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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 2, 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:	*Wiercioch, Jane v. County of Erie, et al.*
Document Received:	Notice of Claim
Name of Claimant:	Jane Wiercioch 1059 Borden Road Depew, New York 14043
Claimant's attorney:	Adam M. Lynch, Esq. Lipsitz Green Scime Cambria 42 Delaware Avenue, Suite 120 Buffalo, New York 14202-3924

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA
Erie County Attorney

By: _____
Jeremy C. Toth
Second Assistant County Attorney
jeremy.toth@erie.gov

JCT/dld
Enc.

In the Matter of the Claim of

JANE WIERCIOCH,

Claimant,

- against -

ERIE COUNTY
95 Franklin Street, 16th Floor
Buffalo, New York 14202

CITY OF BUFFALO
65 Niagara Square
Buffalo, New York 14202

CITY OF BUFFALO DIVISION OF
PARKS AND RECREATION
502 City Hall
Buffalo, New York 14202

CITY OF BUFFALO DEPARTMENT
OF PUBLIC WORKS, PARKS
AND STREETS
502 City Hall
Buffalo, New York 14202

CITY OF BUFFALO DIVISION OF
REAL ESTATE
901 City Hall
Buffalo, New York 14202

NIAGARA FRONTIER
TRANSPORTATION AUTHORITY
181 Ellicott Street
Buffalo, New York 14203

Respondents.

NOTICE OF CLAIM

RECEIVED
SEP 30 2014
ERIE COUNTY
DEPARTMENT OF LAW

TO: ERIE COUNTY,
CITY OF BUFFALO,
CITY OF BUFFALO DIVISION OF PARKS AND RECREATION,
CITY OF BUFFALO DEPARTMENT OF PUBLIC WORKS, PARKS AND STREETS,
CITY OF BUFFALO DIVISION OF REAL ESTATE, and
NIAGARA FRONTIER TRANSPORTATION AUTHORITY

PLEASE TAKE NOTICE, that JANE WIERCIOCH, has and hereby makes claim against ERIE COUNTY, CITY OF BUFFALO, CITY OF BUFFALO DIVISION OF PARKS AND RECREATION, CITY OF BUFFALO DEPARTMENT OF PUBLIC WORKS, PARKS AND STREETS, CITY OF BUFFALO DIVISION OF REAL ESTATE and NIAGARA FRONTIER TRANSPORTATION AUTHORITY, and in support of said claim states the following:

1. The Post Office address of the claimant is 1059 Borden Road, Depew, New York 14043.

2. The attorneys for the claimant are LIPSITZ GREEN SCIME CAMBRIA LLP, and their Post Office address is 42 Delaware Avenue, Suite 120, Buffalo, New York 14202-3924.

3. The claim of JANE WIERCIOCH is for personal injuries, including without limitation, loss of income and medical expenses, and for consequential damages generally.

4. The claim arose at the Buffalo and Erie County Naval & Servicemen's Park, located at 1 Naval Park Cove, in the City of Buffalo, County of Erie and State of New York.

5. The claim arose in substance as follows: On the 24th day of July, 2014, at approximately 1:15 p.m., the claimant, JANE WIERCIOCH, while traversing the walkway in front of the Naval Park was caused to fall on loose stone and raised pavement, resulting in serious injuries to the claimant.

DATED: Buffalo, New York
September 17, 2014

X _____
JANE WIERCIOCH

LIPSITZ GREEN SCIME CAMBRIA LLP

By: _____
ADAM M. LYNCH, ESQ.
Attorneys for Claimant
Office and P.O. Address
42 Delaware Avenue, Suite 120
Buffalo, New York 14202-3924
(716) 849-1333
[AML: # 99283.0001]

STATE OF NEW YORK)
) SS.:
COUNTY OF ERIE)

JANE WIERCIOCH, being duly sworn deposes and says that she is the claimant above named; and makes this claim on behalf of self; she has read the foregoing claim and knows the contents thereof; the same is true to the knowledge of the claimant except for the matters herein alleged upon information and belief, and as to those matters, she believes them to be true.

X Jane Wiercioch
JANE WIERCIOCH

Sworn to before me on this
19 day of September, 2014.

X Lisa A. DeJohn
Notary Public

LISA A. DeJOHN
Notary Public, State of New York
Qualified in Erie County
My Commission Expires Aug. 18 2018