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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

October 17, 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:	*Rosborough, Angel, as parent and natural guardian of Ella Rosborough, an infant v. County of Erie*
Document Received:	Notice of Claim
Name of Claimant:	Angel Rosborough 650 Beach Road Angola, New York 14006
Claimant's attorney:	Brian J. Bogner, Esq. LoTempio & Brown, P.C. One Franklin Court 181 Franklin Street Buffalo, New York 14202

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
Enc.

RECEIVE
OCT 11 2013
ERIE COUNTY
DEPARTMENT OF LAW

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

ANGEL ROSBOROUGH, as parent and natural guardian of ELLA ROSBOROUGH, an infant,

Claimant,

v.

COUNTY OF ERIE,

Respondent.

NOTICE OF CLAIM

TO: Erie County Attorney
95 Franklin Street, Suite 1634
Buffalo, New York 14202

Pursuant to General Municipal Law §§ 50-e and 50-i, please take notice that the claimant, ANGEL ROSBOROUGH, as parent and natural guardian of ELLA ROSBOROUGH, an infant, by her attorneys, LoTempio & Brown, P.C., asserts a claim against the County of Erie as follows:

1. The post-office address of the claimant is 650 Beach Road, Angola, New York 14006.

2. The claimant is represented by LoTempio & Brown, P.C., 181 Franklin Street, Buffalo, New York 14202.

3. The nature of the claim is for negligence while the infant, ELLA ROSBOROUGH, attended a County of Erie run summer program called N.U.R.T.U.R.E. from July 9, 2013 to August 13, 2013. Specifically, the infant was subjected to inappropriate insults and discipline. In addition, the infant was not provided with proper facilities or food, and was not given proper medical treatment. Finally, the infant was not properly supervised, taken off site without parental permission and forced to say a prayer before every meal without parental permission.

4. As a result of the above, the infant sustained physical and emotional pain and suffering.

5. The claimant hereby demands payment for the above-referenced injuries and damages.

6. In the event the respondent fails to make payment for the above-referenced injuries and damages within the time frame provided by law, the claimant intends to commence a lawsuit with respect to this claim.

Dated: October 7, 2013
Buffalo, New York

Brian J. Bogner, Esq.
LoTempio & Brown, P.C.
Attorneys for Claimant
181 Franklin Street
Buffalo, New York 14202
(716) 855-3761

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE) ss:

I, Angel Rosborough, being duly sworn, deposes and says that:

I am the Plaintiff in the within action; I have read the foregoing Notice of Claim and know the contents thereof; the same is true to deponent's own knowledge, except as to the matters stated to be alleged on information and belief; and as to those maters, I believe them to be true.

ANGEL ROSBORUGH

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

Notary Public

LAUREN L. BURNS
Notary Public
State of New York
Qualified in Erie County
My Comm. Expires 9/21/20/7