NOTICE OF CIRCUMSTANCES OF INJURY WIS. STAT. § 893.80(1d)(a)

TO:

CITY OF WEST ALLIS

City Clerk

7525 W. Greenfield Avenue

Room 108

West Allis, WI 53214

CLAIMANT:

REID SEGHERS

10526 W. Cortez Circle, Apt. 25

Franklin, WI 53132

PLEASE TAKE NOTICE:

1. The Claimant, Reid Seghers ("Seghers"), is an adult resident of Milwaukee County, Wisconsin and currently resides at 10526 W. Cortez Circle, Apt. 25, WI 53527.

- 2. Seghers is employed with the City of West Allis Police Department ("WPD") and is an employee of the City of West Allis.
- 3. On October 27, 2022, at 4:34 p.m., Seghers was on duty with WPD and was in full uniform. Seghers had initiated a traffic stop at or near S. 84th Street (393 feet south of Hwy 181 S/B) and was outside his squad.
- 4. At the time and place described above, Kenneth D. Grady, Jr. ("Grady"), an uninsured driver, was operating a 2013 Chevrolet Malibu and was stopped at or near . 84th Street (393 feet south of Hwy 181 S/B), when he suddenly and without warning accelerated his vehicle, striking and dragging Seghers. Grady then fled the scene.
- 5. At and before the time of the described motor vehicle collision, Grady was negligent in the operation and use of the vehicle in that he, among other things, failed to maintain control, failed to maintain a proper lookout, operated the vehicle in an aggressive or reckless manner, and was otherwise negligent.
- 6. The negligence of Grady was the cause of the injuries and damages sustained by Seghers.
- 7. As a result of the described motor vehicle accident and the negligence of the Grady, Seghers suffered severe injuries to his knee, head, chest, neck and back that have required, and will require, medical care, treatment and attention with attendant expense, past wage loss and potential impairment of future earning capacity, past and future pain, suffering, disability and loss of enjoyment of life, and other compensable injuries.

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- 8. At all times material hereto, the City of West Allis and the City of West Allis Human Resources Department had actual and constructive notice of the aforesaid incident and thoroughly investigated it. WPD was present at accident scene and took command of the scene. Seghers has been working with the City of West Allis Human Resources Department regarding his accident and injuries as he is applying for worker's compensation from the City of West Allis for these injuries.
- 9. Seghers may pursue a claim against the City of West Allis' uninsured or underinsured motorist insurer.
- 10. Attached hereto as **Exhibit A** is a true and correct copy of Wisconsin Motor Vehicle Crash Report 1SL04D2Z9Z.

The Claimant is represented by the law firm of MacGillis Wiemer, LLC, by Attorney Christopher J. MacGillis and Attorney Lauren E. Raupp. It is requested that all notices, documents and/or correspondence related to this claim be served upon the Claimant in the care of his legal counsel at MacGillis Wiemer, LLC, 11040 W. Bluemound Rd., Ste. 100, Milwaukee, WI 53226.

Dated at Milwaukee, Wisconsin, this 13th day of February, 2023.

MacGILLIS WIEMER, LLC
Attorneys for the Claimant, Reid Seghers

Christopher J. MacGillis State Bar No. 1068944

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Lauren E. Raupp

State Bar No. 1089899

<u>Document Drafted By:</u> MacGillis Wiemer, LLC

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