

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
*JOHN D. GEORGIN
*† LINCOLN K. MURPHY
* DANIEL E. MEYLINK
* ADAM C. ESSLING

* Licensed in Wisconsin
Licensed in Ohio
† Certified Civil Trial Specialist by
The National Board of Trial Advocacy

January 25, 2021

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

RE: Our Client: Lonnie Nash
Date/Injury: 07/31/2020

OFFICE OF CITY ATTORNEY
02 FEB '21 AM 11:54

Dear Mr. Owczarski:

Previously, our office filed a demand package containing the medical records, bills and other special damages for this claim. Pursuant to Steve Carini's request, this letter contains our initial monetary demand for this claim- \$15,000.00. Once you have had an opportunity to review the demand package and our monetary demand, please contact me to discuss settlement.

Thank you.

Very truly yours,

GENDLIN, LIVERMAN & RYMER, S.C.

By: 

Daniel E. Meylink

DEM/to
Enclosure

CITY OF MILWAUKEE
2021 FEB - 1 PM 3: 01
CITY CLERK'S OFFICE

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August 24, 2020

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

**CITY CLERK'S OFFICE
2020 AUG 25 PM 12:47
CITY OF MILWAUKEE**

RE: Notice of Injury Form
Our Client: Lonnie Nash
Date/Injury: 07/31/2020

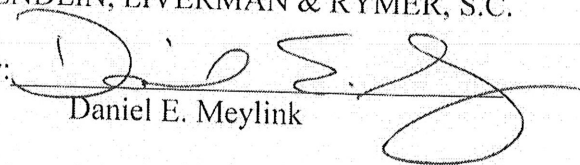
To Whom It May Concern:

Enclosed herewith please find an original and one (1) copy of the Notice of Injury Form relative to the above matter. I would appreciate if you would indicate the date of receipt and filing on one of the enclosed copies.

Thank you for your anticipated cooperation.

Very truly yours,

GENDLIN, LIVERMAN & RYMER, S.C.

By: 
Daniel E. Meylink

DEM/to
Enclosure

RECEIVED
OFFICE OF CITY ATTORNEY

AUG 28 2020

12 25 A.M./P.M.

NOTICE OF INJURY

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

City of Milwaukee, Department of Public
Frank P. Zeidler Municipal Building
Jeffrey Polenski, Commissioner
841 N. Broadway, Room 501
Milwaukee, WI 53202

8/25/20
11:52

[Handwritten signature]

Pursuant to the provisions of Sec. 893.80(1)(a) the claimant, Lonnie Nash, an adult, residing at 2130 S. 7th 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:

CITY OF MILWAUKEE
CITY CLERK'S OFFICE
AUG 25 PM 12:50

1. The attorneys for Lonnie Nash, an adult resident of the City of Milwaukee, residing at 2130 S. 7th 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 Lonnie Nash sustained serious personal injuries at approximately 11:18 a.m. on July 31, 2020 at So. 6th Street and W. National Avenue, in the City and County of Milwaukee. Mr. Nash was walking to the bus stop located at the above intersection when he stepped on an electrical junction cover on the side walk. The cover broke causing Mr. Nash's foot and leg to fall through the cover and into a depression. The City of Milwaukee, City of Milwaukee Department of Public Works Street Lighting Services Department failed to properly inspect,

RECEIVED
OFFICE OF CITY ATTORNEY

AUG 26 2020

12 25 A.M. P.M.

monitor and maintain the junction cover in a reasonable and safe manner, and was otherwise negligent.

4. That a proximate cause of said injuries was the negligence of the City of Milwaukee, City of Milwaukee Department of Public Works Street Lighting Services causing serious injuries.


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

6. That the undersigned is one of the attorneys for Lonnie Nash, 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 21st day of August, 2020.

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 21 day of August, 2020



Notary Public

My commission is permanent or expires on 2/19/22

(Seal if any below)

