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COUNTY OF SANTA CRUZ

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GOVERNMENT TORT CLAIM
RECOMMENDED ACTION

Agenda March 23, 1999

ASSISTANTS

To: The Board of Supervisors

Estate of Roxana (Mohsenzadegan) Farr by her husband

Re: Claim of Azad Michael Farr, No. 899-106

Original Document and associated materials are on file at the Clerk to the Board of Supervisors.

In regard to the above-referenced claim, this is to recommend that the Board take the following action:

Estate of Roxana (Mohsenzadegan) Farr
by her husband, Azad Michael Farr,

- x 1. Deny the claim of No. 899-106 and refer to County Counsel.
- 2. Deny the application to file a late claim on behalf of _____ and refer to County Counsel.
- 3. Grant the application to file a late claim on behalf of _____ and refer to County Counsel.
- 4. Approve the claim of _____ in the amount of _____ and reject it as to the balance, if any, and refer to County Counsel.
- 5. Reject the claim of _____ as insufficiently filed and refer to County Counsel.

cc: Not County Jurisdiction

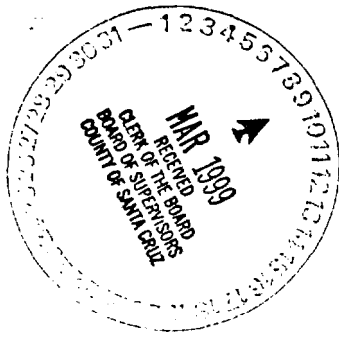
RISK MANAGEMENT

By Janet McKinley

COUNTY COUNSEL

By Elle Lewis

LTR9.WPT



CLAIM AGAINST THE
COUNTY OF SANTA CRUZ

Government Code Section 9 10 to 9 11.2 require
that all claims must be presented to the
Controller within (6) six months from date of accident

CLAIMANT'S NAME: ESTATE OF ROXANA (MOHSENZADEGAN) FARR by her
husband AZAD MICHAEL FARR

AMOUNT OF CLAIM: In excess of the jurisdictional minimum limits of the Superior
Court of the State of California

CLAIMANT'S ADDRESS: 15 146 Sperry Lane, Saratoga, CA 95070

ADDRESS AT WHICH NOTICES ARE TO BE SENT:

PAULA CANNY, Attorney at Law
1800 Trousdale Drive
Burlingame, CA 940 10
(650) 652-7862

DATE OF ACCIDENT: 9/26/98

LOCATION OF ACCIDENT: SR 17 A7 feet North of MPI-SCR-11.34, Alsoknown as
the intersection of SR 17 at Old Santa Cruz Highway.

HOW DID ACCIDENT OCCUR:

Roxana (Mohsenzadegan) Farr was a passenger in a vehicle driven by her husband, Azad Michael Farr. The car that her husband was driving crossed into oncoming traffic and was struck broadside to the passenger side, her side, by another vehicle.

The area of this highway at SR 17 and Old Santa Cruz Highway constitutes a dangerous condition of public property in that the dangerous condition created a substantial risk of the type of injury hereinafter stated as the property was used with due care in a manner that was reasonably foreseeable that it would be so used in that claimant drove his vehicle on the roadway, but that the condition of the roadway was so dangerous that it created a substantial risk that claimant would suffer the injuries as hereinafter described.

Further, on the date of this accident, and prior thereto, the highway was in a dangerous condition that created a substantial risk of the type of injury hereinafter stated when the property was used in the manner was reasonably foreseeable in that claimant would drive his vehicle on that roadway and that the curve in the roadway was and is unsafe if taken at the speed limit and that

there was no warning sign of such fact and such danger would not be reasonably apparent to and would not have been anticipated by a person using due care such that in addition to the dangerous nature of the curve there is a dip in the fast lane which claimant was traveling and there was no warning of that dip in the fast lane and further there was no barrier separating the two flows of traffic such that the dangerous condition and the injuries as hereinafter alleged are foreseeable.

DESCRIBE INJURY OR DAMAGE: Claimant was killed. She was pronounced dead at the scene. Attached hereto is a copy of Roxana (Mohsenzadegan) Farr's death certificate.

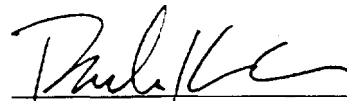
NAME OF PUBLIC EMPLOYEE OR EMPLOYEES CAUSING INJURY OR DAMAGE, IF KNOWN:

Unknown to claimant

ITEMIZATION OF CLAIM:

Claimant is dead. Her husband will be denied the loss of her, consortium, pain, suffering, future earnings, medical bills that were incurred, funeral expenses, all of which are as of yet unknown.

Dated: March 8, 1999



PAULA K. CANNY, Attorney at Law
Attorney for Claimant