



County of Los Angeles

November 4, 2025

Dawyn R. Harrison
County Counsel

Board of Supervisors

Hilda L. Solis
Supervisor, First District

Holly Mitchell
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

A handwritten signature in blue ink, appearing to read 'AMB'.

RE: **Item for the Board of Supervisors' Agenda**
County Claims Board Recommendation
Jimmy Avalos v. LAUSD, et al.
Los Angeles Superior Court Case No. 22STCV00379



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 Jimmy Avalos v. Los Angeles Unified School District, et al., Los Angeles Superior Court Case No. 22STCV00379, in the amount of \$150,000, and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Department of Public Works' budget.

This dangerous condition of public property lawsuit alleges that Plaintiff suffered injuries when he hit a displaced sidewalk panel and fell.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Jimmy Avalos v. Los Angeles Unified School District, et al.
CASE NUMBER	22STCV00379
COURT	Los Angeles Superior Court
DATE FILED	September 15, 2021
COUNTY DEPARTMENT	Department of Public Works
PROPOSED SETTLEMENT AMOUNT	\$ 150,000
ATTORNEY FOR PLAINTIFF	Anthony Werbin, Esq. DOWNTOWN LA LAW GROUP
COUNTY COUNSEL ATTORNEY	Melissa A. McCaverty, Esq. Deputy County Counsel
NATURE OF CASE	On September 15, 2021, Plaintiff was riding his electric skateboard on the sidewalk at 1600 S. Central Avenue, in Los Angeles, California, an unincorporated area of the County, when he hit a displaced sidewalk panel and fell. Plaintiff claims to have suffered injuries and damages from the incident. Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.
PAID ATTORNEY FEES, TO DATE	\$ 65,442
PAID COSTS, TO DATE	\$ 10,123



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:	On September 16, 2021
Briefly provide a description of the incident/event:	On September 16, 2021, Plaintiff was riding an electric skateboard on the sidewalk at or near 6100 South Central Avenue, Los Angeles, CA 90001 when he fell due to an uneven portion of the sidewalk resulting in his physical injuries.

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

Root Causes:

- A. The tree roots at the location in question displaced the sidewalk, creating an uneven surface.
- B. The uneven portion of the sidewalk was left in disrepair after the August 11, 2021, biennial sidewalk inspection.
- C. Our road maintenance crew performing the biennial sidewalk inspection was operating under the understanding that the incident location was outside the jurisdiction of the County and within the City of Los Angeles.
- D. The inspection maps of the City of Los Angeles border appeared to indicate that Central Avenue was outside of the County jurisdiction.

2. Briefly describe recommended corrective actions:

(Include each corrective action, due date, responsible party, and any disciplinary actions if appropriate)

Corrective Actions:

- The tree that displaced the sidewalk was evaluated in July 2020 and again in May 2023 during the Department's regular tree trimming cycle. The tree was evaluated by a certified arborist who determined it to be a healthy tree that did not require removal.
- The sidewalk was repaired and made safe on December 8, 2021, after the Department received notice of a claim.
- On August 19, 2024, an email was sent to Road Maintenance District Engineers about reviewing the Biennial Sidewalk Inspection and Repair Guidelines. A meeting was held on August 21, 2024, to discuss and update these guidelines.
- In December 2021, Road Maintenance Supervisors in Road Division 241 were reminded of the jurisdictional boundary on South Central Avenue between the City of Los Angeles and the County of Los Angeles. This boundary runs along the easterly curb face, and the easterly sidewalk has been included in the biennial sidewalk inspection program.

- On December 7, 2021, sidewalk inspection maps were updated to clarify the boundary line between County and City jurisdictions, confirming that the area in question falls under the County's jurisdiction.

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)
Jacklin E. Injijian

Signature:

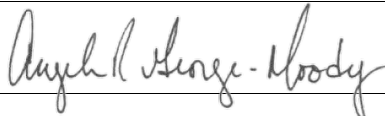


Date:
08/19/2025

Name: (Department Head)

Angela George-Moody, Chief Deputy Director

Signature:



Date:
08/28/2025

Chief Executive Office Risk Management Inspector General USE ONLY

Are the corrective actions applicable to other departments within the County?

- ☐ Yes, the corrective actions potentially have County-wide applicability.
- ☒ No, the corrective actions are applicable only to this department.

Name: (Risk Management Inspector General)
Betty Karmirlian

Signature:



Date:
9/2/2025