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PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- The adjuster name, Northbrook Shield's address, the claim number and the policy number and limits are not in the file. They are placeholders, and the firm notes say the adjuster is unknown.
- Totals must be checked against the bills. The medical total of $12,999.35 is the "Grand total charges" line on itemized_bills.pdf p.1. The out-of-pocket total of $165.00 is the sum of three receipts.
- The urgent care note records a 4 cm forearm laceration. Plastic surgery records a 5 cm forearm scar. The letter reports each as written, so confirm there is no discrepancy to explain.
- Workers' compensation (Badgerline Comp Insurance) paid the urgent care and hospital charges and $2,110.60 in wage benefits. The lien amount is not in the file. Confirm how the letter should treat the lien and the paid amounts, and whether it should mention workers' compensation to the carrier at all.
- Lost wages of $3,166.00 come from an employer payroll summary, not from payroll records. Absence is stated as April 7 through April 26, 2026, with release to full duty on April 27, 2026.
- Urgent care records say photos were taken, but no photographs are in the file. None are cited or described, so add them if available.
- No scar revision cost estimate exists, and plastic surgery recommended only "re-evaluation" for revision. Counseling cost is unknown, and the first appointment (June 18, 2026) may not have occurred yet.
- The client's own account of pain, scarring and daily-life effects is not in the file.
- [VERIFY] items: Wisconsin dog owner liability, including any enhanced damages for prior notice and defenses, and Wisconsin workers' compensation lien rules.
- The client is 29, so no minor's settlement language is included.

Lindqvist Moran S.C.
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

[ADD: adjuster name]
Northbrook Shield Insurance Company
[ADD: street address]
[ADD: city, state ZIP]

Re: Our client: Andre L. Whitfield | Your insureds: Craig and Monica Dahl | Claim No. [ADD: claim number] | Date of loss: April 6, 2026 | Dog bite at 615 Thornapple Drive, Ellery Falls, Wisconsin

Dear [ADD: adjuster name]:

Introduction

This firm represents Andre L. Whitfield for the injuries he suffered when a dog attacked him on April 6, 2026, on the front walkway at 615 Thornapple Drive, Ellery Falls, Wisconsin [animal_control_report.pdf p.1]. The dog belongs to your insureds, Craig and Monica Dahl, whom we understand to be covered under a homeowner's policy issued by Northbrook Shield Insurance Company [firm notes]. Please refer to claim number [ADD: claim number] and policy number [ADD: policy number] in your response.

Please direct all further communication about this claim to our office and do not contact Mr. Whitfield directly.

The incident

Mr. Whitfield is a parcel delivery driver for Fenwick Parcel Express. At 11:20 AM on April 6, 2026, he was walking up the front walkway at 615 Thornapple Drive to leave a package on the porch [animal_control_report.pdf p.1]. The side yard gate was open [animal_control_report.pdf p.1]. The Dahls' dog, a male German shepherd mix named "Duke" weighing about 70 pounds, ran from the side yard without barking [animal_control_report.pdf p.1]. The dog bit Mr. Whitfield on the left forearm and then on the right thigh when he turned away [animal_control_report.pdf p.1].

A neighbor, Sylvia Brandt, heard yelling and saw Mr. Whitfield fall backward onto the walk while the dog held his arm [animal_control_report.pdf p.1]. Mrs. Dahl came out and pulled the dog off by its collar [animal_control_report.pdf p.1]. Larchmont County Animal Services investigated under Report No. LCAS-26-0418, and the investigating officer was Rachel Imhoff [animal_control_report.pdf p.1].

Liability

The Animal Services report records the following:

- Mrs. Dahl told the investigating officer: "The gate latch has been broken for a couple weeks. We meant to fix it. Duke doesn't like delivery people." [animal_control_report.pdf p.1]
- On September 12, 2025, the same dog bit a meter reader on the hand at the same address (LCAS-25-0977). The owners received a written warning to keep the dog confined

[animal_control_report.pdf p.1].

- After the April 6, 2026 attack, the owners were cited for dog at large and received a second written warning [animal_control_report.pdf p.1].
- The dog was placed under home quarantine from April 6 through April 16, 2026, and was released healthy [animal_control_report.pdf p.1].

On these records, your insureds had been warned in writing to confine this dog after an earlier bite. They knew the gate latch was broken and left it unrepaired for about two weeks. They also acknowledged that the dog did not like delivery people. The dog then left the yard and attacked a delivery driver on the walkway. [VERIFY: Wisconsin rule on dog owner liability (strict liability, prior knowledge or negligence) and defenses such as provocation or trespass]

Injuries and treatment

Ellery Falls Urgent Care, April 6, 2026. Mr. Whitfield was treated for puncture wounds and a 4 cm laceration on the left forearm and two puncture wounds on the right thigh [medical_records.pdf p.1]. The wounds were irrigated and the laceration was closed loosely with 5 sutures [medical_records.pdf p.1]. He was started on amoxicillin-clavulanate and given a tetanus booster [medical_records.pdf p.1]. Photographs were taken and he was taken off work until recheck [medical_records.pdf p.1]. The provider was Jenna Morrow, PA-C [medical_records.pdf p.1].

