

EISENBERG, RILEY, & MUWONGE, S.C.

ATTORNEYS AT LAW
2228 WEST WELLS STREET
MILWAUKEE, WISCONSIN 53233
(414) 933-0000

2005 AUG 30 PM 3:29

August 22, 2005
RONALD D. LEONHARDT
CITY CLERK

City of Milwaukee
200 East Wells Street
Milwaukee, Wisconsin 53202

Re: Our Client: Rose Struck
Date of Accident: July 18, 2005
Place of Accident: 1609 N. Prospect Ave

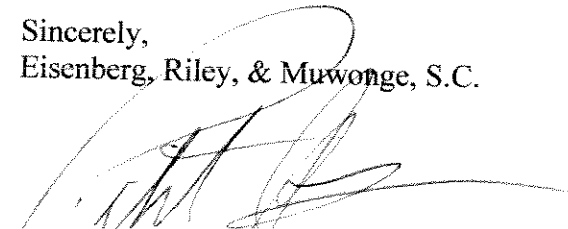
Dear Gentleperson:

This correspondence is to inform you that we have been retained by the above named party for the purposes of collecting damages due to the accident that occurred at the above referenced date and location. It is also to advise you of our lien rights as prescribed by the State of Wisconsin Statutes and by a written contract signed by our above named client. For your protection, as well as ours, please make sure that our name appears on any settlement/payment check in connection with this matter.

Please be advised that your insurance company must be contacted, so as to guarantee protection under your insurance policy. If they are not notified by you promptly they may not have to provide coverage to you, then all expenses would be borne by you alone.

If you have a liability insurance carrier, kindly notify me of the name, and your policy number. For further information concerning this matter you may contact this office at the telephone number and address listed above.

Sincerely,
Eisenberg, Riley, & Muwonge, S.C.



By: Patrick J. McClellan
Investigator

PJM/bi

CITY OF MILWAUKEE

AUG 31 11:02 AM '05

RECEIVED

October 26, 2006

CERTIFIED RECIEPT NUMBER: 7004 1350 0000 0173 8296

TO: CITY OF MILWAUKEE
City Clerk
City Hall
800 East Wells Street, Room 205
Milwaukee, WI 53202

CITY OF MILWAUKEE
2005 OCT 27 PM 12: 54
RONALD J. LEONARDI
CITY CLERK

NOTICE OF CLAIM OF ROSE STRUCK PURSUANT TO §893.80(1)(b), WIS. STATS.

PLEASE BE ADVISED that we were retained by and represent Rose Struck of 1567 N. Prospect Ave. #701, Milwaukee, WI 53202 and hereby give notice of claim on her behalf in all matters concerning all injuries and damages she sustained as a result of the trip and fall accident she was involved in on July 18, 2005 at around 9:15 a.m. While using the public sidewalk on the west side of the street at around 1609 North Prospect Ave., Milwaukee, WI and while walking in a northerly direction, Ms. Struck was caused to trip by the section of grating and concrete housing of an electrical vault which surface was of an uneven height thereby causing a variance and in turn causing Ms. Struck, to trip, fall and sustained injuries. Ms. Struck sustained permanent injuries and damages as a result of this accident and was caused to be subjected to diagnostic testing, surgery and therapy which gave rise to the following medical bills from the following medical providers and entities as itemized below:

<u>Past Provider</u>	<u>Dates of Service</u>	<u>Amounts Incurred and Owed</u>
1. Columbia St. Mary's Hospital -- Columbia Campus	7/18/05 – 12/7/05	\$23,677.52
2. Infinity Healthcare Physicians	7/18/05	275.00
3. Wisconsin Radiology Specialists	7/18/05 & 7/19/05	77.00
4. Newport Anesthesia Providers	7/19/05	153.61
5. Columbia West Clinic	7/28/05 to 12/8/05	742.00
6. Dr. Paul Loewenstein	3/2/06	400.00
Total Medical Bills:		<u>\$25,325.13</u>
<u>Future Provider</u>	<u>Dates of Service</u>	<u>Amounts to be Incurred</u>
7. Dr. Paul Loewenstein	unkonwn	1,800.00

