

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ERIE

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**RAHEEM REDDICK,**

Claimant,

**NOTICE OF CLAIM**

vs.

**CITY OF BUFFALO,  
BUFFALO MUNICIPAL HOUSING AUTHORITY,  
BUFFALO SEWER AUTHORITY,  
ERIE COUNTY WATER AUTHORITY,  
COUNTY OF ERIE,**

Respondents.

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**TO: City of Buffalo  
Law Department  
65 Niagara Square, Room 1100  
Buffalo, New York 14202**

**Buffalo Municipal Housing Authority  
300 Perry Street  
Buffalo, New York 14204**

**Buffalo Sewer Authority  
City Hall, Room 1038  
Buffalo, New York 14202**

**Erie County Water Authority  
295 Main Street, Room 350  
Buffalo, New York 14203**

**County of Erie  
Department of Law  
95 Franklin Street, Room 1634  
Buffalo, New York 14202**

**RECEIVED**  
JUL 30 2025  
BY: BNS

**PLEASE TAKE NOTICE**, that RAHEEM REDDICK, by and through his attorneys, LEWIS & LEWIS, P.C., hereby makes claims and demands against CITY OF BUFFALO, BUFFALO MUNICIPAL HOUSING AUTHORITY, BUFFALO SEWER AUTHORITY, ERIE COUNTY WATER AUTHORITY and COUNTY OF ERIE, as follows:

1. The name and post-office address of the claimant is as follows: RAHEEM REDDICK, 305 Perry Street, Buffalo, New York 14204. The claimant's date of birth is June 25, 1990. The name, post-office address and telephone number of the claimant's attorneys is LEWIS & LEWIS, P.C., Adam DelleBovi, Esq., 800 Cathedral Park Tower, 37 Franklin Street, Buffalo, New York, 14202; (716) 854-2100.

2. The nature of the claim is as follows: Upon information and belief, claimant, RAHEEM REDDICK, did sustain personal injuries and damages as a result of the carelessness, recklessness and negligence of CITY OF BUFFALO, BUFFALO MUNICIPAL HOUSING AUTHORITY, BUFFALO SEWER AUTHORITY, ERIE COUNTY WATER AUTHORITY and COUNTY OF ERIE including but not limited injuries to RAHEEM REDDICK'S left leg, left knee, left hip, back and right rib(s).

Upon information and belief, the respondent's negligence and culpable conduct includes: creating a dangerous, hazardous and/or defective condition; failing to warn or protect claimant, RAHEEM REDDICK, against a dangerous, hazardous and/or defective condition; violation of Labor Law §§ 200, 240(1), and 241(6); all of which caused injury to Claimant.

3. The facts and circumstances of this claim are as follows: Upon information and belief, on or about May 9, 2025, while claimant, RAHEEM REDDICK, was in the course of his employment for Tom Rall Contracting, at the Perry Street Homes project, also known as Commodore Perry Homes, on Perry Street in Buffalo, New York, the claimant, RAHEEM

REDDICK, was caused to fall into an uncovered manhole and suffer personal injuries, including but not limited to his left leg, left knee, left hip, back and right rib(s).

Upon information and belief, CITY OF BUFFALO, BUFFALO MUNICIPAL HOUSING AUTHORITY, BUFFALO SEWER AUTHORITY, ERIE COUNTY WATER AUTHORITY and COUNTY OF ERIE, owned, operated, controlled and maintained the roadway and manhole on Perry Street in Buffalo, New York. The respondents had and breached its duty to maintain the subject roadway and manhole in a reasonably safe condition. The respondents had and breached its duty to warn Claimant of the dangerous and defective condition posed by the uncovered manhole on Perry Street in Buffalo, New York. Further, the respondents failed to construct, shore, equip, guard, arrange, operate and conduct the area where Claimant worked so as to provide reasonable and adequate protection and safety to Claimant in violation of New York Labor Law.

4. The items of damages and injuries sustained by Claimant, RAHEEM REDDICK, are as follows: painful bodily injury; left leg injury left knee injury; left hip injury; back injury; right rib(s) injury; conscious pain and suffering; economic loss; future loss of enjoyment of life; future economic loss; and other damages and injuries that are as of yet unascertainable. In addition, the claimant has and will incur future medical expenses as a result of this incident and will require further medical treatment. Upon information and belief, the claimant's injuries and damages are and may be, in all or some respects, permanent, progressive and ongoing in nature relating directly to the incident and negligence described herein.

5. The claimant presents this claim and demands payment and notifies the respondents that unless this claim is adjusted within 30 days from the date of service of this notice, it is the intention of the claimant to commence an action against the respondents.

DATED: Buffalo, New York  
July 29, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Adam DelleBovi', written over a horizontal line.

Adam DelleBovi Esq.  
LEWIS & LEWIS, P.C. on behalf of  
Claimant, Raheem Reddick.