St. Brigid Medical Center, April 9 to April 11, 2026. Mr. Whitfield was admitted with spreading redness, swelling and fever from the forearm wound [medical_records.pdf p.1]. The diagnosis was cellulitis of the left forearm with a small abscess [medical_records.pdf p.1]. The sutures were removed, the abscess was drained at bedside, and he received IV antibiotics [medical_records.pdf p.1]. He was discharged on oral antibiotics under Dr. Farah Siddiqui, MD [medical_records.pdf p.1].

Lakeshore Plastic Surgery, May 28, 2026. Dr. Colin Avery, MD, found the healed forearm laceration to be a raised, red scar 5 cm long, with two depressed puncture scars [medical_records.pdf p.1]. The thigh scars were 1 cm each [medical_records.pdf p.1]. Dr. Avery recorded that the scars are likely permanent [medical_records.pdf p.1]. He recommended silicone sheeting and re-evaluation for scar revision of the forearm [medical_records.pdf p.1].

Family Care Associates, June 4, 2026. Mr. Whitfield reported nightmares and anxiety approaching homes with dogs, and Dr. Hannah Kerr, MD, referred him to counseling [medical_records.pdf p.1]. He was released to full duty on April 27, 2026 [medical_records.pdf p.1].

Medical specials

Provider	Dates of service	Amount billed	Source
Ellery Falls Urgent Care	April 6, 2026	$825.60	[itemized_bills.pdf p.1]
St. Brigid Medical Center	April 9 to April 11, 2026	$11,532.75	[itemized_bills.pdf p.1]

Provider	Dates of service	Amount billed	Source
Lakeshore Plastic Surgery	May 28, 2026	$446.00	[itemized_bills.pdf p.1]
Family Care Associates	June 4, 2026	$195.00	[itemized_bills.pdf p.1]

Total (as read from the bills): $12,999.35 [itemized_bills.pdf p.1]

Mr. Whitfield's workers' compensation carrier, Badgerline Comp Insurance, paid the urgent care and hospital charges and issued a lien notice dated May 15, 2026 [itemized_bills.pdf p.1]. Lien amount: [ADD: lien amount]. We will address the lien separately. [VERIFY: Wisconsin rule on workers' compensation lien and its effect on the claimed medical expenses and wage loss]

Future care. Lakeshore Plastic Surgery recommended re-evaluation for scar revision of the forearm but has not yet given a cost estimate [medical_records.pdf p.1; itemized_bills.pdf p.2]. Estimated future medical costs: [ADD: estimated future medical costs]. Mr. Whitfield has also been referred to Lakeview Counseling Center, with a first appointment set for June 18, 2026. The cost is not yet known [itemized_bills.pdf p.1]. Counseling costs: [ADD: counseling costs].

Lost wages and out-of-pocket expenses

Fenwick Parcel Express payroll shows average weekly earnings of $1,108.00 and an absence from April 7, 2026 through April 26, 2026, with wages lost of $3,166.00 [itemized_bills.pdf p.1]. Workers' compensation paid wage benefits of $2,110.60 [itemized_bills.pdf p.1].

Mr. Whitfield's out-of-pocket costs, supported by his receipts, are:

Item	Date	Amount	Source
Wound dressings, gauze and ointment	April 7, 2026 to May 30, 2026	$64.20	[itemized_bills.pdf p.1]
Replacement uniform pants, torn in the attack	April 12, 2026	$42.00	[itemized_bills.pdf p.1]
Mileage to plastic surgery consult, 84 miles	May 28, 2026	$58.80	[itemized_bills.pdf p.1]

Total (as read from the bills): $165.00

Scarring, emotional impact and daily life

Mr. Whitfield is left with a raised, red 5 cm scar and two depressed puncture scars on his left forearm, and two 1 cm scars on his right thigh [medical_records.pdf p.1]. His plastic surgeon has recorded that the scars are likely permanent [medical_records.pdf p.1]. Two months after the attack, he reported nightmares and anxiety when approaching homes with dogs [medical_records.pdf p.1]. [ADD: client's own account of pain, scarring and effect on daily life and work]

Demand

Mr. Whitfield seeks compensation for his medical expenses, lost wages, out-of-pocket costs, future care, permanent scarring, and the physical and emotional effects of this attack. We demand [ADD: demand amount] and a response by [ADD: response deadline].

Sincerely,

Erik J. Lindqvist
Lindqvist Moran S.C.