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1925 - 1975

\* Also admitted in Massachusetts

August 16, 2022

Town of Bristol  
Attn: Town Clerk  
10 Court Street  
Bristol, RI 02809

**Re: Our Client: Natelia Esteves**  
**Date of Loss: July 13, 2022**  
**Our File No.: Esteves/206846**

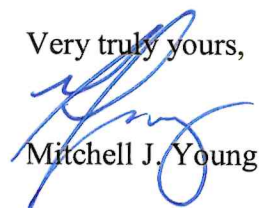
Dear Ms. Cordeiro:

Enclosed for your review and pursuant to R.I. Gen. Laws § 45-15-5, please find a Petition to the Town Council filed on behalf of Petitioner, Natelia Esteves for injuries sustained on town property on or about July 13, 2022.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to call my office.

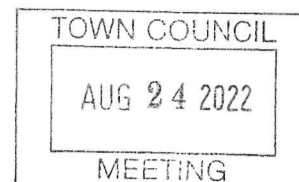
I am,

Very truly yours,



Mitchell J. Young

MJY/idm  
Enclosures



**TOWN OF BRISTOL**  
**State of Rhode Island**

**PETITION TO THE TOWN COUNCIL**

**PERSONAL INJURY**

TO THE HONORABLE TOWN COUNCIL OF THE TOWN OF BRISTOL:

The undersigned respectfully petitions your Honorable Body for compensation for injuries and damages sustained. The Petitioner specifically reserves her right to amend this Petition should additional evidence become available. In support hereof the undersigned Petitioner states:

1) The Petitioner, Natelia Esteves, is a resident of the Town of Bristol, County of Bristol, and State of Rhode Island and at all pertinent times stated herein exercised due care and caution.

2) On or about July 13, 2022, the Town of Bristol owned, leased and/or otherwise controlled and maintained a sidewalk and surrounding grass area between the sidewalk and the roadway located on the south-most side of State Street at or near its intersection with Hope Street in Bristol, Rhode Island (hereinafter "Premises").

3) On or about July 13, 2022, there existed an unmarked hole on the Premises which appeared approximately two feet in diameter and approximately six inches in depth. This hole existed in the grass area of the Premises located approximately fifty (50) feet east of the intersection of State Street and Hope Street. Photographs of the location of the hole and the subsequent remedial measures taken to warn of and fill-in the hole are attached hereto as *Exhibit 1*.

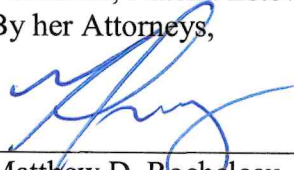
4) On or about July 13, 2022, Natelia Esteves was a pedestrian lawfully in the roadway and walking on State Street towards the south-most sidewalk area of the Premises. As Ms. Esteves stepped into the grass area located between the roadway and the cement sidewalk, Ms. Esteves stepped into the unmarked hole causing her to fall to the ground and sustain severe personal injuries.

5) On or about July 13, 2022, the Town of Bristol negligently breached their duty to maintain said Premises in a reasonably safe condition and negligently failed to warn Ms. Esteves of the unsafe condition which existed on the Premises.

6) As a direct and proximate result of the Town of Bristol's breach of the duties owed to Ms. Esteves, she was caused to fall while on the Premises causing her to be severely injured, to endure and to continue to endure great pain and agony of body, to incur and to continue to incur expenses for medical care and attention, to be unable to perform her usual activities and to lose and continue to lose large sums of money as a result thereof.

WHEREFORE, Petitioner presents this Claim in the amount of ONE HUNDRED THOUSAND AND 00/100 DOLLARS (\$100,000.00).

Petitioner, Natelia Esteves,  
By her Attorneys,



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Matthew D. Rocheleau, Esq. (#6107)  
Mitchell J. Young, Esq. (#10127)  
Brosco & Brosco, P.C.  
312 South Main Street  
Providence, RI 02903  
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myoung@broscolaw.com

## CERTIFICATION

I hereby certify that the within PETITION TO THE BRISTOL TOWN COUNCIL was hand delivered on the 16<sup>th</sup> day of August, to Melissa Cordeiro, Town Clerk, Bristol Town Hall, 10 Court Street Bristol, RI 02809.

Mitchell Young

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PETITIONER'S NAME: Natelia Esteves

ADDRESS: 50 Opechee Drive  
Bristol, RI 02809

DATE OF INCIDENT: On or about July 13, 2022

NAMES AND ADDRESSES OF PHYSICIANS:

**Bristol Fire Department**  
4 Annawamscutt Drive  
Bristol, RI 02809

**Portsmouth Fire Department**  
2300 East Main Road  
Portsmouth, RI 02871

**Newport Hospital**  
11 Friendship Street  
Newport, RI 02840

**University Orthopedics**  
One Kettle Point Avenue  
East Providence, RI 02914

**Bristol County Physical Therapy**  
Bristol Medical Center  
1180 Hope Street  
Bristol, RI 02809

## Exhibit 1











