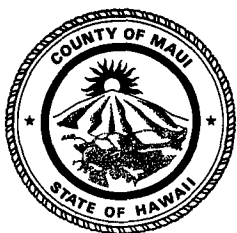


PRL-1(42)

ALAN M. ARAKAWA
Mayor



PATRICK K. WONG
Corporation Counsel

EDWARD S. KUSHI
First Deputy

LYDIA A. TODA
Risk Management Officer
Tel. No. (808) 270-7535
Fax No. (808) 270-1761

DEPARTMENT OF THE CORPORATION COUNSEL
COUNTY OF MAUI
200 SOUTH HIGH STREET, 3RD FLOOR
WAILUKU, MAUI, HAWAII 96793
EMAIL: CORPCOUN@MAUICOUNTY.GOV
TELEPHONE: (808) 270-7740
FACSIMILE: (808) 270-7152

2018 JUL 31 PM 1:43
OFFICE OF THE
COUNTY COUNCIL

RECEIVED

July 31, 2018

MEMO TO: Don S. Guzman, Chair
Parks, Recreation, Energy, and Legal Affairs Committee

FROM: Moana M. Lutey, Deputy Corporation Counsel

SUBJECT: LITIGATION MATTERS - Settlement of Claims and Lawsuits
(PRL-1)
Settlement of Claim: Cassandra Martin
Claim No.: 30180290038-0001

Pursuant to Section 3.16.020B of the Maui County Code, our department hereby requests authorization to discuss settlement of the aforementioned claim. It is anticipated that an executive session may be necessary to discuss questions and issues pertaining to the powers, duties, privileges, immunities, and liabilities of the County, the Council, and the Committee. There is no immediate deadline to this matter.

Copies of the claim and proposed resolution are enclosed. We request that a representative from the Department of Environmental Management be in attendance during discussion of this matter. If you have any questions, or concerns, please do not hesitate to contact me.

cc: Stewart Stant, Director of Environmental Management

MML:cs

Resolution

No. _____

AUTHORIZING SETTLEMENT OF CLAIM NO. 30180290038-0001
OF CASSANDRA MARTIN

WHEREAS, Cassandra Martin filed Claim No. 30180290038-0001 against the County of Maui on May 29, 2018, for damages to her vehicle resulting from sulfuric acid being discharged from an exhaust fan at the Department of Environmental Management's Wastewater Reclamation Facility lab building in Kihei between March 19, 2018 and March 23, 2018; and

WHEREAS, Cassandra Martin has alleged that the County of Maui is liable for the damage caused to her property; and

WHEREAS, the County of Maui, to avoid incurring expenses and the uncertainty of a judicial determination of the parties' respective rights and liabilities, have reached a proposed resolution of this claim by way of a negotiated settlement; and

WHEREAS, having reviewed the facts and circumstances regarding this matter and being advised of attempts to reach resolution of this claim by way of a negotiated settlement by the Department of the Corporation Counsel, the Council wishes to authorize settlement; now, therefore,

BE IT RESOLVED by the Council of the County of Maui:


1. That it hereby approves settlement of Claim No. 30180290038-0001 in the amount of EIGHT THOUSAND THREE HUNDRED NINE AND 07/100 DOLLARS (\$8,309.07); and

Resolution No. _____

2. That payment is authorized to satisfy settlement of this claim following the execution of the "Release of Claim" by Cassandra Martin; and

3. That certified copies of this Resolution be transmitted to the Mayor, the Director of Finance, the Director of Environmental Management, and the Corporation Counsel.

APPROVED AS TO FORM
AND LEGALITY:



MOANA M. LUTEY
Deputy Corporation Counsel
County of Maui
2018-0450

COUNTY OF MAUI

RECEIVED

CLAIM FOR DAMAGE OR INJURY

2018 MAY 29 PM 3:33

PLEASE PRINT CLEARLY

OFFICE OF THE COUNTY CLERK

- 1. Claimant: Mr. Mrs. Ms. Cassandra Martin
- 2. Address: 480 East Welakahao Rd. Kihei 96753
- 3. Telephone No.: Business 808-875-5337 Residence 808-870-7671
- 4. Date of Accident: Reported 3/27/18
- 5. Location of Accident: 480 East Welakahao Rd. Kihei Hawaii 96753
- 6. Amount of Claim: Property Damage \$ 8,309-9,835 Personal Injury \$ 8,309-9,835
- 7. Describe the accident in detail. Indicate all the facts, causes, persons involved, witnesses, extent of damage, etc., and why you think the County is responsible. You may write on the back if needed.
My vehicle was parked in the parking lot next to the Kihei WWRF Lab Building.
Discovered unknown dark spots stained on various area of my personal vehicle paint
and pitted spots covering the car. The lab building roof and side wall were
stained and with air boume substance in area where acid vapor vents from
the fume hood. The employee vehicle parking lot is down wind of the lab building.
Investigated by self and others involved in incident (see incident report).
Between 3/19/18 to 3/23/18 consistent rain and wind conditions existed.
- 8. If you carry insurance applicable to this claim, please provide the name and address of the insurance company and your policy number.
No personal insurance claim has been made

Policy No. _____

A. Did you file a claim with your insurance company? No
If yes, amount claimed \$ 8,309-9,835 Deductible amount \$ 8,309-9,835

B. If a claim was filed with your insurance company, what action do they intend to take?
I did not file a claim with my insurance company, as I should not
have to pay deductible and have premium increase due to County's issue.

I HEREBY DECLARE THAT THE FOREGOING STATEMENTS ARE TRUE AND CORRECT.


(Signature of Claimant)

5/25/17
(Date)

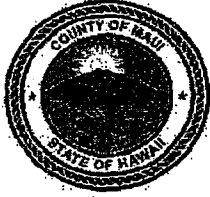
Cassandra Martin (cont)

Additionally, In my investigation, I found the following:

- The vent from the lab roof directly above the parking lot is from a fume hood that vents acid vapor that is released during the laboratory's nutrient testing.
- Although the fume hood has been inspected and certified, only the equipment within the lab is included in the inspection. There are no records of the external vent and blower being inspected or maintained since it was installed.
- The Chemist who was conducting the testing noticed a sound of water in the ventilation fan during the rain event, which was not a normal sound. It has since stopped, but should be investigated.

