

## LAW OFFICES OF JOHN C. PRYOR

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David B. Shelby, Esq.  
4942 Single Street  
Cincinnati, Ohio 45202

Re: Reyes v. Miles | Case No. 2025 CV 01254  
April 10, 2026

Dear Attorney Shelby:

You have requested a formal demand for settlement in Reyes v. Miles before trial.

### **Statement of Facts**

As you are aware, this case arises from a vehicle-pedestrian incident on March 15, 2025, at the intersection of 5th Avenue and Jefferson Street in downtown Nashville.

Prior to March 15, 2025, Ms. Reyes was a 26 year-old second-year law student at the University of Cincinnati College of Law. She worked as a law clerk at the Hamilton County Public Defender's Office earning \$16,380 per year and supplemented her income editing legal writings for a UC professor. She was on track for a successful career in public interest law, with strong academic performance, active involvement in student organizations and a demonstrated commitment to a career as a litigator in public law.

On the night in question, Ms. Reyes was walking to her hotel after attending a legal internship networking event nearby. It is our position that she lawfully entered the marked crosswalk when she was struck by a 2022 Toyota Camry driven by your client, Dante Miles.

### **Theory of Liability**

Liability for negligence rests solely with your client. Mr. Miles had a duty to operate his vehicle with reasonable care and yield the right of way to pedestrians within a marked crosswalk. Mr. Miles breached that duty when he failed to maintain proper lookout and by striking Ms. Reyes.

Evidence will show that at the time of the incident, Mr. Miles had just completed a rideshare drop off moments before entering the intersection. Text messages produced in discovery demonstrate Mr. Miles was distracted by this rideshare exchange, impairing his ability to maintain proper lookout.

This collision was not an unavoidable accident but instead a direct and foreseeable result of inattentive driving.

### **Damages**

Ms. Reyes sustained serious and lasting injuries including a fractured pelvis, concussion, and significant trauma to her spine, confirmed by your expert witness and medical records. Her condition ultimately required extensive treatment including orthopedic care, physical therapy and surgery in December 2025. Additionally, Dr. Karim Bhatt, M.D., will opine that Ms. Reyes can reasonably expect to incur additional medical expenses over the next several years as a result of this accident.

According to medical records provided to you in discovery, Ms. Reyes has incurred \$17,114 in medical expenses to date. Additionally she has sustained \$5,360 in lost wages and \$68,456 for pain and suffering. An economic loss evaluation by Dr. Sheppard further estimates a projected \$635,000 loss in future earning capacity. Altogether, these damages total an estimated \$725,960.

### **Valuation of the Case**

Given the severity of Ms. Reyes' injuries, the extensive medical treatment and the permanent impact on her earning capacity and quality of life, the value of this case exceeds \$700,000.

In an effort to resolve this matter without litigation and avoid additional time and money, as a reasonable compromise, Ms. Reyes hereby makes a good faith settlement demand in the amount of \$250,000. This demand reflects a fair and sensible resolution.

We are prepared to proceed to trial if necessary and will seek full compensation for damages at that time; however, we remain open to resolving things amicably.

Please review this offer with your client and provide a response no later than fourteen (14) business days.

Sincerely,

*John C Pryor*

John C. Pryor, Esq.  
*Attorney for Plaintiff Jordan Reyes*

JC:eg