



J. RANDOLPH PICKETT  
R. BRENDAN DUMMIGAN  
KIMBERLY O. WEINGART  
CHRISTOPHER A. LARSEN

DEENA D. SAJITHARAN  
KYLE T. SHARP  
RACHEL M. JENNINGS  
SAMANTHA N. STANFILL

January 23, 2024

2023-014670-20

***Via Hand Delivery  
& Electronic Mail***

City of Portland  
Risk Management/Liability  
1120 S.W. 5<sup>th</sup> Ave., Suite 1040  
Portland, Oregon 97204-1912  
[LiabilityClaims@portlandoregon.gov](mailto:LiabilityClaims@portlandoregon.gov)

Re: *Summer Scott-Moncrieff v. City of Portland*  
Date of Incident: July 28, 2023  
**ORS 30.275 TORT CLAIM NOTICE**

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Dear Mr. Read:

This office has been retained by Summer Scott-Moncrieff, with respect to bodily injuries to her right arm and shoulder that she suffered on July 28, 2023, when a bus driver closed the doors on Ms. Scott-Moncrieff's arm while she was attempting to board a shuttle, upon information and belief, operated by SP Plus Corporation dba SP+, at Portland International Airport located at 7000 NE Airport Way, in the city of Portland, county of Multnomah, state of Oregon. Ms. Scott-Moncrieff was an employee of American Airlines at the time, taking the shuttle bus from the PDX Employee Parking Lot.

Formal notice of this claim is hereby given pursuant to the provisions of ORS 30.275. Ms. Scott-Moncrieff is making a claim for damages against the City of Portland ("CITY OF PORTLAND") for its negligence in failing to ensure that its agents, employees, and subcontracted entities remain alert and attentive when shuttle passengers are boarding the vehicle and in failing to ensure reasonable and safe means for individuals to board shuttles arriving at the platform. The City of Portland's negligence includes, but is not limited to, its failure to promulgate safe practices and procedures with respect to boarding passengers on shuttle buses and departing from shuttle stations with all passengers confirmed safe on board with shuttle doors closed safely. The City of Portland further failed to train and supervise its agents, employees, and subcontracted entities in such a way to ensure the systemic use of aforementioned safety rules and procedures.

Notice of this claim against the City of Portland is being provided within 180 days of the time that Ms. Scott-Moncrieff knew, or in the exercise of reasonable care, should have known, of the facts giving rise to her claim against the City of Portland.

Additionally, this letter shall serve as a formal request to the City of Portland to preserve and not destroy any and all evidence relating to the above-described incident or injuries, including, but not limited to, incident reports, witness statements and other investigative materials, all photographs or video footage relating to Ms. Scott-Moncrieff's injury incident of July 28, 2023, as well as any video of other routes run by the shuttle bus operator during her entire shift of that date.

210 SW MORRISON ST, SUITE 400 | PORTLAND, OREGON 97204  
TEL: 503.223.7770 | FAX: 503.227.2530 | PDW.LEGAL

PICKETT DUMMIGAN WEINGART LLP

City of Portland  
January 23, 2024  
Page | 2

All correspondence regarding this claim should be forwarded to this office at the address indicated on this letterhead. We would appreciate written confirmation of receipt of this notice of claim and request to preserve evidence. Please forward a copy of this letter to any applicable insurance carrier. If you have information about other persons or entities potentially liable for causing Ms. Scott-Moncrieff's injuries, we will appreciate you sharing that information with us.

This letter hereby constitutes formal notice that all appropriate legal claims for damages will be asserted against the City of Portland, with such notice being required by ORS 30.275. If this notice is in any way deficient, or received by the wrong City of Portland employee, please *immediately* advise of the perceived defect or the identity of the correct employee, legal counsel, or risk management officer to whom this communication should be sent.

If you have any questions about the above, or if you think additional information should be provided as part of the Oregon Tort Claims Act notice, please feel free to contact the undersigned by telephone or email.

Thank you for your attention to this matter.

Very truly yours,

  
Samantha N. Stanfill  
Attorney at Law

(503) 223-7770  


cc: Kimberly O. Weingart (*via electronic mail*)