

Daniel W. Stevens
danstevens@wi.rr.com

Rudolph J. Kuss
rudolphkuss@yahoo.com

Law Office of
Daniel W. Stevens

Joseph J. Esser
1924-1989

William H. Dieterich
Of Counsel

October 10, 2008

Clerk, City of Milwaukee
ATTN: CLAIMS
City Hall, Room 205
200 East Wells Street
Milwaukee, WI 53202

Re: Our Client: Deslie Lawrence
3908 N. 63rd Street
Milwaukee, WI 53216

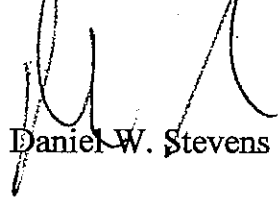
CITY OF MILWAUKEE
2008 OCT 13 PM 3:48
RONALD D. LEONHART
CITY CLERK

To Whom It May Concern:

Please be advised that we have been retained by Ms. Deslie Lawrence with regard to the Property Damage Claim against City of Milwaukee that occurred on or about June 6, 2008. Kindly direct all correspondence and inquiries to my office. If there should be any questions please contact me directly.

Very truly yours,

LAW OFFICE OF DANIEL W. STEVENS


Daniel W. Stevens

CITY OF MILWAUKEE
RECEIVED
2008 OCT 13 PM 3:54
OFFICE OF
CITY ATTORNEY

DWS:klm

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

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

TO:

Clerk, City of Milwaukee
ATTN: CLAIMS
City Hall, Room 205
200 East Wells Street
Milwaukee, WI 53202

CLAIMANT:

Deslie Lawrence
3908 N. 63rd Street
Milwaukee, WI 53216
Telephone: 414.461.1896

CITY OF MILWAUKEE
RECEIVED
2008 OCT -6 PM 3:25
OFFICE OF
CITY ATTORNEY

PLEASE TAKE NOTICE that the above-named Claimant states that the following circumstances give rise to a claim:

1. That on or about June 6, 2008, a sewer blockage occurred in a City-owned sewer located near Claimant's residence at 3908 N. 63rd Street.

2. That large quantities of water flooded the street and the Lawrence yard.

3. That upon information and belief, negligent maintenance of the City-owned sewer, appurtenances thereto, and the City street in which the same are located, contributed to the blockage and subsequent flooding.

4. That Claimant observed two City employees locking a valve in the sewer.

5. That the City employees told Claimant that they were locking the valve for the purpose of diverting the water to Claimant's property in order to prevent the water from causing damage to the downtown Milwaukee area.

6. That the City either negligently or intentionally caused damage to Claimant's property.

7. That the City's actions have caused Claimant to incur substantial damages, loss and expense and to suffer emotional distress. The itemized list of damages known as of the date of this Notice is as follows:

- \$13,650.00 for sump pump replacement


CITY OF MILWAUKEE
08 OCT - 7 AM 8:36
RONALD D. FEONHARDT
CITY CLERK

- \$ 380.00 for electrical repairs
- \$ 283.01 to replace freezer
- \$ 1,094.02 to replace washer and dryer
- \$ 2,568.72 to replace carpeting
- \$ 2,800.00 to replace damaged drywall and re-paint
- \$ 4,200.00 to replace furnace
- \$ 1,800.00 to replace water heater
- \$ 2,868.00 for cleaning and drying
- \$20,866.00 for foundation repair

WHEREFORE, Claimant, whose name and address is stated above, claims relief against the City of Milwaukee for the itemized damages set forth above, for such other damages as may be subsequently discovered and for Claimant's reasonable attorneys' fees.

Dated this 4th day of October, 2008.

PETRIE & STOCKING, S.C.
Attorneys for Claimant


Elizabeth Gamsky Rich, Esq.
State Bar No. 1019123

Petrie & Stocking, S.C.
Plymouth Gateway Plaza
637 Walton Drive, Suite 1
Plymouth, WI 53073
T 920.892.2449
F 920.893.0695

Claim against MSDS

10/3/2008				
Georgia Slaughter	Home:	414-464-6109		
5206-08 N. 27th Street				
Milwaukee, WI 53209				
Notice of Claim				
List of losses from Sewer backup in June, 2008				
5206				
Carpet		\$ 600.00		
Large area throw rugs		\$ 400.00		
Christmas decorations		\$ 1,500.00		
bleach		\$ 5.00		
mop		\$ 5.00		
broom		\$ 5.00		
gloves		\$ 3.00		
time spent cleaning out		\$ 200.00	16 hours	(2-days)
Helpers		\$ 200.00	same	(1)
washer		\$ 800.00		
dryer		\$ 600.00		
hot water heater		\$ 300.00		
paint for basement walls		\$ 200.00		
paint for 1/2 side of floors		\$ 100.00		
TV Stand		\$ 200.00		
		\$ 5,118.00		
5208				
base board		\$ 150.00		
hot water heater		\$ 300.00		
paint for basement floor		\$ 100.00		
paneling		\$ 1,200.00		
labor to re-install paneling		\$ 850.00		
bleach		\$ 5.00		
broom		\$ 5.00		
		\$ 2,610.00		
		\$ 7,728.00		
-home value lowered because numerous sewage backups				
-possible structural damage to home				

RONALD D. LEONHARDT
CITY CLERK

2008 OCT - 3 AM 10: 05

CITY OF MILWAUKEE

OFFICE OF
CITY ATTORNEY

2008 OCT - 3 PM 3: 41

CITY OF MILWAUKEE
RECEIVED