



July 10, 2024

Mr. Terrance D. McCracken  
ERIE COUNTY WATER AUTHORITY  
295 Main Street, Suite 350  
Buffalo, New York 14203

**RE : Our Client : SHERRI L. BELLANCA**  
**Date of Accident : June 5, 2024**

Dear Sir/Madam:

Please be advised that this law firm has been retained by the above-referenced individuals in regard to personal injuries suffered as a result of an accident that occurred on the above-referenced date.

Enclosed please find a Notice of Claim.

Respectfully,

A handwritten signature in blue ink, appearing to read 'JW Looney', is written over a light blue circular stamp.

John W. Looney, Esq.

JWL/mel  
Enclosure

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ERIE  
\*\*\*\*\*

SHERRI L. BELLANCA  
5790 West Lane  
Lake View, New York 14085

Claimant,

**NOTICE OF CLAIM**

v.

TOWN OF HAMBURG  
6100 South Park Avenue  
Hamburg, New York 14075

ERIE COUNTY WATER AUTHORITY  
295 Main Street, Room 350  
Buffalo, New York 14203

Respondents.

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**PLEASE TAKE NOTICE** that Claimant hereby makes a claim against Respondents for damages for personal injuries sustained by Claimant by reason of the unlawful, wrongful, negligent, and careless acts and omissions of Respondents and/or their agents, contractors, servants and/or employees and in support thereof, Claimant states the following to be true and accurate:

1. Claimant's address is 5790 West Lane, Lake View, New York 14085.
2. Claimant is represented by Looney Injury Law, PLLC with offices located at 8340 Main Street, Suite 2A, Williamsville, New York 14221.
3. Claimant stepped into a hole and fell on Apollo Drive at the intersection with West Lane in the Town of Hamburg, New York.
4. Claimant sustained personal injuries as a result of the accident which occurred on or about June 5, 2024, at approximately 5:30 p.m.

5. The accident occurred because Respondents were negligent in creating and/or allowing a dangerous condition to exist (a recessed water valve access hole) on Apollo Drive at the intersection with West Lane. As a result of the accident, Claimant was caused to suffer serious and potentially permanent injuries.
6. As a result of the accident, Claimant suffered injuries to her neck, shoulders, arms and left ankle.
7. By virtue of the negligence of Respondents, Claimant has incurred economic loss (medical expenses and loss of income), the amount of which cannot be reasonably calculated at this time, and non-economic loss (pain and suffering).

**TAKE NOTICE** that Claimant demands payment of her claim as set forth above.

DATED: Buffalo, New York  
July 9, 2024

**LOONEY INJURY LAW, PLLC**

By: 

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John W. Looney, Esq.  
Attorney for Claimant  
8340 Main Street, Suite 2A  
Williamsville, New York 14221  
(716) 300-7777

**VERIFICATION**

STATE OF NEW YORK )  
COUNTY OF ERIE ) SS.:  
CITY OF BUFFALO )

Sherri Bellanca, being duly sworn, deposes and says that she is the Plaintiff in the within action; that she has read the foregoing **NOTICE OF CLAIM** and knows the contents thereof; that the same is true to the knowledge of the deponent, except as to the matters therein stated to be alleged on information and belief, and that as to those matters they believe it to be true.

Sherri Bellanca  
Sherri Bellanca

STATE OF NEW YORK )  
COUNTY OF ERIE ) SS.:  
CITY OF BUFFALO )

On the 1<sup>ST</sup> day of July, in the year 2024, before me, the undersigned, personally appeared, Shērrī Bellanca, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her capacity and that by her signature on the instrument, the individual or the person upon behalf of which the individual acted, executed the instrument.

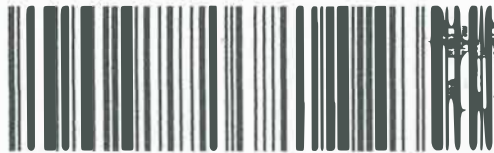
John W. Looney  
Notary Public / Commissioner of Deeds

JOHN W. LOONEY  
NOTARY PUBLIC-STATE OF NEW YGRK  
No. 02LO6424395  
Qualified in Erie County  
My Commission Expires 11-01-2025



Looney Injury Law, PLLC  
 8340 Main Street, Suite 2A  
 Williamsville, New York 14221

**CERTIFIED MAIL**



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**Retail**



**RDC 99**



14203

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ERIE COUNTY WATER AUTH  
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Mr. Terrance D. McCracken  
 ERIE COUNTY WATER AUTHORITY  
 295 Main Street, Suite 350  
 Buffalo, New York 14203

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