

CITY OF RIALTO LIABILITY

CLAIM FOR DAMAGES TO PERSON OR PROPERTY

CITY OF RIALTO

1923 MOV 27 ANII: 22

RECEIVED
EITY CLEAF

- 1. Claims for death, injury to person, or to personal property must be filed not later than six (6) months after the occurrence (Gov. Code §911.2).
- 2. Claims for damages to real property must be filed not later than one (1) year after the occurrence (Gov. Code §911.2).
- 3. READ ENTIRE CLAIM FOR BEFORE FILING
- 4.ATTACH SEPARATE SHEETS, IF NECESSARY, TO GIVE FULL DETAILS

RETURN TO: Rialto City Clerk's Office

Mail: 150 S. Palm Ave., Rialto, CA 92376 Address: 290 W. Rialto Ave., Rialto, CA 92376

CLAIMANT INFORMATION:			
Felicia Renea Manier		ATE OF BIDTH	
FULL NAME		DATE OF BIRTH	
HOME ADDRESS INCLUDING CITY, STATE & ZIP		HOME TELEPHONE NO.	
		()	
BUSINESS ADDRESS INCLUDING CITY, STATE & ZIP		BUSINESS TELEPHONE NO.	
ADDRESS AT WHICH CLAIMANT DESIRES TO RECEIVE NOTICES OR COMMUNICATIONS REGARDING THIS CLAIM (if different from home address provided above): Law Office of Jacob Emrani - C/O Nikolas M 714 W Olympic BLVD STE 300 Los Angeles, nikolas @calljacob.com (858) 519 - 564			
1. WHEN DID DAMAGE OR INJURY OCCUR? DATE: 05/24	L/2023 TIME: _	2:30 □ AM 🖾 PM	
3. HOW DID DAMAGE OR INJURY OCCUR? Please see attached			
4. WERE POLICE AT THE SCENE? ☐ YES ☒ NO WER 5. WHAT PARTICULAR ACT OR OMISSION DO YOU CLAIR employee causing the injury or damage, if known. Please see attached	E PARAMEDICS AT THE SCENE?		
6. GIVE TOTAL AMOUNT OF CLAIM Include estimate of amount how was the above amount computed? Be specific DAMAGES INCURRED TO DATE:	nt of any prospective injury or damage c, list doctor bills, repair estimates, etc. Plea	\$\frac{\text{Unlimited civil claim}}{\text{more \$ than \$25,00}}\$ se attach 2 estimates.	
Item/Date:		Amount: \$	
Item/Date:		Amount: \$	

Unlimited civil claim, more

	S, AS FAR AS KNOWN:	797	MOU DO BOOK		
Item/Date:		4420			
Item/Date: TOTAL ESTIMATED AN			RECEIVE Amour	nt: \$	
TOTAL ESTIMATED AN	OUNT PROSPECTIV	E DAMAGES:	CITY CLEAR	\$	
7. WITNESSES TO DAMAGE OR INJU	RY List all persons known	to have information (att	ach additional pages, if nec	essary)	
NAME:		NAME:			
ADDRESS:		ADDRESS:			
TELEPHONE: ()					
8. IF INJURED, PROVIDE NAME, CON					
NAME:					
ADDRESS:					
TELEPHONE: ()					
DATE: TIME:			TIME:		
9. PLEASE READ THE FOLLOWING O					
7/	CURB	SIDEWALK			
SIGNATURE OF CLAIMANT OR AG	ATED UPON MY INFORMATION IRE) UNDER PENALTY OF ENT	AND BELIEF; AND AS TO T		M TO BE TRUE. CORRECT. 2023	
RELATIONSHIP TO CLAIMANT					

CITY OF RIALTO

Ms. Felicia Renea Manier Supplement Claim for Damages (City of Rialto)

RECEIVE ...

*How did damage or injury occur?

Felicia Renea Manier (hereinafter "Claimant") was walking on the corner in front of Yellowstone Way & Courtlynn Road in Rialto California 92377 at approximately 2:30 P.M on May 24th, 2023. Suddenly and unexpectedly, she tripped and fell on an uplifted and uneven concrete which is owned and maintained by the City of Rialto. The Claimant fell face forward and sustained serious bodily injuries. The Claimant has experienced extreme pain, anxiety, anguish, and other traumatic symptoms which are secondary and ancillary to her injuries. Moreover, the Claimant has not even begun to recover from her injuries. The extent of her injuries will inhibit her from making a full recovery or from being able to enjoy life to the fullest were it not for this incident.

The Claimants' injuries include but are not limited to: Elbow (fractured), Wrist, Neck, Hip, Leg, Feet, Back, etc

*What particular act or omission do you claim caused the injury or damages?

The City of Rialto is the direct and proximate cause of the Claimant's injuries. The City of Rialto has a duty of care to ensure all sidewalks, roads, and adjacent areas under its control are reasonably maintained and free from hazards. The City of Rialto breached this duty and failed to properly maintain, control, and monitor their sidewalks, roads, and adjacent areas. This failure allowed a dangerous condition to exist at said location with no warnings or signage provided by the City. The neglectful disrepair of the area in question resulted in one portion of the walkway being significantly lower than the next portion without being readily visible to pedestrians. These failures, acts, and omissions created a reasonably foreseeable risk which could and should have been prevented by the City. The City of Rialto and its governmental entities knew or should have known of the dangerous condition and had the opportunity to take measures against this foreseeable risk to pedestrians, including the Claimant.

