

**Liberty Insurance Corporation**

Po Box 8017  
Wausau WI 54402-8017



Telephone: (800) 435-4401 x 8061  
Fax: (603) 334-0274

December 16, 2010

City Clerk  
ATTN: CLAIMS  
200 E WELLS ST  
ROOM 205  
MILWAUKEE WI 53202

OFFICE OF THE CITY CLERK  
2010 DEC 21 AM 10:59

RE: Employee: SEAMUS CREIGHTON  
Employer: UNITED PARCEL SERVICE  
Contract #: WC7-C25-004175-240-04  
Claim #: WC413-982181  
Injury: Ankle - Sprain  
Date of Injury: 09/07/2010  
Date of Report: 09/08/2010

Dear City Clerk:

Liberty Mutual is the Workers Compensation Carrier for United Postal Service. On Tuesday 9/7/2010 between 1:30 - 1:45 PM Seamus Creighton was making a delivery to 3068 North 44th Street in Milwaukee. There is a pothole on North 44th Street across the street (west) of the front of the delivery address and about two car lengths south of the intersection of Burleigh. North 44th Street is a one way street for northbound traffic south of Burleigh. There is northbound-facing parking on both the west and east sides of the street in the area where the accident happened. Seamus Creighton parked on the west side of North 44th Street and intended to cross to the east side to the delivery address when the accident happened. Mr. Creighton stepped into the pothole and fell to the ground, suffering from a right ankle injury. (Pictures of the pothole enclosed)

Because Mr. Creighton was in the course and scope of his employment Liberty Mutual is paying Workers Compensation Benefits. Because his injury was on City of Milwaukee property, Liberty Mutual is subrogating the City of Milwaukee and putting you on notice of our lien for failure to maintain premises (roadways) and failure to warn of hazards (pothole/rough road).

Mr. Creighton is currently treating for a right ankle sprain injury, so Liberty Mutual's lien is not final at this time.

Our current lien is \$2,770.66 in Indemnity payments made and \$3,892.15 Medical payments made (Payment Ledgers enclosed)

Mr. Creighton's information is as follows:

Seamus Creighton 5349 S 7, MILWAUKEE, WI, 53221 P: (414) 405-3275, email address unknown

Correspondence Copy #: 531145750

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2010 DEC 21 PM 2:46

CITY OF MILWAUKEE RECEIVED EX016601

Also enclosed is Liberty Mutual's notice of lien that was sent directly to the City of Milwaukee, Department of Public Works on 10/27/2010 and the City Attorney's Office on 12/15/2010.

Once the claim has been filed on behalf of Liberty Mutual please contact me directly with the Claim Adjuster information and claim number.

