

**STATE OF WISCONSIN
NOTICE OF INJURY
Pursuant to Section 893.80, Wisconsin Statutes**

To: City of Milwaukee, Department of Public Works, Mayor Tom Barrett

Claimants' Name, Address and Telephone Number:

Dennis Civers
2359 South 51st Street, Apt. 203
Milwaukee, WI 53219

(414) 543-4175

TIME & DATE OF OCCURRENCE:

March 9, 2005
1:10 p.m.

LOCATION:

20th and Cleveland, Milwaukee County, Wisconsin

STATEMENT OF CIRCUMSTANCES GIVING RISE TO THE CLAIM FOR INJURY:

While working to install a new light pole on 20th and Cleveland, Mr. Civers received a massive electrical shock. The pole was made of concrete with steel reinforcement rods in its center. And an aluminum cap on the top. Mr. Civers was working with a crew consisting of: Sari Tomaszewski, Kris Kaszuba, Rob Lawson and Jeff Wallace. Ms. Tomaszewski was operating the crane of holding the pole, while Mr. Civers was on the ground, guiding the pole into position. Mr. Civers was wearing a hardhat and protective gloves at that time.

There was a rumble and there flying sparks. The pole had come into contact with a wire up above and it conducted through the pole. Mr. Civers received an electrical shock from the pole, which could have been carrying up to 7620 volts traveling through it at the time of the incident. He was pulseless and nonbreathing, PNB at that time.

CITY OF MILWAUKEE
2005 JUL 18 PM 2:45
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CITY CLERK

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2005 JUL 18 PM 3:03
OFFICE OF
CITY ATTORNEY

His crew and then the first responders conducted CPR, reviving Mr. Civers. He was then taken to Froedert Hospital where he was treated by Dr. Kathleen Christians. Dr. Christians determined that Mr. Civers had sustained electrical burns to his right middle finger as well as his right upper calf. He also sustained significant short-term memory loss. Mr. Civers has been unable to work for the past seventeen weeks. His doctors do not have any predictions as to when, if ever, he may return to his previous occupation. He suffers headaches and nerve damage-related pains on a daily basis. He has no recollection of the incident to this date. Mr. Civers has been a loyal employee since 1975 and now seeks damages and related costs for his on the job injuries.

ITEMIZED STATEMENT OF RELIEF SOUGHT

Mr. Civers seeks the damages listed below. He reserves the right to amend these numbers as the extent and duration of his injuries and limitations become clearer.

1. Permanent Injuries	\$250,000.00
- Burns, Nerve Damage Right Upper Calf and Leg	
- Burns, Nerve Damage in Right Middle Finger and Hand	
- Headaches	
- Memory Loss	
2. Pain and Suffering	\$100,000.00
3. Emotional Distress	\$ 50,000.00
4. Loss of Ability to Earn	
Receiving 80% of Pay 17 weeks	\$2,589.10
Will receive 80% of Pay remaining 25 weeks	\$3,807.50
Inability to Earn (8 years until retirement)	
Projected Annual Income with COLA	\$288,480.68
1 - (\$36,552.00)	
2 - \$37,648.56	
3 - \$38,778.02	
4 - \$39,941.36	
5 - \$41,139.60	

6 - \$42,373.79
7 - \$43,645.00
8 - \$44,954.35
\$288,480.68

5. Loss of Benefits for Self and Partner \$420,000.00
Estimated Annual Cost for Private Insurance \$60,000.00
(Diabetic + one)

TOTAL CLAIM \$1,114,877.28

Dated this 7th day of July, 2005.

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