The User's manual for the system (Labconco Hooded Combination Kjeldahl Systems) is attached. It states that highly corrosive fumes produced from boiling sulfuric acid will flow through the ductwork and therefore, the exhaust stack rising from the piping assembly must be vented to the atmosphere via acid-resistant, sealed ductwork and a remote blower. Page 4 of the manual states, "The remote blower creates suction and draws acid fumes through the CPVC digestion manifold and exhaust piping provided and pull the fumes under negative pressure out through the duct work system connected to the remote blower and ultimately the building's exterior. The 6 inch stack on the left side of the unit must be connect to a leak-tight PVC ductwork system that vents 10 ft above the building roof."

In my research, I found other documents from the manufacturer (attached) that warn against venting toward parking lots. One states "Consider what is being exhausted and how it is being exhausted. For example, you would not want to allow acid vapors to flow over a parking lot, possibly harming vehicles below."



County of Maui
 Department of the Corporation Counsel
 Risk Management Division
 200 S High Street Phone (808)270-7535
 Wailuku, HI 96793 Fax (808) 270-1761

INCIDENT REPORT

FOR INTERNAL/COUNTY USE ONLY – TO BE COMPLETED BY COUNTY PERSONNEL
 Complete this form for all **NON-AUTOMOBILE** events resulting in potential bodily injury (aka "near miss"), property damage, loss or theft, and send within 24 hours to the **Risk Management Division** either by fax 270-1761, email: bridget.nakama@mauicounty.gov, or interoffice mail.

Incident Date 3/19/18 - 03/23/18 **Incident Time** 700-1530 **Location** Kihei WWRF
Notified by (person reporting the Incident): Reginald Balido **Phone:** 808-870-7829
Date and Time Reported Called Superintendent Monday 3/26/18 at 1730 when discovered.
Department DEM **Division and/or Unit #** (if known) Wastewater Kihei
Were Police notified? Yes No **If yes, Police Report #** _____
Was anyone injured? Yes No **If yes, please describe.** _____

Any property damage? Yes No / **If yes, describe County or third-party damage:**
7 Personal vehicles, 2017 White Toyota Tacoma Sport TRD, 2018 Dark Gray Honda Civic, 2009 White Toyota Prius, 2004 Silver Toyota Tacoma, 2010 White Toyota Tacoma, 2005 Toyota Corolla, 2009 Black Mazda3

Describe the Incident (circumstances, weather conditions, etc.) _____
Parked vehicles in parking lot next to the Kihei WWRF Lab Building. Discovered unknown dark spots stained on various area of our personal vehicles paint.
Further Investigation revealed sulfuric acid discharges from the Lab Building exhaust fan.
Vehicles are parked down wind of lab building.

Witnesses:

Name	Address	Contact #	Relationship
Lena Mendez	480 East Welakahao Rd. Kihei	808-875-5337	Co-worker
Cassie Martin	480 East Welakahao Rd. Kihei	808-875-5344	Co-worker

Corrective measures taken, if any, to prevent recurrence.
Safety officer (Theo Leong), went to investigate. Lab Building discharges sulfuric acid from exhaust fan.
Inspect the exhaust fan for possible leak in system and repair as needed. Relocated our personal vehicles.

Dept. Head Requests Temporary Restraining Order (TRO)/Injunction: Yes No

Report completed by: (print & initial) REB **Your Phone:** 808-870-7829 **Date:** 3/27/18
Francis Asiu 3/27/18 3/27/18
Supervisor (print & initial) **Date** **Department Head Signature** **Date**

Original: Department
 Copy: Managing Director, Risk Management Division

Revised: 9/20/17

Date: 5/16/2018 02:31 PM
 Estimate ID: 1169
 Estimate Version: 0
 Preliminary
 Profile ID: Mitchell

STUDIO AUTO BODY

251 Lafo st. Unit H1, Kahului, HI 96732
 (808) 871-6454
 Fax: (808) 871-6484
 Email: studioautobodyinc@gmail.com

Damage Assessed By: Jeremiah Becker
 Classification: Audit

Deductible: UNKNOWN

Owner: Cassandra Martin
 Telephone: Home Phone: (808) 870-7671

Mitchell Service: 910178

Description: 2009 Toyota Prius
 Body Style: 4D Sed
 VIN: JTDKB20U297822952
 OEM/ALT: O
 Options: PASSENGER AIRBAG, POWER LOCK, POWER WINDOW, POWER STEERING, REAR WINDOW DEFOGGER, AIR CONDITION, REAR WINDOW WIPER, TILT STEERING COLUMN, AM/FM STEREO, DRIVER AIRBAG, HEATED EXTERIOR MIRROR, FRONT SIDE AIRBAG WITH HEAD PROTECTION, ANTI-LOCK BRAKE SYS., TRACTION CONTROL, ALUM/ALLOY WHEELS, TIRE INFLATION/PRESSURE MONITOR, CD PLAYER, POWER ADJUSTABLE EXTERIOR MIRROR, AUTO AIR CONDITION, FIRST ROW BUCKET SEAT, CLOTH SEAT, SIDE AIRBAGS, AUTOMATIC HEADLIGHTS, KEYLESS ENTRY SYSTEM, REAR BENCH SEAT, REAR SPOILER, STEERING WHEEL AUDIO CONTROLS

