

**STATE OF WISCONSIN****CIRCUIT COURT****MILWAUKEE**

Patricia Love vs. Corey W Jenkins et al

**Electronic Filing  
Notice**

Case No. 2025CV004592

Class Code: Personal Injury/Automobile

**FILED**

05-28-2025

Anna Maria Hodges

Clerk of Circuit Court

2025CV004592

Honorable William

Sosnay-08

Branch 08

Received by  
JUN 05 2025  
City Clerk's Office

CITY OF WAUWATOSA, A MUNICIPALITY  
7725 WEST NORTH AVENUE  
C/O CITY ATTORNEY ALAN KESNER  
WAUWATOSA WI 53213-0068

Name: gma  
Date: 6/5/25  
Time: 9:25 AM / PM

Case number 2025CV004592 was electronically filed with/converted by the Milwaukee County Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases.

Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. Electronic parties are responsible for serving non-electronic parties by traditional means.

You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a fee to register as an electronic party. This fee may be waived if you file a Petition for Waiver of Fees and Costs Affidavit of Indigency (CV-410A) and the court finds you are indigent under §814.29, Wisconsin Statutes.

If you are not represented by an attorney and would like to register an electronic party, you will need to enter the following code on the eFiling website while opting in as an electronic party.

**Pro Se opt-in code: 557342**

Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Registration is available to attorneys, self-represented individuals, and filing agents who are authorized under Wis. Stat. 799.06(2). A user must register as an individual, not as a law firm, agency, corporation, or other group. Non-attorney individuals representing the interests of a business, such as garnishees, must file by traditional means or through an attorney or filing agent. More information about who may participate in electronic filing is found on the court website.

If you have questions regarding this notice, please contact the Clerk of Circuit Court at 414-278-4140.

Milwaukee County Circuit Court  
Date: May 28, 2025

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05-28-2025  
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Clerk of Circuit Court  
2025CV004592  
Honorable William  
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STATE OF WISCONSIN    CIRCUIT COURT    MILWAUKEE COUNTY

PATRICIA LOVE  
9538 West North Avenue, #1  
Wauwatosa, WI 53226,

Plaintiff,

v.

Case No:  
Case Code: 30101

COREY W. JENKINS  


CITY OF WAUWATOSA  
A Municipality  
c/o City Attorney Alan Kesner  
7725 West North Avenue  
Wauwatosa, WI 53213-0068,

CITIES AND VILLAGES MUTUAL INSURANCE COMPANY  
c/o Allison DeFranze, Registered Agent  
9898 West Bluemound Road  
Milwaukee, WI 53226-4319,

GEICO Casualty Company (Underinsured)  
c/o CT Corporation System, Registered Agent  
301 South Bedford Street, Suite 1  
Madison, WI 53703,

UNITEDHEALTHCARE INSURANCE COMPANY  
c/o CT Corporation System, Registered Agent  
301 South Bedford Street, Suite 1  
Madison, WI 53703,

Defendants.

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SUMMONS

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THE STATE OF WISCONSIN

To each person named above as a Defendant:

You are hereby notified that the Plaintiff has filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature of the legal action.

Within forty-five (45) days of receiving this Summons, you must respond with a written answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint. The Court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent to or delivered to the Court, whose address is:

Clerk of Circuit Court  
Milwaukee County Courthouse  
901 North Ninth Street  
Milwaukee, WI 53233

and to GENDLIN, LIVERMAN & RYMER, S.C., Plaintiff's attorneys, whose address is:

Suite 300  
10335 West Oklahoma Avenue  
Milwaukee, Wisconsin 53227.

You may have an attorney help or represent you.

If you do not provide a proper answer within 45 days, the Court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated in Milwaukee, Wisconsin this 28<sup>th</sup> day of May, 2025.

Respectfully Submitted,  
GENDLIN, LIVERMAN & RYMER, S.C.  
*/s/ Daniel E. Meylink*

Electronically Signed By: \_\_\_\_\_

Daniel E. Meylink  
State Bar No. 1036263  
Attorney for the Plaintiff

**P.O. ADDRESS**

10335 West Oklahoma Avenue

Suite 300

Milwaukee, Wisconsin 53227

P: (414) 272-3399

F: (414) 272-6659

Email: [dmeylink@glr-law.com](mailto:dmeylink@glr-law.com)

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COREY W. JENKINS

CITY OF WAUWATOSA  
A Municipality  
c/o City Attorney Alan Kesner  
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CITIES AND VILLAGES MUTUAL INSURANCE COMPANY  
c/o Allison DeFranze, Registered Agent  
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Madison, WI 53703,

UNITEDHEALTHCARE INSURANCE COMPANY  
c/o CT Corporation System, Registered Agent  
301 South Bedford Street, Suite 1  
Madison, WI 53703,

Defendants.

