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.

- Authority: the firm notes say Carol Pfeiffer is attorney-in-fact for Edna Pfeiffer, who is living. The admission record lists Carol as "power of attorney" [admission_assessment_care_plan.pdf p.1], but no POA document is in the file. Confirm its scope and the proper client capacity.
- Marked [VERIFY]: Iowa pre-suit notice, expert affidavit, resident-rights law and arbitration clause requirements. Check whether the admission agreement (not in the file) has an arbitration clause.
- Totals: the medical charges total $146,680.00 as printed in the hospital records, and the addends sum to the same figure. Please recheck. No itemized bills were provided. The Infectious disease consult dates are missing, and the Linden Grove charges run through 03/31/2026, so confirm they are actual billed charges and whether care is ongoing.
- The January 22, 2026 state inspection excerpt cites a deficiency for "one resident" without naming her. Confirm it concerns Ms. Pfeiffer before relying on it.
- The 121-pound weight is attributed to "nursing home admission" in the hospital record. The admission excerpt gives no weight. No dietitian notes or supplement records were provided, so the nutrition point is limited to what the records show.
- No expert or nursing review is in the file, and no record states causation. The letter links the failures to the injuries only through the sequence of record entries. Confirm the framing, especially the osteomyelitis.
- The records are single-page excerpts. "Blank" turning-record entries are described as blank, not as care not given. Confirm the full chart is obtained.
- Placeholders to fill: administrator name, ZIP, insurer address, claim number, delivery method, firm address and contact details, letter date, family impact, current condition update, demand amount, response deadline.

Kessler Danforth LLP
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

[ADD: administrator name], Administrator
Willow Bend Care Center
1200 Meadowlark Road
Corvell, Iowa [ADD: ZIP]

Re: Edna R. Pfeiffer, Resident at Willow Bend Care Center, October 6, 2025 to January 8, 2026 | Claim No. [ADD: claim number] | Pressure injury and fall with hip fracture

Dear [ADD: administrator name]:

Introduction

We represent Carol Pfeiffer, the daughter and attorney-in-fact of Edna R. Pfeiffer, in connection with harm to Ms. Pfeiffer while she was a resident of Willow Bend Care Center from October 6, 2025 [admission_assessment_care_plan.pdf p.1] until she was transferred to the hospital on January 8, 2026 [nursing_notes_incident_report.pdf p.1]. [firm notes] This letter is also being sent to the facility's liability carrier, Prairie Gate Liability Insurance. Claim number: [ADD: claim number]. Please direct all communication about this matter to our office and do not contact Ms. Pfeiffer or her family directly.

The resident and the care required

Ms. Pfeiffer was admitted on October 6, 2025, at age 86. Her diagnoses included moderate dementia, type 2 diabetes, atrial fibrillation on an anticoagulant, and a history of falls at home. [admission_assessment_care_plan.pdf p.1]

Willow Bend's own admission assessment scored her as high risk for both pressure injury (Braden Scale 12) and falls (Morse Fall Scale 75). [admission_assessment_care_plan.pdf p.1] Her skin was intact, with no pressure injuries, on admission. [admission_assessment_care_plan.pdf p.1] The facility recorded that she needed extensive assistance of two staff for bed mobility and transfers, could not reposition herself, and was incontinent of bladder. [admission_assessment_care_plan.pdf p.1]

The care plan, signed by Director of Nursing Janet Coyle, RN, on October 7, 2025, required the following [admission_assessment_care_plan.pdf p.1]:

- Reposition every two hours while in bed and document it on the turning record.
- A pressure-relieving air mattress.
- A skin check each shift, with any redness reported to the nurse and the wound nurse.
- Incontinence care after each episode, with barrier cream.
- Bed in the lowest position with floor mats on both sides.
- A bed alarm on at all times while in bed.
- Dietitian review and a nutritional supplement twice daily.

What happened

Pressure injury. The December 2025 turning record has blank night-shift entries for December 3-5, December 9-12 and December 18-21, 2025. The staffing sheets show one aide for 28 residents on the night shift on those dates. [nursing_notes_incident_report.pdf p.1]

On December 14, 2025, LPN T. Garland recorded a 3 cm reddened area on Ms. Pfeiffer's sacrum. The note states that the air mattress was found unplugged, that it was plugged in, and that the wound nurse was not notified. [nursing_notes_incident_report.pdf p.1]

On December 23, 2025, wound nurse Lisa Hagen, RN, recorded a sacral wound of 6 cm x 5 cm with dark tissue and foul odor, unstageable. Her note states that the physician and family were notified for the first time that day. [nursing_notes_incident_report.pdf p.1]

On January 2, 2026, the wound was debrided by the wound physician and was recorded as stage 4 with bone visible. [nursing_notes_incident_report.pdf p.1]

Fall. The incident report completed by night nurse Dana Pruitt, LPN, records that at 4:10 AM on January 8, 2026, Ms. Pfeiffer was found on the floor beside her bed. The bed was in the high position, there was no floor mat on the left side, and the bed alarm was not attached to her and did not sound. The last documented check was at 11:30 PM. She was crying and holding her right hip. 911 was called and she was taken to Corvell General Hospital. [nursing_notes_incident_report.pdf p.1]

Hospital course. At Corvell General Hospital, an X-ray showed a displaced right femoral neck fracture. The hospital also documented a stage 4 sacral pressure injury of 7 cm x 6 cm with exposed bone, a low albumin of 2.4, and a weight of 104 pounds, down from 121 pounds on nursing home admission. [hospital_records.pdf p.1] Treatment included the following [hospital_records.pdf p.1]:

- January 9, 2026: right hip hemiarthroplasty (Dr. Graham Wexler, orthopedics).
- January 12, 2026: MRI of the pelvis showing osteomyelitis of the sacrum, with an infectious disease consult and IV antibiotics through a PICC line planned for six weeks.
- January 14, 2026: surgical debridement of the sacral wound (Dr. Imani Price, general surgery), with a wound vacuum device placed.

