

STATE OF WISCONSIN

CITY OF MILWAUKEE  
CIRCUIT COURT MILWAUKEE COUNTY  
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CECILIA PUSKARICH,

RONALD D. LEONHARDT  
CITY CLERK

Claimant,

NOTICE OF INJURY

-vs.-

CITY OF MILWAUKEE,

Defendant.

Cecilia Puskarich, of 309 West Mineral Street, Milwaukee, Wisconsin 53204, by her attorney, Robert L. Sanderson, does hereby place City of Milwaukee on notice of an accident and injury which occurred on October 6, 2000, at approximately 2:15 p.m., on a City of Milwaukee sidewalk adjacent to a parking lot between the buildings located at 722 through 730 South 5<sup>th</sup> Street, in the City and County of Milwaukee, State of Wisconsin.

That at the said time and place the claimant, Cecilia Puskarich, being 79 years of age, sustained injuries when she fell on a mound of dried cement that had been left on the sidewalk next to a part of said sidewalk the City of Milwaukee had replaced, causing the same to injure the claimant. The negligent acts and omissions of the defendant include, but are not limited to the following: (1) Failure to manage and supervise the sidewalk replacement and repair so as to prevent a large mound of wet cement to dry on the adjoining sidewalk;(2) failure to properly maintain and inspect said sidewalk and the surrounding area for misplaced material; (3) failure to give proper warning of any defects on the sidewalk; and (4) failure to hire construction companies that would coordinate the replacement of the sidewalk for the defendant, so as to avoid a mound of wet cement to be left on an adjoining sidewalk.

That by reason of the accident described above, and the negligence and carelessness of the

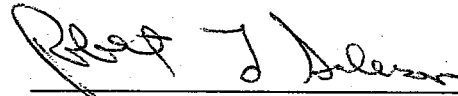
CITY OF MILWAUKEE  
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CITY ATTORNEY  
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defendant, City of Milwaukee, its agents, servants, and employees, the claimant, Cecilia Puskarich,  
has sustained injuries and damages.

Dated this 28<sup>th</sup> day of November, 2000.

**ROBERT L. SANDERSON, S.C.**

By:



**ROBERT L. SANDERSON**

**SBN: 01008373**

**Attorney for Claimant**

Subscribed and sworn to me this  
28<sup>th</sup> day of November, 2000.



**Notary Public, State of Wisconsin**  
**My Commission expires 4/27/03.**

P.O. Address:

606 W. Wisconsin Avenue, Suite 1900  
Milwaukee, WI 53203-1905  
PH: (414) 272-6900