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**COMPLAINT**

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**NOW COMES** the above-named Plaintiff, Patricia Love, by her attorneys, Gendlin, Liverman & Rymer, S.C., by Attorney Daniel E. Meylink, and as and for her cause of action

against the above-named Defendants, alleges and shows the Court as follows:

1. That the Plaintiff, Patricia Love, is an adult individual residing at 9538 West North Avenue, #1 in the City of Wauwatosa, County of Milwaukee, State of Wisconsin.
2. That upon information and belief, the Defendant, Corey W. Jenkins, is an adult individual whose last known address is [REDACTED] County of Milwaukee, State of Wisconsin.
3. That upon information and belief, the Defendant, City of Wauwatosa, is a municipal body corporate, operating pursuant to the provisions of the Wisconsin Statutes, with its principal offices located at 7725 West North Avenue in the City of Wauwatosa, County of Milwaukee, State of Wisconsin. The City of Wauwatosa City Attorney Alan Kesner's Office is located at 7725 West North Avenue, Wauwatosa, Wisconsin, 53213-0068.
4. That upon information and belief, the Defendant, City of Wauwatosa, provides liability coverage for the acts of its employees and therefore, covered the Defendant, Corey W. Jenkins, while the parties were involved in a principal/agent, master/servant, and/or employer/employee relationship.
5. That upon information and belief, the Defendant, City of Wauwatosa, was at all times material herein involved in a principal/agent, master/servant, and/or employer/employee relationship with the Defendant, Corey W. Jenkins, and by reason of said relationships and the hereinafter alleged negligence of the Defendant, Corey W. Jenkins, the Defendant, City of Wauwatosa, is negligent for the acts of their agents, servants and/or employees, and therefore is a proper party Defendant herein.
6. That the Plaintiffs have complied with the Statutes of the State of Wisconsin

requiring Notice of Claim and Notice of Injury. City Attorney Kesner sent Plaintiff a letter dated January 6, 2025 indicating her claim was denied. On January 22, 2025, Defendants were personally served with the Plaintiff's Notice of Claim. Defendants have not responded within 120 days. The present action is being timely commenced.

7. That the Defendant, Cities and Villages Mutual Insurance Company, is a domestic corporation, duly organized and existing under the laws of the State of Wisconsin with its principal offices located at 9898 West Bluemound Road, Milwaukee, Wisconsin, 53226 and whose registered agent and address for the purpose of process is Allison DeFranze, 9898 West Bluemound Road, Milwaukee, Wisconsin, 53226-4319.

8. That upon information and belief, said Defendant was and is engaged in the business of selling and providing policies of liability insurance and conducts substantial business in the County of Milwaukee, State of Wisconsin.

9. That upon information and belief, at all times hereinafter mentioned, there was in full force and effect a policy of liability insurance issued by the Defendant, Cities and Villages Mutual Insurance Company, to the Defendant, City of Wauwatosa, in the State of Wisconsin, and that by virtue of the alleged negligence of said Defendant, and the provisions of Section 803.04 (2), Wisconsin Statutes, said Defendant, Cities and Villages Mutual Insurance Company, is a proper party Defendant in this action.

10. That the Defendant, Geico Casualty Company, is a foreign corporation licensed to do business in the State of Wisconsin, with its principal offices located at 5260 Western Avenue, Chevy Chase, MD, 20815, and whose registered agent and address for the purpose of process is CT Corporation System, 301 South Bedford Street, Suite 1, Madison, Wisconsin, 53703.

11. That upon information and belief, said Defendant was and is engaged in the business of selling and providing policies of liability insurance and conducts substantial business in the County of Milwaukee, State of Wisconsin.

12. That upon information and belief, at all times hereinafter mentioned, there was in full force and effect a policy of liability insurance issued by the Defendant, Geico Casualty Company, and covering the Plaintiff, Patricia Love, in the State of Wisconsin, and said policy contained provisions for underinsured coverage. That by reason of underinsured motorist coverage and by virtue of the provisions of §803.04(2), Wis. Stats., said Defendant, Geico Casualty Company, is a proper party Defendant in this action.

13. That upon information and belief, the Defendant, UnitedHealthcare Insurance Company, is a foreign corporation with its principal offices located at 185 Asylum Street, Hartford, Connecticut, 06103 and whose registered agent for purpose of service of process is CT Corporation System, 301 South Bedford Street, Suite 1, Madison, Wisconsin, 53703.

