LAW OFFICES

## DOWLING & BLUMENFIELD, LLP

A Limited Liability Partnership

Charles S. Blumenfield\* Robert G. Dowling

\*also admitted in New York

735 North Water Street, Suite 1200 P.O. Box 611 Milwaukee, Wisconsin 53201-0611 (414) 271-5529

Fax: (414) 271-0611

**Legal Assistants** Jennifer Livingston Anne Ihde

October 19, 2001

**VIA CERTIFIED MAIL** City of Milwaukee City Hall 200 East Wells Street

Milwaukee, WI 53202 ATTN: City Clerk

Our Client: Re:

Patricia Wright

Date of Injury: August 23, 1999

Dear Clerk:

Enclosed please find a Notice of Claim regarding the injuries sustained by our client, Patricia Wright, on August 23, 1999.

Very truly yours,

**DOWLING & BLUMENFIELD, LLP** 

By: Charles S. Blumenfield fai

CSB/tai Enclosure

## **NOTICE OF CLAIM**

TO: City of Milwaukee
Attn: City Clerk
City Hall
200 East Wells Street
Milwaukee, WI 53202

NOTICE IS HEREBY GIVEN to the City of Milwaukee, Milwaukee, Wisconsin, pursuant to §893.80 Stats., that a claim is hereby made for personal injuries and damages sustained by Patricia Wright, as set forth below:

- 1. The name of the law firm representing Patricia Wright is Dowling & Blumenfield, LLP, 735 N. Water Street, Suite 1200, P.O. Box 611, Milwaukee, WI 53201-0611.
- 2. Patricia Wright, whose address is 4747 N. Green Bay Avenue, Milwaukee, Wisconsin 53209, sustained personal injuries on August 23, 1999 when she tripped and fell after stepping on a defective piece of curb in front of 4747 N. Green Bay Avenue, Milwaukee, Wisconsin 53209.
- 3. The proximate cause of said injuries was the negligent manner in which the curb was maintained by the City of Milwaukee, resulting in Ms. Wright falling when she stepped onto a section of the curb which was loose and then shifted causing her to slip and fall, breaking her ankle.
- 4. As a direct and proximate result of the negligence of the City of Milwaukee and its employees, Patricia Wright suffered a broken ankle, and other personal injuries, damages including medical care and treatment, lost wages, pain, suffering and disability and the loss of enjoyment of life, all in the total amount of \$150,000.

- 6. A Notice of Injury was duly filed with the City of Milwaukee on or about October 29, 1999, advising said municipality of the circumstances of this claim.
- 7. This claim for damages is brought by the undersigned, as one of the duly authorized attorneys for Patricia Wright.

Dated at Milwaukee, WI, this \_\_\_\_\_\_day of October, 2001.

**DOWLING & BLUMENFIELD, LLP** 

Charles S. Blumenfield State Bar # 01016104

MAILING ADDRESS: P.O. Box 611

Milwaukee, WI 53201-0611 (414) 271-5529 Milwaukee Office

Daniel L. Shneidman Robert G. Dowling Charles S. Blumenfield Timothy E. Hawks Thomas M. Domer Katherine L. Charlton Jeffrey P. Sweetland Daniel R. Schoshinski Thomas Nelson Israel Ramon

John B. Kiel Vicki S. Bors Angela M. Van Boxtel Mark A. Sweet Lori K. Murphy

Howard N. Myers Bruce A. Chesshire Of Counsel

## Shneidman Myers

The Law Firm Of
Shneidman Myers Dowling Blumenfield
Ehlke Hawks & Domer

700 West Michigan, Suite 500 P.O. Box 442 Milwaukee, WI 53201-0442 414-271-8650 Fax: 414-271-8442 Madison Office

217 S. Hamilton
Madison, WI 53703

Rugge F. Ehike
Action M. Alappad

Plonn C. Talis

RONALD D. LEONHARDT

CITY CLERK

October 29, 1999

City of Milwaukee City Hall 200 East Wells Street Milwaukee, WI 53202 Attn: City Clerk

Re:

Our Client:

Date of Injury:

Patricia Wright August 23, 1999

Dear Sir/Madam:

Enclosed please find a Notice of Claim regarding the injuries sustained by our client, Patricia Wright on August 23, 1999.

Very truly yours,

SHNEIDMAN, MYERS, DOWLING, BLUMENFIELD, EHLKE, HAWKS & DOMER

Charles S. Blumenfield

CSB:tai
Bnclosure
CPatricia Wright

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## **NOTICE OF INJURY**

TO: City of Milwaukee
Attn: City Clerk
City Hall
200 East Wells Street
Milwaukee, WI 53202

NOTICE IS HEREBY GIVEN to the City of Milwaukee, Milwaukee, Wisconsin, for personal injuries and damages sustained by Patricia Wright, date of birth, September 5, 1958, as set forth below:

- 1. The name of the law firm representing Patricia Wright is Shneidman, Myers, Dowling, Blumenfield, Ehlke, Hawks & Domer, P.O. Box 442, 700 West Michigan, Suite 500, Milwaukee, Wisconsin 53201-0442.
- 2. Patricia Wright, whose address is 4747 N. Green Bay Avenue, Milwaukee, WI 53209, sustained personal injuries when she fell after stepping on a defective piece of curb at 4747 N. Green Bay Avenue, Milwaukee, Wisconsin 53209.
- 3. The proximate cause of said injuries was the negligent manner in which the curb and sidewalk were maintained by the City of Milwaukee.
- 4. As a direct and proximate result of the negligence of the City of Milwaukee and its employees, Patricia Wright suffered a sprained ankle, and other personal injuries.

- 5. This document is a Notice of Injury pursuant to §893.80 (1)(a) Stats., served on the above-named City of Milwaukee. This is not a claim for damages. No claim for damages is being made at this time.
- 8. The undersigned is one of the attorneys for Patricia Wright, and is authorized to make this Notice of Injury regarding the circumstances of the claim.

Dated at Milwaukee, Wisconsin, this 29th day of October, 1999.

SHNEIDMAN, MYERS, DOWLING, BLUMENFIELD, EHLKE, HAWKS & DOMER Attorneys for Injured Party

> Charles S. Blumenfield State Bar No. 1016104

**MAILING ADDRESS:** 

700 W. Michigan, Suite 500 P.O. Box 442

Milwaukee, WI 53201-0442

Phone: (414) 271-8650