

110529

FILE FOR RECORD
SKAMANIA CO. WASH
BY Alyce Dunn

DEC 3 1 45 PM '90

GARY H. OLSON

FORM OF CLAIM FOR DAMAGES

TO THE BOARD OF COUNTY COMMISSIONERS of Skamania County, Washington:

PLEASE TAKE NOTICE that in accordance with Chapter 36.45 of the Revised Code of Washington, I Jelene Rae Randall & James Ryan Randall hereby present you with my claim for damages against the County of Skamania, State of Washington, with the information required to be given by RCW 36.45.020 as follows:

1. That the injury for which I claim damages against the County of Skamania, State of Washington, occurred on or about the 3rd day of August, 1990.

2. That the place of injury was Highway 14 at Drano Lake, Skamania County Washington. Mile post 57 - Site 56-92.

3. That the location and description of the defect which caused the injury are Same as Above (2.)

4. That the injury is described as follows: Fractured Skull, Leg, Knees both legs broken - See attached for detail on injuries.

5. That the amount of damages claimed is as follows: Jelene Rae Randall \$500,000.00
James Ryan Randall \$100,000.00

6. That the actual residence of the claimant at the time of presenting and filing this claim is 580 Highline Road
Hood River, OR 97031

7. That the actual residence of the claimant for a period of six months immediately prior to the time that this claim accrued was 580 Highline Road
Hood River, OR 97031

DATED: 12/3, 1990.

See Notarist Statement with Signature
(Claimant)

NOTE: Personal Property (Car, etc.) damages are to be accompanied by estimated repair costs. Additional information required by No.s 2-4 of this form may be attached on the back of this Claim for Damages.

Registered
Index
Filed
12-4-90
Clifford

NOTICE OF CLAIM
SKAMANIA COUNTY
State of Washington

Date of Loss: 8/3/90

Claimants: Jolene Rae Randall (26 years)
James Ryan Randall (1½ years)

Location: Highway 14 at Drano Lake, Skamania County Washington.
12.3 miles east of Stevenson; Mile post 57 - site 56.98.

Defect: Improper passing zone, highway defect.

Accident Caused By Defect:

Vehicle #3 driven by Mike L. Cannon had just passed Randall vehicle passing with insufficient clearance and again attempted to pass the next vehicle pulling out into left lane heading west and collided head on with on coming east bound vehicle #2 driven by Sue K. (Wilson) Gallatin, which became airborne and collided with Randall vehicle.

This is a Two-way road with 5 tunnels and very bad passing conditions prior to this stretch of the road, which appears to be a straight stretch. But, in fact near the west-end there is slight bend to the right which makes it impossible to see oncoming traffic for a short period of time. Along with the slight bend in the road there is a raised bank railroad directly on one side and a lake directly on the other side. Having driven this road and seen others drive it and talking with many who travel it daily; it is a known fact that everyone familiar and/or unfamiliar with this road thinks is a great place to punch it and pass. IT IS MY CONTINITION THAT THIS SHOULD HAVE BEEN AND SHOULD BE A NO PASSING ZONE HEADING WEST BECAUSE OF THE SLIGHT CURVE TO THE RIGHT MAKING IT IMPOSSIBLE FOR A VEHICLE TO SEE ONCOMING TRAFFIC COMING FROM THE WEST.

Injuries:

Jolene Rae Randall - received a fractured skull, facial laceration above eye, hearing loss right side, smell and taste complete loss, many cuts on left arm leaving scars, shattered right ankle (as of now it is frozen), broken right talus and deep laceration of the right knee joint, left talus pushed up into left knee.

Jolene was life flighted to Emanuel Hospital given 2 units of blood unconscious in the intensive care unit for 1 week, she was in the hospital for 1½ months. She had surgery on her right ankle and left knee, memory loss (still evident), upon coming home from the hospital she was in a wheel-chair for another month and used a walker for 1 month. She now has a frozen ankle causing her much pain and disability. This was a near fatal accident - had it not been for life flight.

James Ryan Randall - received a head injury tests were done because of his age 1½ months it was determined that he had a concussion and a black eye with bruises on left shoulder from infant seat strap. He was released from the hospital within 24 hours, Life flight Emanuel.

Damages Claimed:

Jolene Rae Randall - \$500,000.00
James Ryan Randall - \$100,000.00

Present Residence: Jolene & James Randall
580 Highline Road
Hood River, OR, 97031

For 6 months Prior:
580 Highline Road
Hood River, OR 97031

State of Oregon } ss.
County of Hood River }

Jolene Rae Randall
Jolene Rae Randall

James Ryan Randall By Jolene Rae Randall
James Ryan Randall (Guardian)
before Me: Guardian

Sanford K. Olson

Sanford K. Olson
Notary Public for Oregon
My Commission Expires: 4-23-92

1 MOTOR VEHICLE COLLISION REPORT

813 190 12.3 0.0.0.0 6:15 PM

PLATE NO. 12.3 0.0.0.0 CITY OR TOWN Stevenson ON Hwy 14

VEHICLE NO. 1 (YOUR CAR) VEHICLE NO. 2 (OTHER CAR)

RANDALL, Jolene Rae Wilson, Sue R.

580 Highline Road 1842 E, 184

Hood River, OR 97031 Chesham, WA 8200

OR 10 6/30/64 26 1985 Jeep PK/WC/W

QLX 252 OR 18689AA91911

RANDALL, Jolene R. 5049783 OR

80 Highline Road, Hood River, OR 97031

TOTAL LOSS

LIABILITY INSURANCE INFORMATION VEHICLE NO. 1

Wiking Ins. Co. 31-580443

LIABILITY INSURANCE INFORMATION VEHICLE NO. 2

Continental Ins. Co.

Jolene R. Randall 26 580 Highline R. Hood River, OR

James Ryan Randall 1 580 Highline Road

Head, eye

Vehicle No. 3 (other car)

Driver: Mike L. Cannon

P.O. Box 640

Carson, WA 98610

Vehicle Yr. Make Model Style

1978 Olds Starfire 2 door

Name of Insurance Co.

Safco Insurance Co.

Policy Number

P760488

Driver Vehicle #3

Non-disabling injury minor

MOTORCYCLE SAFETY

Vehicle #3 driven by Mike L. Cannon had just passed Randall vehicle passing into insufficient clearance and attempted to pass the next vehicle before out to left hand and collided with oncoming vehicle #2 driven by Sue R. Wilson which collided with Randall vehicle.

Note: Jolene is in intensive care United Emanuel Hospital, OR (Life Flight)

VEHICLES POSITIONS BEFORE COLLISION

PEDESTRIAN PEDAL CYCLIST WAS USING

PEDESTRIAN PEDAL CYCLIST CLOTHING COLOR

ROAD SURFACE

TRAFFIC CONTROL

ROADWAY CHARACTERISTICS

REASON FOR NOT SEEING DANGER

WITNESS NAME

Daniel J. Stair - Hood River, OR 97031

William Hickman - White Salmon

Office E. Dunn - 580 Highline Road Hood River, OR 8/14/98