

EVAN C. GOYKE
City Attorney

MARY L. SCHANNING
ROBIN A. PEDERSON
NAOMI E. SANDERS
JULIE P. WILSON

Deputy City Attorneys
2025 JUN 31 P 3:45

RECEIVED
INFRASTRUCTURE
SERVICES DIV. ADMIN



Milwaukee City Hall Suite 800 • 200 East Wells Street • Milwaukee, Wisconsin 53202-3551
Telephone: 414.286.2601 • TDD: 414.286.2025 • Fax: 414.286.8550

June 30, 2025

Mr. Kevin J. Muhs
City Engineer
Infrastructure Services Division
Municipal Building, Room 701

Re: C.I. File No. 1029-2025-1144
Communication from BRUCE JONES

FROM CITY ENGINEER			
	ORIG	COPY	REVIEW
TJT			COMMENT
KS	X		DISTRIB
TT			FM
CTC			COORD
RB			SEE ME
			ACTION X
			RETURN

Dear Mr. Muhs:

Enclosed herewith please find a copy of a communication concerning a claim which has been referred to us by the City Clerk's Office for an opinion concerning liability.

Because litigation is anticipated, we ask that you make a complete investigation of this matter. When the investigation is completed, please send it to this office to the attention of the Claims Section. We request your response within 45 days of the date of this letter. If you have any questions regarding this matter, please contact Claims Adjuster, Michelle Thompson-Gray.

Very truly yours,

Electronically signed by

EVAN C. GOYKE
City Attorney

ECG/cdr

Enclosure

1029-2025-1144/298469

Vehicle damaged by manhole cover.

KATHRYN Z. BLOCK
THOMAS D. MILLER
PETER J. BLOCK
PATRICK J. MCCLAIN
ANDREA J. FOWLER
JOANNA FRACZEK
HANNAH R. JAHN
MEIGHAN M. ANGER
ALEXANDER R. CARSON
BENJAMIN J. ROOVERS
GREGORY P. KRUSE
ALEX T. MUELLER
ALEXANDER D. COSSI
KATHERINE A. HEADLEY
SHEILA THOBANI
STACY J. MILLER
JORDAN M. SCHETTELE
THERESA A. MONTAG
ALEXANDER E. FOUNDOS
TRAVIS J. GRESHAM
KYLE W. BAILEY
JOSEPH M. DOBBS
WILLIAM K. HOTCHKISS
CLINT B. MUCHE
TYLER M. HELSEL
ZACHARY A. HATFIELD
MEGHAN C. MCCABE
CYNTHIA HARRIS ORTEGA
OLUWASEUN CHRIS IBITOYE
KEVIN P. TODT
NATHANIEL E. ADAMSON
JUSTIN J. DREIKOSEN
Assistant City Attorneys



AT ABOUT 9:30 ON 6-3-25 I was Traveling
NORTH on Humboldt a man cover hole was
Remove my vehicle a 2020 Ford Edge went
in The man hole cause damage To The right
side door and bottom of my vehicle The Stream
on 6-3-25 is causes The man cover hole
To be exposed.

cell phone

Bruce Jones
4128 W Lisbon
53208

414-551-7669
414-551-7669

The accident happen
on Humboldt and
NORTH AVENUE
right by pick n save
1100 E Garfield
Milwaukee WI
53212

CITY OF MILWAUKEE
JUN - 6 P 12:45
1985
CITY CLERK'S OFFICE



UMANSKY COLLISION CENTER

1621 W La Salle Ave, Milwaukee, WI 53209
Phone: (414) 540-2559
FAX: (414) 228-7420

Workfile ID: b1398243
Federal ID: 33-2340968

Preliminary Estimate

Customer: Jones, Bruce

Written By: Stephanle Mallory

Insured: Jones, Bruce Policy #: Claim #:
Type of Loss: Date of Loss: Days to Repair: 0
Point of Impact: 09 Left T-Bone (Left Side)

Owner:	Inspection Location:	Insurance Company:
Jones, Bruce 4128 W LISBON AVE MILWAUKEE, WI 53208 (414) 551-7669 Cell	UMANSKY COLLISION CENTER 1621 W La Salle Ave Milwaukee, WI 53209 Repair Facility (414) 540-2559 Business	