Drive Train: 1.5L Inj 4 Cyl A FWD
 Search Code: None

Line Item	Entry Number	Labor Type	Operation	Line Item Description	Part Type/ Part Number	Dollar Amount	Labor Units
Front Bumper							
1	001683	BDY	OVERHAUL	Frt Bumper Cover Assy			1.7
2	000026	BDY	REPAIR	Frt Bumper Cover	Existing		2.0*
3		REF	REFINISH	Frt Bumper Cover			C 2.6
Front Lamps							
4	002562	BDY	CHECK/ADJUST	Headlamps			0.4
5	002563	BDY	REMOVE/INSTALL	R Front Combination Lamp			0.4 #
6		BDY	REMOVE/INSTALL	Frt Bumper Cover			INC
7	002564	BDY	REMOVE/INSTALL	L Front Combination Lamp			0.4 #
Hood							
8	001695	BDY	REMOVE/INSTALL	R Hood Washer Nozzle			0.2 #
9	001696	BDY	REMOVE/INSTALL	L Hood Washer Nozzle			0.2 #
10	000133	BDY	REPAIR	Hood Panel (Alum)	Existing		4.0*
11		REF	REFINISH	Hood Outside			C 2.6
12	000117	BDY	REMOVE/REPLACE	Hood Adhesive Emblem	90975-02039	40.37	0.2
Front Fender							
13	002591	BDY	REPAIR	R Fender Panel	Existing		2.0*#
14		REF	REFINISH	R Fender Outside			C 1.8
15	002592	BDY	REPAIR	L Fender Panel	Existing		2.0*#
16		REF	REFINISH	L Fender Outside			C 1.8
17	000223	BDY	REMOVE/REPLACE	R Fender Seal	53866-47010	19.45	
18	000224	BDY	REMOVE/REPLACE	L Fender Seal	53867-47010	19.45	
18	002596	BDY	REMOVE/REPLACE	R Fender Adhesive Nameplate	75374-47031	31.95	0.2
20	002596	BDY	REMOVE/REPLACE	L Fender Adhesive Nameplate	75374-47041	31.95	0.2

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<u>Rocker/Pillars/Floor</u>									
21	002897	REF	REFINISH	R Roof Rail					C 1.6 #
22		REF	ADD'L LABOR OP	R Roof Rail					1.5*
23	002898	REF	REFINISH	L Roof Rail					C 1.6 #
24		REF	ADD'L LABOR OP	L Roof Rail					1.5*
<u>Front Door</u>									
25	000942	BDY	REPAIR	R Frt Door Shell	Existing				3.0*#
26		REF	REFINISH	R Frt Door Outside					C 1.8
27	000943	BDY	REPAIR	L Frt Door Shell	Existing				3.0*#
28		REF	REFINISH	L Frt Door Outside					C 1.8
29	001757	BDY	REMOVE/INSTALL	R Frt Otr Door Belt Moulding					0.9 #
30	001758	BDY	REMOVE/INSTALL	L Frt Otr Door Belt Moulding					0.9 #
31	001759	BDY	REMOVE/INSTALL	R Frt Door Mirror					INC #
32	001760	BDY	REMOVE/INSTALL	L Frt Door Mirror					INC #
33	000954	BDY	REMOVE/REPLACE	R Frt Upr Door Blackout Tape	75921-47011	50.71			0.2
34	000955	BDY	REMOVE/REPLACE	L Frt Upr Door Blackout Tape	75922-47011	50.71			0.2
35	000956	BDY	REMOVE/REPLACE	R Frt Door Rear Moulding	75755-47010	33.50			0.2
36	000957	BDY	REMOVE/REPLACE	L Frt Door Rear Moulding	75756-47010	33.50			0.2
37	000960	BDY	REMOVE/REPLACE	R Frt Otr Door Belt Moulding	75710-47010	55.97			INC
38	000961	BDY	REMOVE/REPLACE	L Frt Otr Door Belt Moulding	75720-47010	55.97			INC
39	001769	BDY	REMOVE/INSTALL	R Frt Otr Door Handle					0.6 #
40	001770	BDY	REMOVE/INSTALL	L Frt Otr Door Handle					0.6 #
<u>Rear Door</u>									
41	001136	BDY	REPAIR	R Rear Door Shell	Existing				3.0*
42		REF	REFINISH	R Rear Door Outside					C 1.8
43	001136	BDY	REPAIR	L Rear Door Shell	Existing				3.0*
44		REF	REFINISH	L Rear Door Outside					C 1.8
45	001779	BDY	REMOVE/INSTALL	R Rear Otr Door Belt Moulding					INC
46	001780	BDY	REMOVE/INSTALL	L Rear Otr Door Belt Moulding					INC
47	001155	BDY	REMOVE/REPLACE	R Rear Upr Door Blackout Tape	75923-47011	50.71			0.2
48	001156	BDY	REMOVE/REPLACE	L Rear Upr Door Blackout Tape	75924-47011	50.71			0.2
49	001161	BDY	REMOVE/REPLACE	R Rear Door Front Moulding	75761-47010	31.40			0.2
50	001162	BDY	REMOVE/REPLACE	L Rear Door Front Moulding	75762-47010	31.40			0.2
51	001185	BDY	REMOVE/REPLACE	R Rear Otr Door Belt Moulding	75730-47010	55.97			0.2
52	001166	BDY	REMOVE/REPLACE	L Rear Otr Door Belt Moulding	75740-47010	55.97			0.2
53	001858	BDY	REMOVE/INSTALL	R Rear Otr Door Handle					1.0 #
54	001859	BDY	REMOVE/INSTALL	L Rear Otr Door Handle					1.0 #
<u>Roof</u>									
55	001274	BDY	REPAIR	Roof Panel	Existing				5.0*#
56		REF	REFINISH	Roof Panel Outside					C 2.6
57	001790	BDY	REMOVE/INSTALL	R Roof Drip Moulding					0.4
58	001791	BDY	REMOVE/INSTALL	L Roof Drip Moulding					0.4
59	002761	BDY	REMOVE/INSTALL	Antenna Base					0.4 #
60		BDY	REMOVE/INSTALL	Roof Headliner					3.1
<u>Quarter Panel</u>									
61	001326	BDY	REPAIR	R Quarter Outer Panel	Existing				3.0*#
62		REF	REFINISH	R Quarter Panel Outside					C 1.8
63	001327	BDY	REPAIR	L Quarter Outer Panel	Existing				3.0*#
64		REF	REFINISH	L Quarter Panel Outside					C 1.8
<u>Liftgate</u>									
65	002244	BDY	REPAIR	Liftgate Shell (Alum)	Existing				2.0*
66		REF	REFINISH	Liftgate Outside					C 2.1
67	001654	REF	REFINISH	Liftgate Spoiler					C 1.2
68	001656	REF	REFINISH	Garnish					C 0.8
69	001865	BDY	REMOVE/INSTALL	Liftgate Spoiler					0.4 #
70	001445	BDY	REMOVE/REPLACE	Liftgate Adhesive Nameplate	75442-47010	28.62			0.2
71	002140	BDY	REMOVE/REPLACE	Liftgate Adhesive Nameplate	75441-47021	30.46			0.2
72	001447	BDY	REMOVE/REPLACE	Liftgate Adhesive Nameplate	75443-47020	31.49			0.2

