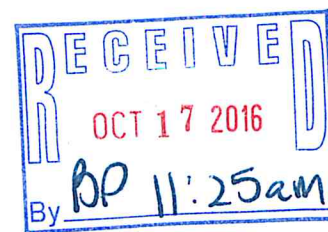


# MORGAN & MORGAN®

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October 10, 2016

## CERTIFIED MAIL RETURN RECEIPT

7015 3010 0002 2842 0238



\* 3 1 7 8 8 4 7 \*

Douglas S. Hollberg, Chairman  
City of Griffin, Georgia  
Board of City Commissioners  
100 S. Hill Street  
Griffin, GA 30223

Michael Yates, Chief of Police  
Griffin Police Department  
868 West Poplar Street  
Griffin, GA 30224

Kenny Smith, City Manager  
City of Griffin  
Office of City Manager  
100 S. Hill Street  
Griffin, GA 30223

Andrew J. Whalen, Esq.  
City of Griffin Attorney  
The Whalen Law Firm LP  
100 S. Hill Street, Suite 524  
Griffin, GA 30223

Re: Ante Litem Notice of Tort Claim  
Our Client(s): Daffney McGlohon  
Date of Incident: 6/25/2016  
Your Claim No: Unknown

To Whom It May Concern:

Within six (6) months of the date described above, this Notice is being sent pursuant to the requirements of O.C.G.A. § 36-33-5 to provide you with a thirty (30) day opportunity for adjustment of a tort claim against the City as a result of the following incident:

- (a) Name of the City Government entity involved: City of Griffin; Griffin Police Department
- (b) Time: June 25, 2016;
- (c) Place: Griffin, GA
- (d) Nature of Loss Suffered: Back Pain and Right Shoulder Pain
- (e) Amount of Loss Claimed: Daffney McGlohon has claims for her medical expenses, past and future, lost income, past and future in the amount of \$20,000.00. We expect for this figure to increase, as Ms. McGlohon is still treating with her doctor. Furthermore, a claim for her pain and suffering, mental

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and emotional suffering and any other non-economic damages recoverable under all applicable laws in the amount of \$20,000.00. **Please be advised the client is still receiving medical treatment which may affect the amount of the claim for medical expenses and all other non-economic damages.**

(f) Acts or omissions which caused the loss: Brandon Walden, an Officer with the City of Griffin Police Department was traveling eastbound on SR16 approaching the intersection of South Pine Hull Road, in Griffin, GA when he negligently failed to yield while turning left, causing the collision with Ms. McGlohon's vehicle.

At all relevant times, Officer Brandon Walden owed certain civil duties to Ms. McGlohon, and, notwithstanding those duties, Officer Brandon Walden did violate them in the following particulars:

- In failing to make reasonable and proper observations while driving the 2008 Dodge Charger or, if reasonable and proper observations were made, failing to act thereon;
- In failing to keep in his proper lane in violation of O.C.G.A. § 40-6-50; In failing to make timely and proper application of his brakes in violation of O.C.G.A. § 40-6-241;
- In failing to observe or undertake the necessary precautions to keep his 2008 Dodge Charger from colliding with Ms. McGlohon's vehicle in violation of O.C.G.A. § 40-6-390;
- In driving his 2008 Dodge Charger without due caution and circumspection and in a manner so as to endanger the person and/or property of others in the immediate vicinity in violation of O.C.G.A. § 40-6-241; and
- In driving the 2008 Dodge Charger in reckless disregard for the safety of persons and/or property in violation of O.C.G.A. § 40-6-390;

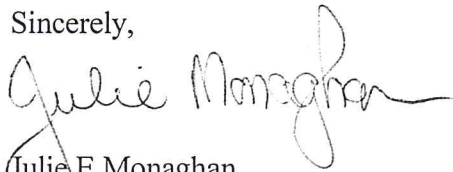
No action to make a civil recovery for these claims will be commenced except upon the expiration of thirty days (30) following receipt of this notice, or the City's denial of the claim, which ever occurs first.

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The information supplied herein is provided for the purposes of allowing you to conduct an investigation of the alleged incident and determine if the claim should be settled without litigation. Should you require additional information for that determination, please contact my Paralegal, Stephanie Forbes.

Sincerely,

A handwritten signature in cursive script that reads "Julie Monaghan". The signature is written in dark ink and is positioned above the typed name.

Julie E Monaghan  
JEM/saf

Enclosures

cc: Floyd Walker, Jr.  
Joanne Todd, Commissioner  
Dick Morrow, Commissioner  
Rodney McCord, Commissioner  
Ryan McLemore, Commissioner  
Cora Flowers, Commissioner  
Cynthia Ward, Commissioner