

Notice to Comply

Survey Date: December 21, 1999



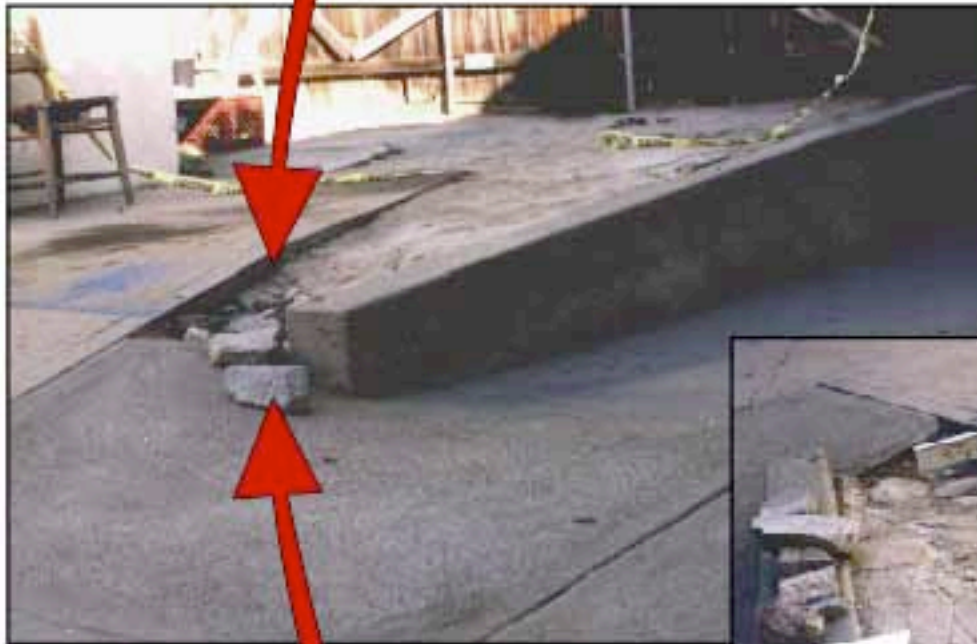
CITY OF LOS ANGELES HOUSING DEPARTMENT CODE ENFORCEMENT UNIT

MAINTENANCE		
<i>repave cracked parking space pavement at rear of #4383</i>	A8	<i>Repair or replace all cracked, damaged, or missing decking, walkway and stairway material. (91.8104.1 L.A.M.C.)</i>

SURVEY DATE:
12/21/99

**Notice to Comply Issued
17 Days Before Accident;
NO REPAIRS MADE**

ACCIDENT DATE:
1/7/00



Thomas Gunzler Report

June 15th, 2000

Reference: Bulosan, Jeremy

* * *

My inspection indicates that a severe pedestrian hazard existed at the time of the reported accident in the form of a pit approximately 22 inches square and ranging in depth between 2 and 3 inches.



[emphasis added]

City of Los Angeles Housing Department

Code Enforcement Unit

Courtesy Notice: October 21, 1999



Owner: Kaufman, Lis B
Job Address: 4381-87 York Blvd

This letter is to request that you call at your convenience between 7:00 a.m. and 9:00 a.m. to set up an appointment for the routine inspection of your apartment units.

The Code Enforcement Inspectors are inspecting for conformance to codes...

* * *

The maintenance of any of the following listed deficiencies or any other Life Safety Issues, will result in the issuance of a Notice to Comply:

1. Lack of proper maintenance...in a building or on it premises...

* * *

IT IS HIGHLY RECOMMENDED THAT YOU PERFORM ANY NECESSARY REPAIRS PRIOR TO THE INSPECTION DAY.

NOTICE DATE:
10/21/99

Courtesy Notice Served
78 Days Before Accident;
NO REPAIRS MADE

ACCIDENT DATE:
1/7/00

Inspection Notice: November 30, 1999



Owner: Kaufman, Lis B
Job Address: 4381-87 York Blvd

THE PROPERTY ADDRESS LISTED ABOVE HAS BEEN SCHEDULED FOR INSPECTION ON 12/21/1999, AT 1:00 p.m. PLEASE MAKE ARRANGEMENTS TO PROVIDE...AN ESCORT (Manager, Owner, or Owner's Representative) FOR THE INSPECTOR.

