



County of Santa Cruz

OFFICE OF THE COUNTY COUNSEL

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GOVERNMENT TORT CLAIM

RECOMMENDED ACTION

Agenda January 15, 2002

To: Board of Supervisors

Re: Claim of Archie Coley, No. 102-060

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 Archie Coley, No. 102-060 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: Not County Jurisdiction

RISK MANAGEMENT

By Janet McKinley
Janet McKinley, Risk Manager

DANA McRAE, COUNTY COUNSEL

By Kim Elizabeth Baskett
Kim Elizabeth Baskett, Assistant County Counsel

102-060

Coley



CLAIM AGAINST THE COUNTY OF SANTA CRUZ
(Pursuant to Section 910 et Seq., Govt. Code)

TO: BOARD OF SUPERVISORS
COUNTY OF SANTA CRUZ
ATTN: Clerk of the Board
Governmental Center
701 Ocean Street, Santa Cruz, CA 95060

Claimant's Name: Archie Coley

Address: 1862 El Rancho Drive
Santa Cruz, California 95060

Phone No: 831-438-6520

P.O. Box to which notices are to be sent: Joseph R. Zoucha, Esq.; 655 Middlefield Road
Redwood City, CA 94063

2. Occurrence: Personal Injury

Date: 6-12-01 Place: 4365 Brancifort Drive, Santa Cruz, CA

Circumstances of occurrence or transaction giving rise to claim: Claimant was hired by US Gov't to demolish a drug lab on property. He had to traverse a bridge. The bridge collapsed due to negligent construction, repair and maintenance. It is asserted the bridge was under the control of Santa Cruz County.

3. General description of indebtedness, obligation, injury, damage or loss incurred so far as is now known:

Claimant suffered bruises and abrasions, crushed lumbar vertebrae, lumbar vertebrae, crushed right lung, fractured right knee, left wrist injury, smashed left hand.

4. Name(s) of public employee(s) causing injury, damage or loss, if known: Unknown exactly. Whoever is in charge of maintenance and inspection of bridge.

5. Amount claimed now \$ 250,000.00

Estimated amount of future loss, if known \$ unk.

TOTAL \$ _____

6. Basis for above computations: medical bills approximate \$50,000.00. Lost wages approximate \$10,000.00. Rest is general damages.

7. If the amount claimed is over \$10,000, indicate the court of jurisdiction:
Municipal Court Unlimited Jurisdiction Superior Court

CLAIMANT'S SIGNATURE: *Joseph R. Zoucha*

Joseph R. Zoucha, Esq.

No. Claim must be presented to Clerk, Board of Supervisors, within six (6) months after the act which occasioned the injury.

Americans with Disabilities Act questions or requests for accommodations may be directed to the ADA Coordinator at 454-2962 (TDD 454-2123). PER5003

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2/12-140

LAW OFFICE OF JOSEPH R. ZOUCHA

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JOSEPH R. ZOUCHA
LICENSED IN CALIFORNIA AND INDIANA

December 12, 2001

Clerk of the Board of Supervisors
Santa Cruz County
701 Ocean Street, Room 500
Santa Cruz, California 95060

Via Certified Mail
Fax: (631-454-2327

Re: Claim of Archie Coley
D.O.L. June 12, 2001

Dear Sir/Madam:

Thank you very much for sending me the claim form in this matter. Enclosed is the claim presented on behalf of Archie Coley. Please direct all correspondence to the undersigned.

Thank you for your courtesy and cooperation in this matter.

Sincerely yours,

JRZ/hs
enclosure: as stated

JOSEPH R. ZOUCHA, ESQ.