Sincerely,  
  
CORAL DEUBER  
RECOVERY SPECIALIST III

ENCLOSURE

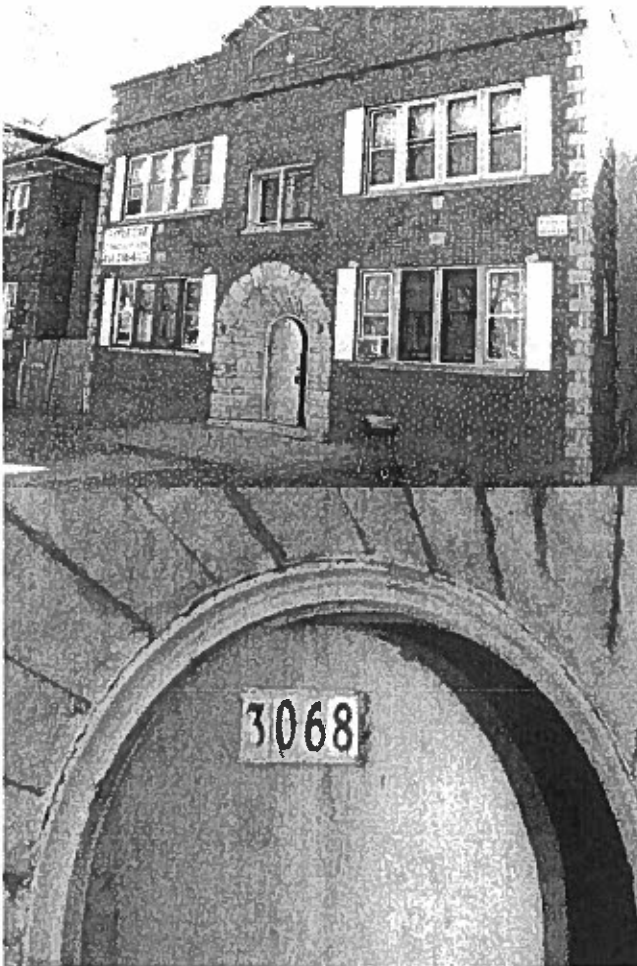
Correspondence Copy #: 531145750

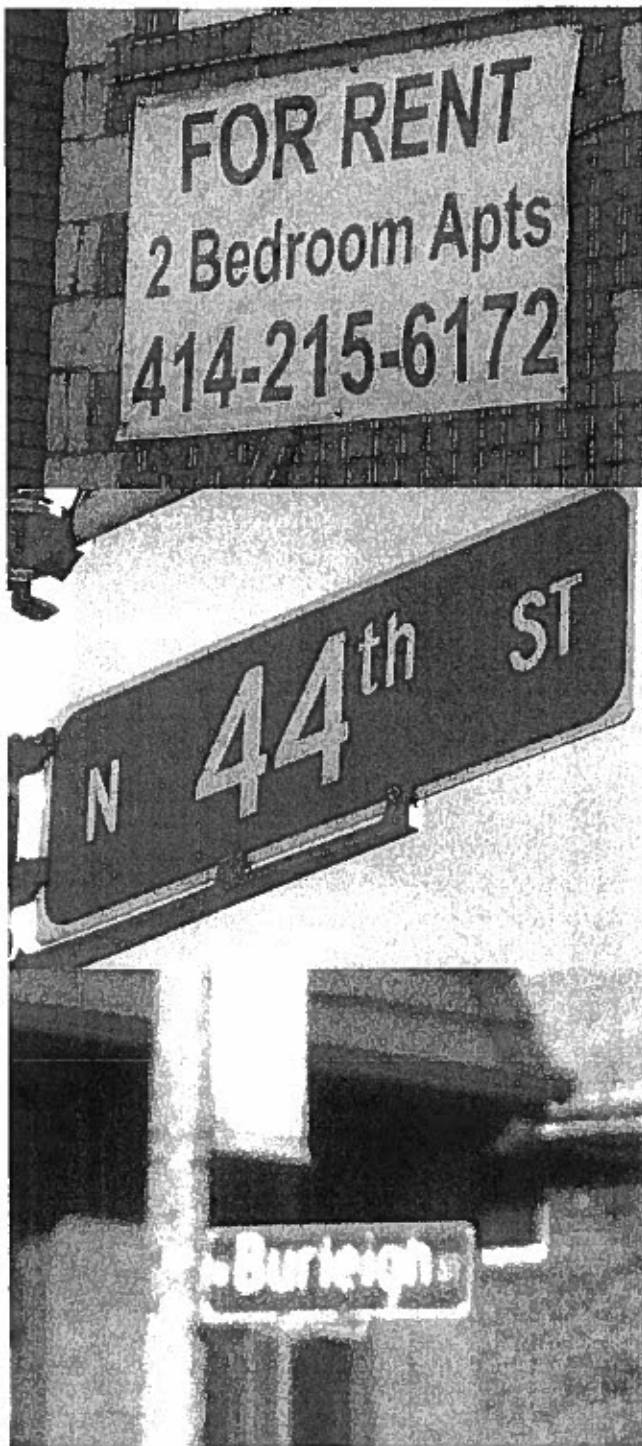
**Helping People Live Safer, More Secure Lives**

