

SCOTT S. KANG \*  
NATASHA D. COBB \*†  
WILLIAM T. PIPPEL \*

## KANG LAW GROUP

14705 SW Millikan Way  
Beaverton, Oregon 97003

KB PLOP 3000 / 3012 + 3017 ✓

\* Licensed in Oregon  
† Licensed in Washington

2022-012091-22

-----  
Tel: (503) 646 - 3131  
Fax: (503) 626 - 5001

March 17, 2022

### VIA CERTIFIED MAIL

Risk Management/Liability  
1120 SW 5<sup>th</sup> Ave., Suite 1040  
Portland, OR 97204-1912

RECEIVED

MAR 22 2022

CITY OF PORTLAND  
RISK MGMT

RE: Our Client : Jose Alberto Reyes Ventura  
Date of Injury : March 7, 2022

### NOTICE OF REPRESENTATION

AND

### FORMAL TORT CLAIM NOTICE PURSUANT TO ORS 30.275

To Whom It May Concern:

Please be advised that our firm has been retained to represent Jose Alberto Reyes Ventura in a claim for damages and personal injuries suffered on March 7, 2022, when an accident occurred at the intersection of NE Marine Dr. and NE 122<sup>nd</sup> Ave., in or near Portland, Oregon. Jose Alberto Reyes Ventura was driving westbound on NE Marine Dr. when a Portland Police Officer, who gave his name only as Wildo, was driving his patrol vehicle northbound on NE 122<sup>nd</sup> Ave. and pulled forward crashing into the driver's side door of Jose Alberto Reyes Ventura's vehicle.

Prior to the expiration of the statute of limitations, we will sue on our client's behalf against the Portland Police alleging negligence. Further, we may bring an action for breach of oral or implied contract as explained in more detail below.

Please provide our office with copies of any and all materials, documents, photographs, videos, reports, and statements related to the subject motor vehicle crash. The Portland Police and its agents are to maintain possession of all evidence collected. Do not dispose of any evidence. Willful suppression of evidence raises an unfavorable presumption against the party who suppressed it. O.R.S. § 40.135, Rule 311(1)(c); *Stephens v. Bohlman*, 909 P.2d 208, 211 (Or. Ct. App. 1996).

Please correspond only with our office regarding this matter. We look forward to working with you to resolve this matter. Thank you for your anticipated courtesy and cooperation.

Sincerely,  
KANG LAW GROUP

s/Natasha Cobb

Natasha Cobb

Of Attorneys for Mr. Ventura

(503) 410-7536

natasha@kanglaw.net