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THE GRAHAM LAW FIRM

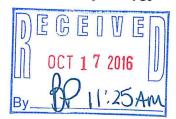
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October 12, 2016

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VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andrew J. Whalen, III City Attorney City of Griffin P.O. Box T Griffin, GA 30224

RE: ANTE LITEM NOTICE OF INJURY AND CLAIM AGAINST CITY OF GRIFFIN, GA.

Dear Ms. Hampton:

Pursuant to O.C.G.A. §36-33-5 *et seq.*, please be advised that our firm has been retained by Miss Devin L. Favors (hereinafter, the "Claimant") to represent her in her claim for personal injuries against the City of Griffin.

On the evening of September 28, 2016, Ms. Favors was travelling eastbound on Meriwether Street. A City of Griffin vehicle, operated by Tyler R. White, backed out of a parking space and struck Ms. Favors' vehicle on the front passenger door with the rear bumper of the City's vehicle. Ms. Favors attempted to avoid the accident but was unable to do so. She immediately claimed of injuries and was transported by EMS to the emergency room.

A. Entities and Individuals Against Whom Claims are Made

1. City of Griffin

Claimant identifies the City of Griffin, Georgia, its employees, agents, representatives, departments, agencies and/or divisions, (hereinafter, the "City"), as an entity, or entities, against whom these claims are made. This claim includes, but is not limited to, personnel and staff of the City of

Griffin, who are paid by, employed by, and/or controlled by the City of Griffin, and/or any of its departments, agencies, divisions, who have committed or failed to commit specified acts required of the City or its employees, agents, representatives, departments, agencies and/or divisions.

B. Extent of Injury

Ms. Favors was immediately injured when she was struck by the City's vehicle operated by a City employee. Ms. Favors suffered pain and injury to her right shoulder, neck and back, and is experiencing regular headaches. The injury will require treatment and time off from work.

C. Negligence Causing Injury

The City is liable to Ms. Favors under the theory of negligence due to the Improper Backing violation committed by Mr. White. The City, as owner of the vehicle and employer of Mr. White, and through the doctrine of respondeat superior, is liable for the injuries suffered by Ms. Favors. Mr. White failed to exercise ordinary care and did not operate his vehicle in a safe manner. He, and therefore, the City, breached the duty of care when Mr. White failed to make sure the roadway was safe for him to back the City's vehicle out of a parking space without harm or injury to other motorists. As a result of the breach of duty, Mr. White and the City caused harm to our client resulting in the damages included herein.

D. <u>Damages to Ms. Favors</u>

Ms. Favors suffered immediate pain and suffering after the initial impact. She complained of injuries on the scene and was transported to the emergency room. We anticipate that Ms. Favors will incur medical expenses in excess of Five Thousand Dollars as well as her ongoing pain and suffering. Also, Mr. Favors' vehicle was damaged as a result of the impact. The loss to her property has yet to be determined as of the date of this letter.

This notice is being sent pursuant to the requirements of O.C.G.A. §36-33-5, and is made based upon the information currently known and available to Claimant. Under the provisions of applicable Georgia laws governing ante-litem notice requirements, Claimant provides you with the information above, believing it is sufficient to enable the City to conduct an investigation into the allegations set forth in this notice and determine if the claims may be settled without litigation.

If you are uncertain as to the nature and/or extent of any of the allegations or claims for damages contained in this notice letter, please notify me immediately in writing so that I may supplement this information, to the extent possible without the benefit of a formal investigation with any information that may be available to Claimant.

Under Georgia law, the City of Griffin has thirty (30) days to respond, in writing, to this notice of claim before Claimant will have the statutory right to file a lawsuit against the City for all claims identified or actionable based on the circumstances giving rise to this notice.

Thank you for your prompt attention to this matter.

0.101/

Sincere

Charles D. Graham

cc: Kenny Smith, City Manager (Via Certified Mail)