The City of Rialto should have an adequate inspection and reporting system whereby City sidewalks, roads, and adjacent areas open to the general public are routinely checked to identify the existence of dangerous conditions. City employees working throughout the City should be able to report dangerous conditions they come across to the City for review and repair. It is questionable if the City maintained and operated such a system with due care. A routine inspection and reporting system would have discovered the dangerous condition of the area in question. The condition had existed for such a period of time that it is foreseeable that injuries can occur attempting to traverse the path as an ordinary person would. The condition of the area was dangerous enough that the walkway should have been repaired, closed for repair, or at the very least warning signs should have been put in place.

As seen in the photos included in the claim package the City rectified the dangerous condition in questions shortly after the claimant was injured. The City of Realto knew or should have known about the existence of the dangerous condition because as the photos included in the claim package show there was ongoing construction in the vicinity of where the claimant got injured. The subsequent remedial measures show that the City had knowledge of the condition and the ability to take steps that would have prevented the claimants' injuries if taken previously.

City employees with the Maintenance and Facilities Department who are tasked with maintaining City sidewalks, roadways, parking lots, and adjacent areas should have noticed the dangerous condition while performing their work on the adjacent projects. City sidewalks, roadways, parking lots, and adjacent areas should be routinely inspected for the creation of dangerous conditions like the damaged sidewalk which hurt the members of the public, such as the Claimant.

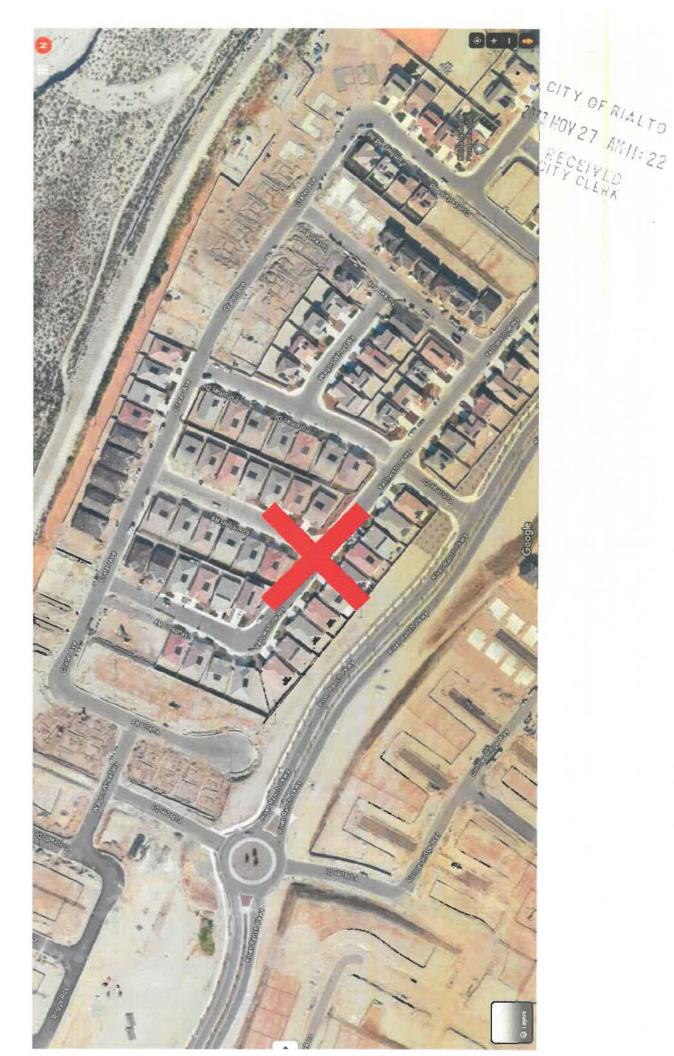
*DAMAGES

This is an unlimited civil claim, more than \$25,000.00.

Damages include: Medical Expenses - Past and Future (Economic Damage); Past and Future Lost Earnings (Economic Damage); Lost Earning Capacity (Economic Damage); Loss of Ability to Provide Household Services (Economic Damage); General damages include damages for Physical pain, Mental Suffering and Emotional Distress, including Past and future physical pain/mental suffering/loss of enjoyment of life / disfigurement / physical impairment /inconvenience / grief / anxiety / humiliation /emotional distress / and other damages.

No fixed standard exists for deciding the amount of these noneconomic damages. The Claimant continues to treat with health care specialists.

