

HULTQUIST LAW, P.C.
A PROFESSIONAL CORPORATION

Attorney Christopher E. Hultquist

Admitted in Rhode Island and Massachusetts

October 12, 2023

Via Federal Express

Bristol Town Council
c/o Melissa Cordeiro
Town Clerk
10 Court Street
Bristol, RI 02809

**NOTICE OF INJURY AND PRESENTMENT OF CLAIM
PURSUANT TO R.I.G.L. §45-15-9 and §45-15-5**

Injured Party: Dallys Doppke
90 Bay Spring Avenue, Apt # 110
Barrington, RI 02806

Location of Injury: Sidewalk across from 484 Thames Street near Independence Park (See attached photograph in Bristol Police Department Report depicting damaged section of sidewalk)

Date of Injury: 9/2/23, approximately 2:30pm.

Defective condition: Poorly maintained sidewalk, dangerous depression/damage as depicted in attached photograph.



Dear Town Council Members:

Please accept this correspondence as the statutorily required notice of injury and presentment of claim pursuant to R.I.G.L. §45-15-9, and 45-15-5. On September 2, 2023, my client, Dallys Doppke, was seriously injured while walking on the sidewalk in the area across from 484 Thames Street near Independence Park. Unfortunately, she tripped and fell where the sidewalk was damaged as depicted in the attached photograph.

My client sustained injuries including a head injury and fractured shoulder following her fall. She was transported from the scene by Bristol Ambulance to Rhode Island Hospital. My client has and will continue to treat with University Orthopedics under the care of Roman Hayda, MD.

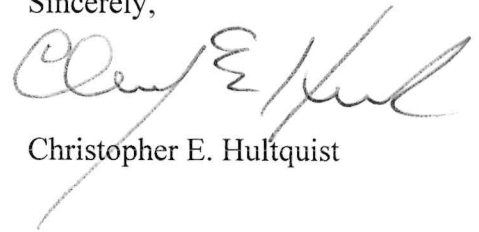
My client's medical records and associated billing statements are being requested, and they will be produced upon receipt.

It is my client's contention that the Town of Bristol was under a duty of reasonable care to maintain a safe sidewalk for the benefit of pedestrians. The Town breached this duty by allowing the sidewalk to degrade in a manner that resulted in a hazardous condition causing her injuries.

The extent of my client's damages is not known at this time. However, due to the injuries mentioned above, lost earnings, and my client's past and future pain and suffering, I have been given the authorization to accept \$100,000.00 to resolve this claim at this time. My client's damages exceed the \$100,000.00 statutory cap, and she reserves all rights to maintain a claim that exceeds the cap if an action is filed in Rhode Island Superior Court

If I do not hear from you within the statutorily allotted time, I will file suit in Rhode island Superior Court. Thank you for your anticipated cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris E. Hult", is written over a horizontal line.

Christopher E. Hultquist

lp/ceh
Enclosures



Bristol Police Department

395 METACOM AVENUE ❖ BRISTOL, RHODE ISLAND 02809
TELEPHONE (401) 253-6900



September 20, 2023

Dallys Doppke
90 Bay Spring Ave
Barrington, RI 02806

Dear Dallys Doppke,

Please find attached our response to your record request. Portions of this report have been redacted in accordance with RIGL 33-2-2(II)(D)(c) to protect against unwarranted invasion of personal privacy.

In accordance with RIGL 38-2-8, any person or entity denied copies of requested records or the ability to inspect records by the Bristol Police Department, may seek an administrative appeal in writing from the Chief of Police for review of the determinations. The Chief shall make a final determination whether or not to allow public inspection within (10) ten business days. If the denial is confirmed, you are thereafter free to file a complaint with the office of Attorney General, or you may institute proceedings in Superior Court

Sincerely,

Steven St. Pierre
Lieutenant

Bristol Police Department
Incident Report

Page: 1
09/20/2023

Incident #: 23-1242-OF
Call #: 23-21950

Date/Time Reported: 09/02/2023 1426
Report Date/Time: 09/02/2023 1438
Occurred Between: 09/02/2023 1426-09/02/2023 1450
Status: No Crime Involved

Reporting Officer: Patrol Officer ANGELO GRECO
Approving Officer: Sergeant BRETT ESTRELLA

Signature: _____

Signature: _____

EVENTS(S)

LOCATION TYPE: Park/Playground Zone: 12
INDEPENDENCE PARK
THAMES ST
BRISTOL RI 02809

1 Assist EMS

VICTIM(S) SEX RACE AGE SSN PHONE

1 DOPPKE, DALLYS L F W [REDACTED] ***** *****

[REDACTED]

Bristol Police Department

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NARRATIVE FOR PATROL OFFICER ANGELO GRECO

Ref: 23-1242-OF

Entered: 09/02/2023 @ 1440	Entry ID: GREA
Modified: 09/02/2023 @ 1446	Modified ID: GREA
Approved: 09/08/2023 @ 1121	Approval ID: ESTB

On 09/02/23 at approximately 1438 hrs I responded to Independence Park for a reported female who fell on the ground and sustained a head injury. Upon my arrival I made contact with the victim, Dallys Doppke ([REDACTED]). Dallys advised me that as she was walking on north the sidewalk (across from 484 Thames St.) her foot came into contact with a section of the sidewalk that is uneven. As a result, Dallys stated that she fell onto the ground and struck the back of her head. I observed a small section of the sidewalk to be uneven/damaged (See attached picture).

Dallys was later evaluated by Bristol Rescue.

** Portions of this report have been redacted **



