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November 3, 2023

Via E-Mail & Regular Mail

2023-014413-20

Portland Bureau of Transportation  
Traffic Signals Maintenance  
1120 SW Fifth Avenue  
Suite 1331  
Portland, OR 97204-1912

RE: October 6, 2023 Traffic Crash at Intersection of E Burnside St & NE 162<sup>nd</sup> Ave

Dear Sir/Madam:

We represent Ms. Lisa Pugh with reference to the injuries that she sustained in a traffic crash that occurred at the intersection of E Burnside St & NE 162<sup>nd</sup> Ave on October 6, 2023 at approximately 2:16 in the afternoon. The crash occurred in the intersection. There is a dispute regarding the color of the traffic signal for each of the individuals involved in the crash. We have obtained video footage from Tri-Met that shows the crash. The angle of the footage does not show the color of the traffic signal for *East* bound traffic on Burnside St, but it does show that the traffic signal for *West* bound Burnside St was clearly green prior to the crash occurring.

- All existing documentation in any way relating to the testing of the traffic signals at the described intersection during the period of time beginning six months prior to the crash and through the present.
- Existing documentation reflecting any maintenance pertaining the traffic signals in question, at the described intersection, through the period of time beginning six months prior to the described traffic crash through the present.

Thank you and my email address is: [REDACTED]

Very truly yours,

*Phillip C. Gilbert*

Phillip C. Gilbert

PCG/bms  
23-1054

c: Ms. Lisa L. Pugh