Rear Lamps

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73	001809	BDY	REMOVE/INSTALL	R Rear Combination Lamp		0.3
74	001810	BDY	REMOVE/INSTALL	L Rear Combination Lamp		0.3
75	002757	BDY	REMOVE/INSTALL	R License Lamp		0.2 #
76	002758	BDY	REMOVE/INSTALL	L License Lamp		0.2 #
<u>Rear Bumper:</u>						
77	001812	BDY	REMOVE/INSTALL	Rear Bumper Assy		1.0
78	001634	BDY	REPAIR	Rear Bumper Cover	Existing	2.0*
79		REF	REFINISH	Rear Bumper Cover		C 2.4
<u>Additional Costs & Materials</u>						
80	936014		ADD'L COST	Flex Additive		10.00 *
<u>Additional Operations</u>						
81		REF	ADD'L OPR	Clear Coat		4.4
82	933003	REF	ADD'L OPR	Tint Color		0.5*
83	933005	BDY	ADD'L OPR	Restore Corrosion Protection		1.0*
84	933007	REF	ADD'L OPR	Feather, Prime & Block		2.5*
85		REF	ADD'L OPR	Finish Sand And Buff		10.1
86	933018	REF	ADD'L OPR	Mask For Overspray		5.00 * 0.5*
<u>Additional Costs & Materials</u>						
87			ADD'L COST	Paint/Materials		1,340.80 *
88			ADD'L COST	Hazardous Waste Disposal		8.00 *

* - Judgment Item
 # - Labor Note Applies
 C - Included in Clear Coat Calc

Estimate Totals

I. Labor Subtotals	Units	Rate	Add'l Labor Amount	Sublet Amount	Totals	II. Part Replacement Summary	Amount
Body	56.2	54.00	0.00	0.00	3,034.80 T	Taxable Parts	790.26
Refinish	52.5	54.00	5.00	0.00	2,840.00 T	Parts Adjustments	316.10
						Sales Tax @ 4.166%	46.09
						Total Replacement Parts Amount	1,152.45
Taxable Labor					5,874.80		
Labor Tax @ 4.166%					244.74		
Labor Summary	108.7				6,119.54		
III. Additional Costs					Amount	IV. Adjustments	Amount
Taxable Costs					1,358.80	Customer Responsibility	0.00
Sales Tax @ 4.166%					56.61		
Total Additional Costs					1,415.41		
Paint Material Method: Rates Init Rate = 32.00 , Init Max Hours = 99.9, Addl Rate = 0.00:							
						I. Total Labor:	6,119.54
						II. Total Replacement Parts:	1,152.45
						III. Total Additional Costs:	1,415.41
						Gross Total:	8,687.40

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IV. Total Adjustments: 0.00
Net Total: 8,687.40

This is a preliminary estimate.
Additional changes to the estimate may be required for the actual repair.

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Auto Masters

Workfile ID:

36034cea

Collision Repair & Auto Refinishing
250 W Waiehu Beach Rd, Wailuku, HI 96793
Phone: (808) 244-2204

Preliminary Estimate

Customer: MARTIN, CASSIE**Job Number:**

Written By: Robert Leyba

Insured: MARTIN, CASSIE
Type of Loss: Other
Point of Impact: 16 Non-Collision

Policy #: _____
Date of Loss: _____

Claim #: _____
Days to Repair: 0

Owner:
MARTIN, CASSIE

Inspection Location:
Auto Masters
250 W Waiehu Beach Rd
Wailuku, HI 96793
Repair Facility
(808) 244-2204 Business

Insurance Company:
CUSTOMER PAY

VEHICLE

2009 TOYO Prius 4D H/B 4-1.5L Hybrid EFI WHITE

VIN: JTDKB20U297822952
License: LCK 800
State: HI

Interior Color: GRAY
Exterior Color: WHITE
Production Date:

Mileage In: _____
Mileage Out: _____
Condition: _____

Vehicle Out: _____
Job #: _____

TRANSMISSION

Automatic Transmission

POWER

Power Steering

Power Brakes

Power Windows

Power Locks

Power Mirrors

Heated Mirrors

DECOR

Dual Mirrors

Console/Storage

Overhead Console

CONVENIENCE

Air Conditioning

Intermittent Wipers

Tilt Wheel

Cruise Control

Rear Defogger

Keyless Entry

Message Center

Steering Wheel Touch Controls

Rear Window Wiper

Climate Control

RADIO

AM Radio

FM Radio

Stereo

Search/Seek

CD Player

SAFETY

Drivers Side Air Bag

Passenger Air Bag

Anti-Lock Brakes (4)

Front Side Impact Air Bags

Head/Curtain Air Bags

SEATS

Cloth Seats

Bucket Seats

WHEELS

Aluminum/Alloy Wheels

PAINT

Clear Coat Paint

OTHER:

Traction Control

Rear Spoiler

California Emissions

Preliminary Estimate

Customer: MARTIN, CASSIE

Job Number:

