

NOTICE OF INJURY

TO: City Hall  
Jim Owczarski, City Clerk  
200 E. Wells Street, Room 205  
Milwaukee, WI 53202

*CD 8/5  
JWZ*

CITY OF MILWAUKEE  
2022 JUN 28 AM 10:31  
CITY CLERK'S OFF

Pursuant to the provisions of Sec. 893.80(1)(a) the claimant, Christine Papadogeorgis, an adult, residing at 1302 E. Knapp Street, in the City and County of Milwaukee, State of Wisconsin, herewith gives notice of injury giving rise to a future claim for relief in the form of monetary damages as set forth below:

1. The attorneys for Christine Papadogeorgis, an adult resident of the City of Milwaukee, residing at 1302 E. Knapp Street, Milwaukee, WI, are GENDLIN, LIVERMAN & RYMER, S.C., 10335 W. Oklahoma Ave. Suite 300, Milwaukee, WI 53227.

2. This Notice of Injury will also serve as a formal notification of our attorney lien rights in accordance with Wisconsin Statute §757.36.

3. That Christine Papadogeorgis sustained serious personal injuries at approximately 6:30 p.m. on June 3, 2022 at the Ogden streetcar pick up point, in the City and County of Milwaukee, when Ms. Papadogeorgis boarded The Hop Streetcar, operated by an unknown female employee/agent of the City of Milwaukee that accelerated The Hop Streetcar while Ms. Papadogeorgis was moving with her walker to sit in the handicapped seat, causing her to fall to the ground sustaining serious injuries.

4. That a proximate cause of said injuries was the negligence of the City of Milwaukee, and the unknown female employee/agent operator of the City of Milwaukee.

5. That as a result of the aforesaid incident, Christine Papadogeorgis sustained serious personal injuries, pain, suffering and disability and incurred medical expenses.

OFFICE OF CITY ATTORNEY  
29 JUN '22 AM 09:39

6. That the undersigned is one of the attorneys for Christine Papadogeorgis, and is, therefore, authorized to give this Notice of Injury and certifies that the above-described injury, damage or death actually occurred, that I have read the above notice and that the same is true to my knowledge except for those matters stated upon information and belief and as to those matters, I believe the same to be true.

Dated at Milwaukee, Wisconsin, this 22<sup>nd</sup> day of June, 2022.

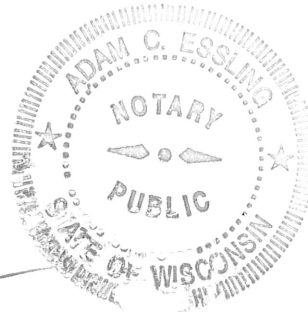
GENDLIN, LIVERMAN & RYMER, S.C.

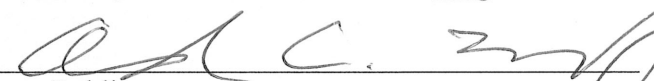
BY:   
Daniel E. Meylink

**P.O. ADDRESS**

Suite 300  
10335 W. Oklahoma Ave.  
Milwaukee, WI 53227  
(414) 272-3399

STATE OF WISCONSIN  
COUNTY OF Milwaukee  
Subscribed and sworn to before me this  
This 22<sup>nd</sup> day of June, 2022



  
Notary Public  
My commission is permanent or expires on permanent.  
(Seal if any below)

**GENDLIN, LIVERMAN & RYMER, S.C.**

10335 W. OKLAHOMA AVE., STE. 300  
MILWAUKEE, WI 53227  
PHONE: (414) 272-3399  
FAX: (414) 272-6659

**PERSONAL INJURY  
ATTORNEYS**

\*♦MICHAEL J. GENDLIN  
\*ANDREW R. LIVERMAN  
\*†TIMOTHY J. RYMER  
\* LOUIS E. BAUREIS  
\*† LINCOLN K. MURPHY  
\* DANIEL E. MEYLINK  
\* ADAM C. ESSLING

\* Licensed in Wisconsin  
♦ of counsel  
† Certified Civil Trial Specialist by  
The National Board of Trial Advocacy

June 24, 2022

The HOP MKE Streetcar Operations and Maintenance Building  
450 N 5th Street  
Milwaukee, WI 53203

City Hall  
Jim Owczarski, City Clerk  
200 E. Wells Street, Room 205  
Milwaukee, WI 53202

RE: Our Client: Christine Papadogeorgis  
Date/Incident: June 3, 2022

Dear Sir or Madam:

Please be advised that this office has been retained to represent the legal interest of the above-named client relative to the personal injuries and/or damages that he/she sustained as a result of the above-mentioned incident.

