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CITY OF PORTLAND
RISK MANAGEMENT
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January 23, 2025

Via Certified Mail

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Portland, OR 97204

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Director of Parks & Recreation
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Portland, OR 97204

Heidi Rahn
Oregon Zoo
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Metro Parks and Nature Director
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Caroline E. K. MacLaren
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600 NE Grand Avenue
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TORT CLAIM NOTICE

To Whom It May Concern:

This office represents Jeremiah Wright regarding injuries he suffered when he tripped and fell over a planter with an exposed and protruding tree stump in the Portland Zoo parking lot at around 6:30 pm on January 1, 2025, in Portland, Oregon. The planter was unmarked and insufficiently lit in the middle of a pedestrian walkway. I have attached photographs of the planter and tree stump. Mr. Wright suffered a significant injuries, specifically a [REDACTED] which required [REDACTED] surgery. In addition, Mr. Wright will miss months of work while his arm heals.

You are hereby notified pursuant to ORS 30.275 that Mr. Wright intends to assert claims against the City and Metro, along with their agents, employees or representatives along with any other government entity that owns or controls the parking lot arising from the events and injuries set forth above. We understand that Mr. Wright has already communicated with Zoo Public Safety Officer Kevin Heikilla and Erin Bird of Explore Washington Parks about this incident.

Please direct any inquiries about this incident to this office using the contact information set forth herein. We look forward to your confirmation of receipt of this letter.

Best regards,

LEE RANA ATTORNEYS

/s/ *Ryan Lee*

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RML/mcg
Enclosures (photographs 2)



