FICTIONAL SAMPLE · DRAFTED BY FREE DEMAND WRITER FROM A MADE-UP CASE FILE · NOT LEGAL ADVICE

PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- The combined total of $104,780.40 is my addition of the six paid items ($35,970.40), the $310.00 physician charges and the $68,500.00 remediation estimate. The paid subtotal matches the $35,970.40 stated on the cost summary, but please check all figures against the original invoices.
- The Pinewood Remediation Services proposal was not in the file; only the Northgate report and the cost summary refer to it. The cost summary dates it February 18, 2026. The Northgate report is dated February 20, 2026 and says the proposal is attached. Please review the proposal itself and confirm the $68,500.00 estimate.
- The file does not give the Meridian claim number, policy number, adjuster name, addresses, or the state environmental hotline case number. These are placeholders.
- The sources do not say who owns 60 Alder Hill Road. The fire report says the old fill pipe there was never capped or removed. Please decide whether the property owner should be named or put on notice, since the letter relies on Harborline's delivery conduct only.
- Medical records cover only Priya Dhawan and Arjun Dhawan (age 7). There is none for Samuel Dhawan. The file does not state Arjun's relationship to the clients. The firm notes say the firm represents Samuel and Priya only, so please confirm whether the firm also represents Arjun (through a parent or guardian) and how much detail about the minor to include.
- Dr. Brody's causation statement is quoted as written ("consistent with exposure to fuel oil vapors as reported"). The file does not say whether the $310.00 in office visit charges has been paid.
- The hotel and meal costs run through March 31, 2026, per the cost summary. If the family has not returned home, later costs need to be added. See the placeholder in the Damages section.
- The Northgate report compares results to a screening level only for the February 9, 2026 air sample (3.0) and for soil (5,100 mg/kg). The report does not give units for the 3.0 figure, so the letter states it as written. Please check against the full report.
- The fire report says "about 140 gallons," and the delivery ticket shows 140.2 gallons. The letter states both.
- Two items are marked [VERIFY] in the Basis of the claim section: the New Jersey rule on recovery of cleanup costs, and the New Jersey filing deadline for contamination and exposure claims and when it starts to run. No statutes are cited.

- The demand amount, response deadline, letter date and delivery method are placeholders. Any lost-value claim needs an appraisal, which is not in the file.

Castellano Brightman LLC
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

[ADD: recipient name]
Harborline Fuel Delivery Inc.
[ADD: street address]
[ADD: city, state ZIP]

[ADD: adjuster name]
Meridian Energy Risk Insurance
[ADD: street address]
[ADD: city, state ZIP]

Re: Demand for Remediation and Payment of Costs and Damages, Fuel Oil Release at 58 Alder Hill Road, Westbury Township, New Jersey. Our clients: Samuel and Priya Dhawan. Your insured: Harborline Fuel Delivery Inc. Claim No. [ADD: claim number]. Date of loss: January 22, 2026. Westbury Township Fire Department Incident No. WTFD-26-0215.

Dear [ADD: recipient name]:

Introduction

This firm represents homeowners Samuel and Priya Dhawan [firm notes]. We write about the fuel oil contamination at and affecting their home at 58 Alder Hill Road, Westbury Township, New Jersey, which resulted from a heating oil delivery made by Harborline Fuel Delivery Inc. ("Harborline") on January 22, 2026 [fire_department_spill_report.pdf p.1]. Meridian Energy Risk Insurance ("Meridian") acknowledged the Dhawans' claim against its insured by letter dated March 3, 2026, and stated that coverage is under review [costs_and_medical.pdf p.1]. This letter is directed to both Harborline and Meridian. Please forward it to any other carrier that may provide coverage.

The source and the responsible party

On January 22, 2026, at 10:48 AM, Mrs. Dhawan called the Westbury Township Fire Department to report a strong fuel oil odor in the basement of her home and oil seeping through the foundation wall [fire_department_spill_report.pdf p.1].

The Fire Department's report found that Harborline truck No. 17, driven by Leon Pruitt, delivered heating oil to the neighboring property at 60 Alder Hill Road at about 9:30 AM that morning [fire_department_spill_report.pdf p.1]. The report states that the house at 60 Alder Hill Road converted to natural gas in 2023, that the old fill pipe on the side wall facing number 58 was never capped or removed, and that the tank it once fed had been taken out [fire_department_spill_report.pdf p.1]. The driver pumped about 140 gallons of No. 2 heating oil into the open fill pipe, and the oil discharged into the soil along the shared side yard [fire_department_spill_report.pdf p.1]. The delivery ticket shows 140.2 gallons [fire_department_spill_report.pdf p.1].

Oil was found pooling in the basement of 58 Alder Hill Road along the north foundation wall and in the sump pit. Air monitoring in the basement showed elevated organic vapor readings, and the occupants, two adults and one child, were advised to leave the home [fire_department_spill_report.pdf p.1]. Responders disabled the sump pump, placed absorbent booms and notified the state environmental hotline [fire_department_spill_report.pdf p.1]. Harborline supervisor Mark Delaney arrived on scene at 11:40 AM and stated that the driver did not confirm the account was active [fire_department_spill_report.pdf p.1].

Northgate Environmental Consultants concluded that the January 22, 2026 release at 60 Alder Hill Road is the source of the contamination at the Dhawans' home [environmental_sampling_report.pdf p.1].

