

ORIGINAL

CITY OF MILWAUKEE
NOTICE OF CLAIM FOR DAMAGES RECEIVED

02 FEB 20 PM 4:30

A. CLARA LISTON
2700 N. 37TH STREET
MILWAUKEE, WI 53210

OFFICE OF
CITY ATTORNEY

Claimant,

-vs-

City Clerk, Common Council
CITY OF MILWAUKEE
200 E. Wells Street
MILWAUKEE, WI 53202

Respondent.

CITY OF MILWAUKEE
02 FEB 20 AM 10:57
RONALD D. LEONHARDT
CITY CLERK

TO: City Clerk
City of Milwaukee
200 E. Wells Street
Milwaukee, WI 53202

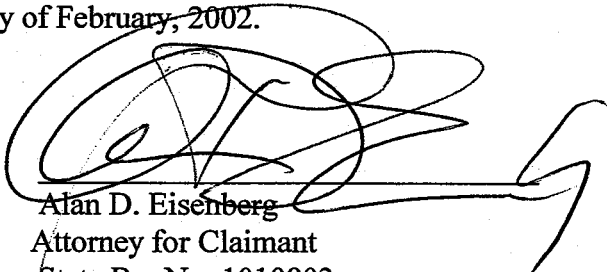
PLEASE TAKE NOTICE that the Law Offices of Alan D. Eisenberg appears for A. Clara Liston, and claims that the City of Milwaukee through its police officers, employees, supervisors and officials' callous disregard for human life and safety and grossly excessive and reckless pursuit of a fleeing motorist, caused a Milwaukee County Transit System bus (Eastbound Center Street Bus, Route #22) to run off the road at the intersection of N. 37th Street and W. Center Street, in the City of Milwaukee, Milwaukee County, Wisconsin, wherein the transit bus caused damages to real property and home furnishings belonging to Claimant on or about December 19, 2001, at or about 9:15 p.m.,

1. At or about 9:15 p.m., on or about Wednesday, December 19, 2001, as a result of grossly excessive and reckless pursuit of a fleeing motorist, by a Milwaukee Police Department vehicle, a Milwaukee County Transit System bus eastbound in West Center Street at North 37th Street, on Route #22, was forced to travel across all lanes of traffic and collided with the south side of the duplex owned by Claimant, Ms. A. Clara Liston;
2. At or about 9:15 p.m., on or about Wednesday, December 19, 2001, said motor bus caused extensive damages to the exterior structure and interior membrane of the southeastern portion of claimant's home;
3. At or about 9:15 p.m., on or about Wednesday, December 19, 2001, said motor bus caused other property losses including but not limited to heating and natural gas service, electrical, telephone, electronic security, and sewer and water systems all of which systems were immediately rendered out of service;

Notice of Claim
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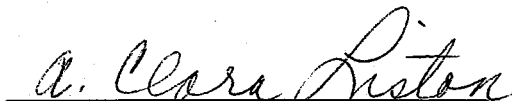
4. At or about 9:15 p.m., on or about Wednesday, December 19, 2001, said motor bus caused temporary displacement of Claimant and co-habitants of Claimant's residence, forcing Claimant and co-habitants into the street in winter conditions and forcing Claimant and co-habitants to seek emergency shelter, lodging and food at unknown and unfamiliar locations for a period of 44 days;
5. At or about 9:15 p.m., on or about Wednesday, December 19, 2001, said motor bus caused Claimant to be deprived of the quiet enjoyment of Claimant's property for a period of 44 days;
6. At or about 9:15 p.m., on or about Wednesday, December 19, 2001, said motor bus caused Claimant and co-habitants to seek ongoing medical attention for severe stress, trauma and fear as a result of her home being catastrophically bombarded and causing Claimant to become displaced for a period of 44 days;
7. At or about 9:15 p.m., on or about Wednesday, December 19, 2001, said motor bus caused Claimant to be inconvenienced as to Claimant's normal routines and affairs and to seek legal services in addition to professional counseling and medical services;
8. Claimant seeks One Million (\$1,000,000.00) dollars in compensatory damages and One Million (\$1,000,000.00) dollars in punitive damages and any other just and equitable relief as may be granted..

Dated at Milwaukee, Wisconsin this 8th day of February, 2002.



Alan D. Eisenberg
Attorney for Claimant
State Bar No. 1010803

APPROVED BY:



A. CLARA LISTON

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