



DERREVERE STEVENS
BLACK & COZAD
 ATTORNEYS AT LAW

PHONE: 561.684.3222 | FAX: 561.640.3050 | WWW.DERREVERELAW.COM

MAIN OFFICE & MAILING:
 2005 VISTA PARKWAY, SUITE 210
 WEST PALM BEACH, FL 33411

OTHER OFFICES:
 2655 SOUTH LE JEUNE ROAD, SUITE 521
 CORAL GABLES, FLORIDA 33134
 PHONE: 786.255.7434
 100 CAMBRIDGE STREET, 14TH FLOOR
 BOSTON, MA 02114
 PHONE: 617.766.8803

September 12, 2023

SENT VIA US MAIL

Erie County Water Authority
 295 Main Street, Room 350
 Buffalo, NY 14203-2494

* JON D. DERREVERE, ESQ.
 *** MICHAEL B. STEVENS, ESQ.
 * BRYAN W. BLACK, ESQ.
 BART COZAD, ESQ.
 MEGHAN A. WILSON, ESQ.
 ** ROBERT STERN, ESQ.

*** LICENSED IN FL, MA, VT, NH, RI, CT, ME, AND DC.
 ** LICENSED IN NY, NJ, AND MA.
 * FLORIDA SUPREME COURT CERTIFIED MEDIATOR.

Client: Allstate Fire and Casualty Insurance Company
 Insured: Leonardo Proietto & Caitlin Proietto
 Claim No.: 0709734478
 Our File No.: 25405
 Date of Loss: 04/11/2023
 Loss Location: 1921 Abbott Rd, Alckawanna, NY

NOTICE OF CLAIM

To Whom It May Concern:

Please be advised that the undersigned has been retained to represent Allstate Fire and Casualty Insurance Company a/s/o Leonardo Proietto & Caitlin Proietto as it relates to the incident that occurred on or about 04/11/2023 at the property located at 1921 Abbott Rd, Alckawanna, NY. You were responsible for maintaining a job site at the above Loss Location. You failed to do so by negligently failing to secure construction signs. Subsequently a sign caused damage to the Insured's vehicle. Because of your company's negligence, Leonardo Proietto & Caitlin Proietto, and in turn, Allstate Fire and Casualty Insurance Company, have been damaged in the amount of \$9,351.97, which includes Leonardo Proietto & Caitlin Proietto's \$41,120.23 deductible as well as prejudgment interest that has accrued to date. I am enclosing a copy of the subrogation demand package hereto, for your convenience.

The purpose of this letter is to give your company notice of Allstate Fire and Casualty Insurance Company's claim, and to provide the parties with an opportunity to resolve the matter without protracted litigation. Further, we request that you provide the following information within thirty (30) days of the date of this Notice:

1. The name of your company's insurer;
2. The name of each insured;

Allstate Fire and Casualty Insurance Company a/s/o Leonardo Proietto & Caitlin Proietto

Claim No.: 0709734478

Page 2 of 2

3. The limits of liability coverage;
4. A statement of any policy of coverage defenses which such insurer reasonably believes are available at the time of filing the statement; and
5. A copy of your company's insurance policy.

In the event that this matter has not been resolved within the next thirty (30) days, I have been directed to file suit against your company in furtherance of obtaining a judgment. Please do not hesitate to contact me with any questions.

In the meantime, please govern yourself accordingly.

Very truly yours,

/s/ Cairin M. Sager

CAIRIN M. SAGER
cms@derreverelaw.com

CMS