VEHICLE

2020 FORD Edge Titanium AWD 4D UTV 4-2.0L Turbocharged Gasoline Gasoline Direct Injection BLACK

VIN: 2FMPK4K91LBA76871	Interior Color: BLACK AND BROWN	Mileage In: 76,091	Vehicle Out:
License: AWA-5265	Exterior Color: BLACK	Mileage Out:	
State: WI	Production Date:	Condition:	Job #:

TRANSMISSION	Air Conditioning	FM Radio	SEATS
Automatic Transmission	Intermittent Wipers	Stereo	Bucket Seats
4 Wheel Drive	Tilt Wheel	Search/Seek	Reclining/Lounge Seats
POWER	Cruise Control	Auxiliary Audio Connection	Leather Seats
Power Steering	Rear Defogger	Premium Radio	Heated Seats
Power Brakes	Keyless Entry	Satellite Radio	
Power Windows	Alarm	SAFETY	
Power Locks	Message Center	Drivers Side Air Bag	Aluminum/Alloy Wheels
Power Mirrors	Steering Wheel Touch Controls	Passenger Air Bag	PAINT
Heated Mirrors	Rear Window Wiper	Anti-Lock Brakes (4)	Clear Coat Paint
Power Driver Seat	Telescopic Wheel	4 Wheel Disc Brakes	OTHER
Power Passenger Seat	Heated Steering Wheel	Traction Control	Fog Lamps
Memory Package	Climate Control	Stability Control	Rear Spoiler
DECOR	Backup Camera	Front Side Impact Air Bags	Signal Integrated Mirrors
Dual Mirrors	Parking Sensors	Head/Curtain Air Bags	California Emissions
Privacy Glass	Remote Starter	Hands Free Device	TRUCK
Console/Storage	Home Link	Xenon or L.E.D. Headlamps	Power Trunk/Liftgate
Overhead Console	RADIO	Blind Spot Detection	
CONVENIENCE	AM Radio	Lane Departure Warning	

Preliminary Estimate

Customer: Jones, Bruce

2020 FORD Edge Titanium AWD 4D UTV 4-2.0L Turbocharged Gasoline Gasoline Direct Injection BLACK

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1	FRONT DOOR						
2	*	Rpr LT Door shell				8.0	2.2
3		Add for Clear Coat					0.9
4		R&I LT Belt molding chrome				0.3	
5		R&I LT Handle, outside w/passive entry w/chrome				0.4	
6		R&I LT Mirror outside w/blind spot, w/heat, w/memory				0.3	
7		Repl LT Lower molding black	FT4Z5820879AA	1	148.18	0.3	
8	#	Feather / Prime / Block		1		0.3	0.3
9		R&I LT R&I trim panel				0.5	
10	MISCELLANEOUS OPERATIONS						
11	#	Car Cover / Mask For Overspray Color And Clear		1			0.2
12	#	Refn De-nib & Polish				0.2	
13	#	Hazardous Waste Disposal		1	10.00		0.5
14	#	Spray out card for color match		1			0.5
15	#	Tint Color		1			0.5
16	#	Refn Wet / Dry Sand and buff				1.4	
17	#						
18	#	**POSSIBLE HIDDEN DAMAGES - ADDITIONAL CHARGES MAY APPLY**		1			
SUBTOTALS					158.18	10.1	6.2

NOTES

Prior Damage Notes:
N/A

Preliminary Estimate

Customer: Jones, Bruce

2020 FORD Edge Titanium AWD UTV 4-2.0L Turbocharged Gasoline Gasoline Direct Injection BLACK

ESTIMATE TOTALS

Category	Basis	Rate	Cost \$
Parts			158.18
Body Labor	10.1 hrs	@ \$ 70.00 /hr	707.00
Paint Labor	6.2 hrs	@ \$ 70.00 /hr	434.00
Paint Supplies	6.2 hrs	@ \$ 50.00 /hr	310.00
Body Supplies	8.3 hrs	@ \$ 4.00 /hr	33.20
Subtotal			1,642.38
Sales Tax	\$ 1,642.38	@ 5.9000 %	96.90
Grand Total			1,739.28
Deductible			0.00
CUSTOMER PAY			0.00
INSURANCE PAY			1,739.28

MOTOR VEHICLE REPAIR PRACTICES ARE REGULATED BY CHAPTER ATCP 132, WIS. ADM. CODE, ADMINISTERED BY THE BUREAU OF CONSUMER PROTECTION, WISCONSIN DEPT. OF AGRICULTURE, TRADE AND CONSUMER PROTECTION, P.O. BOX 8911, MADISON, WISCONSIN 53708-8911.