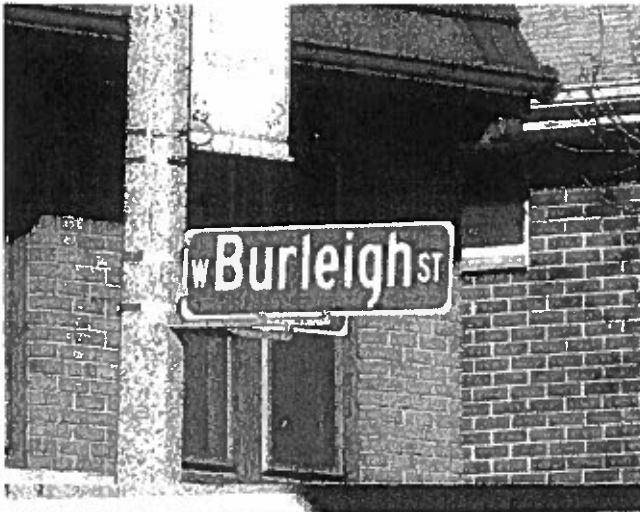
EX016601

**Field Investigator Original Photo Template**

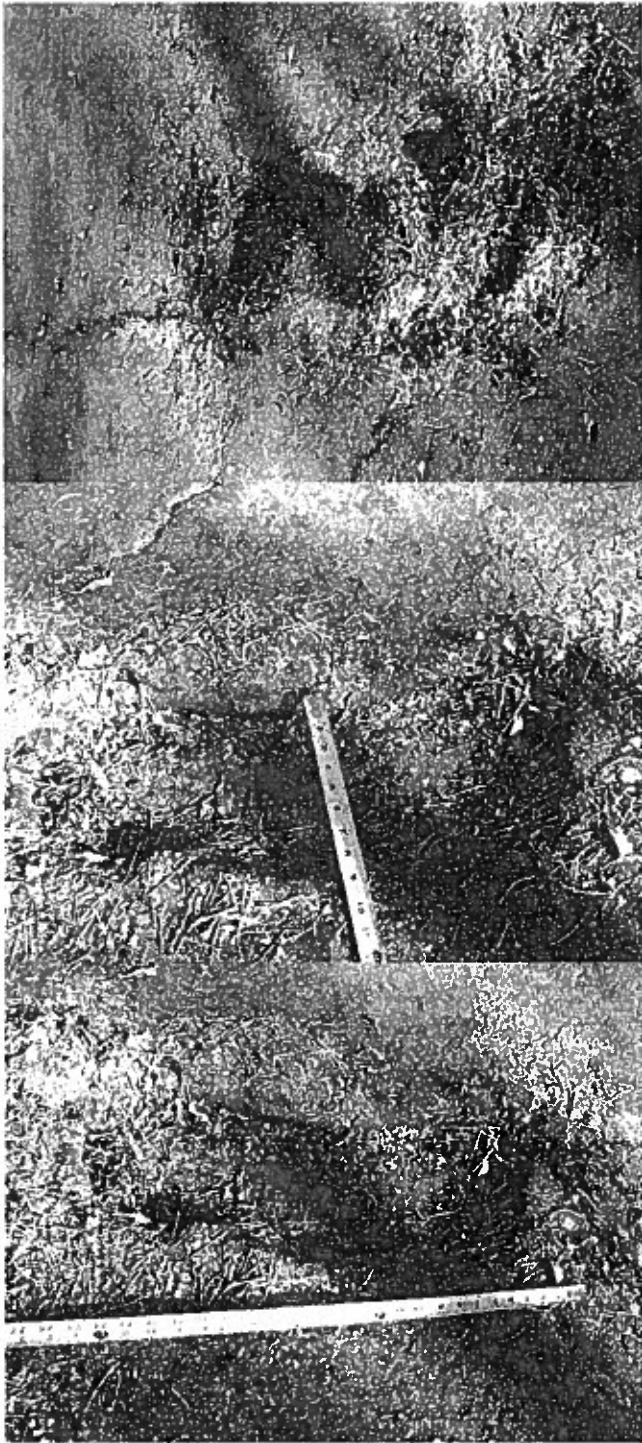
<b>Full Case Caption:</b>	Seamus Creighton – United Parcel Service
<b>Claim Number:</b>	WC413-982181
<b>Field Investigator:</b>	David Unmacht
<b>Case Manager:</b>	Cora Deuber – CRU in Wausau, WI
<b>Date Completed:</b>	10/18/10