Gulm



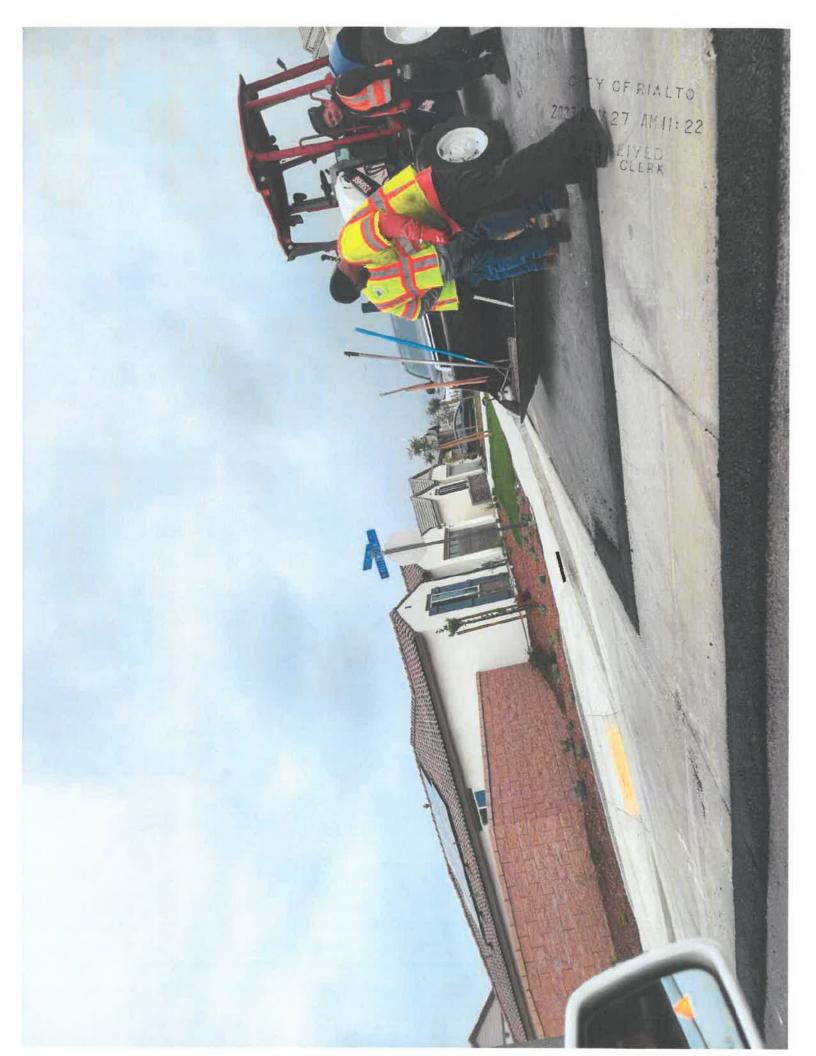


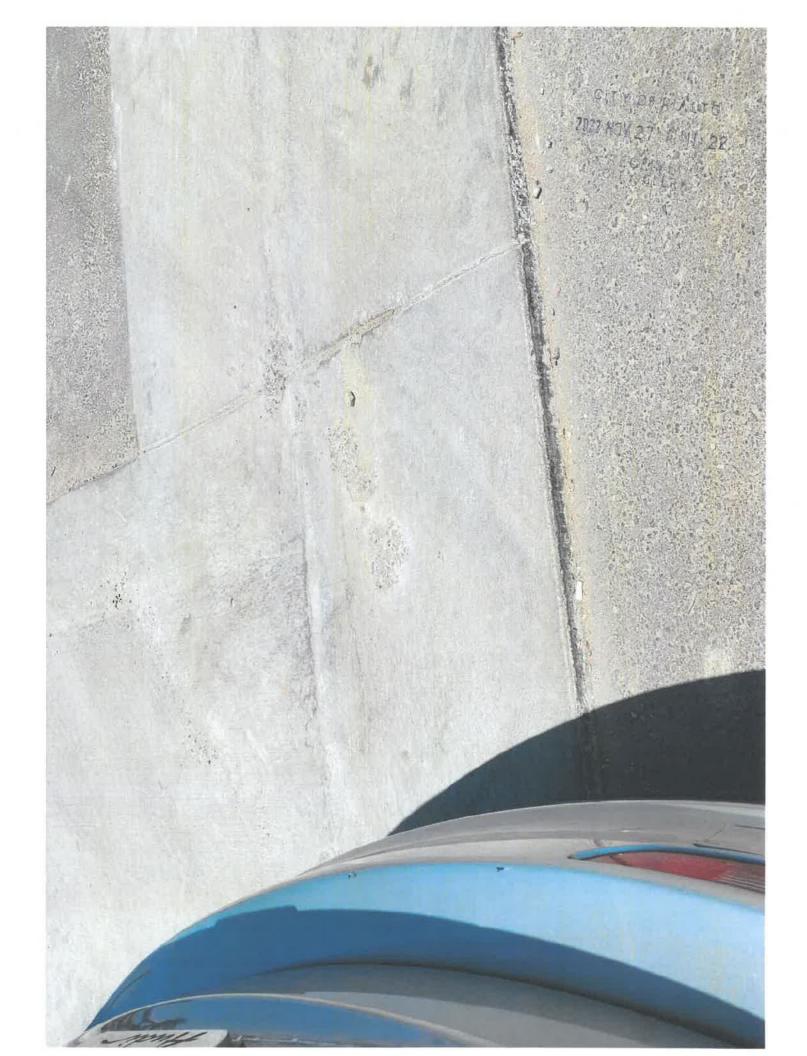
DESIGNEE AUTHORIZATION

TO: The City of Realto	
CLAIM NO.:	
DATE OF LOSS: 05/24/2023	
Pursuant to Section 2695.2(c) of the California (authorize THE LAW OFFICES OF JACOB personal injury claim under the above captioned lo This authorization shall be valid for 2 (two) year	EMRANI my attorneys, to handle my ss.
revoked by the undersigned. Any and all prior undersigned as of the date of this authorization.	authorizations are hereby revoked by the
	*
	Signature
	Felicia Renea Manier
	Printed Name
	Address
	Date
	Telephone

