

NOTICE OF CIRCUMSTANCES GIVING RISE TO CLAIM
AND CLAIM PURSUANT TO WIS. STAT. § 893.80

BY PERSONAL SERVICE

TO: **Ronald D. Leonhardt, Clerk**
City of Milwaukee
City Hall, Room 205
200 E. Wells Street
Milwaukee, WI 53202,

CLAIMANT: Louise Burdue
100 W. Maple Street
Milwaukee, Wisconsin 53204

CITY OF MILWAUKEE
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RONALD D. LEONHARDT
CITY CLERK

PLEASE TAKE NOTICE that Louise Burdue, by her attorney, states that the following circumstances potentially give rise to a claim:

1. As part of the City of Milwaukee's 2010 Paving Program, the City took bids and awarded Zignego Company, Inc. the \$1.6 million project.
2. Part of the Paving Program included work to be performed on Louise Burdue's street where her business is located, at 100 W. Maple Street, Milwaukee, WI 53204.

On April 26, 2010, Ms. Burdue was notified that construction was to begin on South 1st Street between E. Lincoln Avenue and S. Kinnickinnick Avenue.

Construction began and Zignego Company, Inc., began working on the sidewalk abutting Ms. Burdue's premises located at 100 W. Maple Street.

Soon after the commencement of this construction by Zignego, part of Ms. Burdue's basement wall collapsed into her basement exactly where Zignego was performing work on the sidewalk.

6. As a result of the collapse, Zignego ceased construction so that Ms. Burdue could repair her basement wall, plumbing and electrical damages which she has begun to do immediately at her expense.
7. For the repair of the wall that collapsed, Ms. Burdue incurred repair costs of \$5000.
8. As a result of the wall collapse, some of the electrical wiring was damaged and Ms. Burdue has incurred nearly \$3000 in expenses to repair to electrical damage. The electrical repair project is not yet complete and additional expenses are likely to occur.

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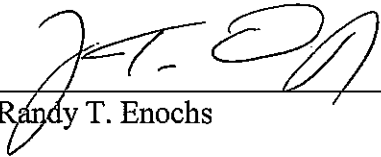
OFFICE OF
CITY ATTORNEY

9. As a result of the wall collapse, some of the plumbing was damaged and Ms. Burdue has incurred nearly \$3000 in expenses to repair the plumbing damage.
10. Zignego did not take all of the normal and expected precautions and caused the collapse in Ms. Burdue's wall, causing her to incur unnecessary expenses.

WHEREFORE, claimant, whose name and address are stated above, claims relief against the City of Milwaukee for the sum of \$11,000.

Dated: August 11, 2010

Attorneys for Claimant



Randy T. Enochs

State Bar No. 1065740
SEIFERT LAW CENTER
230 W. Wells, Suite 610
Milwaukee, WI
414-273-9900