

PROCESS SERVER *[Signature]*  
TIME \_\_\_\_\_ : \_\_\_\_\_ AM/PM DATE \_\_\_\_\_  
( ) PERSONAL ( ) SUBSTITUTE  
( ) POSTED ( ) CORPORATE

**GENDLIN, LIVERMAN & RYMER, S.C.**

10335 W. OKLAHOMA AVE., STE. 300  
MILWAUKEE, WI 53227  
PHONE: (414) 272-3399  
FAX: (414) 272-6659

**PERSONAL INJURY  
ATTORNEYS**

- \*♦MICHAEL J. GENDLIN
- \*ANDREW R. LIVERMAN
- \*†TIMOTHY J. RYMER
- \* LOUIS E. BAUREIS
- \*† LINCOLN K. MURPHY
- \* DANIEL E. MEYLINK
- \* ADAM C. ESSLING

\* Licensed in Wisconsin  
♦ of counsel  
† Certified Civil Trial Specialist by  
The National Board of Trial Advocacy

November 6, 2024

City Hall  
Jim Owczarski, City Clerk  
200 E. Wells Street, Room 205  
Milwaukee, WI 53202

OFFICE OF CITY ATTORNEY  
11 NOV '24 PM 03:40

RE: Notice of Injury Form  
Our Client: Michael Rodgers  
Date/Injury: 09/11/2024

To Whom It May Concern:

Enclosed herewith please find an original and one (1) copy of the Notice of Injury Form relative to the above matter. I would appreciate if you would indicate the date of receipt and filing on one of the enclosed copies.

Thank you for your anticipated cooperation.

Very truly yours,

GENDLIN, LIVERMAN & RYMER, S.C.

By: *Louis E. Baureis*  
Louis E. Baureis

LEB/mw  
Enclosure

CITY OF MILWAUKEE  
2024 NOV - 8 PM 2:01  
CITY CLERK'S OFFICE

**NOTICE OF INJURY**

OFFICE OF CITY ATTORNEY  
11 NOV 24 PM 03:40

TO: Milwaukee City Hall  
Jim Owczarski, City Clerk  
200 W. Wells Street, Room 205  
Milwaukee, WI 53202

Milwaukee Department of Public Works  
Frank P. Zeidler Bldg.  
8541 N. Broadway, #501  
Milwaukee, WI 53202

Pursuant to the provisions of Sec. 893.80(1)(a) the claimant, Michael Rodgers, an adult, residing at 6720 N. 108<sup>th</sup> Street, in the City of Milwaukee, County of Milwaukee, State of Wisconsin, 53224, herewith gives notice of injury giving rise to a future claim for relief in the form of monetary damages as set forth below:

1. The attorneys for Michael Rodgers, an adult resident of the City of Milwaukee, residing at 6720 N. 108<sup>th</sup> Street, Milwaukee, WI 53224, are Gendlin, Liverman, and Rymer S.C., 10335 W. Oklahoma Ave., Suite 300, Milwaukee, Wisconsin 53227.

2. This Notice of Injury will also serve as a formal notification of our attorney lien rights in accordance with Wisconsin Statute §757.36.

3. That Michael Rodgers sustained serious personal injuries at approximately 7:10 a.m. on September 11, 2024 at or near 4385 N. 26<sup>th</sup> Street (alley) in the City of Milwaukee, County of Milwaukee, State of Wisconsin when a skid steer machine, operated by Jeffrey Dinkin, a City of Milwaukee, Department of Public Work's employee, lifted a couch in the alleyway in an attempt to dispose of the furniture inside of a disposal truck, failing to notice that Michael Rodgers was asleep on the couch.

4. That a proximate cause of said injuries to Michael Rodgers, was the negligence of Jeffrey Dinkins, a City of Milwaukee Department of Public Works employee and/or agent acting within the scope of his authority, for his failure to reasonably inspect the area, including but not limited to, the couch, and making sure the couch was safe to lift before attempting to dispose of it, resulting in serious injuries to Michael Rodgers.

5. That as a result of the incident set forth herein above, Michael Rodgers, sustained serious personal injuries, pain, suffering and disability and incurred medical expenses.

6. That the undersigned is one of the attorneys for Michael Rodgers, and is, therefore, authorized to give this Notice of Injury.

I declare under penalty of false swearing under the law of Wisconsin that the foregoing is true and correct.

Signed on this 6<sup>th</sup> day of November, 2024, at Milwaukee, Wisconsin.

GENDLIN, LIVERMAN, & RYMER. S.C.

By: 

Louis E. Baureis  
S/B/N: 1028120

**P.O. Address:**

Suite 300  
10335 W. Oklahoma Ave.  
Milwaukee, WI 53227  
(414) 272-3399

STATE OF WISCONSIN

COUNTY OF Milwaukee

Subscribed and sworn to before me this

This 6 day of November, 2024

Michaline Wagner

Notary Public

My commission expires 06/19/2028.

Seal Below

