

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ERIE

---

GLORIA SHINNERS and ROBERT SHINNERS,  
Individually and as Husband and Wife,

Claimants,

**NOTICE OF CLAIM**

v.

ERIE COUNTY WATER AUTHORITY,

Respondent,

---

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

**PLEASE TAKE NOTICE**, that the undersigned hereby makes this notice of claim in compliance with the applicable statutes of the State of New York:

1. The Claimants herein are Gloria Shinnors and Robert Shinnors who reside at 3191 Winsted Road, Hamburg, NY 14075.

2. The Claimants herein are represented by law firm of Collins & Collins Attorneys, LLC, 267 North Street, Buffalo, NY 14201.

3. The subject claim is for personal injuries and associated medical and economic loss sustained by reason of the negligence and statutory violations of the respondent, Erie County Water Authority, by and through its agents, servants and/or employees.

5. Upon information and belief, on or before June 26, 2025, Erie County Water Authority, by and through its agents, servants, and/or employees, were performing construction and/or maintenance work at the intersection of Winsted Road and Stratford Terrace in Hamburg New York, 14075. During this construction and/or maintenance work, Erie County Water

Authority, by and through its agents, servants, and/or employees, created a hazardous condition at the intersection.

4. The incident giving rise to the damages occurred on June 26, 2025, at approximately 9:15 A.M., when the Claimant, Gloria Shinnars, tripped and fell on a defect and/or hazardous condition located at the intersection of Winsted Road and Stratford Terrace in Hamburg New York, 14075. At the time of the incident, there was no work being actively performed. Shortly after, Erie County Water Authority, by and through its agents, servants, and/or employees, filled the hazardous condition. Attached hereto and made a part hereof as **Exhibit A** are photographs of the hazardous condition after it was filled. As a result of the fall, the claimant suffered serious and permanent injuries including but not limited to her foot.

5. The aforesaid incident was caused by the negligence and statutory violations of the respondent, Erie County Water Authority, by and through its agents, servants and/or employees. The negligence of the respondent includes, but is not limited to, failure to maintain its premises in a reasonably safe condition for users, failing to place any warning signs, failing to place any barricades, particularly in the area depicted in the photographs described above.

6. As a result of the negligence of the respondent, Erie County Water Authority, Claimant, Gloria Shinnars, has sustained serious and permanent injuries along with medical expenses.

7. At the time of the incident, Claimant, Robert Shinnars, was married to Claimant, Gloria Shinnars. Claimant, Robert Shinnars, seeks damages including but not limited to: loss of consortium; loss of support; and interference with the martial relationship.

8. The total sum claimed is in an amount to be determined by a jury and it shall include past and future pain and suffering, past and future lost wages, and past and future medical expenses.

DATED: August 19, 2025  
Buffalo, New York

*Gloria Shinner*

GLORIA SHINNER

*Robert Shinner*

ROBERT SHINNER

STATE OF NEW YORK)

COUNTY OF ERIE)

ss:

On the 19 day of August, 2025, GLORIA SHINNER and ROBERT SHINNER, being duly sworn, deposes and says that he is the Petitioner in this matter; that he has read the foregoing Notice of Claim and knows the contents thereof; that it is true to his personal knowledge, except as to matters stated to be upon information and belief, and as those matters he believes to be true.

Sworn to before me on this

19 day of August, 2025

*T. Dylan Collins*

Notary Public



### CERTIFICATION

Pursuant to Part 130-1 of the Rules of the Chief Administrator, the undersigned attorney certifies that, to the best of my knowledge, information, and belief, formed after inquiry reasonable under the circumstances, the presentation of this paper or the contentions therein are not frivolous as defined in subsection (c) of §130-1.1.

A handwritten signature in blue ink, appearing to read "T. Dylan Collins", is written over a horizontal line.

T. Dylan Collins, Esq.  
Collins & Collins Attorneys, LLC  
*Attorneys for Claimants*  
267 North Street  
Buffalo, New York 14201  
(716) 885-9700

# **EXHIBIT A**







