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## NOTICE OF CLAIM AND CLAIM PURSUANT TO WIS. STAT. § 893.80

AUG 182015

DANE COUNTY CLERK

To: Deputy Cheryl Beckwith
Dane County Sheriff's Office
115 W. Doty Street
Madison, WI 53703

Claimant: Paul Beck 41 Rickel Road Sun Prairie, WI 53590

Joe Parisi
Dane County Executive
City County Building, Rm 421
210 Martin Luther King Jr. Blvd.
Madison, WI 53703

Scott McDonell
Dane County Clerk
City County Building, Rm 106A
210 Martin Luther King Jr. Blvd.
Madison, WI 53703

Sheriff David J. Mahoney Dane County Sheriff's Office 115 W. Doty Street Madison, WI 53703 81815

Please take notice that Paul Beck, by his attorneys, Lawton & Cates, S.C., by Dixon R. Gahnz, pursuant to Wis. Stat. § 893.80, states that the circumstances giving rise to a claim are as follows:

- Claimant, Paul Beck, is an adult currently residing at 41 Rickel Road Sun Prairie,
   Wisconsin 53590.
- On May 21, 2015, Mr. Beck was walking in the crosswalk at the intersection of North Sherman Avenue and Aberg Avenue. Mr. Beck had a walk signal.
- 3. Deputy Cheryl Beckwith was operating a Dane County Sheriff's Department squad car at the same location at the same time.

4. Deputy Beckwith failed to yield the right of way to Mr. Beck, and failed to notice

him crossing the street. Deputy Beckwith struck Mr. Beck with the squad car.

5. There was a traffic camera operating at the intersection. The video shows that

Mr. Beck was in the middle of the street and in the crosswalk when Deputy

Beckwith hit him.

6. As a result of the motor vehicle collision, Mr. Beck suffered severe injuries

requiring hospitalization. After being released from the hospital Mr. Beck was

sent to a rehabilitation center where he continues to receive treatment for his

injuries.

7. Deputy Beckwith was negligent in that she failed to yield to Mr. Beck's right of

way, she failed to observe a pedestrian in plain sight and she hit a pedestrian in a

marked crosswalk.

8. Deputy Beckwith's negligence proximately caused Mr. Beck's injuries.

Claim for Damages Pursuant to Wis. Stat. § 893.80

Mr. Beck hereby makes a claim for \$250,000 in damages based on medical expenses,

pain and suffering.

Dated this / day of August, 2015.

LAWTON & CATES, S.C.

Dixon R. Gahnz, SBN 1024367

P.O. Box 2965

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(608) 282-6200

Attorneys for Claimants