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P 716.854.3400 ‹ www.RuppPfalzgraf.com

BRANDON M. SNYDER
snyder@RuppPfalzgraf.com

November 4, 2026

VIA CERTIFED MAIL
RETURN RECEIPT REQUESTED

Erie County Water Authority
Ellicott Square Building
295 Main Street, Room 350
Buffalo, New York, 14203

Dear Sir or Madam:

Re: New York Central Mutual Fire Insurance Company as subrogee of Kathleen S. Janicki, *et al.* v. Erie County Water Authority, *et al.*
Our File No.: 0005.45733

Please be advised that this law firm represents New York Central Mutual Fire Insurance Company as subrogee of Kathleen S. Janicki, Kathleen S. Janicki individually, Sonja Krauza, and Leslie Professional Service, LLC d/b/a Sieck, Mast & Leslie Funeral Home (collectively the "Claimants"). Enclosed for service upon Erie County Water Authority please find a Notice of Claim on behalf of each Claimant, directed to Erie County Water Authority. Please advise whether these claims will be adjusted and/or paid.

Should you have any questions or concerns regarding the foregoing, please contact the undersigned.

Sincerely,

Brandon M. Snyder

/pjc
Enclosure

NEW YORK CENTRAL MUTUAL FIRE INSURANCE COMPANY as subrogee of KATHLEEN S. JANICKI

Claimant,

v.

NOTICE OF CLAIM

ERIE COUNTY WATER AUTHORITY, and CITY OF BUFFALO

Respondents.

TO: ERIE COUNTY WATER AUTHORITY, and CITY OF BUFFALO

PLEASE TAKE NOTICE that Rupp Pfalzgraf LLC, on behalf of the claimant, New York Central Mutual Fire Insurance Company as subrogee of Kathleen S. Janicki, hereby makes claim and demand against Erie County Water Authority ("ECWA") and the City of Buffalo as follows:

1. The claimant's post-office address is 1899 Central Plaza East, Edmeston, New York. Kathleen Janicki ("claimant's subrogor") post-office address is 245 Orchard Park Road, West Seneca, New York, 14224.

2. The claimant's attorney is Brandon Snyder, Esq., of Rupp Pfalzgraf LLC, with a post-office address at 1600 Liberty Building, 424 Main Street, Buffalo, New York 14202.

3. The claim is one for negligence which resulted in substantial property damage to the real property located at 245 Orchard Park Road, West Seneca, New York 14224 (the "insured property"), on or about August 7, 2026, between 12:00 a.m. and 11:59 p.m. Specifically, on or about August 7, 2026, a water main broke in the vicinity of the insured property, causing substantial water and sewage to enter and accumulate throughout the basement of the insured property. Upon information and belief, the water main at issue was operated and maintained by ECWA and/or the City of Buffalo. Upon information and belief, on August 6, 2026, ECWA received notice of a leak in the water main on Orchard Park Road, confirmed the leak, and marked the area, but did not repair the leak that day. Upon information and belief, on August 7, 2026, during ECWA's excavation and repair operations, the water main failed and burst, discharging substantial quantities of water onto Orchard Park Road and the surrounding properties, including the insured property, before ECWA was able to isolate and shut down the main. Upon information and belief, ECWA and/or the City of Buffalo, by and through its agents, servants, representatives, and/or employees, owned, operated, controlled, maintained, and/or had responsibility for the water main and/or related water infrastructure at issue.

4. Upon information and belief, the incident described herein and resulting damages sustained were caused as a result of the negligence, carelessness, recklessness, acts, omissions, and/or unlawful conduct on the part of the respondents and their agents, servants, representatives, and/or employees. More particularly, among other things, in failing to timely and adequately repair a known leak in the water main after receiving notice of same on August 6, 2026; in failing to properly excavate and protect the water main during repair

operations; in failing to timely isolate and shut down the water main once it failed; in failing to properly inspect, maintain, repair, and/or replace the water main; and in failing to warn nearby property owners, including the claimant's subrogor, of the danger.