14. That upon information and belief, at all times hereinafter mentioned, said Defendant was and is engaged in the business of providing policies of health insurance and conducts substantial business in Milwaukee County, Wisconsin.

15. That upon information and belief, at all times hereinafter mentioned, there was in full force and effect a contract of health care insurance issued by the Defendant, UnitedHealthcare Insurance Company, covering and protecting the Plaintiff, Patricia Love, and providing health care insurance benefits to her, and that by virtue of medical expenses paid, or to be paid, on behalf of the Plaintiff, Patricia Love, the Defendant, UnitedHealthcare Insurance Company, is a proper Defendant herein.



**FIRST CAUSE OF ACTION**

16. That on December 13, 2023, at approximately 10:56 a.m., the Plaintiff, Patricia Love, was the operator of a vehicle traveling southbound on North 76<sup>th</sup> Street in the left lane in the City of Milwaukee, County of Milwaukee, State of Wisconsin.

17. That upon information and belief, at the same time, the Defendant, Corey W. Jenkins, as an employee of the Defendant, City of Wauwatosa, was the operator of a vehicle that was also traveling southbound on North 76<sup>th</sup> Street in the right hand through lane in the City of Milwaukee, County of Milwaukee, State of Wisconsin.

18. That at said time and place, the Defendant, Corey W. Jenkins, as an employee of the Defendant, City of Wauwatosa, was negligent with respect to the manner in which he operated his motor vehicle, including, but not limited to staying in designated lane, unsafe lane deviation, failure to maintain proper lookout, and was otherwise negligent, when he attempted to switch lanes causing a collision between the driver side of his vehicle and the passenger side of the vehicle occupied by the Plaintiff, resulting in damage to the vehicle owned by the Plaintiff, and injuries to the Plaintiff, as more specifically hereinafter set forth.

19. That as a direct result of the negligence of the Defendant, Corey W. Jenkins, as an employee of the Defendant, City of Wauwatosa, and the collision which was solely and proximately caused by said negligence, the Plaintiff, Patricia Love, sustained severe injuries to various parts of her body including, but not limited to, her neck and suffered from headaches.

20. That as a consequence of the heretofore described injuries, the Plaintiff, Patricia

Love, has experienced extreme and prolonged physical pain, anguish, suffering, disability and mental distress for which she was obliged to seek and obtain extensive health care services. That as a direct result of said injuries, the Plaintiff, Patricia Love, was rendered incapable of pursuing her normal activities.

21. That upon information and belief, the injuries sustained by the Plaintiff, Patricia Love, and the resultant disability may be permanent and may in the future, cause said Plaintiff to experience extreme and prolonged physical pain, anguish, suffering, mental distress and disability. That said injuries, as heretofore described have, and upon information and belief, will in the future render said Plaintiff incapable of enjoying a normal life, all to her damage.

22. That the Plaintiff, Patricia Love, sustained damage, towing, and, storage to her vehicle, as a result of the collision described above.

### **SECOND CAUSE OF ACTION**

23. That the damages of the Plaintiff, Patricia Love, may exceed the insurance available from the Defendant, Cities and Villages Mutual Insurance Company, and, therefore, the Plaintiff, Patricia Love, hereby makes a claim for underinsured motorist coverage against the Defendant, Geico Casualty Company.

### **THIRD CAUSE OF ACTION**

24. That upon information and belief, the Defendant, UnitedHealthcare Insurance Company, claims that it has paid medical expenses, for and on behalf of the Plaintiff, Patricia Love, under the terms and provisions of its alleged contract of insurance that it issued.

25. That upon information and belief, the Defendant, UnitedHealthcare Insurance Company, claims a right of subrogation to be reimbursed for the medical expenses paid under and in accordance with the terms of its alleged policy, on behalf of the Plaintiff, Patricia Love, due to injuries that were sustained in the above described collision.

26. That the Plaintiff, Patricia Love, denies the right of said Defendant, UnitedHealthcare Insurance Company, to be reimbursed or subrogated to its interests and seeks that its subrogation lien be extinguished.

**WHEREFORE**, the Plaintiff, Patricia Love, demands judgment as follows:

- A. In favor of the Plaintiff, Patricia Love, and against the Defendants, Corey W. Jenkins, City of Wauwatosa and Cities and Villages Mutual Insurance Company, jointly and severally, in an amount which will fairly and reasonably compensate her for past pain, suffering and disability and for her past medical expenses, for her past loss of earnings and loss of earning capacity and damages to, for and associated with, her vehicle; together with the costs, disbursements and attorney fees as provided for by law.
- B. In favor of the Plaintiff, Patricia Love, and against the Defendant, Geico Casualty Company, on her underinsured motorist claim together with the costs, disbursements and attorney fees as provided for by law.
- C. For judgment extinguishing any and all subrogation rights, if any, of the Defendant, UnitedHealthcare Insurance Company, to be reimbursed and subrogated to the rights and claims of the Plaintiff and for judgment accordingly; together with the costs, disbursements and attorney fees as provided for by law.