2009 TOYO Prius 4D H/B 4-1.5L Hybrid EFI WHITE

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1		FRONT BUMPER					
2		O/H bumper assy				2.4	
3	*	Rpr Bumper cover				2.0	2.8
4		Add for Clear Coat					1.1
5		FRONT LAMPS					
6	R&I	RT R&I headlamp assy				0.3	
7	R&I	LT R&I headlamp assy				0.3	
8		HOOD					
9	*	Rpr Hood (ALU)				3.0	2.4
10		Add for Clear Coat					1.0
11	Repl	Emblem	9097502039	1	40.37	0.2	
12		FENDER					
13	*	Rpr RT Fender				2.0	2.0
14		Overlap Major Adj. Panel					-0.4
15		Add for Clear Coat					0.3
16	*	Rpr LT Fender				2.0	2.0
17		Overlap Major Adj. Panel					-0.4
18		Add for Clear Coat					0.3
19	Repl	RT Emblem "HYBRID"	7537447031	1	31.95	0.2	
20	Repl	LT Emblem "HYBRID"	7537447041	1	31.95	0.2	
21		ELECTRICAL					
22	*	R&I Antenna mast & holder				m 0.5	
23		WINDSHIELD					
24	*	R&I RT Washer nozzle				0.2	
25	*	R&I LT Washer nozzle				0.2	
26		ROOF					
27	R&I	RT Roof molding				0.4	
28	R&I	LT Roof molding				0.4	
29	*	Rpr RT roof side rail outer				s 1.0	1.6
30		Add for Clear Coat					0.3
31	*	Rpr LT roof side rail outer				s 1.0	1.6
32		Overlap Major Non-Adj. Panel					-0.2
33		Add for Clear Coat					0.3
34	*	Rpr Roof panel				3.0	3.0
35		Overlap Major Adj. Panel					-0.4
36		Add for Clear Coat					-0.5
37		PILLARS, ROCKER & FLOOR					
38	*	Rpr RT rocker panel				s 0.5	0.9
39		Overlap Major Non-Adj. Panel					-0.2
40	*	Rpr LT rocker panel				s 0.5	0.9
41		Overlap Major Non-Adj. Panel					-0.2
42		FRONT DOOR					

Preliminary Estimate

Customer: MARTIN, CASSIE

Job Number:

2009 TOYO Prius 4D H/B 4-1.5L Hybrid EFI WHITE

43	*	Rpr	RT Outer panel	2.0	2.0
44			Overlap Major Adj. Panel		-0.4
45			Add for Clear Coat		0.3
46	*	Rpr	LT Outer panel	2.0	2.0
47			Overlap Major Adj. Panel		-0.4
48	*		Add for Clear Coat		0.3
49		R&I	RT Belt w/strip	0.3	
50		R&I	LT Belt w/strip	0.3	
51		R&I	RT R&I mirror	0.3	
52		R&I	LT R&I mirror	0.3	
53	*	R&I	RT Cover white	0.3	
54	*	Rpr	RT Cover white	0.5	0.5
55			Overlap Minor Panel		-0.2
56	*		Add for Clear Coat		0.1
57	*	R&I	LT Cover white	0.3	
58	*	Rpr	LT Cover white	0.5	0.5
59			Overlap Minor Panel		-0.2
60	*		Add for Clear Coat		0.1
61	*	R&I	<u>RT Handle, outside</u>	0.4	
62	*	R&I	<u>LT Handle, outside</u>	0.4	
63		R&I	RT R&I trim panel	0.5	
64		R&I	LT R&I trim panel	0.5	
65	REAR DOOR				
66	*	Rpr	RT Outer panel	2.0	2.0
67			Overlap Major Adj. Panel		-0.4
68	*		Add for Clear Coat		0.3
69	*	Rpr	LT Outer panel	2.0	2.0
70			Overlap Major Adj. Panel		-0.4
71	*		Add for Clear Coat		0.3
72		R&I	RT Belt w/strip	0.3	
73		R&I	LT Belt w/strip	0.3	
74	*	R&I	<u>RT Handle, outside</u>	0.4	
75	*	R&I	<u>LT Handle, outside</u>	0.4	
76		R&I	RT R&I trim panel	0.4	
77		R&I	LT R&I trim panel	0.4	
78	QUARTER PANEL				
79	*	Rpr	RT Quarter panel	2.0	2.4
80			Overlap Major Adj. Panel		-0.4
81	*		Add for Clear Coat		0.4
82	*	Rpr	LT Quarter panel	2.0	2.4
83			Overlap Major Adj. Panel		-0.4
84	*		Add for Clear Coat		0.4
85		Refn	Fuel door		0.3
86	*		Add for Clear Coat		0.1
87	LIFT GATE				

Preliminary Estimate

Customer: MARTIN, CASSIE

Job Number:

2009 TOYO Prius 4D H/B 4-1.5L Hybrid EFI WHITE

88	*	Rpr	Lift gate				2.0	2.1	
89			Overlap Major Adj. Panel					-0.4	
90	*		Add for Clear Coat					0.3	
91	*	R&I	Lift gate trim				0.3		
92	*	Refn	Lift gate trim					0.7	
93			Overlap Minor Panel					-0.2	
94	*		Add for Clear Coat					0.1	
95		Repl	Emblem	9097502040	1	40.37	0.2		
96		Repl	Nameplate "TOYOTA"	7544347020	1	31.49	0.2		
97		Repl	Nameplate "PRIUS"	7544247010	1	28.62	0.2		
98	*	R&I	Nameplate "HYBRID SYNERGY DRIVE"				0.2		
99	#	Rpr	clean & retape hybrid emblem				0.4		
100	*	R&I	Washer nozzle				0.2		
101		R&I	Spoiler assy w/o Touring				0.4		
102	*	Rpr	Spoiler assy				1.0	1.1	
103			Overlap Major Non-Adj. Panel					-0.2	
104	*		Add for Clear Coat					0.2	
105		R&I	Upper trim panel				0.2		
106		R&I	Center panel w/rear wiper				0.2		
107		R&I	Lower trim panel				0.3		
108	REAR LAMPS								
109		R&I	RT Tail lamp assy				0.4		
110		R&I	LT Tail lamp assy				0.4		
111		R&I	High mount lamp				0.2		
112		R&I	RT License lamp				0.2		
113		R&I	LT License lamp				0.2		
114	REAR BUMPER								
115			O/H bumper assy				2.0		
116	*	Rpr	Bumper cover				2.0	2.6	
117			Add for Clear Coat					1.0	
118	#	Subl	Hazardous waste removal		1	5.00 T			
119	#	Repl	Cover Car		1	10.00 T	2.0		
120	#		Color tint / color match		1			0.5	
121	#	Rpr	Color sand and buff				5.0		
122	#	Repl	Corrosion protection primer		1	10.00 T	1.0		
123	#	Repl	Flex additive		1	10.00 T	1.0		
124	#		Rope glass		1	20.00	2.0		
125		Repl	Protector	PT74747040	1	58.00	0.6		
SUBTOTALS						317.75	61.9	40.6	