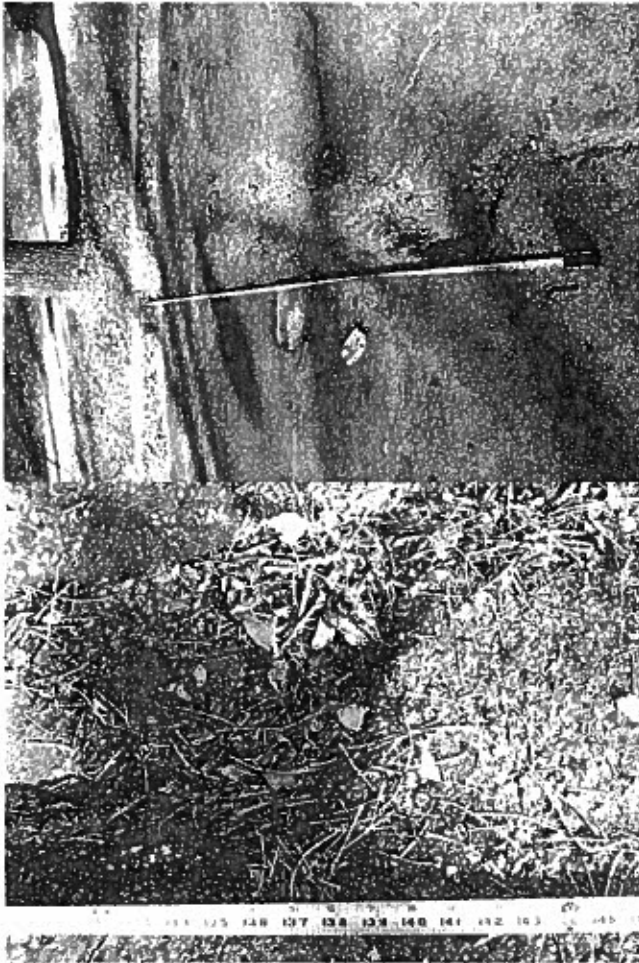












**Date Submitted: 10/18/10**

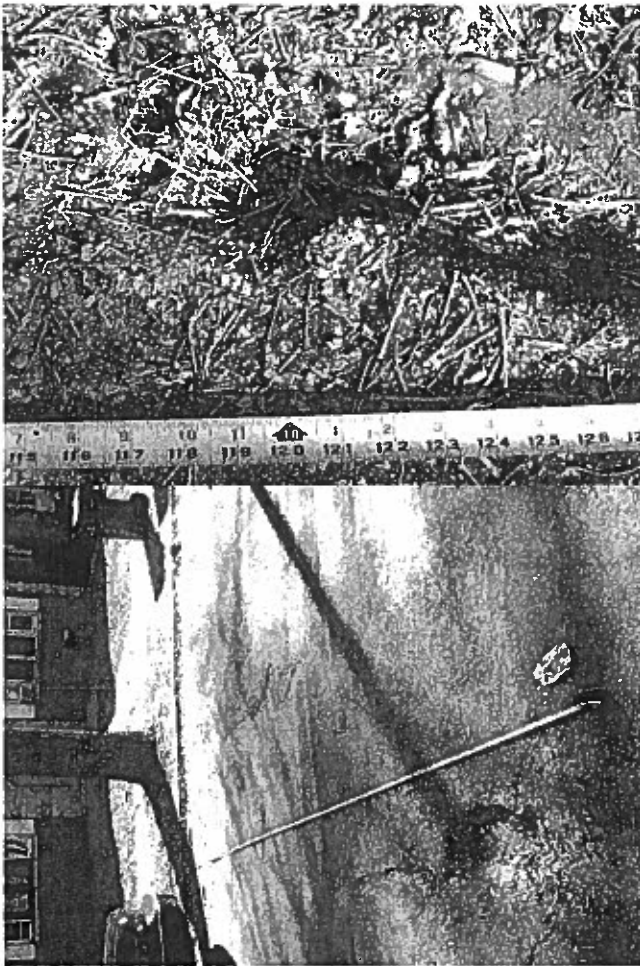
**Field Investigator Original Photo Template**

<b>Full Case Caption:</b>	Seamus Creighton – United Parcel Service
<b>Claim Number:</b>	WC413-982181
<b>Field Investigator:</b>	David Unmacht
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<b>Date Completed:</b>	10/18/10



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<b>Date Completed:</b>	10/18/10

