MICHAEL A. SIRAGUSA
ERIE COUNTY ATTORNEY

COUNTY OF ERIE

MARK C. POLONCARZ
COUNTY EXECUTIVE

DEPARTMENT OF LAW

MICHELLE M. PARKER
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTH
SECOND ASSISTANT COUNTY ATTORNEY

March 13, 2013

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	*Progressive Northern Insurance Company a/s/o Wierzbic, Shannon B. v. County of Erie*
Document Received:	Notice of Claim
Name of Claimant:	Progressive Northern Insurance Company a/s/o Wierzbic, Shannon B.
Claimant's attorney:	Jean Paul LaValley Subrogation Representative Progressive Northern Insurance Co. P.O. Box 512929 Los Angeles, California 90051

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA
Erie County Attorney

By: Michelle Parker
Michelle M. Parker
First Assistant County Attorney

MMP:dld
Enclosure

PROGRESSIVE

Payment Address
24344 Network Place
Chicago, IL 60673-1243

Document Address
P.O. Box 512929
Los Angeles, CA 90051
Phone: (877)818-0139
Fax: (888) 781-6947

Notice of Intent to File Claim
2/22/2013 2:32:00 PM
Certified Mail 91 7108 2133 3934 2547 4550
Return Receipt Requested

COUNTY OF ERIE / DEPARTMENT OF LAW
ATTN: PROPERTY DAMAGE DEPARTMENT
95 FRANKLIN STREET, ROOM 1634
BUFFALO, NEW YORK 14202

Your Client: DIAZ, HENRY
Your Claim Number: UNKNOWN
Our Insured :WIERZBIC, SHANNON B
Our Claim Number:13-5100673
Amount Subject to Reimbursement:2,044.93
Amount of Insured's Deductible:200.00

Please take this as formal notice of our subrogation rights relative to the above -captioned claim. We have completed our investigation into the facts of the above-captioned loss and find that your insured was the proximate cause of the accident.
Location of Loss: FAAHS ST NEAR LAKE AVE
Date and Time of Loss: 01-05-13 @ 10:45 AM

Description of Loss: Our name insured's 2002 Toyota Camry was stopped at Faahs St. Our insured's vehicle was stopped behind a Erie County , 2011 Kenworth Snow plow, license plate # M74482. As our insured was waiting for the snow plow to move forward, the snow plow began to reverse. Our insured attempted to take evasive action by honking the horn, but could not avoid the snow plow from colliding into our insured's vehicle. The driver, Henry Diaz, is the proximate cause of the accident for improper backing.

Please make your draft payable to" Progressive Northern Insurance Co as subrogee of WIERZBIC, SHANNON B
", in the amount stated above and mail it to the attention of the undersigned at your earliest convenience. All supporting documentation is enclosed. I have diaried my file ahead fifteen (15) days. Thank you for your anticipated prompt attention to this matter.

X_____
JEAN PAUL LAVALLEY
Subrogation Representative
Progressive Northern Insurance Co
Tel. 877-818-0139 Ext 37012
Fax. 888-781-6947
Jean-Paul_Lavalley@progressive.com

Sworn to me and subscribed in my presence this 15th day of Feb 2013

NOTARY PUBLIC

NANCY PAGOZZINO
Notary Public
In and for the State of Ohio
My Commission Expires
September 28, 2014

STATE OF OHIO

RECEIVED
MAR 4 - 2013
ERIE COUNTY
DEPARTMENT OF LAW