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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 23, 2015

West Allis Fire Department
Attn: Notice of Claim
7332 W. National Avenue
West Allis, WI 53214

RECEIVED

FEB 26 2015

WEST ALLIS FIRE DEPARTMENT

SCANNED

In Re: Claimant: Danny P. Sarandos
Date of Loss: November 30, 2014
Claim No.: Requested

RECEIVED
MAR 02 2015
WEST ALLIS
CITY ATTORNEY

Dear Notice of Claim Department:

Please be advised that we have been retained by and represent the above named, Danny P. Sarandos ("Danny") with respect to personal injuries sustained by him as a result of the negligent mishandling of Danny by the Emergency Medical Specialist of West Allis Ambulance.

Our investigation reveals that Danny made an emergency 911 call to the West Allis Police Department whereby dispatch sent a West Allis Ambulance to pick him up. The call was made by Danny as he was not feeling well and his legs were giving out on him. Upon arriving at the scene, three EMT specialists came to the upstairs unit of Danny's home located at 2620 S. 84th Street, West Allis, WI. Danny was located in the upstairs bathroom sitting on the toilet cover. All three paramedics came to the upstairs bathroom. Danny told them that he wasn't feeling good and his legs were giving out on him. One paramedic took Danny's blood pressure. They decided to allow Danny to walk down the stairs without any assistance. Danny was holding onto the railing and felt very shaky while doing so.

Once he got to the outside side door of his home, he expected that a stretcher would be available for him to lay in. There was no stretcher and all three paramedics proceeded to walk towards the ambulance that was located past the driveway one house down from Danny's driveway. Danny asked for some assistance to walk the distance of the driveway and into the ambulance. In fact he specifically asked, "Can someone hold me under my arms in case I fall?" All three paramedics ignored Danny and kept walking towards the ambulance.

Danny walked himself very slowly and unassisted to the ambulance. Once he arrived near the doors of the ambulance, he was told to hop in. The ambulance entrance was three to four feet high from the ground. Danny asked for a step stool so that he could enter the ambulance. They said, "We have no step stool, maybe the side door entrance is lower."

When they opened the side door entrance of the ambulance it was the same height. Danny said, "There is no way I can get in there." Then they asked him to grab onto the side rails to hoist himself up into the

ambulance. He tried pulling himself in. He tried once. He tried twice. He tried a third time and then his legs gave out. He fell very hard on the roadway surface and broke his right leg under the knee cap. One of the EMT's said, "Come on, get up." Danny said, "I can't I broke my leg." The other EMT said, "What did he say?" The other EMT said, "I think he said, he broke his leg." At that point, they hauled the stretcher out onto the roadway and assisted Danny on the stretcher and into the ambulance. He was transported to St. Luke's Hospital for multiple injury including a broken leg.

West Allis Fire Department and EMS is responsible as a result of the negligent mishandling of Danny. As such we are making a claim against the City of West Allis for the circumstances described herein.

Accordingly, we will be in touch with you to discuss the evaluation of this claim upon collecting Danny's medical records and medical bills.

Please send written acknowledgement of our legal representation and direct all future correspondence to this office.

Thank you for your courtesy and cooperation.

Very truly yours,

A handwritten signature in cursive script that reads "Georgia L. Konstantakis".

Georgia L. Konstantakis, Esquire

cc: Danny P. Sarandos (in hand delivery)

SCANNED