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8/23/2021



MAINETTI & MAINETTI P.C.

ATTORNEYS AT LAW
130 NORTH FRONT STREET, SUITE 300
KINGSTON, NEW YORK 12401
(845) 600-0000
FAX (845) 477-1600
WWW.MAINETTI.LAW

ALFRED B. MAINETTI
VICTOR R. MAINETTI (1956-1993)
MICHAEL A. MAINETTI
ALEXANDER E. MAINETTI
MICHAEL J. KAVANAGH

POUGHKEEPSIE
9 MANSION STREET
POUGHKEEPSIE, NY 12601
(845) 600-0000

August 20, 2021

City of Kingston
Corporation Council
420 Broadway
Kingston, NY 12401

Re: Our Client: Pamela Wenner
Date of Accident: July 16, 2021

Dear Sir/Madam:

Please be advised our office represents the interests of Pamela Wenner, who was injured on the above date due to your negligence. Our client was caused to sustain serious injuries on July 16, 2021 at approximately 8:45AM when she fell at your premises located at 484 Delaware Ave., Kingston, NY 12401.

Please be advised you are being placed on notice to preserve any photos, motion pictures and/or videotapes of the accident scene, the parties, the instrumentalities involved, taken by or in possession of Elizabeth Straub, your attorneys or their insurance carrier or your agents, servants and employees which pertain to the matter to which this accident refers.

Upon receipt of this letter, kindly contact the undersigned and/or turn this letter over to your insurance company so that a proper disposition of this matter can be made. Of course, if you are already represented by counsel on this claim, then simply turn the letter over to your attorney.

Failure on your part to respond by agent, representative or in person within ten (10) days will result in the appropriate actions being taken to protect the interests of our client.

Very truly yours,

MAINETTI & MAINETTI, P. C.

ALEXANDER E. MAINETTI, ESQ.
AEM:mso



PERSONAL & CONFIDENTIAL

August 25, 2021

**CITY OF KINGSTON
420 BROADWAY
KINGSTON, NY 12401**

RE: POLICY NUMBER: CPKG81320007
CLAIM NUMBER: 200752
DATE OF INCIDENT: July 16, 2021 (This date is approximate and is subject to change.)
CLAIMANT NAME: Wenner, Pamela
DESCRIPTION: Wenner; Notice of Claim - negligence caused clmt fall and resulting injuries

Dear CITY OF KINGSTON,

Tokio Marine HCC - Public Risk Group ("TMHCC") administers insurance claims on behalf of U.S. Specialty Insurance Company ("USSIC"). On behalf of USSIC, we acknowledge receipt of the above-referenced submission. This matter has been assigned to John Galvano, Senior Claims Adjuster. You may reach John Galvano via phone at 248-371-3134 or via e-mail at jgalvano@tmhcc.com.

Kindly be advised that TMHCC has not yet made a determination as to liability or coverage. In that regard, TMHCC expressly reserves all rights, remedies and defenses under the policy and applicable law, including, but not limited to, the right to deny coverage. Nothing stated herein, nor any further action taken by TMHCC or anyone acting on its behalf, shall be construed as a waiver of any rights, remedies or defenses under the policy.

Various factors contribute to the insurance coverage determination. These factors include but are not limited to, the circumstances of the alleged loss, the allegations against the insured, the timing of the loss or wrongful acts alleged, and the relief sought. In some cases, it may be premature to determine whether certain conditions or exclusions apply to preclude coverage.

We will contact you upon completion of our initial review and evaluation of this matter.

For Property and Auto Damage Claims:

Please maintain all items and property in their current damaged state until you have spoken with the assigned Claim Adjuster. If emergency repair work is required, please preserve all evidence possibly related to the loss. If the property involved is currently incurring storage fees, please arrange to have the property moved to a location that does not incur cost, or you may be responsible for same.

In furtherance of our evaluation of this matter, please immediately forward the following information to the attention of John Galvano, Senior Claims Adjuster, at jgalvano@tmhcc.com:

- Any and all estimates that have been received for the damaged property
- Any internal accident or police reports regarding the incident
- Photographic evidence of the damage that was sustained.

Sincerely,
Tokio Marine HCC - Public Risk Group
John Galvano, Senior Claims Adjuster