

MATTHEW H. KEHOE

BRADLEY E. SANDS

**KEHOE & SANDS LAW**

330 N.E. LINCOLN, SUITE 200

HILLSBORO, OR 97124

TELEPHONE 503-648-0766

FACSIMILE 503-648-0760



2025000547GL

RECEIVED

MAR 28 2025

CITY OF PORTLAND  
RISK MANAGEMENT

March 24, 2025

City of Portland  
Risk Management  
1120 SW 5th Ave., 10th Floor  
Portland, OR 97204

Re: Joan A. Spina

**TORT CLAIM NOTICE - ORS 30.275**

Dear Sir/Madam:

This letter is to advise you that our office has been asked to pursue a claim on behalf on Joan A. Spina against the city of Portland as a result of a trip and fall over a sign base installed by the City (see the attached photograph) at 2034 NE Sandy in front of the "Mushroom" building at that location. This sign base was from a No Parking sign that was knocked down sometime in September of 2024. You can see, the sign base in the photo and September 2024 is the date of the google photo.

The City was notified immediately and came out and picked up that sign. They did nothing more. The based for the sign was left there in that condition. Thereafter, on March 13, 2025 my client was exiting her vehicle and tripped and fell over that sign base. As a result of this trip and fall, she suffered [REDACTED]. She is homebound now as with a [REDACTED]

**KEHOE & SANDS LAW**

---

Tort Claim Notice/Joan A. Spina

March 24, 2025

Page - 2

Demand is hereby made upon you for payment of damages sustained by Joan A. Spina as the result of her pain and suffering and those certain economic losses for medical expenses, as a result of the negligence of the City in the removal of this sign base following notification of the sign being down. Rather than remove the base, only the broken sign was removed after being notified by the renter at the property. This claim may well exceed the limits under the OTCA and in no even be less than \$100,000 dollars.

You are hereby notified that a lawsuit may be filed against you and/or your employees or agents on behalf of Joan A. Spina. Please address all inquiries to the undersigned. Thank you for your courtesy.

Very truly yours,



Matthew H. Kehoe

Enclosure

MHK:lmk

S:\Vicki\WORK\Spina, Joan\Tort claim Portland 032525.wpd

cc: Joan A. Spina

Google Maps

2032 Sandy Blvd

Portland, Oregon

Google Street View

Sep 2024 See more dates

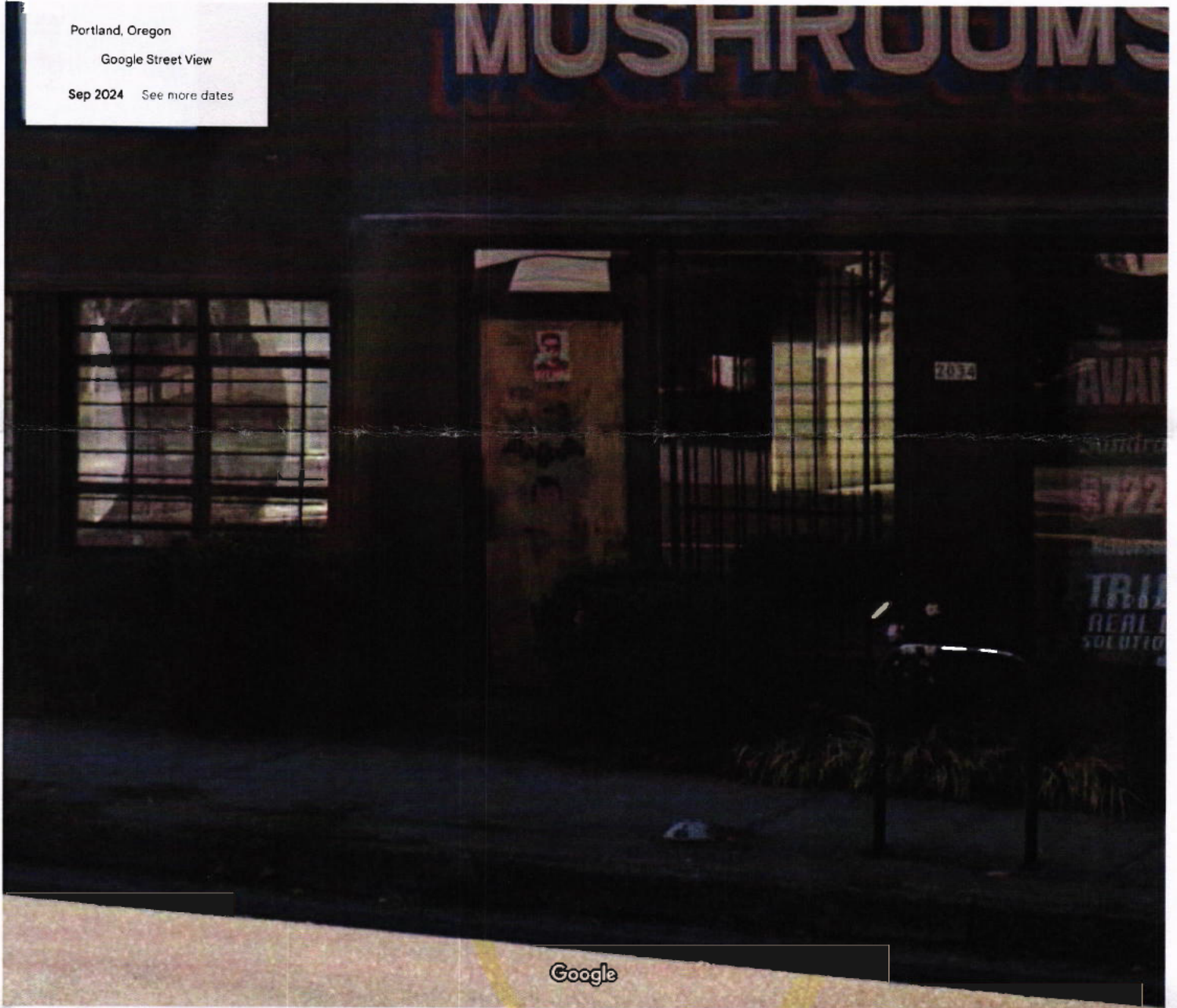
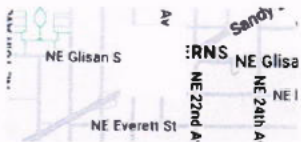


Image capture: Sep 2024 © 2025 Google





**KEHOE & SANDS LAW**  
330 N.E. LINCOLN, SUITE 200  
HILLSBORO, OR 97124

RECEIVED

MAR 28 2025

CITY OF PORTLAND  
RISK MANAGEMENT

PORTLAND OR RPDC 972

25 MAR 2025 PM 4 L



CITY OF PORTLAND  
RISK MANAGEMENT  
1120 SW 5TH AVE., 10TH FLOOR  
PORTLAND, OR 97204



97204-194220

