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The Honorable David Snow,
Mayor, City of Richmond
50 N. 5th Street
Richmond, IN 47374

*VIA US MAIL AND CERTIFIED MAIL,
RETURN RECEIPT REQUESTED*

RE: Tort Claim Notices
Phillips Drugs
631 E. Main Street
Richmond, Indiana 47374

Dear Mayor Snow:

This law firm represents Phillips Drugs., Inc. ("Phillips Drugs"). Pursuant to Indiana Code § 34-13-3 *et. seq.*, this letter serves as Phillips Drugs' two tort claim notices against the City of Richmond. Please forward these notices to the appropriate City of Richmond representatives or employees.

These notices arise from the Stellar Complete Streets construction adjacent to the Phillips Drugs building located at 631 East Main Street. On May 23, 2019, Peter Zaleski, owner of Phillips Drugs, notified the City of Richmond that the recently-installed sidewalks slanted toward the Phillips Drugs' building and expressed concern that the grade of the sidewalk and other design and construction defects would result in water intrusion.

1. First Loss

During and after a rainfall on June 10, 2019, water intruded into Phillips Drugs' basement. The June 10, 2019, water intrusion caused damages in the approximate amount of \$4,498.04.

2. Second Loss

Water again intruded into the Phillips Drugs' basement during a June 15, 2019, rain event. As a consequence, Phillips Drugs incurred causing more than \$3,219.35 in additional damages.

In the decades that Phillips Drugs has owned the building, it has never experienced water intrusion into the basement. Although the water intrusion undoubtedly arises from faulty design, faulty construction, or both, and although Mr. Zaleski has repeatedly sought a resolution from the City of Richmond, the problem remains unresolved and likely to engender additional damages.

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I respectfully request you forward all correspondence regarding these incidents to my attention. Please let me know if you need additional information. We look forward to a prompt resolution of these matters.

Very truly:

A handwritten signature in black ink, appearing to be "J. Michael Cavosie". The signature is stylized with a large, looped initial "J" and "M".

J. Michael Cavosie
JMC:jj

cc: Peter Zaleski, Phillips Drugs, Inc.