

NOTICE OF INJURY
AND
CLAIM FOR DAMAGES

TO: **CITY OF MILWAUKEE**
c/o City Clerk
200 East Wells Street – **ROOM 205**
Milwaukee, Wisconsin 53202

CITY OF MILWAUKEE
2018 MAY 24 PM 1:12
CITY CLERK'S OFFICE

RECEIVED
OFFICE OF CITY ATTORNEY

MAY 25 2018

11:57 (A.M./P.M.)
PJ

THE ABOVE NAMED PARTIES,

PLEASE TAKE NOTICE:

1. Stephan Thomas is an adult individual residing at 2570 N Booth Street, Milwaukee, County of Milwaukee, State of Wisconsin.
2. Stephan Thomas has sustained injuries due to the negligence of the above-named parties.
3. That on January 28, 2018, in the City and County of Milwaukee, Stephan Thomas sustained personal injuries when Stephan Thomas slipped and fell on a defective sidewalk in front of 909 East Garfield Avenue, Milwaukee, Wisconsin.
4. That as a proximate result of said fall, Stephan Thomas sustained personal injuries to his right fibula and tibia which necessitated medical care and attention; furthermore, these injuries are permanent in nature.
5. Liability for the injuries is claimed as follows: The City of Milwaukee on account of its liability for the acts of its agents and employees as further set forth in this Notice of Injury and Claim for Damages, who were acting within the scope of their employment at the time of said accident.

MAY 25 2018

11:58 A.M./P.M.
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6. Medical expenses are ongoing and known bills to date are as follows:

MEDICAL BILLS:

ANTICIPATED MEDICAL EXPENSES

Unknown at this time – estimated amount: **\$100,000.00**

PAIN AND SUFFERING


Past and future pain, suffering and disability: **\$200,000.00**

8. This document is a Notice of Injury and Claim for Damages served on the above-named party in compliance with Wisconsin Law.

WHEREFORE, Stephan Thomas demands **\$300,000.00** from said City of Milwaukee.

Dated at Milwaukee, Wisconsin, this 22nd day of May, 2018.

SCHIRO & ZARZYNSKI



Jeffrey P. Zarzynski, Esq.
(SBN No. 1014707)

P.O. ADDRESS:

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Email: jeff@jeffzarzynski.com

MAY 25 2018


11:58 (AM/PM)

Handwritten mark

STATE OF WISCONSIN)
) ss
MILWAUKEE COUNTY)


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 on claimant's 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 matters stated therein are true; that the source of the affiant's information are statements made by the claimant and that affiant has been duly authorized to verify this Notice of Injury and Claim for Damages.



Jeffrey P. Zarzynski
(SBN No. 1014707)

Subscribed and sworn to before me
this 22nd day of May, 2018.



Notary Public, State of Wisconsin
My Commission expires: 3/5/2021.
6/07/2019