# KMIEC LAW OFFICES

3741 WEST NATIONAL AVENUE
MILWAUKEE, WISCONSIN 53215-1007 OF MILWAUKEE

Attorneys and Counselors Marjan R. Kmiec Steven G. Kmiec Colleen Bero-Lehmann 2007 MAY 28 PM 3: 26 TELEPHONE (414) 649-9790 RONALD D. LEONHARDT FACSIMILE CITY CLERK (414) 649-9794

May 23, 2002

Ron Leonhardt
City Clerk of Milwaukee
205 City Hall
200 East Wells Street
Milwaukee, Wisconsin 53202-3551

James Purko, Director Department of Public Works City of Milwaukee 841 North Broadway Rm. 516 Milwaukee, Wisconsin 53202

Re: Our Client:

Lorinda Avila

Date of Inj:

05/18/02

Dear Messieurs Leonhardt and Purko:

Enclosed you will find a Notice of Claim for injuries sustained by our client.

Very truly yours,

KMIEC LAW OFFICES

Steven G. Kmiec

SGK/wpd Enclosure

## MUNICIPAL NOTICE OF CLAIM/NOTICE OF INJURY

TO: Ron Leonhardt
City Clerk of Milwaukee
205 City Hall
200 East Wells Street
Milwaukee, Wisconsin 53202-3551

James Purko
Director of Department of Public Works
City of Milwaukee
841 North Broadway Rm. 516
Milwaukee, Wisconsin 53202

### NAME AND ADDRESS OF CLAIMANT

Lorinda Avila 434 West Harrison Avenue Milwaukee, Wisconsin 53207

#### CIRCUMSTANCES OF THE CLAIM

On May 18, 2002, the Claimant tripped over a water main shut off valve pipe which was not appropriately screwed down at the address of the Claimant. On the same date, the Claimant contacted the Department of Public Works and they screwed down the cap so that it was flush with the ground.

When the Claimant tripped, she fell on all fours causing damage to her knees as well as radiating numbness in her right arm, palm of her hand and pinky.

## ITEMIZATION OF RELIEF SOUGHT

Potential medical expenses: \$20,000.00 Pain and suffering: \$30,000.00

Dated this 24th day of May, 2002.

KMIEC LAW OFFICES

By:

Steven G. Kmiec Attorney for

State Bar #01019277

## P.O. BOX:

3741 West National Avenue Milwaukee, Wisconsin 53215 (414) 649-9790