

GL-05-17

County of Kenosha
c/o Mary T. Schuch-Krebs, County Clerk
1010 – 56th Street
Kenosha, WI 53140

Kenosha County Sheriff Department
c/o David G. Beth, Sheriff
1000 – 55th Street
Kenosha, WI 53140

Adam R. Barnard,
1000 – 55th Street
Kenosha, WI 53140

[Signature]
2-24-17
3:50 PM
NOTICE

PLEASE TAKE NOTICE of the following circumstances underlying and constituting a claim against the County of Kenosha and the Kenosha County Sheriff Department, given pursuant to §893.80, Wis. Stats., to-wit:

CIRCUMSTANCES OF EVENT

1. Sunny T. Chong is an adult resident of the City and County of Racine, State of Wisconsin, whose current address is 6111 Douglas Avenue, Racine, Wisconsin 53402.
2. Date and time of incident: January 6, 2017 at 6:38 a.m.
3. Location of incident: STH 158/52nd Street, at or about the intersection with 17th Avenue, in the City and County of Kenosha, State of Wisconsin.
4. Circumstances of incident: Claimant, Sunny T. Chong, on the date and time indicated, was traveling east bound in the curb lane in the 1700 block of STH 158/52nd Street. Kenosha County Sheriff Deputy, Adam R. Barnard, driving a Kenosha County Sheriff Department vehicle was traveling eastbound in the center lane in the 1700 block of STH 158/52nd Street, when he attempted to merge into the curb lane, striking the vehicle being driven by claimant, Sunny T. Chong. As a result of the accident claimant, Sunny T. Chong, suffered injuries to her left hand, left shoulder, left buttock and other injuries.
5. Adam R. Barnard negligently operated the vehicle so as to cause it to collide with the vehicle operated by claimant, Sunny T. Chong.



6. At all times material the vehicle driven by Adam R. Barnard was owned, operated and maintained by the County of Kenosha and the Kenosha County Sheriff Department; and Adam R. Barnard was in the scope of his employment with the County of Kenosha.

7. The above-named party was negligent as to the speed, lookout, and management and control of said vehicle.

8. As a direct and proximate result of the negligence of the above-named parties claimant, Sunny T. Chong, suffered personal injuries, mental anxiety and distress, and other personal injuries, including, but not limited to, past and future pain, suffering and disability; past and future medical expenses; and past and future wage loss and loss of earning capacity.

9. At all times material, the above-named parties had actual notice of the aforesaid incident and injuries and thoroughly investigated the same, by virtue of the Wisconsin Motor Vehicle Accident Report (KPD Ref: 6JL0QJJ8VP), a copy of which is attached As Exhibit A.

10. This document is a notice of circumstances of claim served on the above-named parties in compliance with Wisconsin law. This document is not a claim for damages. A claim for damages will be made at a later time, upon completion of medical treatment.


Dated in Racine, Wisconsin, this 8th day of February, 2017.

HABUSH HABUSH & ROTTIER S.C.[®]
Attorneys for Claimant



Kristin M. Cafferty, State Bar No. 1023260

Subscribed and sworn to before me
this 8 day of February, 2017.



Notary Public, State of Wisconsin
My commission expires: 9/30/18



P.O. ADDRESS:
5439 Durand Ave., #220
Racine, WI 53406
(262) 554-6200