

[Your Name]  
[Your Address]  
[City, State, Zip Code]  
[Phone Number]  
[Email]

[Date]

[Insurance Adjuster/Defense Attorney Name]  
[Company Name]  
[Address]  
[City, State, Zip Code]

Re: Notice of Mediation Settlement Demand

Claimant: [Your Name]  
Insured: [Dog Owner Name]  
Claim Number: [Number]  
Date of Incident: [Date]

Dear [Name],

In preparation for our upcoming mediation on [Date], I am submitting this formal settlement demand. Under [State Statute Number], the owner of a dog is strictly liable for damages suffered by a person bitten by the dog, regardless of the former viciousness of the dog or the owner's knowledge of such viciousness.

### **Summary of Incident**

On [Date], while I was lawfully on the premises/public property at [Location], the insured's dog attacked me without provocation. This incident resulted in the following injuries: [List injuries, e.g., deep puncture wounds, nerve damage, scarring].

### **Strict Liability**

The evidence confirms that the insured owned the dog and that a bite occurred. Under the doctrine of strict liability, the insured is responsible for all resulting medical expenses, lost wages, and pain and suffering. Issues of negligence or "one-free-bite" rules are inapplicable under the law.

### **Damages**

As a direct result of this attack, I have incurred the following damages:

- Medical Expenses to Date: \$[Amount]
- Estimated Future Medical Treatment: \$[Amount]
- Lost Wages: \$[Amount]
- Pain, Suffering, and Emotional Distress: \$[Amount]
- Permanent Disfigurement/Scarring: \$[Amount]

**Settlement Demand**

To resolve this matter and avoid the costs of further litigation, I am prepared to settle this claim for the total amount of \$[Total Amount].

This demand is made for mediation purposes only and is subject to the rules of confidentiality regarding settlement negotiations. I look forward to reaching a resolution.

Sincerely,

[Your Signature]

[Your Printed Name]