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

January 6, 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:	*Iqbal, Ghazanfar v. County of Erie*
Document Received:	Notice of Claim
Name of Claimant:	Ghazanfar Iqbal 110 Lathrop Street Buffalo, New York 14212
Claimant's attorney:	Denis J. Bastible, Esq. Cellino & Barnes, P.C. 350 Main Street 2500 Main Place Tower Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA
Erie County Attorney

By: Michelle Parker (dld)
Michelle M. Parker
First Assistant County Attorney

MMP:dld
Enc.

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE
****

GHAZANFAR IQBAL,

Claimant,

v.

COUNTY OF ERIE,

Respondent,

****

This paper received at
Erie County Clerk's Office
on the 30th day of Dec 2013
at a.m. 3:10 p.m.
by [signature]
Deputy Clerk

NOTICE OF CLAIM

RECEIVED
DEC 31 2013
ERIE COUNTY
DEPARTMENT OF LAW

PLEASE TAKE NOTICE, that the above named Claimant claims and demands from the Respondent, COUNTY OF ERIE, recompense for personal injuries and damages sustained by Claimant by reason of the wrongful, negligent and careless acts and omissions of the Respondent, its agents, servants and/or employees, and in support there of, the Claimant states:

1. Claimant's address is 110 Lathrop Street, Buffalo, New York 14212.

2. The Claimant is represented by Cellino & Barnes, P.C. with offices located at 2500 Main Place Tower, 350 Main Street Buffalo, New York 14202, telephone (716) 854-2020.

3. On or about December 6, 2013, at approximately 7:00 a.m., a two-vehicle collision occurred at the intersection of Broadway Avenue and the Harlem Road northbound exit ramp. A truck that had been facing west on Broadway attempted to turn left onto the Harlem Road northbound access ramp. Claimant was traveling east on

Broadway through a green light signal and the turning truck collided with Claimant's vehicle.

4. As a result of the aforementioned collision, Claimant sustained serious physical injuries which included a fractured right leg, a fractured left arm, multiple fractured vertebrae and a fractured pelvis/ hip. Claimant was required to undergo surgical procedures at the Erie County Medical Center. Currently, the full extent of Claimant's injuries are not yet known.

5. It is alleged that the Respondent, through its agents, servants and employees, was negligent in the design of the aforementioned intersection and design of the traffic signal system utilized at the aforementioned intersection. It is alleged that Respondent was further negligent in failing to make necessary changes to the aforementioned intersection and traffic light system and traffic light sequencing. It is alleged that this negligence by Respondent contributed to the occurrence of the collision on December 6, 2013.

6. By virtue of the negligence of the employees, agents or servants of TOWN OF CHEEKTOWAGA, Claimant has incurred medical and hospital expenses, which are to date undetermined and will incur loss of earnings, impairment of health and permanent injuries.

7. Upon information and belief, Claimant will be obligated further medical expenses including drugs, medicines and prosthetic devices, the amount of which cannot be reasonably calculated at this time.

TAKE NOTICE that Claimant demands payment of his claim as set forth above.

DATED: Buffalo, New York
December 13, 2013

Yours, etc.,

CELLINO & BARNES, P.C.

By: _____

Denis J. Bastible, Esq.
Attorneys for Plaintiff
2500 Main Place Tower
350 Main Street
Buffalo, NY 14202-3725
(716) 854-2020

VERIFICATION

STATE OF NEW YORK)ss:
TOWN OF CHEEKTOWAGA)

Ghazanfar Iqbal, being duly sworn, deposes and says that deponent 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 matters therein stated to be alleged upon information and belief, and that as to those matters, deponent believes it to be true.

Ghazanfar Iqbal

Sworn to before me this
20th day of December, 2013

Notary Public

DENISE BASTIBLE
No. 02BA6181841
Notary Public, State of New York
Qualified in Erie County
My Commission Expires 02/11/20 16