Preliminary Estimate

Customer: Jones, Bruce

2020 FORD Edge Titanium AWD UTV 4-2.0L Turbocharged Gasoline Gasoline Direct Injection BLACK

Estimate based on MOTOR CRASH ESTIMATING GUIDE and potentially other third party sources of data. Unless otherwise noted, (a) all items are derived from the Guide DR2MS15, CCC Data Date 06/02/2025, and potentially other third party sources of data; and (b) the parts presented are OEM-parts. OEM parts are manufactured by or for the vehicle's Original Equipment Manufacturer (OEM) according to OEM's specifications for U.S. distribution. OEM parts are available at OE/Vehicle dealerships or the specified supplier. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM parts that may be provided by or through alternate sources other than the OEM vehicle dealerships with discounted pricing. Asterisk (*) or Double Asterisk (**) indicates that the parts and/or labor data provided by third party sources of data may have been modified or may have come from an alternate data source. Tilde sign (~) items indicate MOTOR Not-Included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed as a separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer aftermarket parts are described as Non OEM, A/M or NAGS. Used parts are described as LKQ, RCY, or USED. Reconditioned parts are described as Recond. Recored parts are described as Recore. NAGS Part Numbers and Benchmark Prices are provided by National Auto Glass Specifications. Labor operation times listed on the line with the NAGS information are MOTOR suggested labor operation times. NAGS labor operation times are not included. Pound sign (#) items indicate manual entries.

Some 2024 vehicles contain minor changes from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, labor and parts data from the previous year may be used. The CCC ONE estimator has a list of applicable vehicles. Parts numbers and prices should be confirmed with the local dealership.

The following is a list of additional abbreviations or symbols that may be used to describe work to be done or parts to be repaired or replaced:

SYMBOLS FOLLOWING PART PRICE:

m=MOTOR Mechanical component. s=MOTOR Structural component. T=Miscellaneous Taxed charge category.
X=Miscellaneous Non-Taxed charge category.

SYMBOLS FOLLOWING LABOR:

D=Diagnostic labor category. E=Electrical labor category. F=Frame labor category. G=Glass labor category.
M=Mechanical labor category. S=Structural labor category. (numbers) 1 through 4=User Defined Labor Categories.

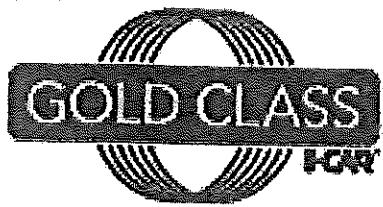
OTHER SYMBOLS AND ABBREVIATIONS:

Adj.=Adjacent. Align.=Align. ALU=Aluminum. A/M=Aftermarket part. Blnd=Blend. BOR=Boron steel.
CAPA=Certified Automotive Parts Association. CFC=Carbon Fiber.
D&R=Disconnect and Reconnect. HSS=High Strength Steel. HYD=Hydroformed Steel. Incl.=Included. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non Adjacent. NSF=NSF International Certified Part.
O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. Sect=Section. STS=Stainless Steel. Subl=Sublet.
UHS=Ultra High Strength Steel. N=Note(s) associated with the estimate line.

CCC ONE Estimating - A product of CCC Intelligent Solutions Inc.

The following is a list of abbreviations that may be used in CCC ONE Estimating that are not part of the MOTOR CRASH ESTIMATING GUIDE:

BAR=Bureau of Automotive Repair. EPA=Environmental Protection Agency. NHTSA= National Highway Transportation and Safety Administration. PDR=Paintless Dent Repair. VIN=Vehicle Identification Number.



