

**WAREHOUSE EMPLOYEES UNION LOCAL NO. 730
HEALTH AND WELFARE TRUST FUND
SUMMARY SUBROGATION REPORT
September 12, 2025**

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**WAREHOUSE EMPLOYEES UNION LOCAL NO. 730 HEALTH AND WELFARE TRUST FUND
SUBROGATION REPORT FOR TRUSTEE MEETING OF SEPTEMBER 12, 2025**

PARTICIPANT (DEPENDENT)	ATTORNEY FOR PARTICIPANT	DATE OF ACCIDENT	EMPLOYMENT STATUS	BENEFITS STATUS	CURRENT LIEN AMOUNT¹	STATUS OF COLLECTION EFFORTS
<i>ACTIVE</i>						
Quentin Chase 7 East Bend Court Apt. F Windsor Mill, MD 21244 (443) 423-2033	Kent L. Greenberg The Law Office of Kent L. Greenberg 10995 Owings Mills Blvd. Suite 209 Owings Mills, MD 21117 (410) 363-1020	10/7/2024	Active	Eligible	\$966.44 (Medical) \$12,557.26 (A&S) \$13,523.70 (ESTIMATED TOTAL; additional physical therapy claims are pending approval)	- Participant was injured in a motor vehicle accident on 10/7/2024. - He has retained an attorney and both Participant and the attorney have signed the Subrogation Agreement. Participant has now completed his treatment and his attorney is compiling information to prepare a demand letter. We will continue to monitor this case.
<i>INACTIVE</i>						
Mohamed Mansaray 8123 Mission Hill Road Jessup, MD 20794 (301) 917-4984	Turner Sothoron McGowan & Cecil LLC 319 Main Street Suite 300 Laurel, MD 20707 (301) 483-9960	10/7/22	Active	Eligible	\$26,864.17 (Medical) \$6,771.46 (A&S): \$33,635.63 (TOTAL)	- Participant fractured his elbow in a slip and fall outside of a gas station. - Participant's medical treatment is ongoing. He received A&S benefits for the period 10/22/22 through 3/28/23. - At a mediation held on June 17, 2024, Participant's counsel reached a tentative settlement for \$50,000 contingent on making "the numbers work for [his] client." - Counsel has asked for an unspecified reduction, but stated that he needs to "put at least \$20,000 in his client's pocket." In support of this request, he has submitted the information in the attached letter in which he states:

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					1. Legal fees and costs: \$15,422.17 2. Outstanding medical bills: \$6,234.66 3. Client recovery: \$20,000 TOTAL: \$41,656.83 • That leaves \$8,343.17 for the Fund • There is video evidence that is very unfavorable to the Participant and his counsel believes this is the best recovery they can hope for. He estimates the chances of recovering at trial at 5%. • In between meetings, the Trustees' denied Participant's renewed request to accept <u>\$11,671.59 in satisfaction of the lien.</u> • On August 29, 2024, counsel for BJs, the store at which Participant fell, contacted us to offer to show the Trustees the video evidence establishing what they believe is Participant's negligence and emphasizing that he will not prevail at trial. They have increased their offer by \$5,000 in order to resolve this matter. • The Trustees rejected the increased offer at their September meeting. • Participant's counsel engaged a third-party subrogation firm to negotiate a reduced lien. The Trustees rejected that offer in October. • The case settled in July 2025 for \$55,000 and counsel's office accidentally sent the Fund a settlement check for \$25,000. The Fund Office has not cashed the check. • Participant's benefits are currently being offset and counsel has asked the Trustees to reconsider a reduction in the lien amount. • If an agreement cannot be reached, counsel has stated that he will file an interpleader action.
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¹ Associated Administrators confirmed the lien amounts contained herein on May 23, 2025.