* * *
These inspectors are inspecting for conformance to codes...

* * *

The maintenance of any of the following listed deficiencies or any other Life Safety Issues, will result in the issuance of a Notice to Comply:

1. Lack of proper maintenance...in a building or on it premises...

* * *

IT IS HIGHLY RECOMMENDED THAT YOU PERFORM ANY NECESSARY REPAIRS PRIOR TO THE INSPECTION DAY.

NOTICE DATE:
11/30/99

Inspection Notice Served
38 Days Before Accident;
NO REPAIRS MADE

ACCIDENT DATE:
1/7/00

City of Los Angeles

Municipal Code – Volume III



Division 81

Existing Buildings and Structures – General Requirements

(Division 81 Amended by Ord. No. 171, 175, Eff. 7/25/96.)

* * *

91.8101.1. Purpose. The purpose of this division is to establish minimum standards to regulate and encourage the proper maintenance, use, repair, rehabilitation, alteration, addition and relocation of existing buildings, structures and premises in order to safeguard life, limb, health, property and public welfare.

* * *

91.8104.1. All physical elements of every existing building, structure or portion thereof shall be maintained by cleaning, painting, staining, refinishing or other restorative means, in a condition as close as reasonably feasible to their originally required and approved state.

Jeremy Bulosan

Neurological Examinations

Dr. Edwin C. Amos – Plaintiff's Doctor

Examination Date: April 6, 2001

...because of the location of the hemorrhage within the substance of the left mid temporal lobe, the neurosurgeon removed functioning and eloquent article brain tissue in addition to the hematoma at the time of operation.

* * *

It is my medical opinion that there has been permanent traumatic brain injury as result of this incident.

* * *

...this child requires ongoing neurocognitive rehabilitation and neuropsychological counseling.

Dr. Andrea Morrison – Defendant's Doctor

Examination Date: June 7, 2001

I have no reason to suspect that he was anything but completely neurologically normal prior to his injury. He suffered a skull fracture and a hemorrhagic contusion in the left temporal lobe, beneath the fracture site.

* * *

I believe that as a result of the traumatic injury, he has suffered a decrease in his cognitive abilities in general.

He demonstrates problems with:

- memory
- ability to focus attention
- visual-motor skills
- easy confusion... dyscalculia
- expressive dysphasia

While he continues to improve, the speed of his neurologic recovery is slowing with time, and I do not believe that he will ever be able to function even close to as well as he would have if he had not sustained head trauma.

Jeremy Bulosan

Damages Summary



Injuries

- Permanent traumatic brain injury
- Left frontal temporal linear skull fracture
- Left occipital linear skull fracture
- Left temporal lobe subdural hematoma
- Left frontal temporal craniotomy for evacuation of hematoma
- Uncal herniation with cranial nerve III paresis
- Shear and contra coup brain injury in the frontal lobe
- Severe brain tissue loss in the mid temporal lobe

Economic Damages

■ Kaiser Permanente	\$	49,947.85
■ California Hospital Medical Center		6,530.50
■ Edwin Amos, MD		3,800.00
■ Parkview Imaging		2,536.00
■ Melanie Lenington, Ph.d		2,375.00
■ Schaefer Ambulance Service		310.25
■ CMCLA Pathology Medical Group		132.00
■ Present Medical Expenses	\$	<u>65,631.60</u>

Residual Damages

- Permanent brain damage
- Significant cognitive impairment
- Severe neurologic impairment and disability
- Decreased visual acuity, double vision and diplopia
- Post traumatic stress disorder
- Problems with memory
- Specific learning disabilities
- Specific language disabilities
- Depression, anxiety and lack of self-esteem
- Likely never to graduate high school (would have graduated college with a four-year degree minimum)
- Likely never to become fully independently functioning
- IQ reduced to 71 (pre-accident IQ range of 90-120)