5. Following the above-described incident, and pursuant to the terms and conditions of the claimant's contract with the subrogor, the claimant expended an amount still to be determined, but in an amount no less than $10,000.00, either to its subrogor and/or on behalf of its subrogor, to compensate the subrogor for the substantial damage to her property. Accordingly, damages for the above-described incident are still to be determined, but are in an amount no less than $10,000.00.

6. It is alleged the incident described herein occurred without any negligence, carelessness, and/or recklessness on the part of the claimant or its subrogor.

WHEREFORE, claimant requests that ECWA and the City of Buffalo honor and pay the claim on behalf of New York Central Mutual Fire Insurance Company as subrogee of Kathleen S. Janicki. ECWA and the City of Buffalo hereby are notified that unless it is adjusted and paid within the time provided by law from the date of presentation, the claimant intends to commence a lawsuit on this claim, together with interest, costs, and disbursements.

Dated: November 2, 2026
Buffalo, New York

Brandon Snyder, Esq., of Counsel

Sworn to before this
2nd day of November, 2026

JONATHAN KAPUS
Notary Public, State of New York
No. 02KA0049515
Qualified in Erie County
Commission Expires April 29, 2030

SUB 2026008074O

11/03/2026 14:25:29

VERIFICATION

STATE OF NEW YORK)
:ss.:
COUNTY OF OTSEGO)

David Evans being duly sworn, deposes and says that he is a Subrogation Examiner with New York Central Fire Mutual Insurance Company, the claimant named in the above notice of claim; that he has read the foregoing notice of claim and knows the contents thereof; and that the same is true to his own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters he believes them to be true.

Deponent further says that the reason that this verification is made by deponent and not by New York Central Mutual Fire Insurance Company, is because New York Central Mutual Fire Insurance Company is a corporation and the grounds of deponent's belief as to all matters in the notice of claim not stated upon his own knowledge, are investigations which deponent has caused to be made concerning the subject matter of this notice of claim and information acquired by deponent in the course of his duties as a Subrogation Examiner at said corporation and from the books and papers of said corporation.

David Evans
Subrogation Examiner

Sworn to before me this
3rd day of November, 2026.

Debra A Wheelock
Notary Public

DEBRA A. WHEELOCK
Notary Public in the State of New York
Registration No. 01WH4993775
Appointed in Otsego County
My Commission Expires 3-23-2030

KATHLEEN S. JANICKI

Claimant,

v.

NOTICE OF CLAIM

ERIE COUNTY WATER AUTHORITY, and
CITY OF BUFFALO

Respondents.

TO: ERIE COUNTY WATER AUTHORITY, and
CITY OF BUFFALO

PLEASE TAKE NOTICE that Rupp Pfalzgraf LLC, on behalf of the claimant, Kathleen S. Janicki, hereby makes claim and demand against Erie County Water Authority ("ECWA") and the City of Buffalo as follows:

1. The claimant's post-office address is 245 Orchard Park Road, West Seneca, New York, 14224.

2. The claimant's attorney is Brandon Snyder, Esq., of Rupp Pfalzgraf LLC, with a post-office address at 1600 Liberty Building, 424 Main Street, Buffalo, New York 14202.

3. The claim is one for negligence which resulted in substantial property damage to the real property located at 245 Orchard Park Road, West Seneca, New York 14224 (the "subject property"), on or about August 7, 2026, between 12:00 a.m. and 11:59 p.m. Specifically, on or about August 7, 2026, a water main broke in the vicinity of the

subject property, causing substantial water and sewage to enter and accumulate throughout the basement of the subject property. Upon information and belief, the water main at issue was operated and maintained by ECWA and/or the City of Buffalo. Upon information and belief, on August 6, 2026, ECWA received notice of a leak in the water main on Orchard Park Road, confirmed the leak, and marked the area, but did not repair the leak that day. Upon information and belief, on August 7, 2026, during ECWA's excavation and repair operations, the water main failed and burst, discharging substantial quantities of water onto Orchard Park Road and the surrounding properties, including the subject property, before ECWA was able to isolate and shut down the main. Upon information and belief, ECWA and/or the City of Buffalo, by and through its agents, servants, representatives, and/or employees, owned, operated, controlled, maintained, and/or had responsibility for the water main and/or related water infrastructure at issue.