Testing and findings

Northgate Environmental Consultants (licensed site professional Diane Okonkwo) investigated the property and issued a report dated February 20, 2026 [environmental_sampling_report.pdf p.1]. The sampling events were:

- **January 23, 2026, indoor air, basement:** total petroleum hydrocarbon vapors 1,850 micrograms per cubic meter; naphthalene 14.2 micrograms per cubic meter. First-floor living room naphthalene was 3.9 micrograms per cubic meter [environmental_sampling_report.pdf p.1].
- **January 28, 2026, soil borings SB-1 to SB-4 along the north foundation:** extractable petroleum hydrocarbons up to 11,400 milligrams per kilogram at SB-2, 4 feet deep. The report's residential soil screening level for this compound group is 5,100 milligrams per kilogram, and the report states that SB-2 and SB-3 exceed it [environmental_sampling_report.pdf p.1].
- **February 9, 2026, indoor air, basement, after initial cleanup:** naphthalene 6.1 micrograms per cubic meter, which the report states is still above the residential indoor air screening level cited in the report (3.0) [environmental_sampling_report.pdf p.1].

Northgate concluded that contaminated soil extends under the north foundation wall. It recommends excavation of about 45 cubic yards, a sub-slab venting system and confirmation sampling before the family returns to the home [environmental_sampling_report.pdf p.1].

Health effects

On February 4, 2026, Alan Brody, MD, of Westbury Family Medicine, saw Priya Dhawan (age 39) and Arjun Dhawan (age 7) [costs_and_medical.pdf p.1]. Both reported headaches, nausea and eye irritation that began January 22, 2026 in the home and improved after they moved to a hotel [costs_and_medical.pdf p.1]. The examination was normal. Dr. Brody's assessment was "symptoms consistent with exposure to fuel oil vapors as reported," and he advised them not to return to the home until indoor air testing is acceptable [costs_and_medical.pdf p.1]. The charges were $310.00 for two office visits [costs_and_medical.pdf p.1].

Damages and costs

The Dhawans' costs and losses to date, and the remaining remediation cost, are as follows:

Item	Date	Amount	Source
Emergency spill response, Coastal Clean Response LLC	January 22, 2026	$9,860.00	[costs_and_medical.pdf p.1]
Environmental investigation, Northgate Environmental Consultants	February 20, 2026	$7,425.00	[costs_and_medical.pdf p.1]
Extended-stay hotel, Westbury Suites	January 22, 2026 to March 31, 2026	$11,340.00	[costs_and_medical.pdf p.1]
Meals above normal household cost (receipts)	January 22, 2026 to March 31, 2026	$2,115.40	[costs_and_medical.pdf p.1]
Replacement of washer, dryer and furnace blower motor	February 2, 2026	$3,980.00	[costs_and_medical.pdf p.1]
Disposal of oil-soaked stored items, basement	February 5, 2026	$1,250.00	[costs_and_medical.pdf p.1]
Physician charges, Westbury Family Medicine (two office visits)	February 4, 2026	$310.00	[costs_and_medical.pdf p.1]
Remaining remediation, Pinewood Remediation Services proposal (not yet incurred)	February 18, 2026	$68,500.00	[costs_and_medical.pdf p.1]; [environmental_sampling_report.pdf p.1]
Total (as read from the bills)		**$104,780.40**	

The cost summary states that the Dhawans have paid $35,970.40 of these costs (the first six items above), which are the amounts they paid before the physician charges and the not-yet-incurred remediation [costs_and_medical.pdf p.1].

Relocation costs after March 31, 2026: [ADD: hotel and meal costs after March 31, 2026, if any]. Loss in property value: [ADD: appraisal or other support for any diminution in value, if the firm will claim it]. Our clients reserve the right to supplement these figures as further costs are incurred.

Basis of the claim

Harborline's delivery of heating oil into an open fill pipe, without confirming that the account was active according to its own supervisor, caused oil to discharge into the soil and migrate onto and beneath our clients' property. In general terms, those facts support claims for negligence, nuisance and trespass and, to the extent applicable, strict liability. Federal and state environmental laws may also apply. [VERIFY: New Jersey rule on recovery of cleanup costs] [VERIFY: New Jersey filing deadline for contamination and exposure claims, and when it starts to run]

Demand

On behalf of Samuel and Priya Dhawan, we demand that Harborline and Meridian:

- Complete, or fund in full, the remaining remediation of 58 Alder Hill Road as recommended by Northgate, including excavation, a sub-slab venting system and confirmation sampling [environmental_sampling_report.pdf p.1].
- Reimburse the costs and medical charges itemized above.
- Pay [ADD: demand amount].

Please respond in writing by [ADD: response deadline]. Meridian should also tell us in that response whether it has completed its coverage review and, if it has accepted coverage, the policy limits that apply [ADD: policy number].

We also demand that Harborline and Meridian preserve all documents, data, samples and physical evidence relating to this incident. This includes the delivery ticket, dispatch, routing and account records for 60 Alder Hill Road, records of truck No. 17 and its delivery equipment, driver Leon Pruitt's records and communications, internal reports and communications about the incident, and any samples or test results.

This letter is not a complete statement of our clients' claims or damages. Our clients reserve all rights and remedies, whether or not stated here. Please direct all further communication about this matter to this office.

Sincerely,

Gina M. Castellano
Castellano Brightman LLC