



LAW OFFICES OF
LAQUETTA S. PEARSON, PC

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June 23, 2015

SENT VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Kenny Smith
City Manager – City of Griffin
Office of City Manager
100 South Hill Street P.O. Box T
Griffin, GA 30224
Phone: 770-229-6408
Fax: 678-692-0403

RE: ANTE LITEM NOTIFICATION

Pursuant to O.C.G.A. § 36-33-5

To:	City of Griffin Police Department
Our Client:	Mr. Jemarko Parker
Date of Accident:	June 11, 2015
Location:	1597 W McIntosh Road, Griffin, Georgia 30223
Time of Occurrence:	5:12 PM

Dear Mr. Smith:

Please be advised that this firm represents the interests of Mr. Jemarko Parker for injuries he sustained as a result of an automobile accident that occurred on June 11, 2015. This letter shall constitute ante litem notice pursuant to O.C.G.A § 36-33-5 and is given on behalf of Jemarko Parker.

FACTS

On June 11, 2015, Jemarko Parker was driving through a parking lot located at 1597 W McIntosh Road in Griffin, Georgia, when his vehicle was struck by a police cruiser that was backing out of a parking space being driven by Officer James Ronald Waddell, Jr. (Please see

attached Accident Report). Officer Waddell admitted that he was backing out of a parking space and struck Mr. Parker's vehicle with the police cruiser that he was operating.

LIABILITY

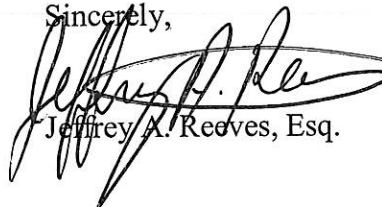
This accident occurred as a result of the negligence of an officer, agent or employee of the City of Griffin in operating a motor vehicle owned, controlled and insured by the City of Griffin when Officer Waddell failed to make sure that the roadway was clear before backing out of a parking space and ensuring that he had the right of way. These theories of negligence are not exclusive of additional theories that may exist but are not yet determined.

INJURIES

As a direct and proximate consequence of the negligence of an officer, agent or employee of the City of Griffin Police Department, Jemarko Parker suffered damage to his person and to the vehicle he was operating. Specifically, Mr. Parker was diagnosed with having a contusion to his left shoulder and pain to the left side of his body. His medical treatment is still continuing and his medical expenses are approximately \$5000.00. We anticipate his medical expenses will exceed this amount.

This letter is intended to establish ante litem notification and is presumed to comply with all such requirements under O.C.G.A. § 36-33-5 unless you notify us of any defect within ten (10) days of receipt. If further information is needed, please feel free to contact the undersigned.

Sincerely,



Jeffrey A. Reeves, Esq.

cc: City of Griffin Police Department