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June 19, 2019

To the Honorable Common Council  
of the City of Milwaukee  
Room 205 – City Hall

Re: C.I. File No. 1029-2018-1922  
Communication from: Hupy & Abraham, S.C.  
111 East Kilbourn Avenue, Suite 1100  
Milwaukee, WI 53202 on behalf of  
John Rivera  
806 E. Kewaunee Street  
Milwaukee, WI 53202

To the Honorable Common Council:

Hupy & Abraham, S.C. alleges that on August 27, 2018 their client sustained injuries when the tire of the motorcycle operated by him became stuck in the streetcar tracks while he was traveling eastbound on St. Paul Avenue at/near North Water Street. Claimed damages total \$50,000.00.

The Infrastructure Services Division indicates that the streetcar tracks at East St. Paul Avenue and North Water Street were constructed in accordance with the standard specifications, plans, and accepted standards for streetcar infrastructure. This project was constructed and completed under a City of Milwaukee contract. The work was performed by Kiewit Infrastructure Company.

There is no evidence that the City was negligent. Therefore, we recommend that this claim be denied.

Very truly yours,

  
GRANT F. LANGLEY  
City Attorney

  
JAN A. SMOKOWICZ  
Deputy City Attorney

JAS:mal  
Enclosure

c: Samir Amin (Infrastructure)  
1029-2018-1922:260328

