

# ZBINDEN & CURTIS<sup>DF TRMN</sup>

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ADMITTED IN OREGON &  
WASHINGTON

March 13, 2025

**VIA CERTIFIED MAIL ONLY**

**Article No.: 9589071052702389945399**

**Tracking No.: 9590940282283030510387**

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

RE: Our Clients : Ervin Jackson  
Location : Sidewalk adjacent 237 NE Broadway St.,  
Portland OR 97232.  
Date of Loss : January 16, 2025

RECEIVED  
MAR 17 2025  
CITY OF PORTLAND  
RISK MANAGEMENT

**NOTICE OF TORT CLAIM PURSUANT TO ORS 30.275**

Dear Risk Management,

Formal Notice of Claim is hereby given of the claims for damages that will be asserted by Ervin Jackson against the City of Portland and their employees and agents.

These claims arise from an event which took place on or about January 16, 2025.

The facts giving rise to the claims for damages are as follows:

This office has been retained to represent Ervin Jackson, in connection with injuries he sustained while walking in on the sidewalk adjacent 237 NE Broadway St., Portland, OR 97232.

On January 16, 2025, Mr. Jackson was walking on the sidewalk adjacent to 237 NE Broadway St., Portland, OR 97232. Ms. Jackson was caused to trip and fall due to an uneven sidewalk panel causing him injuries to his [REDACTED]

My client will be seeking non-economic damages for physical and emotional injuries and is as yet an undetermined amount. In addition, my client will be seeking economic damages for an undetermined amount.

**PORTLAND OFFICE:**  
817 NE Broadway  
Portland, OR 97232  
Phone: (503) 287-5000  
Fax: (503) 223-6118

**Please send all mail and faxes to  
the Portland Office at:**  
P.O. Box 12169  
Portland, OR 97212  
Fax: (503) 223-6118

**WOODBURN OFFICE:**  
1385 Mount Hood Avenue  
Woodburn, OR 97071  
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**[www.zbinden-curtis.com](http://www.zbinden-curtis.com)**

March 13, 2025

Page 2

In addition, this letter shall also serve as a formal request to collect and preserve all photographs, video and/or digital recordings of both prior to and following Mr. Jackson's injury; a list of all witnesses, including pertinent contact information to the event and all reports, notes, memorandums and emails related to this event.

I am directing this letter to you as the City of Portland Risk Management. I trust if you are not the proper person to receive this notice and letter, you will let me know as soon as possible.

Please direct all future communications regarding this claim to the undersigned.

Very truly yours,

*/s/ George G. Curtis*

George G. Curtis

GGC:mjb

Cc: client

