

**NOTICE OF CIRCUMSTANCES OF CLAIM**

TO: CITY OF MILWAUKEE, DEPARTMENT OF PUBLIC WORKS  
WATER DISTRIBUTION, LINCOLN WATER  
ROOM 516  
MUNICIPAL BUILDING  
841 NORTH BROADWAY  
MILWAUKEE, WISCONSIN 53202

CITY OF MILWAUKEE  
2004 JAN -6 PM 2:13  
RONALD J. LEONARDINI  
CITY CLERK

**PLEASE TAKE NOTICE** Pursuant to Wisconsin Statute § 893.80(1)(a) that the undersigned will be making a claim for injuries and damages against you by virtue of the reasons set forth hereafter:

NAME OF CLAIMANT:

MARGARET LAZAREVICH

DATE AND TIME OF INJURIES SUSTAINED:

SEPTEMBER 4, 2003

CITY OF MILWAUKEE  
RECEIVED  
04 JAN -6 PM 2:56  
OFFICE OF  
CITY ATTORNEY

PLACE OR LOCATION WHERE INJURY OR DAMAGES OCCURRED:

2254 SOUTH CHASE AVENUE  
MILWAUKEE, WISCONSIN

MANNER IN WHICH DAMAGES OR INJURIES WERE RECEIVED OR OCCURRED:

Claimant tripped and fell due to a Department of Public Works pipe sticking out of the ground the pipe was in disrepair, being badly chipped and bent. It was also missing its cover, making it particularly hazardous. The pipe is located in front of 2254 South Chase Avenue, Milwaukee, Wisconsin.

GROUNDS ON WHICH CLAIM IS MADE:

Negligence on the part of the City of Milwaukee, Department of Public Works, by its agents, servants, and employees including but not limited to failure to maintain a safe and proper condition for public use and negligently maintaining a stand pipe.

GENERAL DESCRIPTION OF INJURIES AND DAMAGES:

PERSONAL INJURIES: RIGHT KNEE  
LOST WAGES  
MEDICAL EXPENSES  
PAST AND FUTURE PAIN AND SUFFERING

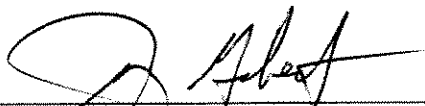
**PLEASE TAKE NOTICE** that satisfaction for such injuries or damages will be claimed, but that the amount of said demand is **UNKNOWN** at the present time. This document is a NOTICE OF CIRCUMSTANCES made pursuant to Wisconsin Statute § 893.80(1)(a) and NOT A NOTICE OF CLAIM pursuant to Wisconsin Statute § 893.80(1)(b).

Dated at Milwaukee, Wisconsin, this 29<sup>th</sup> Day of December, 2003

Claimant: MARGARET LAZAREVICH  
827 SOUTH SHEA  
MILWAUKEE, WISCONSIN 53215

ACTION LAW OFFICES

BY:

  
\_\_\_\_\_  
STEVEN C. GABERT  
Attorney for the Claimant  
933 North Mayfair Road  
Suite 200  
Milwaukee, Wisconsin 53226  
Telephone: (414) 456-1111

Subscribed and sworn to before me  
this 29th day of December, 2003

  
\_\_\_\_\_  
Notary Public, State of Wisconsin  
My Commission Expires: 1-29-06

CERTIFICATE OF SERVICE

---

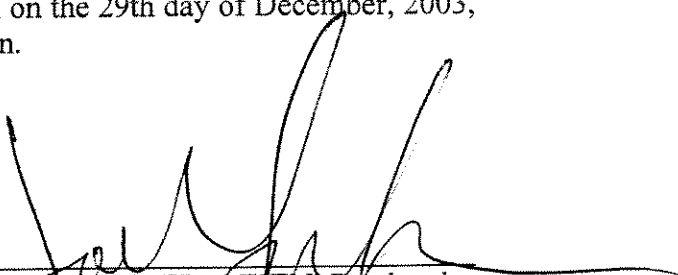
The undersigned hereby certifies that a true copy of the attached:

**NOTICE OF CIRCUMSTANCES OF CLAIM**

was served upon the hereinafter named:

CITY OF MILWAUKEE, DEPARTMENT OF PUBLIC WORKS  
WATER DISTRIBUTION, LINCOLN WATER  
ROOM 516  
MUNICIPAL BUILDING  
841 NORTH BROADWAY  
MILWAUKEE, WISCONSIN 53202

by enclosing same in an adequately postpaid envelope, bearing the sender's name and address which was duly deposited in a U.S. Mailbox on the 29th day of December, 2003, pursuant to Section 801.14(2), Milwaukee, Wisconsin.



JOANNE L. FRANKEN, Paralegal  
983 North Mayfair Road  
Suite 200  
Milwaukee, Wisconsin 53226  
Telephone: (414) 456-1111