This letter of retainer will also serve as a formal notification of our attorney lien rights in accordance with the statutes of the State of Wisconsin.

It is my understanding that The HOP MKE Streetcar Operations and Maintenance Building/City Hall has possession and/or control of The Hop Streetcar involved in this incident. I kindly request that The HOP MKE Streetcar Operations and Maintenance Building/City Hall not spoil the condition of The Hop Streetcar and that you preserve this essential evidence. See Sentry Ins. V Royal Ins., 196 Wis.2d 907 (ct app. 1995). I would like to inspect The Hop Streetcar as soon as possible. Please contact me to arrange a time for this to be accomplished.

I kindly request that The HOP MKE Streetcar Operations and Maintenance Building/City Hall not spoil the condition of The Hop Streetcar and that you preserve this essential evidence including but not limited to:

OFFICE OF CITY ATTORNEY  
29 JUN 22 AM 09:37

CITY OF MILWAUKEE  
2022 JUN 28 AM 8:42  
CITY CLERK'S OFFICE

- The Electronic Control Module (ECM) or Event Data Recorder (EDR) commonly known as a “black box” or any other computer or data link of the subject vehicle to include but not be limited to devices such as Cummins Celect™, Cummins Quik-Link®, NEXIQ Pro-Link®, Detroit Diesel Pro Driver®, Detroit Diesel DDEC III® & DDEC IV®, Caterpillar Fleet Information System®, Caterpillar ADEM® or any similar device (if your vehicles are so equipped).
- GPS Devices
- Video Recorders/video information
- Detection and Avoidance Systems
- Anti-lock Brake Control Module.
- The electronic logging device, travel log and/or any notes, memos, correspondence or written materials kept by The HOP MKE Streetcar Operations Maintenance Building/City Hall for the date of June 3, 2022.

Additionally, I kindly request duplicates of any photographs and/or video surveillance that were taken of the scene. I will gladly reimburse you any costs for the duplication. Of note, such items should also not be spoiled.

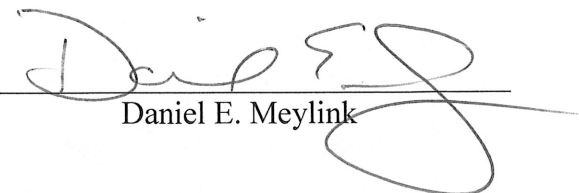
Please provide the names of all individuals claiming to be a witness to the incident, along with any statements obtained including but not limited to Christine Papadogorgis.

Thank you in advance for your anticipated cooperation. I look forward to hearing from you.

Very truly yours,

GENDLIN, LIVERMAN & RYMER, S.C.

By:



Daniel E. Meylink

DEM/to  
Enclosures

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**AFFIDAVIT OF MAILING**

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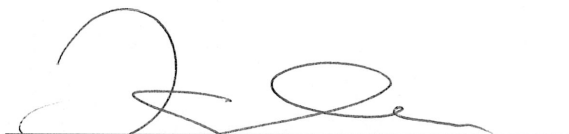
I certify that on 6/23/22, a copy of the foregoing document was sent upon the below listed recipients by:

- Personal Delivery  
 U.S. Mail  
 Via Facsimile to:  
 E-mail Transmission to:

**Address of recipient**

The HOP MKE Streetcar Operations and Maintenance Building  
450 N 5th Street  
Milwaukee, WI 53203

City Hall  
Jim Owczarski, City Clerk  
200 E. Wells Street, Room 205  
Milwaukee, WI 53202

  
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Tammy Olen, Paralegal