

NOTICE OF INJURY

TO: Mr. Ronald D. Leonhardt
Clerk of the City of Milwaukee
City Hall
200 East Wells Street
Milwaukee, WI 53202

CITY OF MILWAUKEE
2003 NOV 25 PM 4:09
RONALD D. LEONHARDT
CITY CLERK

THE ABOVE NAMED PARTIES,
PLEASE TAKE NOTICE:

1. Loretta Graham is an adult and resides at 3631 N. 14th Street, Milwaukee, Wisconsin 53206.
2. Loretta Graham was injured on July 31, 2003, due to the acts, omissions, and negligent conduct of the City of Milwaukee.
3. The circumstances of the injuries are as follows: On July 31, 2003, in the City of Milwaukee, Milwaukee County, Wisconsin, Loretta Graham was exiting City Hall near Market Street. City Hall's address is 200 East Wells Street, Milwaukee, Wisconsin 53202. While walking on the sidewalk, which had scaffolding erected above, Ms. Graham tripped on a raised area in the walkway.
4. At all times material, the aforesaid sidewalk in the City and County of Milwaukee, State of Wisconsin, was a public walkway and the aforesaid deviation and protrusion had existed for a long period of time.
5. At all times material, the City of Milwaukee owned, controlled, inspected, maintained, and repaired the public way where said deviation and protrusion were located.
6. The City of Milwaukee was negligent in failing to properly barricade the aforesaid sidewalk, in failing to warn users of the sidewalk of the dangerous condition of said sidewalk, and in failing to maintain and repair the sidewalk, which is a violation of Section 81.15 of the Wisconsin Statutes.
7. As a direct and proximate result of the negligence of the City of Milwaukee, Loretta Graham suffered a fractured ankle, mental anxiety and distress, and other personal injuries. Ms. Graham also sustained past and future medical expenses.
8. At all times material, the above named party had actual notice of the aforesaid incident and thoroughly investigated it.
9. This document is a notice of injury served on the above-named party in compliance with Wisconsin law. This document is not a claim for damages. No claim for damages is made at this time.

Dated this 25 day of November, 2003 in Milwaukee,

RECEIVED
CITY OF MILWAUKEE

Wisconsin.

Hall Charne Burce & Olson, s.c.

By James H. Hall Jr.
James H. Hall, Jr.
State Bar No. 1004338
Attorney for Injured Party

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