



Sayer Regan & Thayer, LLP

ATTORNEYS AND COUNSELLORS AT LAW

November 16, 2021

*Via Email: Mcordeiro@bristolri.gov
And Regular Mail*

The Town Council
Town of Bristol
10 Court Street
Bristol, RI 02809

TOWN CLERK'S OFFICE
BRISTOL, RHODE ISLAND
2021 NOV 19 AM 9:36

Re: Reimbursement for Damages Caused by the Town at 15 Robin Drive

Council Members,

My office represents Kelly Golden with respect to damage the Town caused to her property located at 15 Robin Drive, Bristol, Rhode Island (the "Property"). This letter serves as a demand against the Town of Bristol pursuant to Rhode Island General Law § 45-15-5.

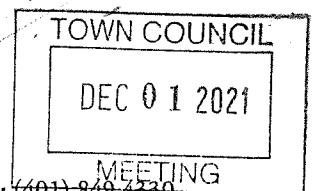
In October of 2021, Ms. Golden retained the services of Roto-Rooter Plumbing & Water Cleanup to snake the lateral sewer line running to the Town sewer pipe. Following that initial appointment, problems with the sewer persisted and Roto-Rooter returned on November 1, 2021. At that time, a video of the interior of the lateral pipe was recorded and it was determined that the line had been cracked/flattened. On November 3rd and 4th 2021, Roto-Router conducted excavation work on behalf of Ms. Golden to repair the damage to the line. During these excavations, it was revealed that the Town's concrete stormwater drain ran directly above the lateral sewer pipe and that said drain had settled, putting pressure on the sewer line and causing it to crack and flatten. Attached hereto as Exhibit "A" are photos of the stormwater drain and sewer pipe.

As a result of the Town's negligence in installing the stormwater drain, Ms. Golden has suffered significant damages. The expenditures Ms. Golden paid to Roto-Rooter for the work beginning in October of 2021 and continuing through the excavation and remediation ending on November 4th amounts to \$16,205.00. Ms. Golden also received paid an invoice from the Town for \$208.00 to have a police detail officer on site during renovations. Attached hereto as Exhibit "B" are invoices Ms. Golden received from Roto-Rooter and the Town related to this work.

As such, we demand the Town make a payment to Ms. Golden in the amount of \$16,413.00. Payment can be made by check to Kelly Golden and sent to 141 Locust Avenue, Portsmouth, RI 02871. Pursuant to R.I.G.L. § 45-15-4, if this demand is not met within forty days of the receipt of this letter, Ms. Golden may take legal action against the Town.

