



LAW DEPARTMENT

Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 500
Detroit, Michigan 48226-3437

Phone 313•224•4550
Fax 313•224•5505
www.detroitmi.gov

July 12, 2023

HONORABLE CITY COUNCIL

**RE: ROBERTO GUZMAN, KHALIL MUHAMMAD, AND CLIFFORD WILLIAMS V
CITY OF DETROIT AND DONALD OWENS
CASE NO: 21-12290
FILE NO: L21-00893**

We have reviewed the above-captioned lawsuit, the facts and particulars of which are set forth in a confidential memorandum that is being separately hand-delivered to each member of Your Honorable Body. From this review, it is our considered opinion that a settlement in the amount of **SEVENTY-FIVE THOUSAND DOLLARS and ^{NO}/Cents (\$75,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **SEVENTY-FIVE THOUSAND DOLLARS and ^{NO}/Cents (\$75,000.00)** and that Your Honorable Body direct the Finance Director to issue four drafts. The first draft in the amount of **THIRTEEN THOUSAND THREE HUNDRED TWENTY-SIX DOLLARS and 70/Cents (\$13,326.70)** payable to **ROBERTO GUZMAN**. The second draft in the amount of **SIXTEEN THOUSAND SIX HUNDRED SIXTY-SEVEN DOLLARS 50/Cents (\$16,667.50)** payable to **KHALIL MUHAMMAD**. The third draft in the amount of **SIXTEEN THOUSAND SIX HUNDRED SIXTY-SEVEN DOLLARS 50/Cents (\$16,667.50)** payable to **CLIFFORD WILLIAMS**. The fourth draft in the amount of **TWENTY-EIGHT THOUSAND THREE HUNDRED THIRTY-EIGHT DOLLARS 30/Cents (\$28,338.30)** payable to **THEIR attorneys, CAIR-MI LEGAL FUND**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No.21-12290, approved by the Law Department.

Respectfully submitted,

/s/ Calvert Bailey
Assistant Corporation Counsel

APPROVED:
CONRAD MALLETT
Corporation Counsel

BY: /s/Krystal A. Crittendon
Krystal A. Crittendon
Supervising Assistant Corporation Counsel

Attachments

R E S O L U T I O N

BY COUNCIL MEMBER _____:

RESOLVED, that settlement of the above matter be and is hereby authorized in the amount of **SEVENTY-FIVE THOUSAND DOLLARS and ^{NO}/Cents (\$75,000.00)**; and be it further

RESOLVED, that the Finance Director be and is hereby authorized and directed to draw four separate warrants. The first warrant upon the proper account in favor of **ROBERTO GUZMAN** in the amount of **THIRTEEN THOUSAND THREE HUNDRED TWENTY-SIX DOLLARS and 70/Cents (\$13,326.70)**. The second warrant upon the proper account in favor of **KHALIL MUHAMMAD** in the amount of **SIXTEEN THOUSAND SIX HUNDRED SIXTY-SEVEN DOLLARS 50/Cents (\$16,667.50)**. The third warrant upon the proper account in favor of **CLIFFORD WILLIAMS** in the amount of **SIXTEEN THOUSAND SIX HUNDRED SIXTY-SEVEN DOLLARS 50/Cents (\$16,667.50)**. The fourth warrant upon the proper account in favor of **CAIR-MI LEGAL FUND** in the amount of **TWENTY-EIGHT THOUSAND THREE HUNDRED THIRTY-EIGHT DOLLARS 30/Cents (\$28,338.30)** in full payment for any and all claims which **ROBERTO GUZMAN, KHALIL MUHAMMAD, and CLIFFORD WILLIAMS** may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about **September 26, 2020**, and otherwise set forth in Case No.21-12290, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 21-12290 and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

APPROVED:
CONRAD MALLETT
Corporation Counsel

BY: /s/Krystal A. Crittendon
Krystal A. Crittendon
Supervising Assistant Corporation Counsel

Approved by City Council: _____

Approved by the Mayor: _____

