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OFFICE OF CITY ATTORNEY

## NOTICE OF INJURY AND CLAIM

TO: Jim Owczarski Milwaukee City Clerk Milwaukee City Hall

200 E. Wells Street, Room 205

Milwaukee, WI 53202

Laura M. Daniels Administration & Projects Manager Water Department 4th Floor 841 N. Broadway St. Milwaukee, WI 53202-3268

Re:

Our Client:

Roger Lange

Our File:

133350 Date of Injury: 03/16/2013 Carrie M. Lewis

Ghassan A. Korban

Commissioner Room 501 Department of Public Works

841 N. Broadway St.

Milwaukee, WI 53202-3268

Water Superintendent 4th floop City of Milwaukee 841 N. Broadway St. Milwaukee, WI 53202-3268 Shassan A. Korban Commissioner Room 501 MII: 42

( ) PERSONAL ( ) POSAED

CORPORATE

PLEASE TAKE NOTICE that the law offices of PADWAY & PADWAY, LTD. have been retained by Roger Lange, to represent him regarding injuries he sustained as result of an accident that occurred on March 16, 2013 on the Northeast corner of the intersection of Humboldt Avenue and Brady Street in the City of Milwaukee, Milwaukee County, Wisconsin. At approximately 11:30 AM on Saturday, March 16, 2013, the claimant exited a westbound bus on the northeast corner of Humboldt Avenue and Brady Street and intended to cross the street to board a southbound bus on Humboldt Avenue. As the claimant walked on the Northeast intersection corner, he stepped into an unmarked hole where a fire hydrant had been removed and not replaced, secured or warned about. The open and exposed hole constituted a dangerous and defective condition. As a result, he fractured his foot and suffered other serious personal injuries.

BE FURTHER ADVISED that Roger Lange resides at 1700 E. River Park Court, Apt. 218A, Shorewood, WI 53211. At the time of the accident, the claimant suffered physical injuries and emotional distress, and incurred medical bills, expenses and wage loss. Claimant has been unable to work since March 16, 2013.

Notice of the aforementioned injuries and damages is hereby given to you.

## **CLAIM**

In addition thereto, on behalf of individual, claim for the following injuries and damages is hereby made:

3.	Wage loss (estimated)	\$5,000.00
2.	Medical bills and expenses (estimated)	\$50,000.00
1.	Pain, suffering and disability	\$50,000.00

Be advised that the above claim may increase but the amount recoverable is limited by state law.

BE FURTHER ADVISED that copies of all notices and responses shall be provided to the undersigned and my attorneys Padway & Padway, Ltd.

Dated at Milwaukee, Wisconsin this 23ep day of May, 2013.

Total damages and losses (estimated):

Subscribed and sworn before me this Amyday of May, 2013.

Notary Public, Milwaukee County My Commission is permadent/expires: Roger Lange



\$105,000.00

P.O. ADDRESS:
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633 W. WISCONSIN AVENUE
SUITE 1900
MILWAUKEE, WI 53203
Phone: (414) 277-9800
Fax: (414) 277-0189