

**NOTICE OF CIRCUMSTANCES GIVING RISE TO CLAIM  
AND CLAIM PURSUANT TO WIS. STAT. § 893.80**

BY PERSONAL SERVICE

TO: Jim Owczarski, Clerk  
City of Milwaukee City Hall  
200 East Wells, Room 205  
Milwaukee, WI 53202

CLAIMANT: Benjamin Perez Hernandez  
4622 West Oklahoma Avenue  
Milwaukee, WI 53215

Evan Goyke  
City of Milwaukee City Attorney  
200 East Wells Street, Room 800  
Milwaukee, WI 53202

PLEASE TAKE NOTICE that the Claimant, BENJAMIN PEREZ HERNANDEZ, by his attorneys, Dubin & Balistreri, Ltd. by Carl L. Dubin, states that the following circumstances give rise to a claim:

1. That on March 9, 2024, the vehicle owned by claimant, Benjamin Perez Hernandez was legally parked in front of 1900 South 13<sup>th</sup> Street in the City of Milwaukee, Wisconsin 53204.

2. City of Milwaukee Police officers were negligently pursuing and participated in a high speed chase of a stolen vehicle knowing their pursuit/chase was in a highly populated and traffic neighborhood/business area. Said negligent pursuit caused the ensuing accident and damages to claimant's vehicle. Said pursuit and crash was captured on video.

2. As a direct and proximate result of the negligence of the City of Milwaukee, the claimant, Benjamin Perez Hernandez sustained property damage to his vehicle in the amount of \$10,616.80 as evidenced by the attached estimate of Amato Collision Center - North, 8301 North 76<sup>th</sup> Street, Milwaukee, WI 53223.

WHEREFORE, Claimant, whose name and address is stated above, claims relief against the City of Milwaukee for a total property damage claim of \$10,616.80.

Dated this 14th day of May, 2024.

DUBIN & BALISTRERI, LTD.  
Attorneys for Claimant

By: 

Carl L. Dubin, State Bar No. 1009717

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CITY OF MILWAUKEE  
2024 MAY 23 PM 2:22  
CITY CLERK'S OFFICE

**AMATO COLLISION CENTER-NORTH**

101 N 76TH ST, MILWAUKEE, WI 53223

Phone: (414) 357-7800

FAX: (414) 357-8161

Workfile ID: ed74a2f9

PartsShare: 7STQ9g

Federal ID: 39-1835232

**Preliminary Estimate**

**Customer: PEREZ, BENJAMIN**

**Job Number:**

Written By: Jason Braatz

Insured: PEREZ, BENJAMIN

Policy #:

Claim #:

Type of Loss:

Date of Loss:

Days to Repair: 0

Point of Impact:

**Owner:**

PEREZ, BENJAMIN

(414) 614-3583 Business

**Inspection Location:**

AMATO COLLISION CENTER-NORTH

101 N 76TH ST

MILWAUKEE, WI 53223

Repair Facility

(414) 357-7800 Business

**Insurance Company:**

**VEHICLE**

2016 HYUN Sonata Sport PZEV 4-Door SED 4-2.4L Gasoline Direct Injection

VIN: 5NPE24AF6GH400027

Interior Color:

Mileage In:

Vehicle Out:

License:

Exterior Color:

Mileage Out:

State:

Product Code:

Condition:

Job #:

**TRANSMISSION**

Automatic Transmiss

Overdrive

**POWER**

Power Steering

Power Brakes

Power Windows

Power Locks

Power Mirrors

Heated Mirrors

Power Driver Seat

**DECOR**

Dual Mirrors

Tinted Glass

Console/Storage

Overhead Console

**COMFORT/CONVENIENCE**

Air Conditioning

Intermittent Wipers

Tilt Wheel

Cruise Control

Rear Fogger

Keyless Entry

Alarm

Message Center

Steering Wheel Touch Controls

Telescopic Wheel

Remote Starter

Backup Camera

RAI

AM Radio

FM Radio

Stereo

Search/Seek

CD Player

Auxiliary Audio Connection

Satellite Radio

**SAFETY**

Drivers Side Air Bag

Passenger Air Bag

Anti-Lock Brakes (4)

4 Wheel Disc Brakes

Front Side Impact Air Bags

Head/Curtain Air Bags

Communications System

Hands Free Device

**SEATS**

Cloth Seats

Bucket Seats

**WHEELS**

Aluminum/Alloy Wheels

**PAINT**

Clear Coat Paint

**OTHER**

Traction Control

Stability Control

Rear Spoiler

Signal Integrated Mirrors

Power Trunk/Liftgate

Get live updates at [www.carwise.com/e/4LeKGC](http://www.carwise.com/e/4LeKGC)

