

November 3, 2025

TO: City of Imperial

ATTENTION:

RE: Claim : ██████████ vs. Imperial
Claimant : ██████████ a minor
Member : City of Imperial
Date Rec'd by Mbr : 10/31/25
Date of Event : 5/21/25
CW File Number : CJP-3055279 ASV

Please allow this correspondence to acknowledge receipt of the captioned claim. Please take the following action:

- **CLAIM REJECTION: Send a standard rejection letter to the claimant.**

Please include a Proof of Mailing with your rejection notice to the claimant. An exemplar copy of a Proof of Mailing is attached. Please provide us with a copy of the Notice of Rejection and copy of the Proof of Mailing. If you have any questions feel free to contact the assigned adjuster or the undersigned claims specialist.

Very Truly Yours,

CARL WARREN & CO.

Timothy M. Varon

Timothy M. Varon
Claims Supervisor



Jurewitz
Law Group



October 27, 2025

Via United States Postal Service

Certified Mail

City of Imperial
420 So. Imperial Avenue
Imperial, California 92251

Re: Our Client: [REDACTED]
Date of Incident: May 21, 2025
Location: Imperial High School
517 W Barioni Blvd.

To Whom This May Concern:

As previously mentioned, this office represents [REDACTED] for personal injuries incurred as a result of the above-mentioned incident.

Enclosed herewith please find a completed Claim for Damages or Injury form as well as our previous letter of representation that was previously provided to the Imperial Unified School District.

If you have any questions or would like to discuss this matter further, please contact me directly at eddie@jurewitz.com to provide this information, or call me at (619) 546-9020.

Please direct any communications and correspondence concerning our client's bodily injury claim to our office only. Do not attempt to contact our client. Thank you for your prompt attention to this matter.

Sincerely,

Eddie Garcia
Attorney
Direct: (619) 546-9020
Email: eddie@jurewitz.com

Enclosure: Claim for Damages to Person or Property
Letter of Representation

CLAIM FOR DAMAGE OR INJURY AGAINST THE CITY OF IMPERIAL, CALIFORNIA

Claims for death, injury to person, or to personal property must be filed not later than six months after the occurrence. (Gov. Code, Sec. 911.2)

Claims for damages to real property must be filed not later than 1 year after the occurrence. (Gov. Code, Sec. 911.2)

TO: City of Imperial
420 So. Imperial Ave.
Imperial, CA 92251

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	17
Name of Claimant	Address	Zip	Phone	Age

600 B Street Suite 1450, San Diego, CA 92101

Address to which Claimant wishes notices sent

WHEN did damage or injury occur? May 21, 2025

WHERE did damage or injury occur? Imperial High School

HOW and under what circumstances did damage or injury occur? [REDACTED] was participating in a wedding class through her high school.
As [REDACTED] participated in the wedding class, her pants caught on fire resulting in severe burns to both of her legs.

WHAT particular action by the City, or its employees, caused the alleged damage or injury? (Include Names of Employees, if known)

[REDACTED] alleges negligent supervisor, failure to provide adequate protective gear and inadequate policies/procedures to prevent any incidents, and inadequate policies and procedures when an incident occurs.

WHAT sum do you claim? Include the estimated amount of any prospective loss, insofar as it may be known at the time of the presentation of this claim, together with the basis of computation of the amount claimed: (Attach estimates or bills, if possible)

\$ _____
\$ _____
\$ _____

Total Amount Claimed \$ 3,000,000.00

NAMES and addresses of witnesses, Doctors and Hospitals:

Pioneers Memorial Hospital, UC San Diego Medical Center

Witness: Classmates [REDACTED]

Signature of Claimant: [Signature]

10/23/2025

Date



Jurewitz
Law Group



June 17, 2025

Via USPS, Facsimile (760) 355-4511 and Email (bfimbres@imperialusd.org), (rruvalcaba@imperialusd.org), (bthomason@imperialusd.org)

Imperial Valley Union District
219 North E Street
Imperial, CA 92251

Imperial Valley Union High School
517 W Barioni Boulevard
Imperial, CA 92251

Re: Our Client: [REDACTED]
Date of Incident: May 21, 2025
Your Party: Imperial Valley Union High School District

Dear Sir or Madam:

Please be advised that this office represents [REDACTED] for personal injuries, incurred as a result of the above referenced accident against your insured. Please direct any communications and correspondence concerning our client's bodily injury claim to our office only.

Please also be advised this letter is intended solely to put your office on notice of our representation of [REDACTED]. This letter of representation does not constitute a government claim, which would trigger any statutory deadlines or limitations, should one be applicable in this case. If a government claim is to be pursued, we will send such a claim separately.

Pursuant to §2695.7(b) of the Standards for Prompt Fair and Equitable Settlements, upon receiving proof of claim, every insurer shall immediately, but in no event more than forty (40) calendar days later, accept or deny the claim in whole or in part, and affirm or deny liability.

Please be further advised that our client is currently seeking medical treatment for injuries sustained in this accident. It is hoped, of course, that our client will respond well to treatment.

Please refrain from contacting our client regarding this incident and refer all documents and correspondence to our office. We do not permit telephone statements unless you are willing to reciprocate and allow us to take a statement of your insured. We do not permit our clients to sign blanket authorizations. However, we may consider a limited records authorization at the conclusion of treatment. We will keep you updated of bills and records as they are received in our office. When our client(s) has made a satisfactory recovery, we will provide your office with a letter of demand with supporting evidentiary enclosures.

Further, this letter is to serve as formal notice that you, as a potential defendant to a civil action, are to *preserve all evidence and documents* as defined by California Evidence Code § 250 related to the above referenced accident, including, but not limited to, witness statements, accident reports, phone records, video recordings, photographs, witness information, communications, or any other record created, regardless of the manner in which the record has been stored, related to this accident.

At this time, pertaining to the accident [REDACTED] was involved in on May 21, 2025, we are requesting copies of any/all the following:

- *Incident/accident reports*
- *Surveillance/video footage*
- *Witnesses to the incident*

Regardless, if negligent or intentional, any altering, changing, modification, tampering, destruction, or loss of this property may subject you and any other wrongdoers to a lawsuit for damages and punitive damages. In addition to any civil liabilities, California Penal Code § 135 makes it a misdemeanor to willfully destroy evidence. Last, spoliation of evidence or failure to provide evidence which you control in this matter may be subject to a jury instruction to construe the absence of evidence against you. See CACI 203 and 204.

All payments made to any individual or entity regarding this accident, including, but not limited to, bodily injury or med pay, must bear our name as co-payee as we do maintain a lien on this claim. This does not apply to property damage.

This is also a formal request for immediate written disclosure of your insured's policy limits. Please submit in writing your insured's policy limits to our office immediately upon availability.

Enclosed with this letter please find a copy of a signed Designee Authorization authorizing this office to act as counsel in this matter.

Thank you for your prompt attention to this matter.

Sincerely,



Eddie Garcia
Attorney
Direct: (619) 546-9020
Email: eddie@jurewitz.com