Preliminary Estimate

Customer: MARTIN, CASSIE

Job Number:

2009 TOYO Prius 4D H/B 4-1.5L Hybrid EFI WHITE

ESTIMATE TOTALS

Category	Basis	Rate	Cost \$
Parts			282.75
Body Labor	61.9 hrs @	\$ 60.00 /hr	3,714.00
Paint Labor	40.6 hrs @	\$ 60.00 /hr	2,436.00
Paint Supplies	40.6 hrs @	\$ 38.00 /hr	1,542.80
Body Supplies	44.2 hrs @	\$ 5.00 /hr	221.00
Miscellaneous			35.00
Subtotal			8,231.55
Sales Tax	\$ 1,860.55 @	4.1666 %	77.52
Grand Total			8,309.07

FOR YOUR PROTECTION, HAWAII LAW REQUIRES YOU TO BE INFORMED THAT PRESENTING A FRAUDULENT CLAIM FOR PAYMENT OF A LOSS OR BENEFIT IS A CRIME PUNISHABLE BY FINES OR IMPRISONMENT, OR BOTH.

Preliminary Estimate

Customer: MARTIN, CASSIE

Job Number:

2009 TOYO Prius 4D H/B 4-1.5L Hybrid EFI WHITE

Estimate based on MOTOR CRASH ESTIMATING GUIDE and potentially other third party sources of data. Unless otherwise noted, (a) all items are derived from the Guide AEM8545, CCC Data Date 3/16/2018, and potentially other third party sources of data; and (b) the parts presented are OEM-parts manufactured by the vehicles Original Equipment Manufacturer. OEM parts are available at OE/Vehicle dealerships. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM parts that may be provided by or through alternate sources other than the OEM vehicle dealerships. OPT OEM or ALT OEM parts may reflect some specific, special, or unique pricing or discount. OPT OEM or ALT OEM parts may include "Blemished" parts provided by OEM's through OEM vehicle dealerships. Asterisk (*) or Double Asterisk (**) indicates that the parts and/or labor data provided by third party sources of data may have been modified or may have come from an alternate data source. Tilde sign (~) items indicate MOTOR Not-Included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed as a separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer aftermarket parts are described as Non OEM, A/M or NAGS. Used parts are described as LKQ, RCY, or USED. Reconditioned parts are described as Recond. Recored parts are described as Recore. NAGS Part Numbers and Benchmark Prices are provided by National Auto Glass Specifications. Labor operation times listed on the line with the NAGS information are MOTOR suggested labor operation times. NAGS labor operation times are not included. Pound sign (#) items indicate manual entries.

Some 2017 vehicles contain minor changes from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, labor and parts data from the previous year may be used. The CCC ONE estimator has a list of applicable vehicles. Parts numbers and prices should be confirmed with the local dealership.

The following is a list of additional abbreviations or symbols that may be used to describe work to be done or parts to be repaired or replaced:

SYMBOLS FOLLOWING PART PRICE:

m=MOTOR Mechanical component. s=MOTOR Structural component. T=Miscellaneous Taxed charge category. X=Miscellaneous Non-Taxed charge category.

SYMBOLS FOLLOWING LABOR:

D=Diagnostic labor category. E=Electrical labor category. F=Frame labor category. G=Glass labor category. M=Mechanical labor category. S=Structural labor category. (numbers) 1 through 4=User Defined Labor Categories.

OTHER SYMBOLS AND ABBREVIATIONS:

Adj.=Adjacent. Algn.=Align. ALU=Aluminum. A/M=Aftermarket part. Blend=Blend. BOR=Boron steel. CAPA=Certified Automotive Parts Association. D&R=Disconnect and Reconnect. HSS=High Strength Steel. HYD=Hydroformed Steel. Incl.=Included. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non Adjacent. NSF=NSF International Certified Part. O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. Sect=Section. Subl=Sublet. UHS=Ultra High Strength Steel. N=Note(s) associated with the estimate line.

CCC ONE Estimating - A product of CCC Information Services Inc.

The following is a list of abbreviations that may be used in CCC ONE Estimating that are not part of the MOTOR CRASH ESTIMATING GUIDE:

BAR=Bureau of Automotive Repair. EPA=Environmental Protection Agency. NHTSA= National Highway Transportation and Safety Administration. PDR=Painless Dent Repair. VIN=Vehicle Identification Number.

