,650.00	\$1,155.00	\$495.00
NeuroDiagnostics — EMG/NCS	\$2,450.00	\$1,715.00	\$735.00
Lakeside Family Medicine — 3 visits	\$1,240.00	\$868.00	\$372.00
Prescriptions (hydrocodone, naproxen, duloxetine, lidocaine)	\$1,180.00	\$826.00	\$354.00
Radiology — CT lumbar (03/14/2025)	\$2,900.00	\$2,030.00	\$870.00
Total medical specials	\$51,360.00	\$35,952.00	\$15,408.00

Projected future care — annual orthopedic follow-up, PRN epidural steroid injections, and maintenance neuropathic medication — is estimated at \$12,000 to \$18,000 over the next five years [p.334, p.364]. Ms. Reyes has also endured two years of chronic pain, restricted function, sleep disturbance, and loss of enjoyment of daily activities.

Demand

This case is within the policy limit and liability is clear. We demand the full policy limit of \$250,000, allocated as \$51,360 in past medicals, \$12,000 in projected future medicals, and \$186,640 for pain, suffering, and loss of enjoyment. The demand is open for thirty (30) days from the date of this letter, after which we will proceed with suit.

Respectfully submitted,

J. Alvarez, Esq.
Mercer & Hale LLP

Prepared with the assistance of MedRecords AI — source-linked chronology and report draft. All figures reconcile to the underlying records.