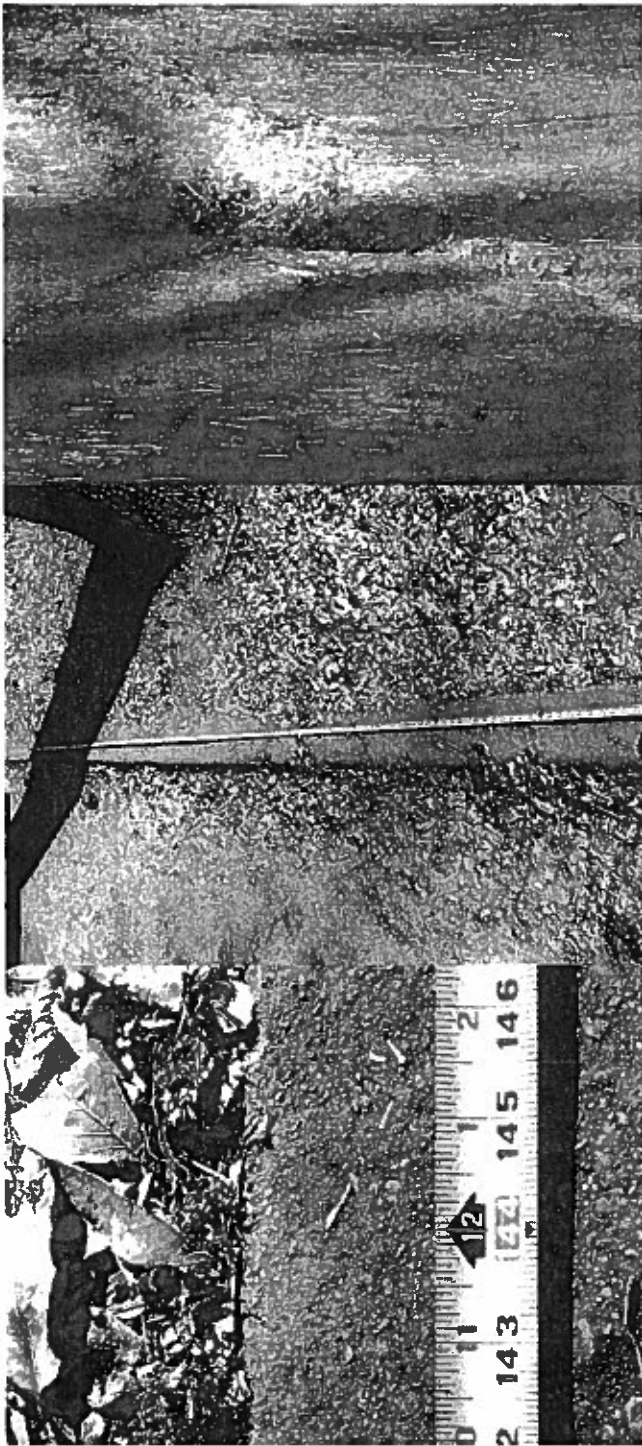


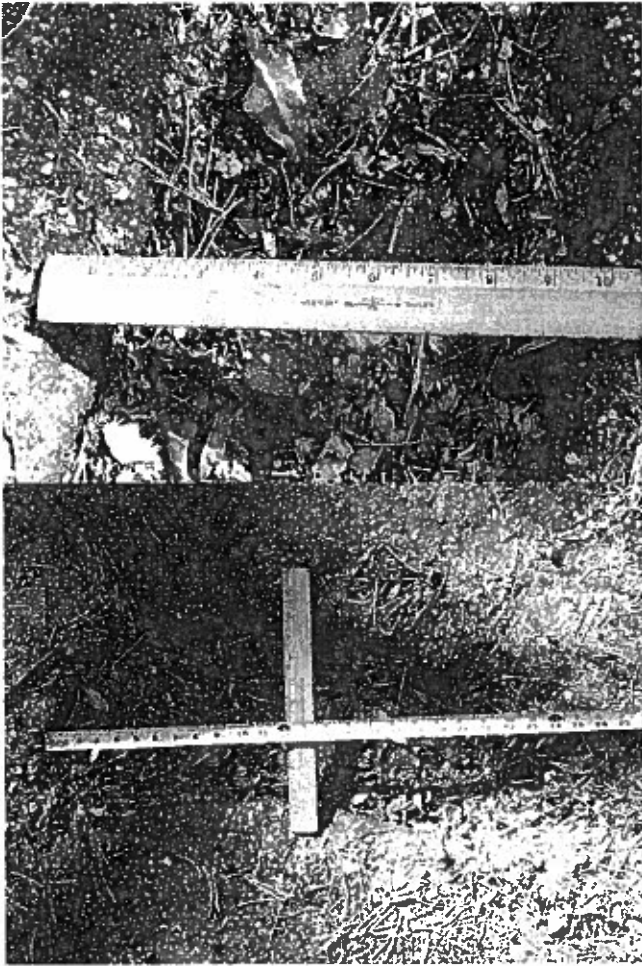
**Date Submitted: 10/18/10**



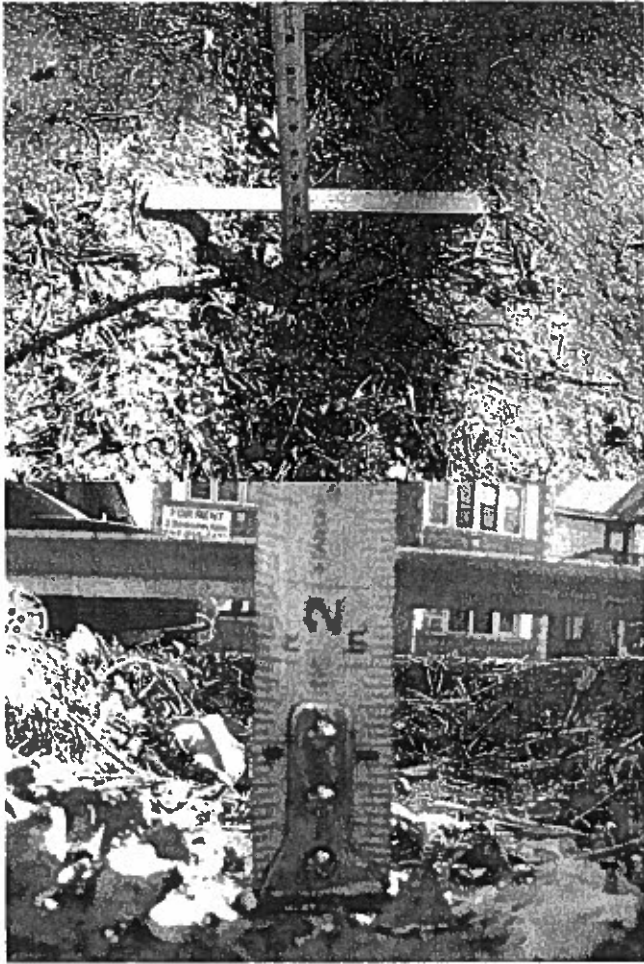












**Medical Cost Summary List**

Claim Number:	WC413-982181/HOD	Injury Date:	09/07/2010			
Claimant Name:	SEAMUS CREIGHTON	Jurts:	WI			
Customer:	UNITED PARCEL SERVICE					
Payee Name	From	Through	Bill Amount	Trans/Pending Amount	Trans/Pending Date	Status
SYNERGISTIC SOLUTIONS LLC	11/2/2010	11/2/2010	561.00	561.00	12/7/2010	Payment Issued
SYNERGISTIC SOLUTIONS LLC	10/28/2010	10/28/2010	43.75	43.75	11/26/2010	Payment Issued
SYNERGISTIC SOLUTIONS LLC	10/25/2010	10/25/2010	513.25	513.25	11/24/2010	Payment Issued
ORTHOPEDIC SURGEONS OF WI SC	10/22/2010	10/22/2010	145.00	0.00	11/10/2010	Printed
ORTHOPEDIC SURGEONS OF WI SC	10/22/2010	10/22/2010	145.00	101.50	11/18/2010	Payment Issued
ORTHOPEDIC SURGEONS OF WI SC	10/8/2010	10/8/2010	116.00	81.20	11/12/2010	Payment Issued
ORTHOPEDIC SURGEONS OF WI SC	9/17/2010	10/8/2010	766.00	455.00	11/12/2010	Payment Issued
RADIOLOGY SPECIALISTS OF MILW	9/9/2010	9/9/2010	418.00	313.50	11/1/2010	Payment Issued
WHEATON FRANCISCAN MEDICAL GROU	9/9/2010	9/9/2010	1,713.00	1,541.70	11/22/2010	Payment Issued
RADIOLOGY SPECIALISTS OF MILW	9/8/2010	9/8/2010	45.00	33.75	11/1/2010	Payment Issued
WHEATON FRANCISCAN MEDICAL GROU	9/8/2010	9/8/2010	83.00	74.70	10/21/2010	Payment Issued
WHEATON FRANCISCAN MEDICAL GROU	9/8/2010	9/8/2010	192.00	172.80	10/8/2010	Payment Issued
				3,892.15		