M. TOGUCHI BODY SHOP, INC.
VISUAL DAMAGE REPORT

Martin, Cassandra
 VISUAL DAMAGE REPORT: 29980

822 ALUA STREET
 WAILUKU, HI 96793
 (808) 244-5339 FAX:(808) 242-4868
 mtbs@mtoguchibodyshop.com

Customer: Insured:	Vehicle:	Insurance Company:
Martin, Cassandra 38 Kamakoi Pl. Kihei, HI 96753 Work: (808) 870-7671 Email:cassie808@outlook.com	TOYO 4D H/B Prius YEAR: 2009 Color: White Paint Code: 040 License: LCK-800 HI Prod Date: 08/01/2008 Mileage In: 101233 VIN: JTDKB20U297822952 Drivable: Yes	OWNER EXPENSE WAILUKU, HI 96793 Claim Number: COUNTY OF MAUI Date of Loss: 05/23/18 Adjuster: NO ADJUSTER

Written by: MCCALL, BRYCE

Item	Price	Ext. Price	Labor	Paint	PT	BT
1 FRONT BUMPER						
2 OVERHAUL O/H bumper assy			134.40 B			
3 REMOVE/RE-INSTALL R&I bumper cover			Incl.			
4 REPAIR Bumper cover			168.00 B	156.80		
5 Add for Clear Coat				61.60		
6 GRILLE						
7 REMOVE/RE-INSTALL Grille center			Incl.			
8 REMOVE/RE-INSTALL RT Grille outer w/o fog lamps			Incl.			
9 REMOVE/RE-INSTALL LT Grille outer w/o fog lamps			Incl.			
10 FRONT LAMPS						
11 REMOVE/RE-INSTALL RT R&I headlamp assy			16.80 B			
12 REMOVE/RE-INSTALL LT R&I headlamp assy			16.80 B			
13 HOOD						
14 REMOVE/REPLACE Emblem	40.37	40.37	11.20 B		0	
15 REPAIR Hood (ALU)			336.00 B	134.40		
16 Overlap Major Non-Adj. Panel				-11.20		
17 Add for Clear Coat				22.40		
18 FENDER						
19 REPAIR RT Fender			224.00 B	112.00		
20 Overlap Major Adj. Panel				-22.40		
21 Add for Clear Coat				16.80		
22 REPAIR LT Fender			224.00 B	112.00		
23 Overlap Major Adj. Panel				-22.40		
24 Add for Clear Coat				16.80		
25 REMOVE/REPLACE RT Emblem "HYBRID"	31.95	31.95	11.20 B		0	
26 REMOVE/REPLACE LT Emblem "HYBRID"	31.95	31.95	11.20 B		0	
27 WINDSHIELD						
28 REMOVE/REPLACE RT Washer nozzle from 2/08	22.76	22.76	11.20 B		0	
29 REMOVE/REPLACE LT Washer nozzle from 2/08	22.76	22.76	11.20 B		0	
30 NOTE: Nozzle's Crack when removed						
31 COWL						
32 REMOVE/REPLACE RT Cowl grille	250.72	250.72	22.40 B		0	
33 REMOVE/REPLACE LT Cowl grille	250.00	250.00	33.60 B		0	
34 ROOF						
35 REPAIR Roof panel			336.00 B	168.00		
36 Overlap Major Adj. Panel				-22.40		
37 Add for Clear Coat				28.00		
38 REMOVE/RE-INSTALL RT Roof molding			22.40 B			
39 REMOVE/RE-INSTALL LT Roof molding			22.40 B			

M. TOGUCHI BODY SHOP, INC.

Martin, Cassandra

VISUAL DAMAGE REPORT: 29980

VISUAL DAMAGE REPORT

Written by: MCCALL, BRYCE			Labor	Paint	
Item	Price	Ext. Price			PT BT
40	REMOVE/RE-INSTALL R&I headliner		145.60 B		
41	PILLARS, ROCKER & FLOOR				
42	REPAIR RT Hinge pillar		168.00 B	78.40	
43	REPAIR LT Hinge pillar		168.00 B	78.40	
44	Overlap Major Non-Adj. Panel			-11.20	
45	REMOVE/RE-INSTALL RT Mud guard front		16.80 B		
46	REMOVE/RE-INSTALL LT Mud guard front		16.80 B		
47	REMOVE/RE-INSTALL RT Mud guard rear		16.80 B		
48	REMOVE/RE-INSTALL LT Mud guard rear		16.80 B		
49	FRONT DOOR				
50	REPAIR RT Outer panel		224.00 B	112.00	
51	Overlap Major Adj. Panel			-22.40	
52	Add for Clear Coat			16.80	
53	REPAIR LT Outer panel		224.00 B	112.00	
54	Overlap Major Adj. Panel			-22.40	
55	Add for Clear Coat			16.80	
56	REMOVE/RE-INSTALL RT Belt w/strip		16.80 B		
57	REMOVE/RE-INSTALL LT Belt w/strip		16.80 B		
58	REMOVE/RE-INSTALL RT R&I mirror		16.80 B		
59	REMOVE/RE-INSTALL LT R&I mirror		16.80 B		
60	REPAIR RT Cover white		56.00 B	28.00	
61	Overlap Minor Panel			-11.20	
62	Add for Clear Coat			5.60	
63	REPAIR LT Cover white		56.00 B	28.00	
64	Overlap Minor Panel			-11.20	
65	Add for Clear Coat			5.60	
66	BLEND RT Handle, outside w/o "Smart key" white			11.20	
67	REMOVE/RE-INSTALL RT Handle, outside w/o "Smart key" white		22.40 B		
68	REMOVE/RE-INSTALL LT Handle, outside w/o "Smart key" white		22.40 B		
69	BLEND LT Handle, outside w/o "Smart key" white			11.20	
70	REMOVE/RE-INSTALL RT R&I trim panel		28.00 B		
71	REMOVE/RE-INSTALL LT R&I trim panel		28.00 B		
72	REMOVE/RE-INSTALL RT Switch bezel		11.20 B		
73	REMOVE/RE-INSTALL LT Switch bezel		11.20 B		
74	REAR DOOR				
75	REPAIR RT Outer panel		224.00 B	112.00	
76	Overlap Major Adj. Panel			-22.40	
77	Add for Clear Coat			16.80	
78	REPAIR LT Outer panel		224.00 B	112.00	
79	Overlap Major Adj. Panel			-22.40	
80	Add for Clear Coat			16.80	
81	REMOVE/RE-INSTALL RT Belt w/strip		16.80 B		
82	REMOVE/RE-INSTALL LT Belt w/strip		16.80 B		
83	REMOVE/RE-INSTALL RT Handle, outside white		22.40 B		
84	REMOVE/RE-INSTALL LT Handle, outside white		22.40 B		
85	BLEND RT Handle, outside white			11.20	
86	BLEND LT Handle, outside white			11.20	
87	REMOVE/RE-INSTALL RT R&I trim panel		22.40 B		
88	REMOVE/RE-INSTALL LT R&I trim panel		22.40 B		
89	QUARTER PANEL				
90	REPAIR RT Quarter panel		224.00 B	134.40	

