GRANT F. LANGLEYCity Attorney

MIRIAM R. HORWITZ ADAM B. STEPHENS MARY L. SCHANNING JAN A. SMOKOWICZ 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

March 9, 2020

To the Honorable Common Council of the City of Milwaukee Room 205 – City Hall

Re:

C.I. File No. 1029-2018-1716

Communication from:

Law Offices of Robert A. Levine

630 N. Broadway

Milwaukee, WI 53202 on behalf of

Susan Vorlob

3455 N. Palmer Street Milwaukee, WI 53212 SUSAN E. LAPPEN PATRICIA A. FRICKER **HEIDI WICK SPOERL GREGG C. HAGOPIAN** JAY A. UNORA KATHRYN Z. BLOCK **KEVIN P. SULLIVAN** THOMAS D. MILLER **ROBIN A. PEDERSON** JEREMY R. MCKENZIE PETER J. BLOCK **JENNY YUAN ALLISON N. FLANAGAN HEATHER H. HOUGH** ANDREA J. FOWLER PATRICK J. MCCLAIN **NAOMI E. GEHLING BENJAMIN J. ROOVERS ELLENY B. CHRISTOPOULOS TYRONE M. ST. JUNIOR** HANNAH R. JAHN JULIE P. WILSON **GREGORY P. KRUSE KIMBERLY A. PRESCOTT SHEILA THOBANI** KATRYNA C. RHODES **NICOLE F. LARSEN** JAMES M. CARROLL WILLIAM G. DAVIDSON MEIGHAN M. ANGER ALEXANDER R. CARSON JENNIFER J. TATE Assistant City Attorneys

Dear Council Members:

Law Offices of Robert A. Levine alleges that on July 13, 2018 their client sustained injuries when she was attending Bastille Days and while walking she caught her foot in an area connected to the streetcar tracks at/near North Jackson Street and East Kilbourn Avenue. Claimed damages total \$500,000.00.

The Infrastructure Services Division indicates that the streetcar tracks at North Jackson Street and East Kilbourn Avenue were constructed in accordance with the standard specifications, plans, and accepted standards for streetcar infrastructure. This project was constructed and completed under a City of Milwaukee contract. The work was performed by Kiewit Infrastructure Company.

There is no evidence that the City was negligent. Therefore, we recommend that this claim be denied.

Very truly yours,

GRANT/F/LANGLEY

City Attorney

JAN A. SMOKOWICZ Deputy City Attorney

JAS:mal Enclosure

c: Samir Amin (Infrastructure)

1029-2018-1716:267429

