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July 24, 2015

Governing Board  
TORRANCE UNIFIED SCHOOL DISTRICT  
2335 Plaza Del Amo  
Torrance, CA 90509

BUSINESS SERVICES  
2015 JUL 27 PM 12:14

RE: Government Code § 910 et. seq. Claim For Damages to Torrance Unified School District

To Whom It May Concern:

Please be advised that The Senators (Ret.) Firm, LLP, and Manly, Stewart & Finaldi represent [REDACTED] and have been authorized to submit this Claim for Damages ("Claim"), pursuant to *Government Code § 910 et. seq.*, to the Torrance Unified School District ("TUSD") on their behalf. In an abundance of caution, we submit both this Claim in letter form, as well as a concurrently submitted Claim using the pre-approved form generated by TUSD. Below, please find the following information, in accordance with *Government Code § 910(a)-(f)*:

The Claimant's name and address is [REDACTED]. However, Claimant desires that any notices associated with this action be delivered to The Senators (Ret.) Firm, LLP, C/O Ronald Labriola, Esq., 19100 Von Karman Ave., Suite 850, Irvine, CA 92612.

Claimant's minor child, [REDACTED] was physically, sexually and emotionally abused by teacher Thomas Joseph Snider while on the wrestling team at Torrance High School. The abuse took on the Torrance High School campus, including without limitation the locker room, gym, and wrestling room. The TUSD, Torrance High School, its agents and employees had knowledge that Snider posed a danger to children in his care and a duty to disclose such information, but failed to disclose such information, thereby resulting in severe emotional distress for claimant when he learned that the child had been abused by Snider and that the District and School failed to warn of the danger.



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Claimant's damage occurred on or about January 28, 2015, when Snider was removed from the school and it was disclosed that he had abused claimant's child. However, the Claimant's damages could be worsened as her child continues to divulge the full extent of the abuse suffered, and details continue to emerge. Claimant's severe emotional distress occurred as a direct result of the actions, or rather, inactions, of the TUSD, Torrance High School and their employees, administrators and agents, in failing to warn claimant of the danger posed by Snider despite knowledge of the risk Snider posed to claimant's child and a duty to disclose said risk.

Thomas Joseph Snider, Karim Girgis, as well as other District and school employees, agents and administrators caused and have knowledge of the injury and damage.

The total dollar amount is in excess of \$10,000.00, and would not qualify as a limited civil case.

If you have any further questions or concerns, please do not hesitate to contact me.

Sincerely,

Ronald T. Labriola, Esq.

THE SENATORS (RET.) FIRM, LLP

## ATTACHMENT A

Claimant's minor child at the time of the abuse, [REDACTED], was physically, sexually and emotionally abused by teacher Thomas Joseph Snider while on the wrestling team at Torrance High School. The Torrance Unified School District ("TUSD"), Torrance High School, its agents and employees had knowledge that Snider posed a danger to children in his care and a duty to disclose such information, but failed to disclose such information, thereby resulting in severe emotional distress for claimant when he learned that the child had been abused by Snider and that the District and School failed to warn of the danger.

Claimant's severe emotional distress occurred as a direct result of the actions, or rather, inactions, of the TUSD, Torrance High School and their employees, administrators and agents, in failing to warn claimant of the danger posed by Snider despite knowledge of the risk Snider posed to claimant's child and a duty to disclose said risk.