

1 Richard F.G. Thomas - State Bar No. 89564
2 HODGES & THOMAS, a Partnership of Professional Corporations
3 2200 Pacific Coast Highway, Suite 302
4 Hermosa Beach, California 90254-2702
5 Telephone (310) 318-3366
6 Facsimile (310) 318-6283

7 Attorney for Claimant, Minor A

8 ORIGINAL

2015 JUL 14 PM 4:05
BUSINESS SERVICES

9 CLAIM FOR PERSONAL INJURIES
10 (Government Code, Section 911.2)

11 Minor A, CASE NO.
12 Claimant,
13 vs.
14 TORRANCE UNIFIED SCHOOL DISTRICT,
15 Respondent.
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18 TO TORRANCE UNIFIED SCHOOL DISTRICT:

19 YOU ARE HEREBY NOTIFIED that Minor A, [REDACTED] and through
20 his mother, whose address is c/o Hodges & Thomas, 2200 Pacific Coast Hwy., Suite 302, Hermosa
21 Beach, California 90254, claims damages from TORRANCE UNIFIED SCHOOL DISTRICT in an
22 amount unknown as of the date of presentation of this claim. Since the student in question is a minor
23 and the inappropriate conduct continues to cause suffering and damages to Minor A, neither his name
24 or his mother's name will be specifically included in this claim. Under separate cover the identity of
25 the minor will be provided on the condition that it will remain confidential and the Torrance Unified
26 School District and its agents, employees or representatives will protect the privacy of Minor A and
27 not publicly release his name or identity in any court document or any other written, oral or digital
28 communication to anyone not connected with the investigation or handling of this claim on the behalf

1 of the Torrance Unified School District. This specifically includes any media, whether print, oral,
2 digital or any other manner.

3 This claim is based upon personal injuries, including but not limited to, emotional distress,
4 humiliation and sexual abuse, sustained by Claimant Minor A on or about September 2013 through
5 January 2015, under the following circumstances: When Minor A was a 9th grade student at Torrance
6 High School he joined the boys wrestling team. Thomas Snider was a teacher and the coach of the
7 boys wrestling team and was employed by the Torrance Unified School District.

8 Based upon information recently learned by the parents of Minor A on or about January 26,
9 2015, from at least September 2013 through January 2015, Thomas Snider had repeated and continual
10 inappropriate conduct with minor claimant.

11 Respondent was responsible for the management, maintenance, control and operation of
12 Torrance High School located at 2200 W. Carson St., Torrance, California 90501. Respondent was
13 responsible for the hiring, back ground checks, supervision, management and control of its employees
14 and staff, included but not limited to Thomas Snider, and is vicariously responsible for their
15 negligence and gross negligence which was a legal cause of Claimant's injuries.

16 Respondent's was aware or should have been aware of the fact that Thomas Snider was a
17 danger to students, such as Claimant, and that his actions were reasonably foreseeable as causing
18 injuries and damages to minor students. Respondent's were specifically made aware that a former
19 student of Thomas Snider had accused him of sexual molestation, prior to the 2013st - 2014 school
20 year.

21 The inappropriate actions and conduct of Thomas Snider occurred on school property and
22 included other members of the boys wrestling team.

23 The injuries sustained by Claimant, as far as known, consist of severe emotional distress and
24 other physical and psychological damages.

25 The full extent of said injuries is currently unknown. Claimant's expenses are presently
26 unknown, along with loss of earnings and future loss of earnings in an amount unknown.

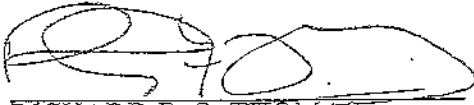
27 The amount claimed as of the date of presentation of the claim is unknown to Claimant at this
28 time but exceeds the sum of \$25,000 therefore it is an unlimited civil case. Estimated prospective

1 | damages are also unknown as of this date.

2 | All notices or other communications with regard to this claim should be sent to Claimant in
3 | care of Richard F. G. Thomas, Hodges & Thomas, 2200 Pacific Coast Highway, Suite 302, Hermosa
4 | Beach, California 90254, telephone number (310) 318-3366.

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DATED: July 8, 2015



RICHARD F. G. THOMAS
Attorney for Claimant

1 PROOF OF SERVICE (C.C.P. §1013(a))

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and
4 not a party to the within action; my business address is 2200 Pacific Coast Highway, Suite 302,
Hermosa Beach, California 90254.