4. Upon information and belief, the incident described herein and resulting damages sustained were caused as a result of the negligence, carelessness, recklessness, acts, omissions, and/or unlawful conduct on the part of the respondents and their agents, servants, representatives, and/or employees. More particularly, among other things, in failing to timely and adequately repair a known leak in the water main after receiving notice of same on August 6, 2026; in failing to properly excavate and protect the water main during repair operations; in failing to timely isolate and shut down the water main once it failed; in failing to properly inspect, maintain, repair, and/or replace the water main; and in failing to warn nearby property owners, including the claimant, of the danger.

5. As a result of the above-described incident. the claimant sustained substantial damage to her real and personal property. a portion of which was not compensated by her property insurer. Accordingly. the claimant's uninsured damages for the above-described incident are still to be determined. but are in an amount no less than $5.390.08.

6. It is alleged the incident described herein occurred without any negligence. carelessness. and/or recklessness on the part of the claimant.

WHEREFORE. claimant requests that ECWA and the City of Buffalo honor and pay the claim of Kathleen S. Janicki. ECWA and the City of Buffalo hereby are notified that unless it is adjusted and paid within the time provided by law from the date of presentation. the claimant intends to commence a lawsuit on this claim. together with interest. costs. and disbursements.

Dated: November 2. 2026
Buffalo. New York

Brandon Snyder. Esq.. of Counsel

Sworn to before me this
2nd day of November. 2026

Notary Public

JONATHAN KAPUS
Notary Public, State of New York
No. 02KA0049515
Qualified In Erie County
Commission Expires April 29, 2030

VERIFICATION

STATE OF NEW YORK)
:ss.:
COUNTY OF ERIE)

Kathleen S. Janicki, being duly sworn, deposes and says that she is the claimant named in the above notice of claim; that she has read the foregoing notice of claim and knows the contents thereof; and that the same is true to her own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters she believes them to be true.

Kathleen S. Janicki

Kathleen S. Janicki

Sworn to before me this
3 day of November, 2026.

Edward W. Halady

Notary Public

EDWARD W HALADY
Notary Public, State of New York
Qualified in Erie County
Reg. No. 01HA4997933
My Commission Expires June 15, 2030

SONJA KRAUZA

Claimant,

NOTICE OF CLAIM

v.

ERIE COUNTY WATER AUTHORITY, and
CITY OF BUFFALO

Respondent.

TO: ERIE COUNTY WATER AUTHORITY, and
CITY OF BUFFALO

PLEASE TAKE NOTICE that Rupp Pfalzgraf LLC, on behalf of the claimant, Sonja Krauza, hereby makes claim and demand against Erie County Water Authority ("ECWA") and the City of Buffalo as follows:

1. The claimant's post-office address is 237 Orchard Park Road, West Seneca, New York, 14224.

2. The claimant's attorney is Brandon Snyder, Esq., of Rupp Pfalzgraf LLC, with a post-office address at 1600 Liberty Building, 424 Main Street, Buffalo, New York 14202.

3. The claim is one for negligence which resulted in substantial property damage to the real property located at 237 Orchard Park Road, West Seneca, New York 14224 (the "subject property"), on or about August 7, 2026, between 12:00 a.m. and 11:59 p.m. Specifically, on or about August 7, 2026, a water main broke in front of the subject property,

causing substantial water to flood the basement, yard, and shed of the subject property. Upon information and belief, the water main at issue was operated and maintained by ECWA and/or the City of Buffalo. Upon information and belief, on August 6, 2026, ECWA received notice of a leak in the water main on Orchard Park Road, confirmed the leak, and marked the area, but did not repair the leak that day. Upon information and belief, on August 7, 2026, during ECWA's excavation and repair operations, the water main failed and burst, discharging substantial quantities of water onto Orchard Park Road and the surrounding properties, including the subject property, before ECWA was able to isolate and shut down the main. Upon information and belief, ECWA and/or the City of Buffalo, by and through its agents, servants, representatives, and/or employees, owned, operated, controlled, maintained, and/or had responsibility for the water main and/or related water infrastructure at issue.

