



0017

# County of Santa Cruz

## OFFICE OF THE COUNTY COUNSEL

701 OCEAN STREET, SUITE 505, SANTA CRUZ, CA 95060-4068  
(831) 454-2040 FAX: (831) 454-2115

SAMUEL TORRES, JR., COUNTY COUNSEL

CHIEF ASSISTANTS  
RAHN GARCIA  
DANA McRAE

### Assistants

Deborah Steen  
Harry A. Oberhelman III  
Marie Costa  
Jane M. Scott  
Tamyra Rice

Pamela Fyfe  
Ellen Aldridge  
Kim Baskett  
Lee Gulliver  
Kathleen Pacheco

## GOVERNMENT TORT CLAIM

### RECOMMENDED ACTION

Agenda March 13, 2001

To: Board of Supervisors

Re: Claim of Orazio Del Giudice, No. 001-083

Original document and associated materials are on file at the Clerk to the Board of Supervisors.

In regard to the above-referenced claim, this is to recommend that the Board take the following action:

- 1 ☒ . Reject the claim of Orazio Del Giudice, No. 001-083 and refer to County Counsel.
- \_\_\_\_ 2. Deny the application to file a late claim on behalf of \_\_\_\_\_ and refer to County Counsel.
- \_\_\_\_ 3. Grant the application to file a late claim on behalf of \_\_\_\_\_ and refer to County Counsel.
- \_\_\_\_ 4. Approve the claim of \_\_\_\_\_ in the amount of \_\_\_\_\_ and reject the balance, if any, and refer to County Counsel.
- \_\_\_\_ 5. Reject the claim of \_\_\_\_\_ as insufficiently filed and refer to County Counsel.

cc: Tom Bolich, Director  
Department of Public Works

### RISK MANAGEMENT

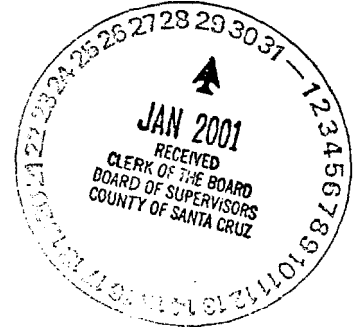
By Janet McKinley

### COUNTY COUNSEL

BY Kim Elizabeth Baskett

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Rev 9/2000

1 WILLIAM C. DRESSER, 104375 0018  
 2 DEOK KIM, 204152  
 3 2400 Moorpark Avenue, Suite 301  
 4 San Jose, CA 95128  
 5 Tel: (408) 279-7529  
 6 Fax: (408) 298-3306



7 Attorneys for Claimant  
 8 ORAZIO DEL GIUDICE

9 GOVERNMENT TORT CLAIM

10 THE COUNTY OF SANTA CRUZ

11 (3RAZIO DEL GIUDICE,  
 12 Claimant,  
 13 vs.  
 14 COUNTY OF SANTA CRUZ,  
 15 Respondent.

16 TO THE COUNTY OF SANTA CRUZ:

17 YOU ARE HEREBY NOTIFIED that Claimant ORAZIO DEL GIUDICE  
 18 whose address is Law Offices of William C. Dresser, 2400 Moorpark  
 19 Avenue, Suite 301, San Jose, CA 95128, Tel: (408) 279-7529, claim  
 20 damages from the County of Santa Clara in an amount yet to be  
 21 fully ascertained, but which includes medical expenses, loss of  
 22 income, pain and suffering, and emotional distress.

23 This claim arises out of the following circumstances:

24 On October 24, 2000, Claimant ORAZIO DEL GIUDICE was  
 25 involved in a motor vehicle accident near the intersection of Old  
 26 San Jose- Soquel Road and Summit Road, by the Summit Store.  
 27 There is a history of many other accidents at that same location.

28 It is the contention of the Claimant that the COUNTY OF  
 SANTA CRUZ, and the employees thereof, were partially if not  
 completely responsible for the accident stated above, and the

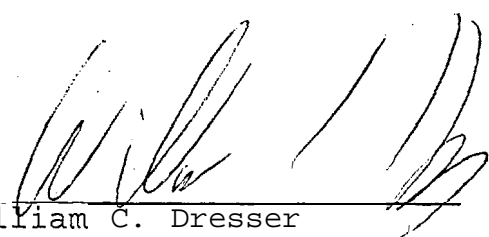
1 damages sustained by Claimants, as stated above.

2 The name or names of the public employees responsible for  
3 these wrongful acts are not completely known to Claimant, but are  
4 believed to include those operating in the County of Santa Cruz  
5 in transportation and or traffic control departments. These  
6 individuals were acting as employees or agents of the COUNTY OF  
7 SANTA CRUZ, and were acting in accordance with programs and  
8 policies of the COUNTY OF SANTA CRUZ which led to the dangerous  
9 condition of the roadway which was a cause of the collision.

10 The complete nature and extent of the damages of Claimant  
11 are not known at this time. However, Claimant alleges that the  
12 damages and injuries he has sustained are for a value in excess  
13 of the minimum recoveries for unlimited jurisdiction of the  
14 Superior Court of the State of California.

15 All notices or other communications with regard to this  
16 claim should be sent to the Claimant in care of The Law Offices  
17 of William C. Dresser, 2400 Moorpark Avenue, Suite 301, San Jose,  
18 CA 95128, Tel: (408) 279-7529.

19  
20 DATED: January 25, 2001

21   
22 William C. Dresser  
23 Attorneys for Claimant  
ORAZIO DEL GIUDICE

24 Del Giudice\TortClaim.125  
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