Dated in Milwaukee, Wisconsin this 28<sup>th</sup> day of May, 2025.

Respectfully Submitted,

GENDLIN, LIVERMAN & RYMER, S.C.

*/s/ Daniel E. Meylink*

Electronically Signed By: \_\_\_\_\_

Daniel E. Meylink  
State Bar No. 1036263  
Attorney for the Plaintiff

**P.O. ADDRESS**

10335 West Oklahoma Avenue  
Suite 300

Milwaukee, Wisconsin 53227

P: (414) 272-3399

F: (414) 272-6659

Email: [dmeylink@glr-law.com](mailto:dmeylink@glr-law.com)

STATE OF WISCONSIN    CIRCUIT COURT    MILWAUKEE COUNTY

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PATRICIA LOVE,

Plaintiff,

v.

Case No: 25-CV-004592

Case Code: 30101

COREY W. JENKINS,  
CITY OF WAUWATOSA,  
CITIES AND VILLAGES MUTUAL INSURANCE COMPANY,  
GEICO Casualty Company (Underinsured),  
UNITEDHEALTHCARE INSURANCE COMPANY,

Defendants.

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**PLAINTIFF PATRICIA LOVE'S FIRST SET OF WRITTEN INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT,  
CITY OF WAUWATOSA**

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**NOW COMES** the Plaintiff, Patricia Love, by and through her attorneys, Gendlin, Liverman & Rymer, S.C., and hereby propounds the following written interrogatories to the Defendant, City of Wauwatosa, to be answered in writing and under oath, within forty-five (45) days pursuant to statute and request that the Defendant produce the following documents and things within forty-five (45) days during the business hours and at the business address of the attorneys for the Plaintiff pursuant to Wis. Stats. §804.09.

In answering these interrogatories, Defendant must furnish all requested information, not subject to a valid objection, that is known by, possessed by, or available to the Defendant, its agents, officers, employees, insurer, consultants, representatives, or investigators.

If Defendant is unable to answer fully any of these interrogatories, it must answer them to the fullest extent possible, specifying the reason for its inability to answer the remainder and stating whatever information, knowledge, or belief it has concerning the unanswerable portion. An

evasive or incomplete answer is deemed to be a failure to answer under Wis. Stats., §804.12, and may render Defendant, its attorneys, or both, liable for the expenses of a motion pursuant to that statute.

Each lettered subpart of a numbered interrogatory is to be considered a separate interrogatory for the purpose of objection. Defendant must object separately to each subpart and, if it objects to less than all of the subparts of a numbered interrogatory, then it must answer the remaining subparts. In addition, if Defendant objects to an interrogatory or a subpart thereof as calling for information which is beyond the scope of discovery, Defendant must nevertheless answer the interrogatory or subpart thereof to the extent that it is not objectionable.

Defendant must supplement its responses to these interrogatories if new information arises prior to trial. In addition, without being requested to do so by Plaintiff, Defendant must seasonably supplement its answers to all interrogatories requesting the identification of persons having knowledge of discoverable matters and the identification of persons expected to be called as expert witnesses at trial. Without being requested to do so by Plaintiff, Defendant must also amend any answer when it is discovered to have been incorrect when made or discovered to be no longer true and circumstances are such that a failure to supplement it is in substance a knowing concealment.

Please repeat each interrogatory immediately preceding your answer.

### **DEFINITIONS**

The terms "incident," "occurrence," "event," and/or "collision" when used herein, refers to the series of events which occurred on December 13, 2023, wherein the Plaintiff, Patricia Love, was involved in an collision involving a vehicle being driven by the Defendant, Corey W. Jenkins,

as an employee of the Defendant, City of Wauwatosa.

The term "document" is used in a comprehensive sense and includes, without limitation, letters, intrafirm or company communications, reports, memoranda, minutes, diaries, agreements, instructions, work assignments, notes, sketches, drawings, laser copies of photographs, work sheets, expense vouchers, contracts, records, tape recordings, studies, summaries, agenda, bulletins, notices, invoices, receipts, financial statements or reports, accounts, books, brochures, schedules, price lists, telegrams, teletype communications, or other similar materials which contain any verbal, graphic or pictorial information. In all cases where originals or non-identical copies are not available, "document" also means identical copies of original documents and copies of non-identical copies.

