

Action #3
12/18/19

cc: Supervisor
Council
Attorney
D. Golazeski
Ins. Carrier

To the supervisor and town clerk of the Town of Union:

PLEASE TAKE NOTICE that Paul Mueller, the Claimant herein, hereby makes the claim against the Town of Union, in the County of Broome, State of New York, for damages sustained by him because of personal injury as hereinafter set forth:

1. The Claimant resides at [REDACTED] in the City of Binghamton, County of Broome, and State of New York. His attorneys are Williamson, Clune & Stevens at 317 North Tioga Street, Post Office Box 126, Ithaca, New York 14850

2. The injuries complained of were sustained on the 15th day of September, 2019.

3. The injuries were sustained at 265 Main Street, Village of Johnson City, County of Broome, and State of New York. The property is identified by Tax Map number 145.57-2-8.

4. The injuries were sustained by reason of the Claimant stepping onto a steel structure which was part of the fire escape for the building. The steel structure became detached from the building which catapulted the Claimant to the ground.

5. The Town of Union performs building safety inspections and code enforcement for the Village of Johnson City, New York.

6. The injuries were caused by the negligence and want of care on the part of said Town of Union and in that the municipalities either failed to inspect the fire escape or improperly inspected the fire escape.

7. The nature and extent of the injuries sustained are as follows: Claimant suffered a fractured pelvis, fractured sacrum, fractured rib, fractured scapula and other bruising with soft tissue injuries for which he was hospitalized. The injuries have impaired the Claimant's ability to work. Furthermore, the Claimant's injuries have caused, are causing, and will cause him pain and suffering.

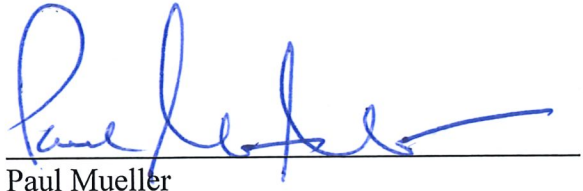
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TOWN OF UNION CLERK

Date: December 4, 2019



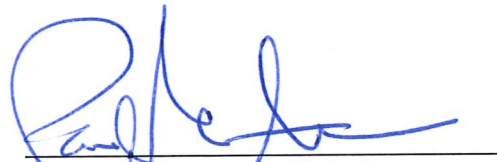
Paul Mueller

Binghamton, New York 13905

INDIVIDUAL VERIFICATION

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

PAUL MUELLER, 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 the matters therein stated to be alleged on information and belief, and that as to those matters deponent believes it to be true.



PAUL MUELLER, Claimant

Sworn to before me this
9th day of December, 2019

Notary Public

JAMES P HUGO
Notary Public, State of New York
No. 01HU6399543
Qualified in Tompkins County
Commission Expires 10/21/2023