

WAGNER, FALCONER & JUDD, LTD.

Attorneys at Law Since 1932

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June 24, 2011

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NOTICE OF CLAIM

Mr. Ronald D. Leonhart
Clerk of the City of Milwaukee
City Hall Room 205
200 E. Wells Street
Milwaukee, WI 53202-3567

Re: Notice of Claim
Our Client/Claimant: James Wilcox
4360 N. 14th Street
Milwaukee, WI 53209
Date of Accident: April 4, 2011
Defendants: City of Milwaukee; K.S. Energy Services, Inc.

11 JUL 28 PM 2:49
2011 JUL 29 PM 1:03
RONALD D. LEONHART
CITY CLERK
CITY ATTORNEY
CITY OF MILWAUKEE RECEIVED

Dear Mr. Leonhart:

PLEASE TAKE NOTICE, Our office has been retained by James Wilcox for purposes of pursuing a claim against the City of Milwaukee and K.S. Energy Services, Inc. for personal injuries sustained by Mr. Wilcox arising out of an accident that occurred on or about April 4, 2011, in Milwaukee, Wisconsin. Pursuant to Wisconsin Statutes Section 893.80 we are hereby providing notice of Mr. Wilcox's claim.


On or about April 4, 2011, James Wilcox, legally blind, was walking to a bus stop near the corner of Congress and 14th Street. As he approached the corner of Congress and 14th Street, he fell into an open manhole where a construction crew for K.S. Energy Services, Inc. had been working on behalf of the city. The crew failed to place any warnings or obstructions to direct patrons around the open hole which led to Mr. Wilcox falling approximately six feet down into the hole.

Mr. Wilcox sustained serious injuries including injuries to his left knee, back and his left hip all of which are still being treated to control swelling and pain. It is too early in his treatment to know the extent of his injuries and/or whether they are permanent in nature.

WHEREFORE, the claimant, James Wilcox, hereby provides notice of his claim and claims relief against the City of Milwaukee in an amount of \$50,000.00 to compensate him for his personal injuries, costs and pain and suffering resulting from the above-referenced accident.

Sincerely,

WAGNER, FALCONER & JUDD, LTD.


Michael C. Demo
Attorney at Law