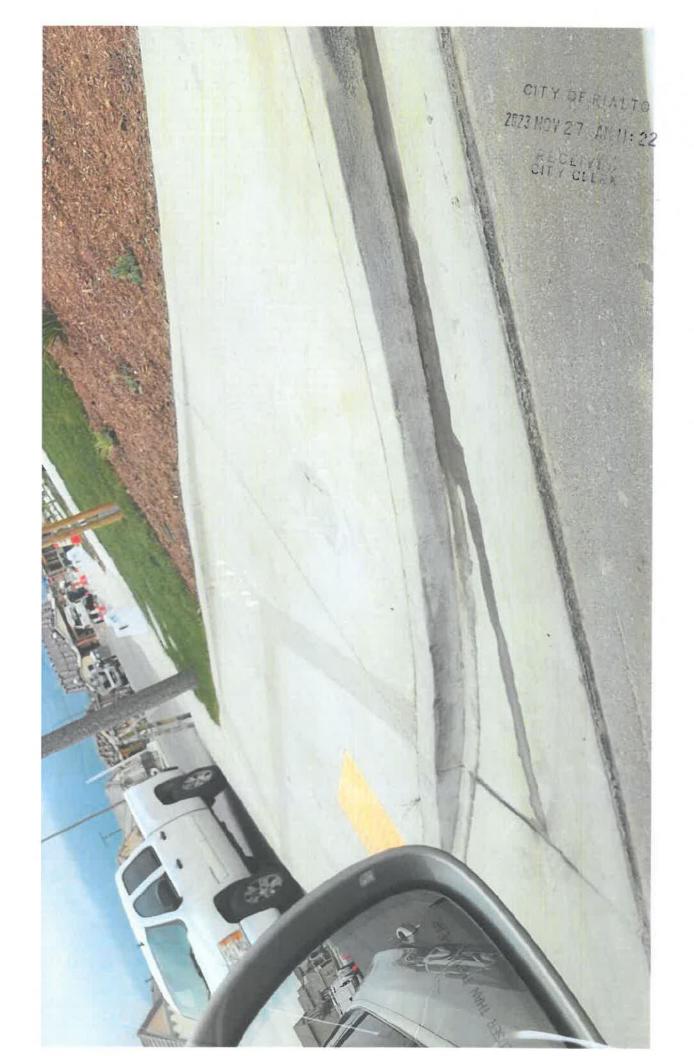






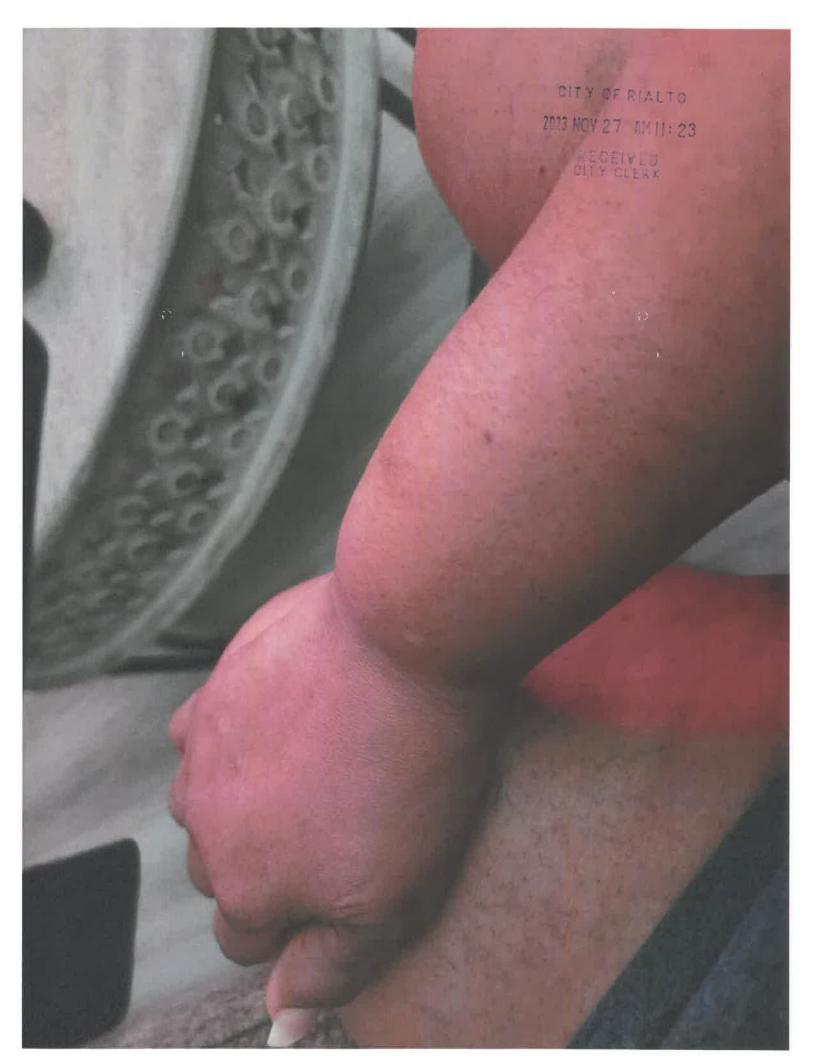




