

Leandra Colley
Demand Letter Assignment
Due: October 1, 2025

Leandra Colley
85 Park Place NE
Atlanta, GA 30303

October 1, 2025

Economy Super-Mart Claims Department
123 Address Road
Norcross, GA 30003

Re: Mary Milley Injury on January 12, 2026

To whom it may concern:

I represent Mary Milley regarding injuries she sustained in your store located at 123 Address Road, Norcross, GA 30003. On January 12, 2026, on or about 2:00 p.m., Ms. Milley was shopping in the toy aisle when she slipped on water on the floor. She fell and suffered a severe injury to her right leg, which resulted in surgery.

Soon afterwards, Ms. Milley spoke with an employee at the coffee bar inside of this Economy Super-Mart location. It was raining on January 12th, and the employee commented that, throughout the day, she noticed *several* shoppers slip on water tracked in from outside. Despite knowledge about the rain and instances of other slips, Economy Super-Mart failed to protect its shoppers. Ms. Milley immediately reported the incident to the store manager and completed an incident report, then went to urgent care that same day. The bone just above her ankle was broken, which required surgery, visits to her orthopedist, and physical therapy.

Ms. Milley is an asset to her community as an ICU nurse at Northside Hospital. Unfortunately, as a direct consequence of the fall, Ms. Milley was unable to return to work for about two months. Even now, Ms. Milley remains in pain, which complicates her workday. ICU nurses are expected to react quickly, but Ms. Milley's pain slows her down and prevents the successful completion of her work assignments. Ms. Milley typically earns \$35 an hour and works four ten-hour shifts per week, meaning she lost approximately \$7,000 to \$8,000 during the two-month period she could not return to work. Additionally, she incurred medical costs related to urgent care, orthopedic visits, surgery, physical therapy, and rehabilitation.

Georgia law requires store owners to maintain their premises in a reasonably safe condition for customers. By allowing water to remain on the floor despite knowing the risk to shoppers, Economy Super-Mart failed to execute its responsibility. Even if the Economy Super-Mart argues that the coffeeshop employees are not employees of Economy Super-Mart, the argument fails. Economy Super-Mart leased the space to the coffee shop; thus, because the coffee shop is on the Economy Super-Mart premises, Economy Super-Mart is responsible for the injury. Thus, Economy Super-Mart is liable for Ms. Milley's injury.

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Ms. Milley is willing to resolve this matter quickly. To that end, she demands payment in the amount of \$25,000 to cover the cost of her lost wages, medical expenses, pain and suffering, and the ongoing impact on her work and daily life. Payment must be made by check within thirty (30) days of the date of this letter.

Please direct any correspondence regarding this matter to my attention. If I do not receive a response within thirty days, Ms. Milley is prepared to pursue all available legal remedies, including filing a lawsuit.

Sincerely,

Leandra Colley