4. Upon information and belief, the incident described herein and resulting damages sustained were caused as a result of the negligence, carelessness, recklessness, acts, omissions, and/or unlawful conduct on the part of the respondents and their agents, servants, representatives, and/or employees. More particularly, among other things, in failing to timely and adequately repair a known leak in the water main after receiving notice of same on August 6, 2026; in failing to properly excavate and protect the water main during repair operations; in failing to timely isolate and shut down the water main once it failed; in failing to properly inspect, maintain, repair, and/or replace the water main; and in failing to warn nearby property owners, including the claimant, of the danger.

5. As a result of the above-described incident, the claimant sustained substantial damage to her real and personal property. Accordingly, the claimant's damages for the above-described incident are still to be determined, but are in an amount no less than $21,000.00.

6. It is alleged the incident described herein occurred without any negligence, carelessness, and/or recklessness on the part of the claimant.

WHEREFORE, claimant requests that ECWA and the City of Buffalo honor and pay the claim of Sonja Krauza. ECWA and the City of Buffalo hereby are notified that unless it is adjusted and paid within the time provided by law from the date of presentation, the claimant intends to commence a lawsuit on this claim, together with interest, costs, and disbursements.

Dated: November 3, 2026
Buffalo, New York

Austin R. Hendricks, Esq.

Sworn to before me this
3rd day of November, 2026

Notary Public

JODI L. FOLEY-JOHNSTON
Notary Public, State of New York
Reg No. 01FO6033530
Qualified in Erie County
My Commission Expires Nov. 22, 2029

VERIFICATION

STATE OF NEW YORK)
:ss.:
COUNTY OF ERIE)

Sonja Krauza, being duly sworn, deposes and says that she is the claimant named in the above notice of claim; that she has read the foregoing notice of claim and knows the contents thereof; and that the same is true to her own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters she believes them to be true.

Sonja Krauza

Sonja Krauza

Sworn to before me this
3rd day of November, 2026.

Gwendolyn Rae Kuc

Notary Public

Gwendolyn Rae Kuc
Notary Public, State of New York
Reg.# 01KU0037715
Qualified in Erie County
Commission Expires 05/23/2029

LESLIE PROFESSIONAL SERVICE, LLC d/b/a
SIECK, MAST & LESLIE FUNERAL HOME

Claimant,

v.

NOTICE OF CLAIM

ERIE COUNTY WATER AUTHORITY,

Respondent.

TO: ERIE COUNTY WATER AUTHORITY

PLEASE TAKE NOTICE that Rupp Pfalzgraf LLC, on behalf of the claimant, Leslie Professional Service, LLC d/b/a Sieck, Mast & Leslie Funeral Home, hereby makes claim and demand against Erie County Water Authority ("ECWA") as follows:

1. The claimant's post-office address is 250 Orchard Park Road, West Seneca, New York, 14224.

2. The claimant's attorney is Brandon Snyder, Esq., of Rupp Pfalzgraf LLC, with a post-office address at 1600 Liberty Building, 424 Main Street, Buffalo, New York 14202.