LnNo	Payee	IndCode	FromDate	ThruDate	Dys	WklyRate	Charge	RedCode	RedAmt	Paid	Is/Rvl St
1	CLT	20	11/28/2010	12/4/2010	6	815	815 RP	RP	541.25	273.75	10
2	CLT	20	11/21/2010	11/27/2010	6	815	815 RP	RP	525.86	289.14	10
3	CLT	20	11/14/2010	11/20/2010	6	815	815 RP	RP	365.97	449.03	10
4	CLT	20	11/7/2010	11/13/2010	6	815	815 RP	RP	241.47	573.53	10
5	CLT	20	10/31/2010	11/6/2010	6	815	815 RP	RP	232.57	582.43	10
6	CLT	20	10/24/2010	10/30/2010	6	815	815 RP	RP	212.22	602.78	10
									Indermity	2770.66	

Liberty Insurance Corporation

Po Box 8017  
Wausau WI 54402-8017



Telephone: (800) 435-4401  
Fax: (603) 334-0274

October 27, 2010

Risk Management  
City of Milwaukee, Department of Public Works  
Zeidler Municipal Building  
841 N. Broadway Room 501  
Milwaukee WI 53202

RE: Employee: SEAMUS CREIGHTON  
Employer: UNITED PARCEL SERVICE  
Claim Number: WC413-982181  
Date of Injury: 09/07/2010

Dear Risk Management:

Liberty Insurance Corporation is the Workers' Compensation Carrier for UNITED PARCEL SERVICE. On 09/07/2010 SEAMUS CREIGHTON sustained a work related injury. Liberty Insurance Corporation is paying Workers' Compensation Benefits.

Our investigation reveals this injury may have been caused by your negligence. Therefore, Liberty Insurance Corporation is placing you on notice of a potential claim to recover the money we have paid SEAMUS CREIGHTON in Workers' Compensation Benefits.

Please notify your insurance carrier of this potential claim. If you do not have insurance, please contact me to discuss this claim.

You can reach me at extension 8061

Sincerely,

CORA L DEUBER  
RECOVERY SPECIALIST III

Correspondence Copy #: 450978850

Helping People Live Safer, More Secure Lives

EX031201

Liberty Insurance Corporation

Po Box 8017  
Wausau WI 54402-8017



Telephone: (800) 435-4401  
Fax: (603) 334-0274

December 15, 2010

Robert Overholt  
C/O City Attorney's Office  
841 N. Broadway Room 716  
Milwaukee WI 53202

RE: Employee: SEAMUS CREIGHTON  
Employer: UNITED PARCEL SERVICE  
Claim Number: WC413-982181  
Date of Injury: 09/07/2010

Dear Robert Overholt:

Liberty Insurance Corporation is the Workers' Compensation Carrier for UNITED PARCEL SERVICE. On 09/07/2010 SEAMUS CREIGHTON sustained a work related injury. Liberty Insurance Corporation is paying Workers' Compensation Benefits.

Our investigation reveals this injury may have been caused by your negligence. Therefore, Liberty Insurance Corporation is placing you on notice of a potential claim to recover the money we have paid SEAMUS CREIGHTON in Workers' Compensation Benefits.

Please notify your insurance carrier of this potential claim. If you do not have insurance, please contact me to discuss this claim.

You can reach me at extension 8061

Sincerely,

CORA L DEUBER  
RECOVERY SPECIALIST III

Correspondence Copy #: 791141050

Helping People Live Safer, More Secure Lives

EX031201