

**LEVINE LAW, LLC**

630 North Broadway  
Milwaukee, Wisconsin 53202  
[www.rlevinelaw.com](http://www.rlevinelaw.com)

**Michael G. Levine\***  
**Jonathan J. Cattey**  
**Robert A. Levine – part-time**  
\*Also Licensed in Florida

CITY OF MILWAUKEE  
2024 AUG 14 PM 1:16  
CITY CLERK'S OFFICE

Telephone (414) 271-9585  
Facsimile (414) 271-8506

July 29, 2024

**VIA CERTIFIED MAIL**

**- RETURN RECEIPT REQUESTED**

Jim Owczarski, City Clerk  
City of Milwaukee  
Attn: Claims  
City Hall, Room 205  
200 East Wells Street  
Milwaukee, WI 53202

**NOTICE OF CLAIM**

Re: My Client: Tywon Thompson  
Date of Injury: July 13, 2024

Dear Clerk:

My firm represents Tywon Thompson (DOB 10/20/1996) of 3157 N. 8<sup>th</sup> St. Milwaukee, Wisconsin 53206, whose 2013 Chevy Cruze was severely damaged and totaled on July 13, 2024 due to the alleged negligence of the City, through its employee(s), servant(s) and/or agent(s), when a tree fell on it that was being worked on by the City.

Shortly after the incident, an employee of the City came to the house and advised my client's mother, Rodnesha Thompson, that the tree had fallen on the vehicle that was parked on the street outside of the residence.

Enclosed please find the following re the above:

1. Photographs showing the damage to my client's motor vehicle; and
2. Estimate of Pinkey's Capital Auto Body in the amount of \$7,576.93.

I am by this letter hereby demanding the total amount of the attached estimate or \$7,576.93.

Kindly review this letter and the enclosed information and then contact my attorney,

City of Milwaukee  
Notice of Claim  
July 29, 2024  
Page 2

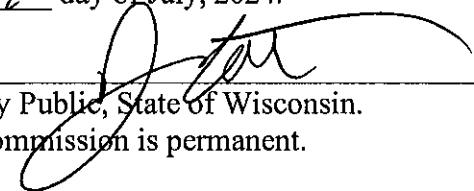
Jonathan J. Cattey, as soon as possible.

Thank you for your cooperation.

Dated this 29<sup>th</sup> day of July, 2024.

  
\_\_\_\_\_  
Tywon Thompson

Subscribed and sworn to before me  
This 29<sup>th</sup> day of July, 2024.

  
\_\_\_\_\_  
Notary Public, State of Wisconsin.  
My commission is permanent.

LEVINE LAW, LLC

  
\_\_\_\_\_  
Jonathan J. Cattey

Encls.



## PINKEY'S CAPITAL AUTO BODY

info@pcabwi.com  
120 W. MELVINA ST., MILWAUKEE, WI 53212  
Phone: (414) 962-3380  
FAX: (414) 962-0670

Workfile ID: 6cd7017a  
PartsShare: 83TBHT  
Federal ID: 390985331  
State ID: 456-0000015257-03  
Federal EPA: Milwaukee, WI  
State EPA: WI

### Preliminary Estimate

**Customer: Thompson, Tywon**

Written By: Steven Schulz

Insured: Thompson, Tywon  
Type of Loss:  
Point of Impact:

Policy #:  
Date of Loss:

Claim #:  
Days to Repair: 0

**Owner:**  
Thompson, Tywon  
(414) 659-1251 Cell

**Inspection Location:**  
PINKEY'S CAPITAL AUTO BODY  
120 W. MELVINA ST.  
MILWAUKEE, WI 53212  
Repair Facility  
(414) 962-3380 Business

**Insurance Company:**

### VEHICLE

2013 CHEV Cruze LT1 Automatic 4D SED 4-1.4L Turbocharged Gasoline Electronic Fuel Injection Red

VIN: 1G1PC5SB8D7225645	Interior Color: Charcoal	Mileage In: 212,514	Vehicle Out:
License: AVM3242	Exterior Color: Red	Mileage Out:	
State: WI	Production Date: 1/2013	Condition:	Job #:

#### TRANSMISSION

Automatic Transmission  
Overdrive

#### POWER

Power Steering  
Power Brakes  
Power Windows  
Power Locks  
Power Mirrors

#### DECOR

Dual Mirrors  
Tinted Glass  
Console/Storage

#### CONVENIENCE

Air Conditioning  
Intermittent Wipers  
Tilt Wheel  
Cruise Control  
Rear Defogger  
Keyless Entry  
Alarm  
Message Center  
Steering Wheel Touch Controls  
Telescopic Wheel

#### RADIO

AM Radio

FM Radio

Stereo  
Search/Seek  
CD Player  
Auxiliary Audio Connection  
Satellite Radio

#### SAFETY

Drivers Side Air Bag  
Passenger Air Bag  
Anti-Lock Brakes (4)  
Front Side Impact Air Bags  
Head/Curtain Air Bags  
Communications System