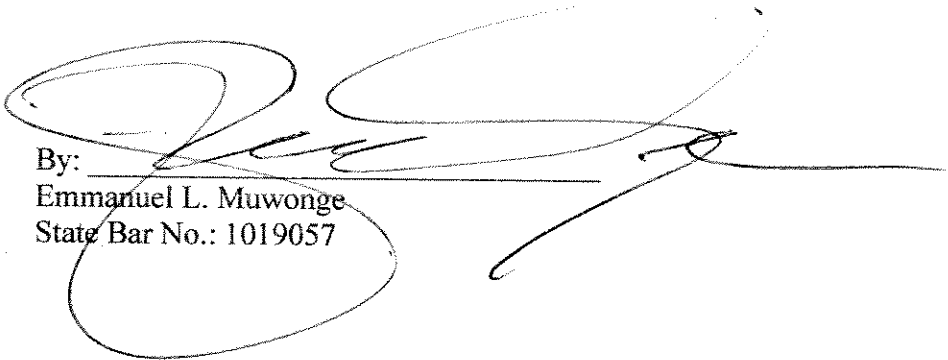
Ms. Struck will incur \$1,800.00 in the form of scar revisions.

CITY OF MILWAUKEE
RECEIVED
2005 OCT 27 PM 3: 32
OFFICE OF
CITY ATTORNEY

The city of Milwaukee, through its agents, servants and employees is hereby notified that Rose Struck makes a claim against the city of Milwaukee for the recover of money damages in the total amount of \$50,000.00 as compensation for her damages, which include past and future medical expenses, past and future pain and suffering.

Please send a written acknowledgment of this notice of claim.

EISENBERG & RILEY, S.C.
Attorneys for Claimant

By: 
Emmanuel L. Muwonge
State Bar No.: 1019057

P.O. Address:

2228 West Wells Street
Milwaukee, WI 53233
(414)933-0000

EISENBERG, RILEY & MUWONGE, S.C.
ATTORNEYS AT LAW

Alvin H. Eisenberg
John Kenyatta Riley
Emmanuel Muwonge
Brian P. Mularski
Christopher L. Zimmerman

2228 W Wells Street
Milwaukee, Wisconsin 53233
(414) 933-0000
Fax (414) 933-0001

Medical Consultant
James M. Zarzynski, M.D.

April 14, 2006

City Of Milwaukee
200 E. Wells St
Milwaukee, WI. 53202

ATTN: Steve Carini

Re: Our Client: Rose Struck
Date of Loss: 7/18/05
Location: 1609 Prospect Avenue
Milwaukee, WI.

Dear Mr. Carini:

Enclosed please find the following items of **SPECIAL DAMAGES:**

Rose Struck

1. Columbia St. Mary's Hospital for ER examination, x-rays, admission, diagnosis, and treatment, dates of services 7/18/05 to 7/19/05, and physical therapy, dates of services 9/13/05 to 12/7/05 in the amount of \$23,677.52.
2. Infinity Healthcare Physicians; this is the bill for the ER doctor at Columbia St. Mary's, date of service 7/18/05 in the amount of \$275.00.
3. Wisconsin Radiology Specialists; this is the bill for the x-ray technicians at Columbia St. Mary's, date of services 7/18/05 and 7/19/05 in the amount of \$77.00.
4. Newport Anesthesia Providers; this is the bill for the anesthesiologist at Columbia St. Mary's, date of services 7/19/05 in the amount of \$153.61.
5. Columbia West Clinic for examination, follow ups, x-rays, dates of services 7/28/05 to 12/8/05 in the amount of \$742.00.

6. Dr. Paul Loewenstein for an estimate in the amount of \$1,800.00.

Total Special Damages to due date: \$26,725.13

After you have a chance to review the materials, please contact Attorney Emanuel Muwonge regarding the settlement discussion.

Sincerely,

EISENBERG, RILEY & MUWONGE, S.C.

A handwritten signature in cursive script, appearing to read "By P. Goeckermann".

By: Bryan P. Goeckermann,
Paralegal

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