

LAW OFFICES OF JON FRIEDMAN, LLC

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November 13, 2024

NOTICE OF TORT CLAIM  
Pursuant to ORS 30.275

*Via Regular US Mail and Email and Fax Where Applicable*

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

Email: Patrick.hughes@portlandoregon.gov  
Liabilityclaims@portlandoregon.gov  
Jessica.bird@portlandoregon.gov

Re: My Client: Paige Rodriguez  
Date of Injury: July 28, 2024  
Location of Injury: Skidmore Fountain

Dear Risk Management:

I represent Paige Rodriguez in connection with injuries she sustained on July 28, 2024 at approximately 3:20pm at the Skidmore Fountain located in downtown Portland between 1st and 2nd Ave.

On July 28, 2024 around 3:20pm Ms. Rodriguez was walking through the Saturday Market. It was a pleasant summer day. As Ms. Rodriguez walked east from SW 2nd Ave. towards SW 1st Ave. she tripped on one of the rocks protruding from the ground surrounding Skidmore Fountain. Ms. Rodriguez fell to the ground and [REDACTED] an immediate [REDACTED]. She was transported to the hospital, where she was diagnosed with a [REDACTED] and [REDACTED] [REDACTED] all caused by her fall.

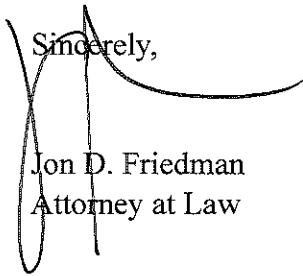
As the party responsible for maintaining a safe premises at or near Skidmore Fountain, Portland Parks & Recreation has a duty to make the premises safe for people in the area, such as Ms.

Rodriguez. Because Portland Parks & Recreation has failed to do so, a claim for damages is asserted against Portland Parks & Recreation. We claim any damages to which Ms. Rodriguez may be entitled under the Oregon State Tort Claims Act or otherwise. The injury to Ms. Rodriguez was caused by the negligence of Portland Parks & Recreation in failing to make the area safe.

Correspondence concerning the claim may be sent to Jon Friedman, of attorneys for Ms. Rodriguez, 811 SW Naito Pkwy Set 610, Portland, OR 97204.

This notice of claim is provided pursuant to Oregon Statutes and a claim will be brought which will include claims for past and future medical bills, past and future pain and suffering, disability, and interference with the activities of daily life.

Sincerely,



Jon D. Friedman  
Attorney at Law