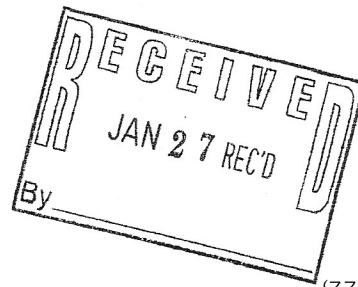


JOHN A. VINCENZI  
ATTORNEY AT LAW  
305 LAWRENCE STREET  
MARIETTA, GEORGIA 30060

FACSIMILE  
(770) 792-3113



TELEPHONE  
(770) 792-3110

January 21, 2015

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mayor of Griffin, Georgia and  
Chairperson, City Commission, Doug Hollberg  
100 South Hill Street  
Griffin, GA 30223

Re: My Client: Charlis Bohannon  
Date of Accident: 8/12/2014

Dear Mayor and Mr. Hollberg:

Please accept this letter as notification pursuant to O.C.G.A. § 36-33-5 that I represent Charlis Bohannon for injuries she received when she fell as a result of a defect in the parking lot owned and maintained by the City of Griffin located behind her apartment building.

Ms. Bohannon's apartment is Apartment A at 134 North Hill Street in the city of Griffin near its intersection at Broad Street. The parking lot is bordered by Broad Street. The incident occurred just prior to 7:30 a.m. My client was taking her grandson to school and she had to walk to her car which was parked in the parking lot. There was an indentation and/or a hole in the pavement that was caused by wear and tear on the parking lot from age as well as heavy city garbage pickup trucks driving on the lot. Ms. Bohannon's foot caught or became lodged in the hole causing her to fall in a face-downward direction where she struck her head and injured the right side of her body. The hole was located near the position of the garbage containers where they were placed at that time. Since the date of her injury, the garbage containers have been relocated elsewhere on the lot. Ms. Bohannon reported the incident to the City of Griffin and an employee of the City called her to discuss the incident and promised to call her back, but failed to do so.

We contend the City is liable for Ms. Bohannon's injuries as the hole in the parking lot constitutes a sidewalk/street defect under the above referenced code. The City had previous reports of the condition of the parking lot, and the hole had existed for such time that the City knew or should have known through the exercise of reasonable care that the hole existed, because the parking area was subject to excessive wear and tear because of the garbage trucks servicing the garbage containers. The hole could have been patched as there are several other holes that are on the same parking lot that are larger.

COPY  
✓ DREW  
✓ G POOLE  
1-27-15  
Law

### **INJURIES TO CHARLIS BOHANNON**

When Ms. Bohannon's head slammed into the pavement, she became mentally confused. Her right forehead area was gashed and she had pain predominately in the right side of her body including her right leg. Her right leg hurt so much she could barely move it, and she had to wait 15 to 20 minutes before she was able to be helped up. Ms. Bohannon had to return to her apartment and lay down on her bed hoping she would recover. The next morning she felt much worse and she went to Spalding Regional Medical Center for treatment. She has been treated by her PCP, Dwayne Watkins, M.D. Dr. Watkins has recommended that she be seen by a neurologist. Unfortunately, obtaining an appointment was difficult because of problems in her insurance coverage so that she had to switch coverage in order to obtain one. She had her first visit on January 20, 2015 and numerous tests are being scheduled. At the present time, I have none of her medical records and it is difficult to state exactly what problems she has. I can tell you she is having trouble with her ability to concentrate, memory problems and dizziness. She says that she has been falling out of her bed at night needing her son to help her back to bed. She has been unable to work because she has been so sick. She is having problems with the feeling in both of her hands as she is dropping things which may suggest that she has a neck injury interfering with the nerves innervating her hands and arms. Not having the hospital records, I believe she has suffered some kind of brain injury and the pain in her legs, particularly in the right, is numbness which would indicate a problem with her lower back. She has had neck and back surgery a number of years before, but the current injuries are new. These problems have apparently been managed by her pain physician, Deshawn Pakira, M.D., whom she had been seeing prior to the accident for arthritis she was suffering in both knees. Since her injuries are ongoing, we reserve the right to supplement this letter as we learn the specifics of her injuries

### **MEDICAL AND HOSPITAL EXPENSES**

Enclosed you will find an itemized list of medical expenses as an attachment totaling \$26,097. My client returned to Spalding Regional. There are additional dates because of complications that arose from her head injury and those related injuries gave her problems. We reserve the right to add the additional expenses incurred with Dr. Dwayne Watkins and Dr. Deshawn Pakira as well as the neurologist that she is seeing whose name is Dr. Wang. My client has not received any of these additional bills but she knows there are charges which we will obtain from the physicians.

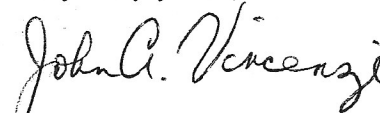
Mayor of Griffin, Georgia and  
Chairperson, City Commission, Doug Hollberg  
January 21, 2015  
Page 3

**SETTLEMENT DEMAND**

It is difficult to evaluate this case at this point. There are several injuries which she might have from the description of problems that have been presented such as a neck or back injury or a brain injury. Since her neurological treatment has been delayed and her injuries are continuing, we will have to await medical records and further testing to provide additional information. Because of unique requirements of Georgia law, I must demand an amount that assumes my client in fact has a brain injury, neck injury and back injury caused by the incident. At the present time, we will settle Ms. Bohannon's claim for \$1,000,000. Of course this amount will be lowered accordingly, if I determine the absence of one or more injuries such as a brain injury or injuries to the neck or back.

Please notify your insurer of this claim and have them contact me for further information.

Very truly yours,

  
John A. Vincenzi

JAV:drm

Enclosure

# Bohannon, Charlis

DOL: 8/12/14

Updated: January 21, 2015 (3:43PM)

## Medical Expenses

<i>DATE</i>	<i>PROVIDER</i>	<i>AMOUNT</i>	<i>Ord</i>	<i>Rcd</i>
8/13/14	Spalding Regional Medical Center	\$9597.58		
10/19/14	Spalding Regional Medical Center	\$10,815.00		
11/21/14	Spalding Regional Medical Center	\$1970.00		
12/9/14	Spalding Regional Medical Center	\$3715.00		
	<i>TOTAL:</i>	\$26,097.58		