Sincerely,

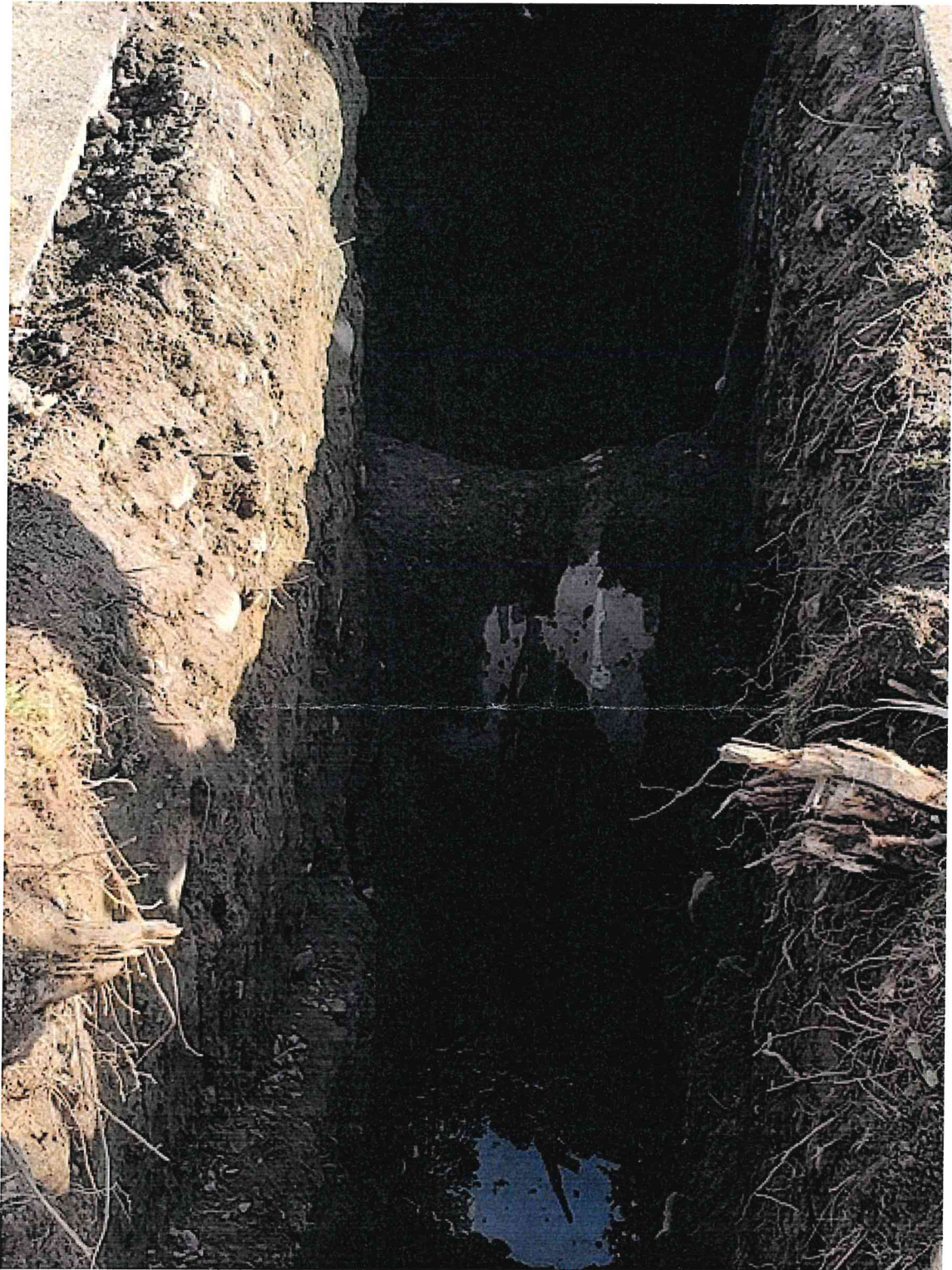
Michael Monti



MEM/ar

cc: Kelly Golden

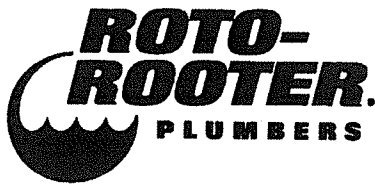
NEWPORT 130 Bellevue Avenue, Newport Rhode Island 02840 TEL: (401) 849-3040 FAX: (401) 849-4330











INVOICE

1195 Broad Street
Providence, RI 02905
401-467-7969 ext.24903
Tax ID #42-0499300

Customer: Kelly Golden

Service Address: 15 Robin Dr
Bristol RI

Comments or Problem Called in as: Sewer overflow

Invoice date			Emergency Excavation	TERMS
11/4/2021				cod

	DESCRIPTION	
	Video of Sewer line in roadway source of backup was a crushed section of Sechedule 35 6 inch SDR directly under the 48 inch concrete storm drain Town sewer inspectors were on site to witness the pipe repair and the section of the line that was causing the issue of backups. Video footage and pictures of piping etc were provided to the homeowner. Roto Rooter portion of job 12480.00 this included the equipment labor of 4 men permits materials.details hydrojetting services	
	Balance Paid	\$12,480.00

Remit payment to:

Roto Rooter Services Company, 1195 Broad Street Providence, RI 02905

Be sure to reference the complete invoice number on the check.

We also accept all major credit cards. Please call 401-467-7969 ext. 24903 for payment.

THANK YOU FOR YOUR BUSINESS!

EXHIBIT B



Kelly Golden <kgolden9989@gmail.com>

Receipt from Foster Excavation

1 message

Foster Excavation via Square <receipts@messaging.squareup.com>

Fri, Nov 5, 2021 at 6:04 AM

Reply-To: Foster Excavation via Square

<CAESKBIAghpyX29pMnU0bnJ3Z3ZjdFya2Rrcm1ldXJzcyllZGlhbG9ndWUilH6beQsWtUAR5fHxWTALGtlWXilclOlLGbcpf9Q7npA.a@reply2.squareup.com>

To: kgolden9989@gmail.com

Now when you shop at sellers who use Square, your receipts will be delivered automatically.

[Not your receipt?](#)

Foster Excavation

How was your experience?

**\$3,000.00**

Custom Amount	\$3,000.00
Total	\$3,000.00

Foster Excavation
19A Buck Hill Rd
Johnston, RI 02919
401-623-1626

MasterCard 6251 (Keyed) Nov 4 2021 at 3:27 PM



#h4Wj

Auth code: 01828W

**Receipt Settings**[Not your receipt?](#) [Manage preferences](#)© 2021 Square, Inc. [Privacy Policy](#)



395 Metacom Avenue
Bristol, Rhode Island 02809-5172
401-253-6900

BRISTOL POLICE DEPARTMENT

POLICE DETAIL OFFICER ON SITE BILL

TO: Billing Office

RE: Request for Payment for Traffic/Detail Service.

Please issue payment for the following Bristol Police officer for traffic control or detail duty.

PLEASE PRINT

Officer's Name Joseph C. Celio Badge # 38 Social Security # _____
Company / Location of Detail 15 Robin Dr.
Describe Work at Site TRAFFIC
Date of Detail 11/31/21 Start Time 0730 Ending Time 1130
Officer's Signature [Signature] Company Representative [Signature]
Total Hours Worked 4 Rate per Hour \$52 Amount Due \$208

FOR OFFICE USE

This money is payable directly to _____

c/o Bristol Police Department, 395 Metacom Avenue, Bristol, RI 02809-5172

OR mail check to: _____

Name _____

Address _____

City State Zip Code _____

Detail Billing Officer
Bristol Police Department

YELLOW - DEPARTMENTAL COPY

WHITE - HIRED EMPLOYEE

11/5/21, 7:50 AM

Gmail - Receipt from Doctor Drain RI LLC



Kelly Golden <kggolden9989@gmail.com>

Receipt from Doctor Drain RI LLC

1 message

Doctor Drain RI LLC via Square <receipts@messaging.squareup.com>

Sat, Oct 30, 2021 at 9:16 PM

Reply-To: Doctor Drain RI LLC via Square

<CAESKBIAGhpyX29peXVldmN3aGJsZmdxa29ncmVkbXdieillZGhG9ndWUllHiG1t9WM9+a+HRS+i7CJm5OSv1i0Tg8G7QribTPUM ux@reply2.squareup.com>

To: kggolden9989@gmail.com

Now when you shop at sellers who use Square, your receipts will be delivered automatically.

Not your receipt?



How was your experience?



\$725.00

Custom Amount	\$725.00
Total	\$725.00

Doctor Drain RI LLC
401-318-9329



Discover 2227 (Keyed)

Oct 30 2021 at 9:15 PM

#IW0D

Auth code: 03041R

"Drain a Pain ??.. Call Doctor Drain RI LLC"
A Professional Drain Service Company

Appreciate your Business!