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

July 23, 2014

Mr. Scott W. Kroll, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Mr. Kroll:

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:	*Meadows, Carolette, et al. v. County of Erie*
Document Received:	Notice of Claim
Name of Claimants:	Carolette D. Meadows, Heather Mitchell Hudson, et al.
Claimants' attorney:	Claimants are proceeding *pro se*.

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.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF

X

In the Matter of the Claim of

Carolette Meadows et al

- against-

☐ Village ☐ Town ☐ City ☒ County of

Erie

X

This paper received at the Erie County Attorney's Office from Carolette Meadows on the 7th day of July, 2014 at 10:22 a.m. ~~p.m.~~

Assistant County Attorney

NOTICE OF CLAIM

TO: ☐ Village ☐ Town ☐ City ☐ County of _____

PLEASE TAKE NOTICE that the claimant herein hereby makes claim and demand against you as follows:

1. The name and post-office address of the claimant and of his/her attorney is:

Claimant	Claimant's Attorney
Carolette Meadows	pro se
Heather Mitchell Hudson	pro se
et al	pro se

2. The nature of the claim:

medical injury due to prolonged exposure to toxic waste located at 88 & Cleveland Ferry Buffalo, NY which the county had full knowledge of and put forth lack of effort to notify residents and has not ensured full remediation of all toxins before approving development of the land for residential use

3. The time when, the place where and the manner in which the claim arose: The incident occurred on or about 1920 ~~at or about~~ _____ ~~☐ a.m. ☐ p.m.~~, to current when the city/county allowed a lead smelting plant to operate in the vicinity of 88 & Cleveland Ferry

4. The items of damage or injuries claimed are:

Residents exposure to toxic waste has led to the development of lupus and other disease clusters

That said claim and demand is hereby presented for adjustment and payment. You are hereby notified that unless it is adjusted and paid within the time provided by law from the date of presentation to you, the claimant intends to commence an action on this claim.

Dated: July 3, 2014
Buffalo, New York

Signature

CAROLETTE MEADOWS
Print Name

STATE OF NEW YORK)
) ss.:
COUNTY OF Erie)

I, Carolette Meadows, am the Claimant in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The contents are true to my own knowledge except as to matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true.

Signature

Sworn to before me on this 3
day of July, 2014.

Amanda Marie Licata
Notary Public

AMANDA MARIE LICATA
NOTARY PUBLIC STATE OF NEW YORK
ERIE COUNTY
LIC. #01LI6286115
COMM. EXP. JULY 22, 2017