

Memorandum

To: Claims Committee
From: Risk Management
Date: February 25, 2025
Re: Christopher Foster v. Polk County Board of County Commissioners

Claim Description: This claim stems from a motor vehicle accident on August 8, 2019, wherein a Building Division vehicle made impact with a water truck occupied by Christopher Foster. This occurred in a new subdivision which was under construction at the time. The water truck was stopped as our vehicle attempted to pass and made impact.



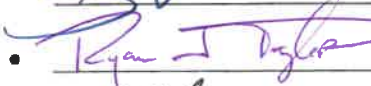
Bodily Injury: Mr. Foster reported to the hospital the following day with neck and back injuries. He treated conservatively and underwent an MRI which revealed significant degenerative changes in both his cervical and lumbar spine. After completing conservative treatment of injections and physical therapy he ultimately underwent a lumbar fusion surgery.

We received a favorable CME opinion which attributes a significant amount of his problems to chronic, degenerative issues in his spine. However, Mr. Foster denies any prior injuries or treatment to his neck and back and we've been unable to discover any evidence of such.

His medical charges related to treatment are \$176,679. There is a workers' compensation lien of \$10,123. He was out of work for approximately 6 months and is also presenting a wage loss claim.

Request: We are requesting \$100,000.00 to settle this claim. Mr. Foster and his attorney Andrew Odza with Demand The Limits, PLLC, agree to settle this claim in exchange for a full release.

SETTLEMENT REQUEST: \$100,000.00

-  Commissioner
-  County Attorney
-  Deputy County Manager
-  Director Risk Management
-  Clerk of Courts