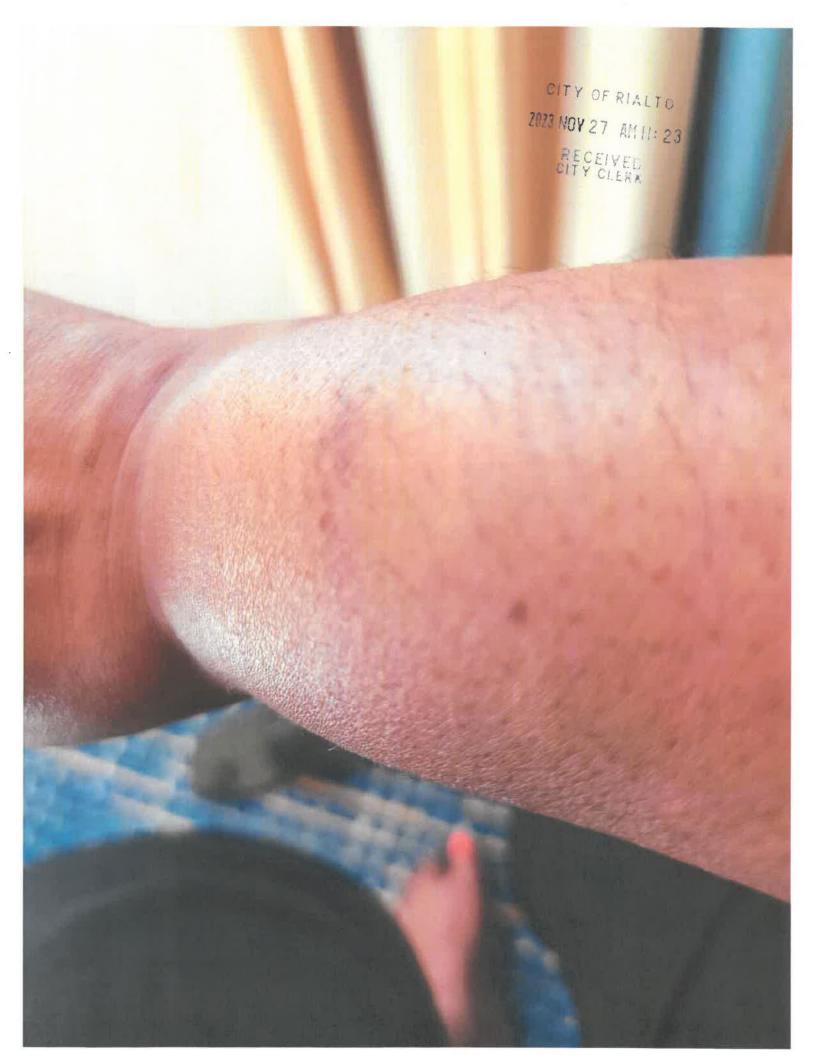




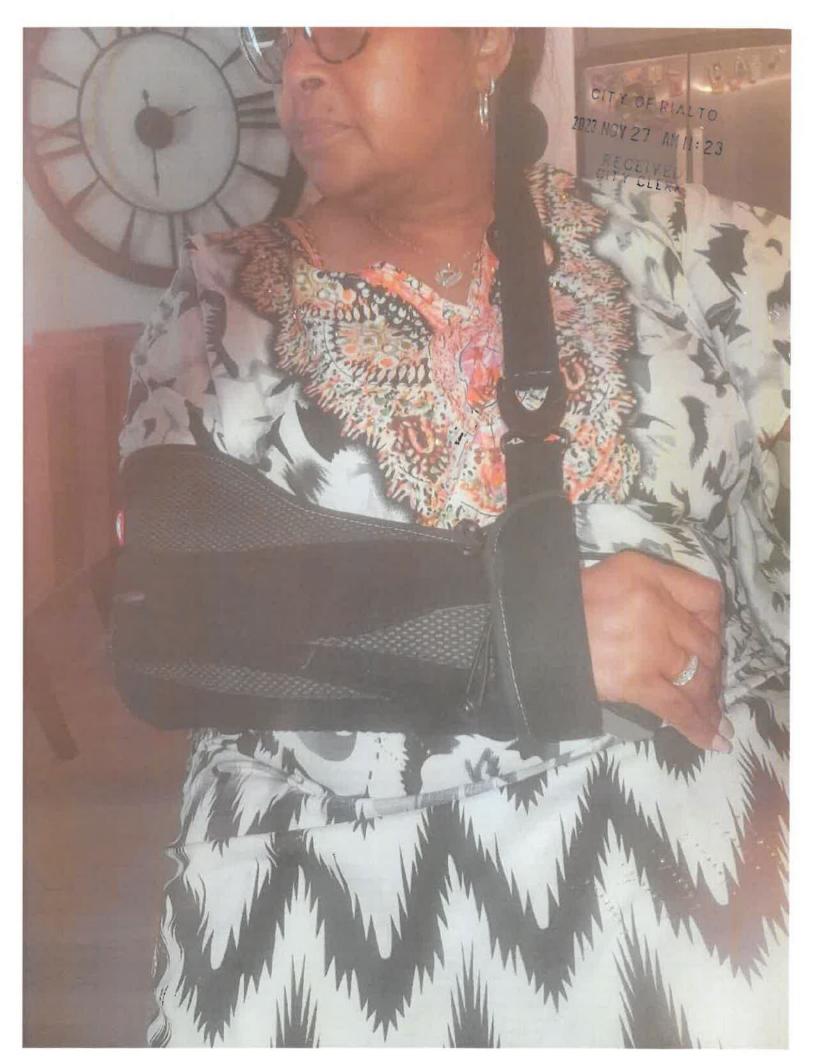
















CITY OF RIALTO

Patient:

