

**THE TOWNSEND LAW FIRM, LLC**50 SW Pine St., Ste. 400  
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December 14, 2023

City of Portland  
Risk Management/Liability  
1120 SW Fifth Avenue, 10th Floor  
Portland, OR 97204-1912**VIA CERTIFIED MAIL****RETURN RECEIPT REQUESTED****VIA EMAIL:** [liabilityclaims@portlandoregon.gov](mailto:liabilityclaims@portlandoregon.gov)**VIA FAX:** 503-823-6120**2022-014532-20**

RE: Claimant: David A. Northcutt on behalf of David W. Northcutt, deceased  
Date of Loss: December 18, 2022  
Location: Intersection of N. Columbia Blvd. and N. Interstate Pl., in Portland,  
Multnomah County, Oregon

**NOTICE OF TORT CLAIM**

To Whom It May Concern:

Pursuant to ORS 30.275, please be advised that this office represents the family of David W. Northcutt in relation to the above reference date of loss wherein David W. Northcutt received fatal injuries from a motor vehicle collision. A claim for damages will be asserted against the City of Portland, officer, employee or agent thereof, for fatal injuries sustained by David W. Northcutt on or about December 18, 2022. Said claims will include, but not be limited to, allegations of negligent design, negligent maintenance as pertains to the crosswalk location, oversight, lighting, signage (alerts), etc. Additionally, a claim for damages (e.g., loss of consortium, et al.) will be asserted in this matter by the children and/or parent of Mr. Northcutt as a result of Mr. Northcutt's fatal injuries. Correspondence concerning this letter and the potential claims herein should be directed to The Townsend Law Firm, LLC at the address listed at the top of this letter. **Please consider this letter the formal tort claim notice as described in ORS 30.275.**

Here are the known facts and circumstances surrounding the above-described fatal motor vehicle collision:

1. At approximately 9:00 p.m. on December 18, 2022, David W. Northcutt was crossing the intersection at N. Columbia Blvd. and N. Interstate Pl., in Portland, Multnomah County, Oregon when he was hit by a 2008 Toyota Prius.
2. The 2008 Toyota Prius was being operated by Maylin Celeste Tellez Chino, who was traveling east on N. Columbia Blvd., in Portland, Multnomah County, Oregon.
3. Ms. Tellez Chino's vehicle struck Mr. Northcutt, causing fatal injuries. Ms. Tellez Chino pulled over to the side of the road and emergency personnel were called.

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4. Mr. Northcutt was pronounced deceased at the scene.
5. Ms. Tellez Chino possessed an Oregon Instruction Permit at the time of the subject incident, requiring there to be an occupant seated beside her who was 21 years or older when she was operating a vehicle. Ms. Tellez Chino was the driver and sole occupant of the 2008 Toyota Prius that struck Mr. Northcutt.

The investigation into the claims surrounding this case is ongoing. If you require additional information, please contact my office. Thank you.

Sincerely,



BLAIR TOWNSEND  
Attorney at Law

SBT:ck  
cc: client