M. TOGUCHI BODY SHOP, INC.

VISUAL DAMAGE REPORT

Written by: MCCALL, BRYCE				Labor	Paint		
Item	Price	Ext. Price				PT	BT
91	Overlap Major Adj. Panel						-22.40
92	Add for Clear Coat						22.40
93	REPAIR LT Quarter panel			224.00 B			134.40
94	Overlap Major Adj. Panel						-22.40
95	Add for Clear Coat						22.40
96	REMOVE/REPLACE RT Quarter panel protector	13.62	13.62	11.20 B			O
97	REMOVE/REPLACE LT Quarter panel protector	13.62	13.62	11.20 B			O
98	REPAIR Fuel door			56.00 B			16.80
99	Add for Clear Coat						5.60
100	LIFT GATE						
101	REPAIR Lift gate w/o camera (ALU)			112.00 B			117.60
102	Overlap Major Adj. Panel						-22.40
103	Add for Clear Coat						16.80
104	REMOVE/RE-INSTALL Lift gate trim w/o "Smart Key" white			16.80 B			
105	BLEND Lift gate trim w/o "Smart key" white						22.40
106	REMOVE/REPLACE Lift gate trim clip	2.16 (2)	4.36				O
107	REMOVE/REPLACE Nameplate "TOYOTA"	31.49	31.49	11.20 B			O
108	REMOVE/REPLACE Nameplate "PRIUS"	28.62	28.62	11.20 B			O
109	REMOVE/REPLACE Nameplate "HYBRID SYNERGY DRIVE"	30.46	30.46	11.20 B			O
110	REMOVE/RE-INSTALL Spoiler assy w/Touring			22.40 B			
111	REPAIR Spoiler assy w/Touring			112.00 B			61.60
112	Overlap Major Non-Adj. Panel						-11.20
113	Add for Clear Coat						11.20
114	REMOVE/REPLACE Spoiler assy fastener	1.47 (4)	5.88				O
115	REAR LAMPS						
116	REMOVE/RE-INSTALL RT Tail lamp assy			22.40 B			
117	REMOVE/RE-INSTALL LT Tail lamp assy			22.40 B			
118	REMOVE/RE-INSTALL High mount lamp			11.20 B			
119	REAR BUMPER						
120	REMOVE/RE-INSTALL R&L bumper cover			50.40 B			
121	ELECTRICAL						
122	REMOVE/RE-INSTALL Holder			28.00 B			
123	NOTE: LABOR: Time is after headliner is						
124	Restore Corrosion Protection	10.00	10.00	28.00 B			
125	SU Flex Additive	10.00	10.00				U
126	Cover Vehicle from Overspray	5.00	5.00	16.80 B			
127	REPAIR Color Sand, Buff, and Polish (0.3 X r			112.00 B			
128	REMOVE/REPLACE A/M Lift tape Windshield Moulding	9.22	9.22	28.00 B			A
129	REMOVE/REPLACE A/M Lift tape Rear glass Moulding	9.22	9.22	28.00 B			A
130	REFINISH Prime, Block & Finish Sand						224.00
131	REPAIR Clean Vehicle for Delivery						
132	SU Hazardous Waste Disposal Fee	5.00	5.00				U
133	REMOVE/REPLACE A/M Lift Tape Quarter Glass Midg	9.22	9.22	22.40 B			A
134	REPAIR Mask Jambes and Appertures - 3 1st pane			56.00 B			

VISUAL DAMAGE REPORT SUMMARY

	PARTS		
	Regular	Supp	Total
New (OEM) Parts:	\$778.56	\$0.00	\$778.56

M. TOGUCHI BODY SHOP, INC.

Martin, Cassandra
 VISUAL DAMAGE REPORT: 29980

VISUAL DAMAGE REPORT

New (OEM) Adj:	\$311.42	\$0.00	\$311.42
Other parts:	\$42.66	\$0.00	\$42.66

	Regular	Supp	Total
Sublet:	\$15.00	\$0.00	\$15.00
Parts Total:	\$1,132.64	\$0.00	\$1,132.64
Labor Total:	\$6,854.40	\$0.00	\$6,854.40
Paint/Material:	\$1,440.20	\$0.00	\$1,440.20
Tax:	\$393.46	\$0.00	\$393.46
Total:			\$9,835.70

OWNER EXPENSE PAYABLE REPAIR TOTAL **TOTAL**
\$9,835.70

"Collision Repair Specialist- Since 1958"

Labor Dept Codes: B-Body D-Detail I-Blueprint E- IN SHOP/ Ready To GO F-Frame G-Sublet M-Mechanical P-Paint S-Parts Ordered A-Aluminum 1-User-defined1 2-User-defined2 3-User-defined3

PT - Price Types:

O - OEM; A - Aftermarket; V - Salvage; R - Remanufactured; Sp - No Type
 L - Labor; M - Material; H - Hazardous; S - Storage; T - Towing; U - Sublet

BT - Billing Types:

No Code - Insurance Charge; CC - Customer Charge; BT - Betterment; AP - Appearance Allowance
 PD - Prior Damage; NC - No Charge

(*) Indicates Estimator Judgement
 Underline Indicates Supplement

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The elements of data used to calculate this Estimate were obtained from a CCC Database.

Calculations of the Estimate are performed by a computer program created by YADA Systems, Inc.