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\*ALSO ADMITTED IN TENNESSEE

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September 16, 2014

### ANTE-LITEM NOTICE

#### VIA CERTIFIED MAIL,

#### RETURN RECEIPT REQUESTED

Return Receipt No. 7012 2920 0001 9140 7728

Mayor Ryan McLemore and Griffin City Council  
City of Griffin, Office of the Mayor  
100 South Hill Street  
Post Office Box T  
Griffin, Georgia 30224

Re: Mary Harrell & Johnathan Harrell v. City of Griffin Police Department  
Date of Incident: May 2, 2014  
Time of Incident: 2:46 p.m.  
Place of Incident: GA 3 and LaPrade Road in Spalding County  
Our File No.: 14.1991.1

Dear Mayor McLemore and City Council Members:

I have been retained to represent Mary Harrell and Johnathan Harrell with respect to injuries/damages Mary Harrell and Johnathan Harrell sustained due to an automobile collision on May 2, 2014. Please direct all future communications and correspondence to my attention.

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This ante-litem notice is sent on behalf of my clients pursuant to O.C.G.A. § 36-33-5 as well as for all other purposes allowed under Georgia law. The purpose of this letter is to provide the City of Griffin with all appropriate ante-litem notice and/or other required notices pertaining to the claims of my clients arising out of the injuries they sustained and the resulting damages.

In accordance with O.C.G.A. § 36-33-5 and all other applicable provisions of Georgia law, the City of Griffin, through the Mayor and City Council, is provided with the following notice of my client's claims:

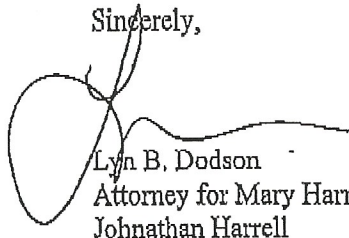
- A. **State Government Entity Involved in the Claim:** Griffin Police Department
- B. **Date and Time of Incident:** May 2, 2014 at approximately 2:58 p.m.
- C. **Place of Incident or Occurrence:** Intersection of Georgia 3 and LaPrade Road, Griffin, Georgia
- D. **Nature of the Loss Suffered:**  
Claimant Mary Harrell was injured when on May 2, 2014, she was traveling as a passenger in her husband Jonathan Harrell's Dodge truck, heading south on GA 3 approaching the intersection with LaPrade Road. As Mr. Harrell approached the intersection with LaPrade Road, Officer Dawn Storm was operating a Dodge Charger in her official capacity as an officer of the City of Griffin. Officer Storm was traveling east on LaPrade Road approaching the intersection with GA 3. Just as the Harrells were approaching the intersection of Ga 3 with LaPrade Road, Officer Storm pulled into the intersection when it was not safe to do so causing a collision with the Harrell vehicle. As a result of the collision, Mary Harrell suffered a torn rotator cuff for which she was caused to undergo a rotator cuff repair. She also suffered neck injuries, fracture to the clavicle and internal stomach bruising. Johnathan Harrell suffered a loss of consortium due to the injuries suffered by his wife.
- E. **Amount of the Loss Claimed:** Full recovery allowed by Georgia law, including, but not limited to, damages for past and future pain and suffering, past and future medical expenses, and past and future lost wages.
- F. **The Acts or Omissions (i.e., Negligence) Which Caused the Loss:** The City of Griffin's negligence included, but may not be limited to, failure to yield to oncoming traffic.

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Claimants seek to recover from the City of Griffin any and all damages allowed under Georgia law including, but not limited to, damages for past and future pain and suffering, past and future medical expenses, past and future lost wages, and for any other economic and non-economic losses suffered as a result of the injuries/damages to Mary Harrell and Johnathan Harrell. Johnathan Harrell seeks to recover for his loss of consortium. This listing of the items of damages to which my clients contend they are entitled shall in no way limit or restrict their right to seek further and/or different damages in any lawsuit filed with respect to this matter.

In the event the City of Griffin believes that this notice is insufficient in any manner and/or additional information is needed to properly adjust the claims asserted by my clients, please feel free to contact me immediately.

Sincerely,



Lyn B. Dodson  
Attorney for Mary Harrell and  
Johnathan Harrell

LD/ar

Cc: Mary and Johnathan Harrell

*Via Certified US Mail*  
*Return Receipt No. 7012 2920 9140 7742*  
*Second Transmittal via Facsimile: 678-692-0402*  
Gregory Poole, Risk Manager  
City of Griffin  
Administrative Services  
100 South Hill Street  
Post Office Box T  
Griffin, Georgia 30224

*Via Facsimile: 678-692-0403*  
Andrew Whalen, City Attorney  
City of Griffin  
Administrative Services  
100 South Hill Street  
Post Office Box T  
Griffin, Georgia 30224