Ms. Pfeiffer was discharged on January 19, 2026 to Linden Grove Rehabilitation; the family moved her from Willow Bend. [hospital_records.pdf p.1]

State survey. The state inspection summary of the January 22, 2026 survey cites the facility for failing to provide care to prevent pressure injuries for one resident, failing to follow the fall care plan, and failing to notify the physician and family of a change in skin condition. [nursing_notes_incident_report.pdf p.1]

The facility's failures

Comparing the care plan with the facility's own records:

- **Repositioning and documentation.** The care plan required repositioning every two hours, documented on the turning record. [admission_assessment_care_plan.pdf p.1] Night-shift entries are blank for nine nights in December 2025, a period in which one aide was assigned to 28 residents. [nursing_notes_incident_report.pdf p.1]
- **Pressure-relieving mattress.** The care plan required an air mattress. [admission_assessment_care_plan.pdf p.1] On December 14, 2025, the mattress was found unplugged. [nursing_notes_incident_report.pdf p.1]
- **Reporting skin changes.** The care plan required redness to be reported to the nurse and wound nurse. [admission_assessment_care_plan.pdf p.1] When redness was found on December 14, the wound nurse was not notified. The physician and family were first notified on December 23, when the wound was unstageable with dark tissue and foul odor. [nursing_notes_incident_report.pdf p.1]
- **Fall prevention.** The care plan required the bed in its lowest position, floor mats on both sides, and a bed alarm on at all times. [admission_assessment_care_plan.pdf p.1] At the time of the fall, the bed was high, the left floor mat was absent, and the alarm was not attached and did not sound. [nursing_notes_incident_report.pdf p.1]
- **Nutrition.** The care plan called for dietitian review and a nutritional supplement twice daily. [admission_assessment_care_plan.pdf p.1] The hospital recorded a low albumin and a weight of 104 pounds, down from 121 pounds. [hospital_records.pdf p.1] [ADD: dietitian notes and supplement administration records, if obtained]
- **Regulatory finding.** The state survey cited deficiencies in pressure-injury prevention, adherence to the fall care plan, and notification of the physician and family. [nursing_notes_incident_report.pdf p.1]

[ADD: expert or nursing review, if any]

Injuries and damages

Ms. Pfeiffer sustained a stage 4 sacral pressure injury with exposed bone and osteomyelitis of the sacrum, a displaced right femoral neck fracture requiring hemiarthroplasty, and two surgical procedures during her hospitalization. [hospital_records.pdf p.1] At discharge on January 19, 2026, she was bedbound, needed total assistance, and had a wound vacuum in place. Her prognosis for wound healing was guarded. [hospital_records.pdf p.1] [ADD: update on Ms. Pfeiffer's current condition and ongoing care]

The medical charges shown in the hospital records are:

Provider or item	Dates	Amount billed	Source
Corvell Area Ambulance	01/08/2026	$1,460.00	hospital_records.pdf p.1
Corvell General Hospital	01/08/2026 - 01/19/2026	$96,215.00	hospital_records.pdf p.1
Orthopedic surgeon fee	01/09/2026	$6,120.00	hospital_records.pdf p.1
General surgeon fee	01/14/2026	$2,980.00	hospital_records.pdf p.1

Provider or item	Dates	Amount billed	Source
Infectious disease consults	[ADD: dates of service]	$1,145.00	hospital_records.pdf p.1
Linden Grove Rehabilitation	01/19/2026 - 03/31/2026	$38,760.00	hospital_records.pdf p.1

Total (as read from the bills): $146,680.00

[ADD: charges after March 31, 2026, and any other expenses, if applicable]

[ADD: family's account of the impact on Ms. Pfeiffer]

Preservation of records

We ask that Willow Bend Care Center and Prairie Gate Liability Insurance preserve all evidence relating to Ms. Pfeiffer's residency and the events described above, including:

- The complete medical chart, including nursing notes, treatment and medication administration records, turning records, skin assessments and wound care documentation.
- All incident reports, including the report of January 8, 2026, and any internal investigation.
- Staffing schedules, assignment sheets and timekeeping records for the dates at issue, including all night shifts in December 2025 and the night of January 7-8, 2026.
- Video recordings.
- Electronic audit trails and metadata for the chart.
- Bed alarm and air mattress equipment, and any maintenance and equipment records.
- All materials relating to the state survey of January 22, 2026 and the facility's response.

Pre-suit requirements

[VERIFY: Iowa pre-suit notice, expert affidavit or other requirements for claims against care facilities, any resident-rights law, and any arbitration clause in the admission agreement]

Demand

On behalf of Ms. Pfeiffer, we demand [ADD: demand amount] and a response by [ADD: response deadline]. Ms. Pfeiffer's family seeks accountability for what happened to her and payment of her medical costs. [firm notes] [ADD: any non-monetary terms the family requests]

Sincerely,

Ruth A. Danforth
Kessler Danforth LLP

cc: Prairie Gate Liability Insurance, [ADD: claims contact name and address]