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

September 6, 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:	*Perkins, William B., Jr. v. County of Erie and Erie County Industrial Development Agency*
Document Received:	Notice of Claim
Name of Claimant:	William B. Perkins, Jr. 234 University Buffalo, New York 14223
Claimant's attorney:	Mark H. Cantor, Esq. Cantor, Dolce, Panepinto, P.C. 1600 Main Place Tower 350 Main Street Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA
Erie County Attorney

By: _____
Jeremy C. Toth
Second Assistant County Attorney

JCT:dld
Enc.

STATE OF NEW YORK
COURT OF CLAIMS

This paper received at the
Erie County Attorney's Office
from Richard Frank on
the 28 day of August, 2013
at 9:27 a.m./p.m.
Assistant County Attorney

WILLIAM B. PERKINS, JR.
234 University
Buffalo, New York 14223

Claimant

vs.

NOTICE OF CLAIM

COUNTY OF ERIE
Department of Law
95 Franklin Street, Room 1634
Buffalo, New York 14202

ERIE COUNTY INDUSTRIAL DEVELOPMENT AGENCY
143 Genesee Street
Buffalo, New York 14203

Defendants

TO: COUNTY OF ERIE:

1. Claimant is a resident of the State of New York and County of Erie residing at 234 University, Buffalo, New York 14223.

2. The name and post office address for the claimants and their attorneys are as follows:

Claimant:
William B. Perkins, Jr.
234 University
Buffalo, New York 14223

Attorneys for Claimant:
Mark H. Cantor, Esq.
Cantor, Dolce & Panepinto, P.C.
1600 Main Place Tower
350 Main Street
Buffalo, New York 14202

3. The address where the accident occurred was at 346 Connecticut Street, Buffalo, New York.

4. That the accident occurred on the 12th day of June, 2013, while claimant was employed by a company known as Charles Dabar Renovations performing construction work on said premises.

5. Claimant was operating a table saw when he was caused to suffer torn tendons in his left dominant hand as a result of said table saw not having a proper and adequate guard, in violation of §241(6) of the Labor Law in the State of New York by virtue of the violation by the defendant of Industrial Code Rule §23-1.12.

6. That as a result of the accident aforesaid described, claimant was forced to undergo surgery to his left hand, requiring hospitalization, has been forced to be disabled from work, has had pain and suffering, has had medical aid and attention, the incurring of medical hospital expenses.

7. That on account of the foregoing, claimant demands that this claim be adjusted and paid by the respondents.

PLEASE TAKE FURTHER NOTICE, that by reason of the failure to make good the claim herein, the claimant intends to commence an action in the New York State Supreme Court to recover damages in an amount which is currently undetermined, together with the costs and disbursements of this action and for such other and further relief as to the Court seems just and proper.

Dated: Buffalo, New York
August 16, 2013

Mark H. Cantor, Esq.
Cantor, Dolce & Panepinto, P.C.
Attorneys for Claimants
1600 Main Place Tower
350 Main Street
Buffalo, New York 14202
(716) 852-1888

VERIFICATION

STATE OF NEW YORK)
COURT OF CLAIMS) ss:

William B. Perkins, being duly sworn, deposes and says that deponents is the Claimant in the within action; that deponent has read the foregoing Notice of Claim and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters, deponent believes to be true.

William B. Perkins

William B. Perkins

Sworn to before me this
7th day of August, 2013.

MARK H. CANTOR
Notary Public, State of New York
Qualified In Erie County
My Commission Expires Mar. 30, 2015