**Preliminary Estimate**

**Customer: PEREZ, BEND**

**Job Number:**

2016 HYUN Sonata Sport PZM 4-2.4L Gasoline Direct Injection

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1		<b>FRONT BUMPER</b>					
2		Front bumper				2.7	
3	<>	Panel for cover	86511C2000	1	537.77	Incl.	3.0
4		Panel for Clear Coat					1.2
5		Panel for grille	86561C2000	1	203.98	Incl.	
6	*	Panel for heavy w/retro cruise bumper, w/o	86350C2000	1	468.65	Incl.	0.0
7		<b>FRONT LAMPS</b>					
8		Headlamp DRL-USA type	92102C2000	1	708.42	0.3	
9		Headlamp DRL-USA type	92101C2000	1	556.45	0.3	
10		<b>HOOD</b>					
11		Panel	66400C2000	1	1,104.63	1.4	2.8
12		Panel Major Adj. Panel					-0.2
13		Panel for Clear Coat					0.5
14		Panel Under (complete)					1.4
15		Panel for Clear Coat					0.3
16		Support cyl	81130C1100	1	145.69	0.3	
17		Support cyl	81171C1000	1	253.00	0.2	
18		Support cyl	81161C1000	1	207.35	0.2	
19		<b>REAR BODY &amp; PANELS</b>					
20		Panel for body part	69100C2000	1	487.65	7.5	1.8
21		Panel Major Adj. Panel					-0.2
22		Panel for Clear Coat					0.3
23		Panel for Inside					0.9
24		Panel for Clear Coat					0.2
25		<b>TRUNK LID</b>					
26	*	Panel w/o				4.0	2.3
27		Panel Major Panel					-0.4
28		Panel for Clear Coat					0.4
29	*	Panel for holding vent 2.4 liter				1.0	1.4
30	*	Panel for Clear Coat					0.3
31		Panel for holding vent 2.4 liter				0.4	
32		<b>REAR BUMPER</b>					
33		Rear bumper				2.5	
34	<>	Panel for cover reverse	86611C2000	1	542.44	Incl.	3.0
35		Panel Major Adj. Panel					-0.2
36	*	Panel for Clear Coat					0.6
37		Panel for bar	86631C2200	1	537.00	Incl.	
38		Panel for sensor	95720C1000S3B	1	266.45	0.1	0.2
39	#	Panel for sensor removal		1	5.00		
<b>SUBTOTALS</b>					<b>6,024.48</b>	<b>20.9</b>	<b>19.6</b>

**Preliminary Estimate**

**Customer:** PEREZ, R

**Job Number:**

2016 HYUN Sonata Sport F 2.4L Gasoline Direct Injection

**ESTIMATE TOTALS**

Category	Basis	Rate	Cost \$
			6,019.48
labor	20.9 hrs @	\$ 70.00 /hr	1,463.00
labor	19.6 hrs @	\$ 70.00 /hr	1,372.00
supplies	19.6 hrs @	\$ 50.00 /hr	980.00
parts			5.00
			9,839.48
Tax	\$ 9,839.48 @	7.9000 %	777.32
<b>Total</b>			<b>10,616.80</b>

MOTOR VEHICLE REPAIR SERVICES REGULATED BY THE BUREAU OF PROTECTION, P.O. BOX 13000, MADISON, WISCONSIN 53708-8911.

REGULATED BY CHAPTER ATCP 132, WIS. ADM. CODE, ADMINISTERED BY THE BUREAU OF PROTECTION, WISCONSIN DEPT. OF AGRICULTURE, TRADE AND CONSUMER SERVICES, P.O. BOX 13000, MADISON, WISCONSIN 53708-8911.

Preliminary Estimate

Customer: PEREZ, MARIANA

Job Number:

2016 HYUN Sonata Sport I D 2.0L I4 Gasoline Direct Injection

Estimate based on MOTOR CRASH ESTIMATING GUIDE and potentially other third party sources of data. Unless otherwise noted, (a) parts are derived from the Guide ARR1027, CCC Data Date 03/08/2024, and potentially other third party sources of data. (b) Items 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/Vendor (OEM) parts are OEM supplied by the specified supplier. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM supplied by or through alternate sources other than the OEM vehicle dealership with disclosure. Risk (\*) 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 are included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed. As described separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer (NAGS) are described as Non OEM, A/M or NAGS. Used parts are described as LKQ, RCY, or USED. Recored parts are described as Recore. NAGS Part Numbers and Barcodes are provided by National Auto Glass Specifications. Labor operation times listed on the line with the MOTOR suggested labor operation times. NAGS labor operation times are not included. Found in manual entries.

Some 2024 vehicles may have been changed from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, CCC ONE and parts data from the previous year may be used. The CCC ONE estimator has a list of vehicle specific parts numbers and prices should be confirmed with the local dealership.

The following is a list of labor operations or symbols that may be used to describe work to be done or parts to be repaired or replaced.

SYMBOLS FOLLOWING: M=MOTOR Miscellaneous category. X=Miscellaneous Motor category.

SYMBOLS FOLLOWING: D=Diagnostic labor category. F=Frame labor category. G=Glass labor category. M=Mechanical labor category. (numbers) 1 through 4=User Defined Labor Categories.

OTHER SYMBOLS AND ABBREVIATIONS: Adj.=Adjacent. CAPA=Certified Aftermarket. HYD=Hydroformed. R&I=Remove and Install. Sect=Section. A/M=Aftermarket part. Blnd=Blend. BOR=Boron steel. D&R=Disconnect and Reconnect. HSS=High Strength Steel. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non-Adjacent. O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. HSS=High Strength Steel. N=Note(s) associated with the estimate line.

CCC ONE Estimating Software Copyright © Intelligent Services Inc.

The following symbols and abbreviations may be used in CCC ONE Estimating that are not part of the MOTOR

CRASH ESTIMATING GUIDE: BAR=Bureau of Motor Vehicle Safety. Environmental Protection Agency. NHTSA= National Highway Traffic Safety Administration. PDR=Paintless Dent Repair. VIN=Vehicle Identification Number.