



County of Los Angeles

July 23, 2024

Dawyn R. Harrison
County Counsel

Board of Supervisors

Hilda L. Solis
Supervisor, First District

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Supervisor, Second District

Lindsey P. Horvath
Supervisor, Third District

Janice Hahn
Supervisor, Fourth District

Kathryn Barger
Supervisor, Fifth District

TO: EDWARD YEN
Executive Officer
Board of Supervisors

Attention: Agenda Preparation

FROM: ADRIENNE M. BYERS
Litigation Cost Manager

RE: **Item for the Board of Supervisors' Agenda
County Claims Board Recommendation
Natalie Reusch v. County of Los Angeles
Los Angeles Superior Court Case No. 22STCV05287**



Attached is the Agenda entry for the Los Angeles County Claims Board's recommendation regarding the above-referenced matter. Also attached are the Case Summary and Summary Corrective Action Plan to be made available to the public.

It is requested that this recommendation, Case Summary, and Summary Corrective Action Plan be placed on the Board of Supervisors' agenda.

AMB:lzs

Attachments

Board Agenda

MISCELLANEOUS COMMUNICATIONS

Los Angeles County Claims Board's recommendation: Authorize settlement of the matter entitled Natalie Reusch v. County of Los Angeles, Los Angeles Superior Court Case No. 22STCV05287, in the amount of \$150,000, and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Department of Parks and Recreation's budget.

This dangerous condition of public property lawsuit arises from alleged injuries sustained from a slip accident that occurred at Kenneth Hahn State Recreation Park.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Natalie Reusch v. County of Los Angeles
CASE NUMBER	22STCV05287
COURT	Los Angeles Superior Court
DATE FILED	February 10, 2022
COUNTY DEPARTMENT	Parks and Recreation
PROPOSED SETTLEMENT AMOUNT	\$ 150,000
ATTORNEY FOR PLAINTIFF	Natalee Fisher, Esq. Dordulian Law Group
COUNTY COUNSEL ATTORNEY	Christina M. Sprenger, Esq. Lawrence Beach Allen & Choi, PC LaTasha N. Corry Deputy County Counsel
NATURE OF CASE	<p>This case involves a slip accident that occurred at Kenneth Hahn State Recreation Park in Los Angeles on April 10, 2021. Plaintiff slipped while walking down a vehicle access ramp in the parking lot. Plaintiff contends that a dangerous condition existed which caused her to sustain injuries for which she seeks damages.</p> <p>Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.</p>
PAID ATTORNEY FEES, TO DATE	\$ 25,974
PAID COSTS, TO DATE	\$ 2,151



Summary Corrective Action Plan

The intent of this form is to assist departments in writing a corrective action plan summary for attachment to the settlement documents developed for the Board of Supervisors and/or the County of Los Angeles Claims Board. The summary should be a specific overview of the claims/lawsuits' identified root causes and corrective actions (status, time frame, and responsible party). This summary does not replace the Corrective Action Plan form. If there is a question related to confidentiality, please consult County Counsel.

Date of incident/event:	April 10, 2021
Briefly provide a description of the incident/event:	The Plaintiff is a 75-year-old- female who alleges a slip and fall incident occurred while visiting Kenneth Hahn Recreation Area in Culver City on April 10, 2021. She filed a complaint alleging a dangerous condition of public property contributed to her sustaining injuries due to the proximity of the vehicle maintenance ramp to the ADA parking space and its visibility. Plaintiff claims she had to stand on the ramp due to a lack of clearance to re-enter her vehicle which caused her to slip and fall.

1. Briefly describe the root cause(s) of the claim/lawsuit:

- 1) The vehicle maintenance ramp involved in the incident at Kenneth Hahn Recreation Area was too close the blue line delineating the ADA parking space and may cause a safety hazard for anyone exiting or entering their vehicle.
- 2) The vehicle maintenance ramp involved in the incident at Kenneth Hahn Recreation Area was not striped or otherwise marked to warn people of the drop off.

2. Briefly describe recommended corrective actions:
(Include each corrective action, due date, responsible party, and any disciplinary actions if appropriate)

- 1) The vehicle maintenance ramp involved in the subject-incident was removed in May 2023. Construction and Maintenance Team leveled the ramp and made it flush against the surrounding pavement with no more changes in elevation.
- 2) Park staff conducted an inspection of the park in March 2023 to further identify and remove similar vehicle maintenance ramps that may cause a safety hazard. Four vehicle maintenance


ramps were identified (including the subject ramp) and effectively removed by May 2023.

- 3) The Department will direct park facility managers to consult with its Planning and Development Agency (P&D) whenever a vehicle maintenance ramp is required to be installed in the future. P&D staff will be responsible for determining if there are potential impacts to ADA requirements and/or accessibility prior to the installation.
- 4) A training will be developed by Risk Management and P&D to assist facility managers with identifying potential safety hazards related to the installation of vehicle ramps as a mitigation measure for public safety.


3. Are the corrective actions addressing department-wide system issues?

- Yes – The corrective actions address department-wide system issues.
 No – The corrective actions are only applicable to the affected parties.

Name: (Risk Management Coordinator) Devyne Dawson	
Signature: 	Date: 1/23/2024

Name: (Department Head or designee) Alina Bokde	
Signature: 	Date: 2/2/2024

Chief Executive Office Risk Management Inspector General USE ONLY
Are the corrective actions applicable to other departments within the County?
<input checked="" type="checkbox"/> Yes, the corrective actions potentially have County-wide applicability. <input type="checkbox"/> No, the corrective actions are applicable only to this department.

Name: (Risk Management Inspector General) Daniela Prowizor	
Signature:  Daniela Prowizor	Date: 2/23/2024

Digitally signed by Daniela Prowizor
Date: 2024.02.23 15:02:05 -08'00'