3. The claim is one for negligence and trespass which resulted in substantial property damage to the real property located at 250 Orchard Park Road, West Seneca, New York 14224 (the "subject property"), on or about August 7, 2026, between 12:00 a.m. and 11:59 p.m. Specifically, on or about August 7, 2026, a water main broke on Orchard Park Road across the street from the subject property. In responding to the water main break, ECWA, by

and through its agents, servants, representatives, and/or employees, improperly entered upon the subject property without the claimant's permission and used the subject property's driveway and parking lot as a staging area for its trucks and equipment, rather than the public roadway and shoulder of Orchard Park Road. Upon information and belief, as many as six or seven of ECWA's full-size dump trucks, with their beds loaded with stone, were parked on the subject property's driveway and parking lot at the same time. ECWA's heavily loaded trucks remained parked on the driveway and parking lot throughout the day, and were repeatedly driven and turned around within same, until the claimant asked ECWA to leave. The concentrated weight of ECWA's heavily loaded dump trucks, together with the repeated driving and turning of those trucks throughout the day, crushed, cracked, and broke apart the blacktop surface of the driveway and parking lot, leaving the blacktop crumbled and severely damaged. Prior to ECWA's use of the subject property, the driveway and parking lot had been patched, resealed, and restriped in the summer of 2025.

4. Upon information and belief, the incident described herein and resulting damages sustained were caused as a result of the negligence, carelessness, recklessness, trespass, acts, omissions, and/or unlawful conduct on the part of ECWA and its agents, servants, representatives, and/or employees. More particularly, among other things, in entering upon and using the claimant's parking lot as a staging area without the claimant's permission or other authority; in parking, driving, and turning heavily loaded dump trucks and other equipment on the claimant's parking lot; in failing to stage its vehicles and equipment on the public roadway and shoulder of Orchard Park Road; in failing to protect the claimant's parking lot from damage; in failing to timely and adequately repair a known leak in the water main after receiving notice of

same on August 6, 2026; and in failing to timely isolate and shut down the water main once it failed.

5. As a result of the above-described incident, the claimant sustained substantial damage to its real property, including the lower parking lot of the subject property. Accordingly, the claimant's damages for the above-described incident are still to be determined, but are in an amount no less than $20,000.00.

6. It is alleged the incident described herein occurred without any negligence, carelessness, and/or recklessness on the part of the claimant.

WHEREFORE, claimant requests that ECWA honor and pay the claim of Leslie Professional Service, LLC d/b/a Sieck, Mast & Leslie Funeral Home. ECWA hereby is notified that unless it is adjusted and paid within the time provided by law from the date of presentation, the claimant intends to commence a lawsuit on this claim, together with interest, costs, and disbursements.

Dated: November 3, 2026
Buffalo, New York

Austin R. Hendricks, Esq.

Sworn to before me this
3RD day of November, 2026

Notary Public

JODI L. FOLEY-JOHNSTON
Notary Public, State of New York
Reg No. 01FO6033530
Qualified in Erie County
My Commission Expires Nov. 22, 2029

VERIFICATION

STATE OF NEW YORK)
:ss.:
COUNTY OF ERIE)

Peter Leslie, being duly sworn, deposes and says that he is a member of Leslie Professional Service, LLC, the claimant named in the above notice of claim; that he has read the foregoing notice of claim and knows the contents thereof; and that the same is true to his own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters he believes them to be true.

Deponent further says that the reason that this verification is made by deponent and not by Leslie Professional Service, LLC, is because Leslie Professional Service, LLC is a limited liability company and the grounds of deponent's belief as to all matters in the notice of claim not stated upon his own knowledge, are investigations which deponent has caused to be made concerning the subject matter of this notice of claim and information acquired by deponent in the course of his duties as a member of said limited liability company and from the books and papers of said limited liability company.

Peter Leslie
Owner

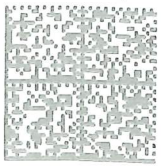
Sworn to before me this
03 day of November, 2026.

Notary Public

KEITH A. WESOLEK
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01WE6427265
Qualified in Erie County
Commission Expires December 27, 29

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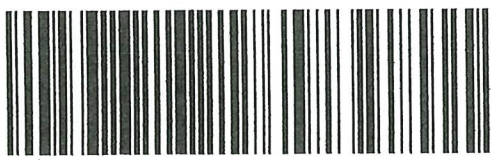
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295 Main Street, Room 350
Buffalo, New York, 14203

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