MANIER, FELICIA R

Procedure

Accession

267-XR-23-048724

11

Ordering OMID MD, REZA

Date of Examination 6/9/2023 08:19 PDT

CITY CLERA Auth (Verified)

XR Elbow Complete Right

Reason For Exam

(XR Elbow Complete Right) pain

267-XR-23-048724

ACCESSION #: 267-XR-23-048724

EXAMINATION: XR Elbow Complete Right

TECHNIQUE: AP, oblique and lateral view of the right elbow

HISTORY: pain.

COMPARISON: None available.

FINDINGS:

There is a nondisplaced fracture involving the radial head/neck.

The radiocapitellar and ulnohumeral joints are preserved. No suspicious elbow joint effusion.

IMPRESSION:

Nondisplaced radial head/neck fracture.

***** Final Report *****

Dictated: 06/09/2023 8:27 am

Dictated by: CHIU MD, MICHAEL

Electronic Signature: 06/09/23 8:27 am

Signed by: CHIU MD, MICHAEL

Disclaimer: This document was generated using voice recognition system, which may produce sporadic inaccurate transcription or nonsensical phrases.

Patient:

MANIER, FELICIA R

DOB:

Procedure

Accession

Ordering LEFEBVRE MD, Date of Examination

Status

XR Wrist Complete Right

267-XR-23-046020

RACHEL

5/31/2023 11:14 PDT Auth (Verified)

Reason For Exam

(XR Wrist Complete Right) fall

267-XR-23-046020

ACCESSION #: 267-XR-23-046020, 267-XR-23-046019

EXAMINATION:

1. PA, oblique, scaphoid and lateral views of right wrist 2. PA, oblique, scaphoid and lateral views of left wrist

HISTORY: fall

COMPARISON: Bilateral hand radiographs dated 11/9/2015

FINDINGS: Bone mineralization is normal. There is no acute fracture, osseous lesion or dislocation on either side. Joint spaces are within normal limits. Carpal alignment is normal bilaterally.

IMPRESSION:

No acute fracture, dislocation or significant arthritic changes in bilateral wrists.

***** Final Report *****

Dictated: 05/31/2023 1:07 pm

Dictated by: PATEL MD, DAKSHESH B

Electronic Signature: 05/31/23 1:07 pm

Signed by: PATEL MD, DAKSHESH B

Disclaimer: This document was generated using voice recognition system, which may produce sporadic inaccurate transcription or nonsensical phrases.

Patient:

MANIER, FELICIA R

CLEAK

Procedure

Accession 267-XR-23-045986 Ordering SHINADA MD. SHUNTARO

Date of Examination

Status 5/31/2023 11:27 PDT Auth (Verified)

views

Reason For Exam-

XR Spine Lumbar 2

(XR Spine Lumbar 2 views) LE numbness, s/p fall, eval fx

267-XR-23-045986

EXAM: XR Spine Lumbar 2 views 267-XR-23-045986

TECHNIQUE: AP and lateral views of the lumbosacral spine.

INDICATION: LE numbness, s/p fall, eval fx

COMPARISON: 6/26/2022

FINDINGS/IMPRESSION:

Exaggeration of the normal lumbar lordosis. There is grade 1 anterolisthesis of L4 on L5. No spondylolisthesis.

No acute fracture. Normal vertebral body heights.

Mild to moderate disc height loss with vacuum disc phenomenon at L4-L5.

Bilateral facet arthropathy is present from L2-L3 through L5-S1.

Multiple surgical clips are present in the left upper quadrant. Phleboliths are present in the pelvis.

***** Final Report *****

Dictated: 06/14/2023 4:14 pm

Dictated by: Cua RES, Ruskin

Fellow/Resident: Cua RES, Ruskin

I certify that I have directed and participated in the above procedure,

reviewed the images, and agree with the interpretation.

Electronic Signature: 06/14/23 4:14 pm

Signed by: GO MD, JOHN L

Disclaimer: This document was generated using voice recognition system, which may produce sporadic inaccurate transcription or nonsensical phrases.

Patient:

MANIER, FELICIA R

DOB:

Procedure

Accession CT Spine Lumbar w/o 520-CT-23-006145

Ordering SHINADA MD, SHUNTARO

Date of Examination Status 6/27/2023 07:44 PDT Auth (Verified)

Contrast

Reason For Exam

(CT Spine Lumbar w/o Contrast) radiculopathy

520-CT-23-006145

CT L-SPINE

INDICATION: radiculopathy

TECHNIQUE: 3-D helical CT acquisition of the lumbar spine was obtained and multiplanar reconstructions were formatted in the axial, sagittal and coronal planes. Up-to-date CT equipment and radiation dose reduction techniques were employed. CTDIvol: 27.4 mGy. DLP: 830 mGy-cm.

