

LAUFENBERG & HOEFLE, S.C.

Lynn R. Laufenberg*
Paul R. Hoefle
Michael L. Laufenberg

115 South 84th Street
Suite 330
Milwaukee, WI 53214

Telephone: (414) 778-0700
Facsimile: (414) 778-1770
Writer's Email:
mll@lauflaw.com

*Certified by NBTA as Civil Trial Advocate

September 24, 2003

Ms. Ellen H. Tangen
City of Milwaukee
Office of the City Attorney
200 E. Well Street - Suite 800
Milwaukee, WI 53202-2025

Re: Bett, et al v. Sdoukos, et al
Case No: 02-CV-1938

Dear Ellen:

Following-up our recent telephone conversation, Jeff Janik faxed me a copy of the declaration page from the Betts' insurance policy in effect at the time of Mrs. Bett's crash. Underinsured Motorist coverage is not listed on the dec pages. Although I do not yet have a certified copy of the policy, it appears from the dec pages that the Betts did not have UIM coverage at the time of Mrs. Bett's crash. Therefore, Mrs. Bett would be left with Allstate's \$25,000.00 policy limits to recover for her damages.

As we discussed, I do not believe that Allstate's \$25,000 limits make Mrs. Bett whole for her injuries and damages. Mrs. Bett's special damages (medical bills and wage loss) total \$16,001.11, and Drs. Delahunt and Kerwin would testify that the medical bills are reasonable, necessary and causally related to this accident. Allstate has already admitted that the wage loss is reasonable, necessary and causally related to the accident, and I do not see that WPS named any witnesses to dispute any of these items of damage.

Additionally, Dr. Delahunt has opined that Mrs. Bett has suffered a permanent injury to her low back, resulting in chronic low back pain that she will continue to have, which will be exacerbated by repetitive bending, lifting and twisting. Dr. Kerwin has opined that Mrs. Bett suffered permanent injuries to her thoracic and cervical spine. He has recommended a continued home stretching regimen, complimented by occasional physical therapy or chiropractic treatments. I am enclosing the reports of Drs. Delahunt and Kerwin for your review, in case you do not already have them. Again, WPS did not name any witnesses to dispute Drs. Delahunt and Kerwin.

Mrs. Bett is only 48 years old. She has a future life expectancy of approximately 34 more years. Her past and future pain, suffering and disability, when combined with the past special damages, clearly makes the Allstate policy limits inadequate to fully compensate Mrs.

September 24, 2003

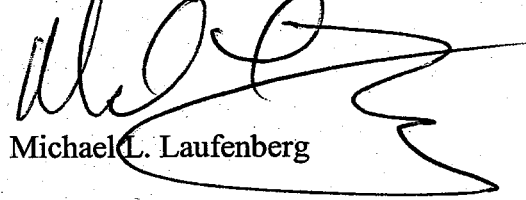
Page 2

Bett for her losses. And, this does not include even the most conservative estimate of Mrs. Bett's future physical therapy or chiropractic needs.

Accordingly, the plaintiffs do not intend to reimburse WPS any amount for its subrogation claim. If WPS feels that Mrs. Bett has been made whole by her recovery, it is free to request a Rimes hearing. However, I ask that you advise me of WPS's intentions at your earliest convenience.

Sincerely,

LAUFENBERG & HOEFLE, S.C.

A handwritten signature in black ink, appearing to read "Michael L. Laufenberg", written over a large, stylized flourish or scribble.

Michael L. Laufenberg

MLL/dau

cc: Mr. and Mrs. Robert J. Bett, w/out Encls.
Mr. Warren J. Klaus, w/out Encls.