

# JACOB & CHIARELLO, LLC

COUNSELLORS AT LAW  
A Limited Liability Corporation

FREDERICK A. JACOB +  
JOSEPH M. CHIARELLO +  
BOHDAN ZACHARIASEVYCH\*

600 WEST MAIN STREET  
P.O. Box 429  
MILLVILLE, NEW JERSEY 08332

JARAD STILES

+ CERTIFIED CIVIL TRIAL ATTORNEY  
\* ALSO MEMBER OF PENNSYLVANIA BAR  
o MASTERS OF LAW IN TAXATION

(856) 825-0700  
FACSIMILE (856) 825-2441  
Matrimonial Direct Dial (856) 825-0782  
Matrimonial Facsimile (856) 327-2252

www.sjtrialfirm.com  
Toll Free 800-303-0701

September 20, 2012

N-4994

Sent via Certified Mail, Return Receipt Requested

Richard C. McCarthy, Solicitor of the  
City of Millville  
1601 N. 2<sup>nd</sup> Street  
1800 Executive Suites, Bldg. D  
P.O. Box 285  
Millville, NJ 08332

RECEIVED

SEP 26 2012

RECEIVED

Re: Estate of Christopher W. Reeves, Deceased, by Susan A. Reeves, Administratrix ad Prosequendum v. City of Millville Police Department; D/A: 7/8/2012

Dear Mr. McCarthy:

Please consider this letter as notice of our intention to make a claim against the City of Millville Police Department in accordance with Title 59, which governs tort claims against municipal entities. I am herewith providing you with the following information concerning this claim:

- 1) The name and post office address of the claimant is Susan A. Reeves, Administratrix ad Prosequendum of the Estate of Christopher W. Reeves, Deceased, 1304 Joann Drive, Millville, NJ 08332;
- 2) Claimant desires all notices regarding this claim to be sent to Frederick A. Jacob, Esquire, JACOB & CHIARELLO, LLC, 600 W. Main Street, P.O. Box 429, Millville, NJ 08332;
- 3) This action concerns alleged intentional acts on the part of the City of Millville Police Department and/or its agents, servants and/or employees, in allowing the commencement of a police chase knowing that there was a substantial certainty of injury or death that would result, and without following the

proper protocol for engaging in such chase.

- 4) The motor vehicle accident which resulted from the police chase authorized by the City of Millville Police Department resulted in the injury and death of Christopher W. Reeves in the early morning hours of July 8<sup>th</sup>, 2012. A copy of the Millville Police Department's Accident Report in this regard will be supplied upon its receipt;
- 5) As indicated above, the ones responsible for the resulting injury and death of Christopher W. Reeves are the agents, servants and/or employees of the City of Millville Police Department who are responsible for decision making within the City of Millville Police Department and who sanctioned and allowed the police chase that took place in the early morning hours of July 8<sup>th</sup>, 2012 which claimed the life of Christopher W. Reeves;
- 6) Christopher W. Reeves was catastrophically injured and died on July 8<sup>th</sup>, 2012 as a result of the motor vehicle accident which occurred as a direct and proximate cause of the City of Millville Police Department's vehicular pursuit of suspect Timothy Seidel along the streets of Millville;
- 7) No medical information, death certificate or bills have been received at this time. Therefore, same will be supplied at a later date; and
- 8) As of the date of this letter, the amount of damages claimed with regard to the above is \$10,000,000. Said amount is subject to amendment at a later time.

If you have any questions concerning this, or if you desire any further information, please request it be means of an appropriate claims form as provided by

Richard C. McCarthy, Solicitor of the  
City of Millville

September 20, 2012  
- Page 3-

Title 59.

Very truly yours,

**JACOB & CHIARELLO, LLC**

Frederick A. Jacob

FAJ/jmp