HEISER COLLISION CENTER

7800 N 76TH ST, MILWAUKEE, WI 53223
Phone: (414) 357-2121
FAX: (414) 357-2133

Workfile ID: 0b1354e8
Federal ID: 45-4012824

Preliminary Estimate

Customer: Jones, Bruce

Written By: Dan Figueroa

Insured: Jones, Bruce

Policy #:

Claim #:

Type of Loss:

Date of Loss:

Days to Repair: 0

Point of Impact: 09 Left T-Bone (Left Side)

Owner:

Jones, Bruce

(414) 551-7669 Cell

Inspection Location:

HEISER COLLISION CENTER

Insurance Company:

7800 N 76TH ST

MILWAUKEE, WI 53223

Repair Facility

(414) 357-2121 Business

VEHICLE

2020 FORD Edge Titanium AWD 4D UTV 4-2.0L Turbocharged Gasoline Gasoline Direct Injection blk

VIN: 2FMPK4K91LBA76871	Interior Color:	Mileage In: 76,055	Vehicle Out:
License: AWA5265	Exterior Color: blk	Mileage Out:	
State: WI	Production Date: 3/2020	Condition:	Job #:

TRANSMISSION

Automatic Transmission

Air Conditioning

FM Radio

SEATS

4 Wheel Drive

Intermittent Wipers

Bucket Seats

POWER

Power Steering

Tilt Wheel

Stereo

Reclining/Lounge Seats

Power Brakes

Cruise Control

Search/Seek

Leather Seats

Power Windows

Rear Defogger

Auxiliary Audio Connection

Heated Seats

Power Locks

Keyless Entry

Premium Radio

Aluminum/Alloy Wheels

Power Mirrors

Alarm

Satellite Radio

PAINT

Heated Mirrors

Message Center

Drivers Side Air Bag

Clear Coat Paint

Power Driver Seat

Steering Wheel Touch Controls

Passenger Air Bag

OTHER

Power Passenger Seat

Rear Window Wiper

Anti-Lock Brakes (4)

Fog Lamps

Memory Package

Telescopic Wheel

4 Wheel Disc Brakes

Rear Spoiler

DECOR

Dual Mirrors

Heated Steering Wheel

Traction Control

Signal Integrated Mirrors

Privacy Glass

Climate Control

Stability Control

California Emissions

Console/Storage

Backup Camera

Front Side Impact Air Bags

TRUCK

Overhead Console

Parking Sensors

Head/Curtain Air Bags

Power Trunk/Liftgate

CONVENIENCE

Remote Starter

Hands Free Device

AM Radio

Home Link

Xenon or L.E.D. Headlamps

Blind Spot Detection

RADIO

Lane Departure Warning

Lane Departure Warning

Get live updates at www.carwise.com/e/56AeFJ

Preliminary Estimate

Customer: Jones, Bruce

2020 FORD Edge Titanium AWD 4D UTV 4-2.0L Turbocharged Gasoline Gasoline Direct Injection blk

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1	FRONT DOOR						
2	*	Rpr LT Door shell				4.0	2.0
3		Add for Clear Coat					0.8
4	Repl	LT Lower molding black	FT4Z5820879AA	1	148.18	0.3	
5	VEHICLE DIAGNOSTICS						
6	#	Pre Scan		1		0.5	M
7	#	Post Scan		1		0.5	M
8	#	Subl Hazardous waste removal		1	3.00	T	
9	#	Repl Cover Car		1	3.00	T	
10	#	Repl Corrosion protection primer		1	10.00	T	0.3
11	#	Subl Four wheel alignment		1	139.99	T	
		Note: Customer states vehicle not driving ok. Will need to have an alignment to ensure nothing is bent.					
12	#	Might have suspension damage(Not visible)		1			
SUBTOTALS					304.17	5.6	2.8

ESTIMATE TOTALS

Category	Basis	Rate	Cost \$
Parts			148.18
Body Labor	4.6 hrs	@ \$ 75.00 /hr	345.00
Paint Labor	2.8 hrs	@ \$ 75.00 /hr	210.00
Mechanical Labor	1.0 hrs	@ \$ 115.00 /hr	115.00
Paint Supplies	2.8 hrs	@ \$ 50.00 /hr	140.00
Body Supplies	4.6 hrs	@ \$ 25.00 /hr	115.00
Miscellaneous			155.99
Subtotal			1,229.17
Sales Tax	\$ 1,229.17	@ 7.9000 %	97.10
Grand Total			1,326.27
Deductible			0.00
CUSTOMER PAY			0.00
INSURANCE PAY			1,326.27

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Preliminary Estimate

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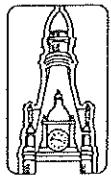
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O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. Sect=Section. STS=Stainless Steel. Subl=Sublet.
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The seal of the City of Milwaukee, featuring a stylized building with a tower and a clock, surrounded by the words "City of Milwaukee".