FINDINGS:

Comparison is made with prior study dated 8/28/2020.

There is a new small superior endplate Schmorl's node at the L5 level with intravertebral herniation of gas associated with vacuum phenomenon of the nucleus pulposus.

The remainder of the examination is unchanged.

Alignment: Normal lumbar lordosis. Grade 1 anterolisthesis of L4 on L5 and L5 on S1. Vertebrae: Normal.

Discs: Mild disc height loss and vacuum disc phenomenon at L4-L5.

At the T12-L1 level, there is no evidence of central spinal canal or neuroforaminal stenosis.

At the L1-L2 level, there is no evidence of central spinal canal or neuroforaminal stenosis.

At the L2-L3 level, there is no evidence of central spinal canal or neuroforaminal stenosis.

At the L3-L4 level, there is no evidence of central spinal canal or neuroforaminal stenosis.

At the L4-L5 level, symmetric disc bulge, thickened ligamentum flavum and facet hypertrophy results in mild-to-moderate spinal canal narrowing. Mild-to-moderate bilateral neural foraminal narrowing. Severe bilateral facet arthropathy with gas within the right joint and asymmetric widening with effusion within the left joint. There is no surrounding inflammatory fat stranding.

At the L5-S1 level, there is no evidence of central spinal canal or neuroforaminal

Report

stenosis. Moderate bilateral facet arthropathy.

CITY OF RIALTO 2023 NOV 27 AMII: 23

Other:

Mild calcific atherosclerosis of the abdominal aorta and its branches. Vacuum phenomenon within the bilateral SI joints.

IMPRESSION:

Compared to 8/28/2020, there is a new small superior endplate Schmorl's node at the L5 level with intravertebral herniation of gas associated with vacuum phenomenon of the nucleus pulposus. The remainder of the examination is unchanged, with stable underlying degenerative changes of the L4-5 and L5-S1 levels as detailed above.

***** Final Report *****
Dictated: 06/29/2023 1:39 pm

Dictated by: KIM MD, PAUL E

Electronic Signature: 06/29/23 1:39 pm Signed by: KIM MD, PAUL E

Disclaimer: This document was generated using voice recognition system, which may produce sporadic inaccurate transcription or nonsensical phrases.

2023 MOY 27 AH II: 24 BECEIVEL CITY CLERK

Manier, Felicia R VALLEY HOSPITAL MEDICAL CENTER ACCT: 000547788919 ADM: 05/24/2023

MANIER, FELICIA R Patient:

Ordering Accession SHINADA MD. CT Spine Lumber w/o 520-CT-23-006145 SHUNTARO

2023 NOV 27 Status AH 11: 24 Date of Examination Date of Examination
6/27/2023 07:44 PDTH Quith (Verified) BITY CLERK

CITY

DOB:

MALTO

Reason For Exam (CT Spine Lumbar w/o Contrast) radiculopathy

Report 520-CT-23-006145

CT L-SPINE

Contrast

TECHNIQUE: 3-D helical CT acquisition of the lumbar spine was obtained and multiplanar reconstructions were formatted in the axial, sagittal and coronal planes. Up-to-date CT equipment and radiation dose reduction techniques were employed. CTDIvol: 27.4 mGy. DLP: 830 mGy-cm.

FINDINGS:

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At the L2-L3 level, there is no evidence of central spinal canal or neuroforaminal stenosis.

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At the L5-S1 level, there is no evidence of central spinal canal or neuroforaminal

Right

Patient: MANIER, FELICIA R

CITY OF I DOB:

2023 NOV 27 AFTT: 24

Procedure XR Elbow Complete 267-XR-23-048724

Accession

Ordering OMID MD, REZA Date of Examination 6/9/2023 08:79:POT Auth (Verified)

Reason For Exam

(XR Elbow Complete Right) pain

267-XR-23-048724

ACCESSION #: 267-XR-23-048724

EXAMINATION: XR Elbow Complete Right

TECHNIQUE: AP, oblique and lateral view of the right elbow

HISTORY: pain.

COMPARISON: None available.

There is a nondisplaced fracture involving the radial head/neck.

The radiocapitellar and ulnohumeral joints are preserved. No suspicious elbow joint effusion.

IMPRESSION:

Nondisplaced radial head/neck fracture.

***** Final Report ***** Dictated: 06/09/2023 8:27 am

Dictated by: CHIU MD, MICHAEL

Electronic Signature: 06/09/23 8:27 am Signed by: CHIU MD, MICHAEL

Disclaimer: This document was generated using voice recognition system, which may produce sporadic inaccurate transcription or nonsensical phrases.

Patient: MANIER, FELICIA R

DOB:

CITY OF RIALTO

Procedure XR Spine Lumbar 2 VIEWS

Accession 267-XR-23-045986 Ordering SHINADA MD, SHUNTARO

Date of Examination Status
5/31/2023 11:27 PDT Auth (Verified)

Reason For Exam

(XR Spine Lumbar 2 views) LE numbness, s/p fall, eval fx

Report

267-XR-23-045986

EXAM: XR Spine Lumbar 2 views 267-XR-23-045986

TECHNIQUE: AP and lateral views of the lumbosacral spine.