Hands Free Device

Rear Side Impact Air Bags

#### SEATS

Cloth Seats  
Bucket Seats  
Reclining/Lounge Seats

#### WHEELS

Aluminum/Alloy Wheels

#### PAINT

Clear Coat Paint

#### OTHER

Traction Control  
Stability Control

## Preliminary Estimate

**Customer: Thompson, Tywon**

2013 CHEV Cruze LT1 Automatic 4D SED 4-1.4L Turbocharged Gasoline Electronic Fuel Injection Red

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1		<b>FRONT BUMPER &amp; GRILLE</b>					
2	R&I	R&I bumper cover				1.8	
3	Repl	Center grille	95225615	1	103.30	0.3	
4		<b>FRONT LAMPS</b>					
5	R&I	RT R&I headlamp assy				0.3	
6	R&I	LT R&I headlamp assy				0.3	
7		<b>HOOD</b>					
8	Repl	Hood	95389675	1	789.02	1.5	2.8
9		Add for Clear Coat					1.1
10		Add for Underside(Complete)					1.4
11		Add for Clear Coat					0.3
12	R&I	Insulator				Incl.	
13		<b>FENDER</b>					
14	*	Blnd RT Fender					<u>0.9</u>
15	*	Blnd LT Fender					<u>0.9</u>
16	R&I	RT Fender liner				0.4	
17	R&I	LT Fender liner				0.4	
18		<b>ROOF</b>					
19	*	Rpr Roof panel				<u>5.0</u>	2.8
20		Overlap Major Non-Adj. Panel					-0.2
21		Add for Clear Coat					0.5
22	R&I	R&I headliner				3.1	
23		<b>WINDSHIELD</b>					
24	Repl	Windshield GM 2nd design	95094668	1	614.92	2.6	
25	#	Urathane kit		1	25.00		
26		<b>REAR DOOR</b>					
27	*	Rpr LT Door shell 2nd design				<u>6.0</u>	2.0
28		Overlap Major Adj. Panel					-0.4
29		Add for Clear Coat					0.3
30	Repl	LT Applique 2nd design	95492676	1	49.87	0.3	
31	R&I	LT Belt w'strip bright finish				0.2	
32	R&I	LT Handle, outside w/o chrome				0.4	
33	R&I	LT R&I trim panel				0.5	
34		<b>PILLARS, ROCKER &amp; FLOOR</b>					
35	*	Rpr <u>LT Uniside (Upper Roof Rail)</u>				<u>6.0</u>	<u>2.0</u>
36		Overlap Major Adj. Panel					-0.4
37		Add for Clear Coat					0.3
38		<b>FRONT DOOR</b>					
39	*	Blnd LT Door shell					<u>1.0</u>
open	Repl	LT Applique 2nd design	95090575	1	71.88	0.3	
41	R&I	LT Belt w'strip bright finish				Incl.	
42	R&I	LT R&I mirror				0.3	
43	Repl	LT Run w'strip 2nd design	95321657	1	157.77	0.3	

## Preliminary Estimate

**Customer: Thompson, Tywon**

2013 CHEV Cruze LT1 Automatic 4D SED 4-1.4L Turbocharged Gasoline Electronic Fuel Injection Red

44	R&I	LT Door glass GM				0.6	
45	R&I	LT Handle, outside w/o chrome				0.4	
46	R&I	LT R&I trim panel				0.6	
47	<b>QUARTER PANEL</b>						
48	*	Blnd LT Quarter panel					<u>1.3</u>
49	R&I	LT Wheelhouse liner acoustic pkg				0.3	
50	R&I	LT Applique bright finish				0.2	
51	Repl	LT Stone guard	22907771	1	50.42	0.2	
52	<b>REAR LAMPS</b>						
53	R&I	LT Tail lamp assy				0.3	
54	<b>REAR BUMPER</b>						
55	R&I	R&I bumper cover				0.9	
56	<b>VEHICLE DIAGNOSTICS</b>						
57	*	Rpr Pre-repair scan			m	<u>0.5</u>	M
58	*	Rpr Post-repair scan			m	<u>0.5</u>	M
59	<b>MISCELLANEOUS OPERATIONS</b>						
60	*	Repl Cover car/bag		1	<u>10.00</u>	0.2	
61	#	Refn Corrosion Protection					0.3
62	#	Mask Jambs - Per Jamb		1			0.5
<b>SUBTOTALS</b>					<b>1,872.18</b>	<b>34.7</b>	<b>17.4</b>

### ESTIMATE TOTALS

Category	Basis			Rate	Cost \$
Parts					1,872.18
Body Labor	33.7 hrs	@		\$ 78.00 /hr	2,628.60
Paint Labor	17.4 hrs	@		\$ 78.00 /hr	1,357.20
Mechanical Labor	1.0 hrs	@		\$ 155.00 /hr	155.00
Paint Supplies	17.4 hrs	@		\$ 58.00 /hr	1,009.20
Subtotal					7,022.18
Sales Tax	\$ 7,022.18	@		7.9000 %	554.75
<b>Grand Total</b>					<b>7,576.93</b>
Deductible					0.00
<b>CUSTOMER PAY</b>					<b>0.00</b>
<b>INSURANCE PAY</b>					<b>7,576.93</b>

**MyPriceLink Estimate ID / Quote ID:**

1243222192355811328 / 138237939

MOTOR VEHICLE REPAIR PRACTICES ARE REGULATED BY CHAPTER ATPC 132, WIS. ADM. CODE, ADMINISTERED BY THE BUREAU OF CONSUMER PROTECTION, WISCONSIN DEPT. OF AGRICULTURE, TRADE AND CONSUMER PROTECTION, P.O. BOX 8911, MADISON, WISCONSIN 53708-8911.



## Preliminary Estimate

### Customer: Thompson, Tywon

2013 CHEV Cruze LT1 Automatic 4D SED 4-1.4L Turbocharged Gasoline Electronic Fuel Injection Red

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 DR1CC11, CCC Data Date 07/17/2024, and potentially other third party sources of data; and (b) the parts presented are OEM-parts. OEM parts are manufactured by or for the vehicle's Original Equipment Manufacturer (OEM) according to OEM's specifications for U.S. distribution. OEM parts are available at OE/Vehicle dealerships or the specified supplier. 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 with discounted pricing. 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 2024 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. Blnd=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 Intelligent 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=Paintless Dent Repair. VIN=Vehicle Identification Number.











