

RECEIVED

JUN 28 2013

OFFICE OF
CITY ATTORNEY

NOTICE OF INJURY

AND

CLAIM FOR DAMAGES

TO: City Clerk of City of Milwaukee
Attn: Claims
200 E. Wells Street
Room 205
Milwaukee, WI 53202

City of Milwaukee
Sidewalk and Maintenance Department
841 North Broadway
Milwaukee, WI 53202

CITY OF MILWAUKEE
13 JUN 27 PM 12: 39
CITY CLERK'S OFFICE

PLEASE TAKE NOTICE that on March 8, 2013, Phyllis D. Graves of 1955 West Perdue Street, Milwaukee, Wisconsin 53209, was walking on a city sidewalk at East Brady Street just east of North Farwell Avenue, city and county of Milwaukee, state of Wisconsin. While Phyllis Graves was walking on said city sidewalk, she tripped and fell over a raised section of the sidewalk.

PLEASE TAKE FURTHER NOTICE that as a proximate result of said accident, Phyllis Graves, sustained personal injuries which necessitated medical care and attention; furthermore, these injuries may be permanent in nature.

Liability for the injuries is claimed as follows:

The City of Milwaukee and the City of Milwaukee Sidewalk and Maintenance Department negligently failed to properly inspect, repair, maintain, warn against and/or care for within a reasonable length of time, as a result of which Phyllis Graves sustained severe personal injuries.

As a proximate result of the above-described negligence, Phyllis Graves, sustained personal

injuries to her back, knees, hips, elbows, chest and stomach, which is causing her to incur medical bills and expenses, as well as future expenses and pain and suffering, all to her damages as listed below.

MEDICAL BILLS TO DATE: Medical treatment is still ongoing.

Specials so far:

St. Joseph's Hospital	(waiting for bill)
Froedtert Hospital	(waiting for bill)
Pain Management Center of Wisconsin	\$656.00
Prescriptions:	Forthcoming

LOSS OF WAGES: (Forthcoming)

FUTURE MEDICAL EXPENSES: Unknown at this time.

PAIN AND SUFFERING:

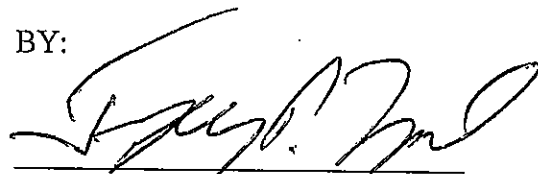
Past pain and suffering and disability	\$25,000.00
Future pain and suffering and disability	(undetermined at this time)

TOTAL CLAIM: \$50,000.00.

WHEREFORE, Phyllis D. Graves, demands an amount unknown at this time from said City of Milwaukee.

DATED at Milwaukee, Wisconsin this 26 day of June, 2013.

BY:



JEFFREY P. ZARZYNSKI
SBW#: 01014707
Attorney for Claimant

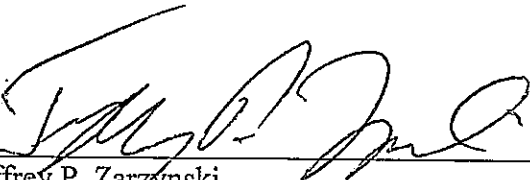
P.O. ADDRESS:

735 West Wisconsin Avenue
Twelfth Floor
Milwaukee, WI 53233
PH: (414) 277-9696
Fax: (414) 224-1411

STATE OF WISCONSIN)
) ss
COUNTY OF MILWAUKEE)


JEFFREY P. ZARZYNSKI, being duly sworn on oath deposes and says:

That he is one of the attorneys for the above-named claimant and that he makes this Affidavit in claimants behalf being duly authorized to do so; that he is a resident of the City and County of Milwaukee, State of Wisconsin, that he has read the foregoing Notice of Injury and Claim for Damages and believes upon information and belief that the matter stated therein are true. That the source of the affiant's information are statements made by the claimants and that he has been duly authorized to verify this Notice of Injury and Claim for Damages.



Jeffrey P. Zarzynski
State Bar No. 01014707

Subscribed and sworn to before me
this 26th day of June, 2013.



Notary Public, State of Wisconsin
My Commission Expires: 6/19/16