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Dec 30 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

Appellate Case No. 2023-001289

Tasha Jones and Shaniqua Thompson, Respondents,

v.

Lyndon Southern Insurance Company,
Safe Choice Insurance, LLC, and
Jupiter Managing General Agency, Inc, Defendants,

Of which

Lyndon Southern Insurance Company is the Appellant.

**RECORD ON APPEAL
SUPPLEMENT**

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SUPPLEMENTAL VOLUME (Pages 715-716)

Trial Exhibits

Defendant's Trial Exhibit

Ex. 2 (Demand Letter of October 18, 2017)	715
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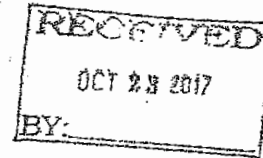
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Dietrich A. Lake

Office 803/750-
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October 18, 2017



Phillip Levesque
Jupiter Auto Insurance
PO Box 190675
Nashville, TN 37219

RE: My Clients: Tasha Jones; Shaniqua Thompson
Date of Loss: 6/15/17
Your insured: Tasha Jones
Claim No.: DMA-0181235
Settlement Offer

Dear Mr. Levesque:

My clients have completed their medical treatment from this incident and have been released from doctor's care. We can now discuss the possibilities for settling their claims.

As you are aware, my clients were turning onto the highway when an unknown driver struck them in the rear and fled the scene of the accident. It appears clear that the unknown/uninsured driver is liable for this accident and the injuries to my clients as the driver was driving too fast for conditions, he/she was following too closely, and he/she failed to maintain control of their vehicle.

My clients sought treatment from several medical providers with general complaints for pain to either their neck or back or body. My clients sought physical therapy as a result of their injuries.

Enclosed is a copy of all of my clients' medicals. Ms. Tasha Jones' specials are as follows:

1. Providence Hospital	\$1740.99
2. PHP ER PHY	\$ 683.00
3. Pitts Radiology	\$ 110.00
4. Lexington Medical Center	\$5138.00
5. Lexington Radiology	\$ 52.00

6. Columbia Rehab	\$1220.00
7. Eau Claire Cooperative	\$ 94.00
8. Richland County EMS	<u>\$ 548.96</u>

TOTAL MEDICALS:

\$9586.95

Ms. Shaniqua Thompson (minor) specials are as follows:

1. Providence Hospital	\$1041.10
2. PHP ER PHY	\$ 376.00
3. Lexington Medical Center	\$6304.75
4. Lexington Radiology	\$ 165.00
5. Renu Health	\$1346.00
6. Richland County EMS	<u>\$ 548.96</u>

TOTAL MEDICALS:

\$9780.71

In an attempt to resolve this matter without any further delay, inconvenience, and expense associated with litigation, I would recommend a settlement: T. Jones - **\$65,000.00**; and S. Thompson - **\$65,000.00**. This offer reflects the serious impact/property damages done to my client's vehicle, the jurisdiction of this incident, and the punitive exposure from this John/Jane Doe driver's reckless driving and leaving the scene of this accident. In addition, enclosed please find a copy of the police report in this case. Please contact me upon your review of your case within fifteen (15) business days to discuss settling this case.

Sincerely,


Dietrich A. Lake

Enclosures