10712 WEST GRANGE AVENUE SUITE 2 HALES CORNERS, WI 53130



759 NORTH MILWAUKEE STREET
SUITE 208
MILWAUKEE, WI 53202
*Preferred Mailing Address

NATASHA MISRA LAW LLC

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November 7, 2022

Milwaukee City Clerk
ATTN: CLAIMS

200 E. Wells Street, Room 205 Milwaukee, WI 53202-3567

Re:

Claimant:

Roshundra Bridges

Date of Accident:

08/02/2021

City Attorney Claim No.:

1030-2021-1113

Dear City Clerk:

This correspondence is in follow-up to the letter dated October 18, 2022 from Ms. Patricia Klosiewski of the Office of the City Attorney regarding the above-referenced claim indicating that the City of Milwaukee is not liable for said damages. At this time, I am requesting to appeal this decision and exercise the right to have this matter further reviewed by hearing.

Contrary to the statements in Ms. Klosiewski's letter, Ms. Bridges' driver side door was open in advance of the sanitation driver approaching Ms. Bridges' vehicle. The letter indicates that the sanitation driver states he could not have moved over which confirms that he saw the open door prior to impact and chose to unsafely and unreasonably drive through the door. As Ms. Bridges was attempting to exit her vehicle, her vehicle was struck by the sanitation truck causing both damage to Ms. Bridges' vehicle and personal injuries as outlined in the documentation previously provided to the City.

You should be aware that this stretch of Villard Avenue was converted from two through lanes to one through lane with a bike lane following this accident as this was a known problem to the City and its drivers.

It is our position that the City is responsible for the damages caused as a result of this accident. I look forward to hearing from you as to the next steps in effort to resolve this matter. You can reach me at 414-210-3834 or natasha@natashamisralaw.com.

Sincerely,

Natasha R. Misra

Attorney for Claimant

cc: Ms. Patricia Klosiewski - Office of City Attorney (via e-mail)

NRM/dg

TEARMAN SPENCER
City Attorney

ODALO J. OHIKU ROBIN A. PEDERSON S. TODD FARRIS Deputy City Attorneys



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

October 18, 2022

Natasha R. Misra, Esq. NATASHA MISRA LAW LLC 759 North Milwaukee Street, Suite 208 Milwaukee, WI 53202

RE:

C.I. File No. 1030-2021-1113

Communication on behalf of Roshundra Bridges

Mailed 10-25-22 **HEIDI WICK SPOERL** KATHRYN Z. BLOCK THOMAS D. MILLER PETER I. BLOCK **ALLISON N. FLANAGAN** PATRICK J. MCCLAIN HANNAH R. JAHN JULIE P. WILSON MEIGHAN M. ANGER ALEXANDER R. CARSON **ALEX T. MUELLER** ALEXANDER COSSI LISA A. GILMORE **NICHOLAS R. SINRAM** TAVISS K. SMITH KATHERINE A. HEADLEY ANTHONY JACKSON STACY J. MILLER JORDAN SCHETTLE THERESA MONTAG TYLER M. HELSEL NANCY A. DOMINSKI **ALEXANDER E. FOUNDOS** CHRISTOPHER JACKSON JAMES D. LEWIS Assistant City Attorneys

Dear Attorney Misra:

The City of Milwaukee is in receipt of your claim for \$50,984.29, relating to damages and injuries your client sustained as a result of an accident involving a City of Milwaukee Sanitation truck driver in the area of 5200 West Villard Avenue on August 2, 2021.

Our investigation reveals that on August 2, 2021, the City Sanitation truck driver was traveling east bound in the right driving lane when Ms. Bridges, sitting in a parked car, opened her driver's side door into oncoming traffic, hitting the City truck. Our driver states that he could not have moved over as there was traffic traveling next to him in the left hand lane.

It is our view that your client was at fault regarding this accident. Accordingly, we are not liable for damages and we are denying your claim. If you wish to appeal this decision, you may do so by sending a letter within 21 days of the receipt of this letter to the Milwaukee City Clerk, 200 East Wells Street, Room 205, Milwaukee, WI 53202, requesting a hearing.

Very truly yours,

TEARMAN SPENCER

City Attorney

PATRICIA KLOSIEWSKI Investigator/Adjuster

PK/cdr 1030-2021-1113/282206

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