INDICATION: LE numbness, s/p fall, eval fx

COMPARISON: 6/26/2022

FINDINGS/IMPRESSION:

Exaggeration of the normal lumbar lordosis. There is grade 1 anterolisthesis of L4 on L5. No spondylolisthesis.

No acute fracture. Normal vertebral body heights.

Mild to moderate disc height loss with vacuum disc phenomenon at L4-L5.

Bilateral facet arthropathy is present from L2-L3 through L5-S1.

Multiple surgical clips are present in the left upper quadrant. Phleboliths are present in the pelvis.

***** Final Report ***** Dictated: 06/14/2023 4:14 pm

Dictated by: Cua RBS, Ruskin

Pellow/Resident: Cua RES, Ruskin

I certify that I have directed and participated in the above procedure, reviewed the images, and agree with the interpretation.

Electronic Signature: 06/14/23 4:14 pm

Signed by: GO MD, JOHN L

Disclaimer: This document was generated using voice recognition system, which may produce sporadic inaccurate transcription or nonsensical phrases.

stenosis. Moderate bilateral facet arthropathy.

CITY OF RIALTO

Other:
Mild calcific atherosclerosis of the abdominal aorta and its branches. 2020 Att 11: 24 phenomenon within the bilateral SI joints. RECEIVED

Compared to 8/28/2020, there is a new small superior endplate Schmorl's node at the L5 level with intravertebral herniation of gas associated with level with intravertebral herniation of gas associated with vacuum phenomenon of the nucleus pulposus. The remainder of the examination is unchanged, with stable underlying degenerative changes of the L4-5 and L5-S1 levels as detailed above.

**** Final Report ***** Dictated: 06/29/2023 1:39 pm Dictated by: KIM MD, PAUL E

Signed by: KIM MD, PAUL E Electronic Signature: 06/29/23 1:39 pm

Disclaimer: This document was generated using voice recognition system, which may produce sporadic inaccurate transcription or nonsensical phrases.

Patient: MANIER, FELICIA R

CITY OF R

2023 NOV 27 AMII: 24

Procedure XR Wrist Complete 267-XR-23-046020 Right

Accession

Ordering LEFEBVRE MD. RACHEL

Date of Examination 5/31/2023 ESIJA POT Auth (Verified) CITY CLERK

Reason For Exam (XR Wrist Complete Right) fall

Report 267-XR-23-046020

ACCESSION #: 267-XR-23-046020, 267-XR-23-046019

EXAMINATION:

1. PA, oblique, scaphoid and lateral views of right wrist 2. PA, oblique, scaphoid and lateral views of left wrist

HISTORY: fall

COMPARISON: Bilateral hand radiographs dated 11/9/2015

FINDINGS: Bone mineralization is normal. There is no acute fracture, osseous lesion or dislocation on either side. Joint spaces are within normal limits. Carpal alignment is normal bilaterally.

IMPRESSION:

No acute fracture, dislocation or significant arthritic changes in bilateral wrists.

***** Pinal Report ***** Dictated: 05/31/2023 1:07 pm

Dictated by: PATEL MD, DAKSHESH B

Blectronic Signature: 05/31/23 1:07 pm Signed by: PATEL ND, DAKSHESH B

Disclaimer: This document was generated using voice recognition system, which may produce sporadic inaccurate transcription or nonsensical phrases.

PROOF OF SERVICE CITY OF RIALTO 1 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES 2 I am employed in the County of Los Angeles, State of California. I am over the age of 18 3 and not a party to the within action; my business address is 714 W. Olympic Blvd., Suite 300, Los Angeles, California 90015. 4 On November 22, 2023, I served the following documents described as: 5 CITY OF RIALTO LIABILITY CLAIM FOR DAMAGES TO PERSON OR PROPERTY 6 by placing the original thereof enclosed in sealed envelope, addressed as follows: 7 Rialto City Clerk's Office 8 150 S Palm Ave Rialto, CA 92376 9 10 BY FIRST CLASS MAIL: I deposited the above-referenced document(s) in a sealed XXenvelope in a United Stated Postal Service Mailbox regularly maintained by the 11 government of the United States for first class delivery, postage fully paid at Los Angeles, California. 12 13 BY PERSONAL DELIVERY: I delivered the above-mentioned documents and 14 personally handed them to the party indicated above or to a representative authorized or associated on behalf of the person or entity described above. 15 16 I declare under penalty of perjury under the laws of the State of California that the foregoing is 17 true and correct. 18 Executed on November 22, 2023, at Los Angeles, California. 19 20 21

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FIRMLY TO SEAL



PRESS FIRMLY TO SEAL

FLAT RATE ENVELOPE POSTAGE REQUIRED

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Rialto City Clerk's Office

SHP 10:0

CLERK

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150 S Palm Ave

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11/13/2023

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Jacob Emrani

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oes not cover certain items. For details regarding claims exclusions see the ail Manual at http://pe.usps.com ational Mail Manual at http://pe.usps.com for availability and limitations of coverage.

RATE ENVELOPE

■ ANY WEIGHT Щ INSURED SKED_



OD: 12 1/2 x 9 1/2 EP14F July 2022

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