5 On July 9, 2015, I served the following document by placing a true and correct copy
6 thereof enclosed in a sealed envelope addressed to all interested parties as listed below:

7 **DOCUMENT(S):** CLAIM FOR PERSONAL INJURIES - (Government Code, Section 911.2)

8 **PARTIES SERVED:**

9 Donald A. Stabler, ED.D. - Via Certified Mail - Return Receipt Requested
10 Torrance Unified School District
11 2335 Plaza Del Amo
Torrance, CA 90509

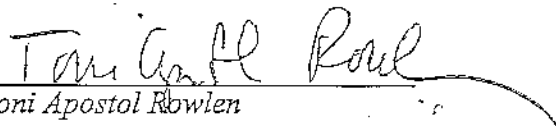
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13 X (BY MAIL) as follows: I am "readily familiar" with the firm's practice of collection and
14 processing correspondence for mailing. Under that practice it would be deposited with the U.S.
15 Postal Service on that same day with postage thereon fully prepaid at Hermosa Beach, California, in
16 the ordinary course of business. I am aware that on motion of the party served, service is presumed
invalid if postal cancellation date or postage meter date is more than one day after the date of deposit
for mailing in affidavit.

17 (VIA FACSIMILE TRANSMISSION) I transmitted such document via facsimile from (310)
18 318-6283 to the offices of the addressee(s).

19 (BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the
addressee(s). (Messenger must sign proof.)

20 X (State) I declare under penalty of perjury under the laws of the State of California that the
21 above is true and correct.

22 Executed on July 9, 2015, at Hermosa Beach, California.

23
24 
25 Toni Apostol Rowlen
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1 Richard F.G. Thomas - State Bar No. 89564
2 HODGES & THOMAS, a Partnership of Professional Corporations
3 2200 Pacific Coast Highway, Suite 302
4 Hermosa Beach, California 90254-2702
5 Telephone (310) 318-3366
6 Facsimile (310) 318-6283

7 Attorney for Claimant, Minor B

8 ORIGINAL

9 CLAIM FOR PERSONAL INJURIES

10 (Government Code, Section 911.2)

11 Minor B,) CASE NO.
12 Claimant,
13 vs.
14 TORRANCE UNIFIED SCHOOL)
15 DISTRICT,)
16 Respondent..)

17
18 TO TORRANCE UNIFIED SCHOOL DISTRICT:

19 YOU ARE HEREBY NOTIFIED that Minor B, [REDACTED] and through his
20 mother, whose address is c/o Hodges & Thomas, 2200 Pacific Coast Hwy., Suite 302, Hermosa
21 Beach, California 90254, claims damages from TORRANCE UNIFIED SCHOOL DISTRICT in an
22 amount unknown as of the date of presentation of this claim. Since the student in question is a minor
23 and the inappropriate conduct continues to cause suffering and damages to Minor B, neither his name
24 or his mother's name will be specifically included in this claim. Under separate cover the identity of
25 the minor will be provided on the condition that it will remain confidential and the Torrance Unified
26 School District and its agents, employees or representatives will protect the privacy of Minor B and
27 not publicly release his name or identity in any court document or any other written, oral or digital
28 communication to anyone not connected with the investigation or handling of this claim on the behalf

QUINCY SERVICE
2015 JUL 14 PM 4:06

1 of the Torrance Unified School District. This specifically includes any media, whether print, oral,
2 digital or any other manner.

3 This claim is based upon personal injuries, including but not limited to, emotional distress,
4 humiliation and sexual abuse, sustained by Claimant Minor B on or about September 2013 through
5 January 2015, under the following circumstances: When Minor B was a 11th grade student at Torrance
6 High School he joined the boys wrestling team. Thomas Snider was a teacher and the coach of the
7 boys wrestling team and was employed by the Torrance Unified School District.

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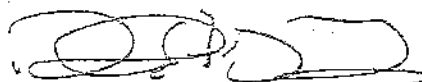
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4 Beach, California 90254, telephone number (310) 318-3366.

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6 DATED: July 8, 2015



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8 RICHARD F. G. THOMAS
Attorney for Claimant

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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

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Toni Apostol Rowlen