



GOMEZ & BECKER ^{LLP}

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rgomez@gomezbecker.com

December 8, 2020

Certified Mail – Return Receipt Requested

Margaret A. Murphy, Esq.
Erie County Water Authority
295 Main Street, Room 350
Buffalo, New York 14203

Re: Service of Notice of Claim

Dear Mrs. Murphy:

Enclosed herein please find a Notice of Claim on behalf of Jacqueline Culliton regarding a trip and fall accident on September 21, 2020.

Very Truly Yours,

GOMEZ & BECKER, LLP

BY: RAFAEL O. GOMEZ

Encl/

JACQUELINE CULLITON,

Claimant,

NOTICE OF CLAIM

v.

ERIE COUNTY WATER AUTHORITY and
TOWN OF AMHERST,

Respondents.

PLEASE TAKE NOTICE Claimant, JACQUELINE CULLITON, by and through her attorneys at Gomez & Becker, LLP, hereby makes a claim against the Erie County Water Authority and Town of Amherst, and respectfully submit the following in accordance and compliance with General Municipal Law §50-e and all other applicable statutes of the State of New York.

1. The post office address of the Claimant, Jacqueline Culliton, is [REDACTED] [REDACTED] Getzville, New York 14068, and she was, and is, a resident of the County of Erie and State of New York.

2. Claimant is represented by Rafael O. Gomez, Esq. with an office located at 2746 Delaware Avenue, Buffalo, NY, 14217.

3. This Notice of Claim is for personal injuries suffered by Jacqueline Culliton regarding an accident on or about September 21, 2020 located at or about the sidewalk area in front of 22 Collins Court, Getzville, New York, 14068.

4. Claimant asserts that Respondents were careless, reckless, and negligent, resulting in a dangerous, hazardous and defective condition to exist on the sidewalk in front of 22 Collins Court, and resulting in her being caused to trip and fall.

5. The trip and fall was solely the result of the carelessness, negligence and recklessness of Respondents, without any such carelessness, negligence or recklessness on the part of Claimant.

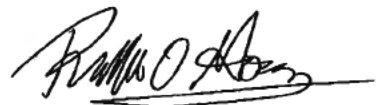
6. Respondents caused, created, and/or failed to maintain the sidewalk creating a dangerous, hazardous and defective condition, failed to warn of said condition, and through its acts and/or omissions allowed a pipe with a cover to protrude from the sidewalk in a dangerous, hazardous and defective manner.

7. Respondents knew, or should have known, this dangerous, hazardous and defective condition existed on the sidewalk in front of 22 Collins Court, and failed to remedy said condition, and failed to warn of same.

8. Respondents' carelessness, negligence and recklessness resulted in Claimant suffering personal injuries requiring medical treatment, pain-and-suffering, and loss of enjoyment of life.

9. Claimant will be seeking damages in a sum of money to be determined by a jury, which shall include all damages to which she is entitled under New York State Law as a result of the claim herein against Respondent.

Dated: November 25, 2020
Buffalo, New York



RAFAEL O. GOMEZ, ESQ.
GOMEZ & BECKER, LLP
Attorneys for Complainant
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Buffalo, New York 14217
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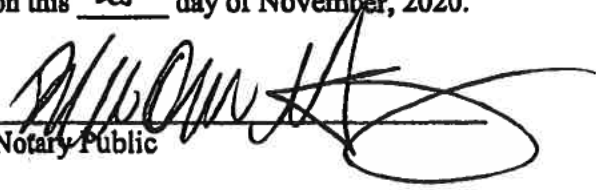
VERIFICATION

I, JACQUELINE CULLITON, being duly sworn, deposes and says that I am the Claimant in the instant action and have read the foregoing Notice of Claim, and know the contents thereof; and that same is true to the best of my knowledge, except as to those matters that are stated to be alleged upon information and belief, and that as to those matters I believe them to be true.



JACQUELINE CULLITON

Subscribed and sworn to before me
on this 25 day of November, 2020.



Notary Public

RAFAEL OMAR GOMEZ
Notary Public, State of New York
Qualified in Erie County
My Commission Expires 2/4/2022



GOMEZ & BECKER LLP

The Eberhardt Mansion | 2746 Delaware Avenue | Buffalo, NY 14217

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, VALID AT DOTTED LINE

CERTIFIED MAIL



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Margaret A. Murphy, Esq.
Erie County Water Authority
295 Main Street, Room 350
Buffalo, New York 14203

BUFFALO NY 14203

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