

B&D LAW GROUP, APLC

10700 SANTA MONICA BOULEVARD, SUITE 200
LOS ANGELES, CALIFORNIA 90025
TEL: (310) 424-5252
FAX: (310) 492-5855

CLAIM FOR DAMAGES

(Government Code §911.2)

TO: CRYSTAL MUI, CITY CLERK

VIA PRIORITY MAIL

City of San Carlos
Attn: Crystal Mui, City Clerk
600 Elm Street
San Carlos, CA 94070

RE: Scott Rhodes
Date of Incident: February 22, 2022
Our File Number 20514

Name of Claimant: Scott Rhodes

Mailing Address of Claimant:

[REDACTED]

Give Address to Which You Desire Notices or Communications to be Sent regarding this Claim:

B&D LAW GROUP, APLC , 10700 Santa Monica Blvd., Suite 200, Los Angeles, California 90025-4768

How Did Damage or Injury Occur? Give full particulars:

Scott Rhodes was injured when the driver of Samtrans, Mr. Peter Lee hit our client.

Name of Agency against which this claim is filed?

City of San Carlos, Samtrans, City of Burlingame, County of San Mateo

When Did Damage or Injury Occur? Give full particulars; date, time of day:

February 22, 2022 at approximately 6.53pm

Where Did Damage or Injury Occur? Describe fully.:

City of Burlingame near Old Bayshore Hwy

RECEIVED

OCT 21 2022

CITY OF SAN CARLOS
CITY CLERK'S DEPARTMENT

City of San Carlos
Attention: City Clerk
RE: Scott Rhodes
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What Particular Act or Omission Do You Claim Caused the Injury or Damage?

The public entity was negligent and carelessly failed to yield and struck our client. The operator of the line was negligent and careless in their operation of the line. Furthermore, the location and design of the roadway and bus passing was dangerous, and presented a dangerous condition. Furthermore, the public entity was negligent and careless in their hiring, training, retaining, and supervising of their worker. Furthermore, as a common carrier the bus owed claimant a duty of utmost care for passengers waiting to board and un-board the bus.

Give Names of employees causing the injury or Damage, if known:

Peter Lee

Names and Address of Witnesses, Doctors and Hospitals:

San Francisco General Hospital 1001 Potrero Ave. San Francisco, CA 94110
Kaiser 1 Quality Dr. Vacaville, CA 95688

What Damage or Injuries Do You Claim Resulted? Please give full extent of injuries or damages claimed.

By way of example and without limitation: Injuries to their person and body, including but not limited to back, neck pain, hips, and bladder.

What is the amount of Your Claim? Please itemize your Damages:

Within the jurisdiction of the Superior Court (Unlimited Civil Case). Demand excess of \$25,000.00.

DATED: 10-18-2022



DANIEL D. GEOULLA, ESQ.
On Behalf of Claimants