Department of Public Works
Infrastructure Services Division
Environmental Engineering Section

Jerrel Kruschke, P.E.
Commissioner of Public Works

Kevin J. Muhs, P.E., AICP
City Engineer

Timothy J. Thur, P.E.
Infrastructure Administration Manager

Kurt Sprangers, P.E.
Engineer in Charge

July 28, 2025

Evan Goyke, City Attorney
City Attorney's Office
841 N Broadway, Room 716

Attn: Claims Section

Subject: Claim of: Bruce Jones
Damages
File: C. I. File No. 1029-2025-1144
Location: N. Humboldt Avenue and E. North Avenue
Date: June 3, 2025

Dear Mr. Goyke:

This is in response to your letter dated June 30, 2025, regarding the subject claim.

On June 3, 2025 Sewer Maintenance responded to a missing lid complaint at N. Humboldt Avenue and E. North Avenue. Our Field Investigator immediately responded and secured the manhole lid. No prior calls were received regarding this or any other City sewer manhole cover in this area. Sewers had no other work near this location.

If you have any further questions concerning this matter, please contact Kurt Spranglers at 286-0515.

Sincerely,


Kevin J. Muhs, P.E., AICP
City Engineer

KRS KRS: eg
1-1 enclosure



CITY OF MILWAUKEE
INFRASTRUCTURE
ENVIRONMENTAL ENGINEERING
SEWER MAINTENANCE

SERVICE REFERRAL RECORD



5312914

Dispatched Location: 2249 N HUMBOLDT AV

Received: 2025-06-03 21:50:00

Contact: SAFFORE, TIARA (920)912-3538

FIELD INVESTIGATION

Time Arrived: _____ Crew #: _____ Investigator: _____ Assisted by: _____

(circle one)

Subject: **LIDS & GRATES** **LOST ITEMS** **CHECK CONNECTION** **ODOR**
CAVE-IN (Dye Test: Pos Neg) **OTHER (explain in 'Action Required' below)**

LOCATION

Street Location (NW NE SW SE) Corner On: N HUMBOLDT AV

At (Address or Intersecting Street): _____

Alley Location: (BEHIND ALONGSIDE) Of: _____

REFERRED TO (circle one)

Large Crew

Hand Crew

Mason

CCTV

Action Required: _____ Barricaded: YES NO

FOLLOW-UP INFORMATION

SEWER MAIN WORK

(circle one)

SEWER TYPE: SAN STORM COMB Size: Depth:

CCTV Exam # _____ CCTV Video # _____ Microfiche # _____

Section Requiring Work: From Manhole # _____ to Manhole # _____

REPAIR by Large Digging Crew # _____

Start Date: _____ Backfilled: _____ Closed: _____ Type of Repair: _____

STRUCTURE WORK

(circle one)

Structure: Catch Basin Storm Inlet Flatbottom Sewer Manhole Drain Communications Manhole

Repair by Crew # _____ & Mason Crew # _____

Start Date: _____ Backfilled: _____ Closed: _____ Type of Repair: _____

HOTLINE INFORMATION

Start Date: _____ Start Time: _____ Ticket Number: # _____

Marking Instructions: _____

Missing Lid or Grate - APPROX AREA, BY PICK N SAVE, MANHOLE LID MISSING OR
LOOSE @ N HUMBOLDT AV & E NORTH AV; SAYS IT BUSTED 2 OF CALLER'S CAR
TIRES, AND NOW A 2ND VEHICLE SAME. X M-5. ID WITHHELD. SAID NO NEED FOR CITY
TO CONTACT HER.

Resolution - PLACED LID ON WITH TAR RING NOW SECURE