The term "identify" when used herein in connection with natural persons means to state their full names, position with or relationship to Defendant, if any, and their last known business and home addresses and telephone numbers.

The term "identify" when used herein in connection with any document means to describe the document, setting forth its date, title, author or authors, their addresses and telephone numbers, the parties thereto, the present location of the document, the name and address of the custodian thereof, and the substance of the document. THOSE INTERROGATORIES PERTAINING TO DOCUMENTS ARE TO BE DEEMED A REQUEST TO PRODUCE PURSUANT TO WIS. STATS. §804.09. Please attach copies of such documents to the answers to these interrogatories, or, if you are unwilling to do that, please respond within thirty (30) days from service of this request upon you to schedule a mutually convenient time and place for you to make the documents available to Plaintiff's attorneys for inspection and copying. Documents to be identified shall

before or after the incident on December 13, 2023 which is the subject of this litigation.

7. Please identify the name, current address and current telephone number of each City of Wauwatosa employee known to you to be a witness to the incident or arrived at the scene of the incident **after** the incident on December 13, 2023 which is the subject of this litigation.

8. Please give the substance of any and all conversations or statements made by or between the Plaintiff and/or claimed witnesses and any owner, agent, employee and/or representative of the Defendant regarding this incident which is the subject of this litigation. Please include the date and time of each conversation or statement.

9. Please state if a report, written document, and/or recording of any kind was made by the owner, agent, employee and/or representative of the Defendant, City of Wauwatosa, or its insurer with respect to the Plaintiff's incident that is the subject of this litigation, and , if so, state the name and address of the person who made the report, the date thereof, and the name and address of the person now in possession and custody of the report or document.

10. State whether you have taken or given any written, oral statements or recorded from any person regarding this incident/collision. If yes then identify the name, current address and current telephone number of the person; the date, time and place the statement was taken or given; the name, current address and current telephone number of the person who took the statement; the name, current address and current telephone number of the person who presently has custody of the statement; and whether you will make same available for inspection and copying at the office of the attorneys for the Plaintiff during business hours.

11. Are you aware of any mechanical defects or problems with the vehicle that the Defendant, Corey W. Jenkins, was driving which may have contributed to the collision? If so,



state what in your opinion was the problem.

12. Please state whether any photographs and/or video recordings have been taken of the scene of the incident. If yes, please identify:

- a) the date same were taken;
- b) where they were taken;
- c) what the pictures/video show;
- d) the name, current address and current telephone number of the person who took same;
- e) the name, current address and current telephone number of the person having custody of same;
- f) whether you will make same available for inspection and copying at the office of the attorney for the Plaintiff during business hours.

13. Please list all factors and events which you believe caused or contributed to the incident which is the subject of this litigation.

#### **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. Please provide complete and true copies of any statements taken by the Defendant, City of Wauwatosa, or any of its agents or representatives with regard to the incident which is the subject of this litigation.

2. Please provide complete and true copies of any estimates, repair bills, and/or appraisals with regard to physical damage to any of the vehicles involved in the collision.

3. Please provide complete and true copies of any reports made by the Defendant, City of Wauwatosa, or any of its agents or representatives with regard to the collision.

4. Please provide laser copies of any photographs depicting injuries to any of the parties, the site upon which the collision occurred, and/or any of the vehicles, products or other instrumentalities involved in the collision.

5. Please provide any video recordings, movie films, and/or motion pictures, including, but not limited to cell phones, DOT and commercial recordings.

6. Please attach copies of all statements referred to in response to any of the above interrogatories.

7. Please provide a copy of all liability policies which may provide insurance coverage regarding the collision described in Plaintiff's Complaint.

8. For the vehicle being driven by the Defendant, Corey W. Jenkins, as an employee of the Defendant, City of Wauwatosa, please provide information and/or records from any monitoring device such as but not limited to DriveCam, MyRate, Mobile TEEN, safety beacon, or any other device that may have monitored the speed, braking, and/or video of driver reactions.

Dated in Milwaukee, Wisconsin this 3<sup>rd</sup> day of June, 2025.

GENDLIN, LIVERMAN & RYMER, S.C.

Electronically Signed By: /s/ Daniel E. Meylink  
Daniel E. Meylink  
State Bar No. 1036263  
Attorney for the Plaintiff

**P.O. ADDRESS**

10335 West Oklahoma Avenue  
Suite 300  
Milwaukee, Wisconsin 53227  
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F: (414) 272-6659  
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