



**LAW DEPARTMENT**

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July 12, 2023

**HONORABLE CITY COUNCIL**

RE: Sean Hayes, et al v City of Detroit  
Case No: 20-008694-NF  
File No: L20-00455 (YRB)

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 **SIXTY-FIVE THOUSAND FOUR HUNDRED DOLLARS AND NO/CENTS (\$65,400.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **SIXTY-FIVE THOUSAND FOUR HUNDRED DOLLARS AND NO/CENTS (\$65,400.00)** and that Your Honorable Body direct the Finance Director to issue three drafts in the amount of (1) **TEN THOUSAND FOUR HUNDRED DOLLARS AND NO/CENTS (\$10,400.00)** payable to **ALDEVON PRIMM** and **HIS** attorneys, **APPLEBAUM & STONE, PLC**; (2) **THIRTY-TWO THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$32,500.00)** payable to **CHRISTOPHER HOLDEN** and **HIS** attorneys, **APPLEBAUM & STONE, PLC**; and (3) **TWENTY-TWO THOUSAND FIVE HUNDRED AND NO/CENTS (\$22,500.00)** payable to **ADRIAN WOOD** and **HIS** attorneys, **APPLEBAUM & STONE, PLC**; to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 20-008694-NF, approved by the Law Department.

Respectfully submitted,  
/s/ Yvonne Bradley  
Yvonne Bradley  
Supervising Assistant Corporation Counsel

**APPROVED:**  
CONRAD MALLET  
Corporation Counsel

BY: /s/Jerry L. Ashford  
**Jerry L. Ashford**  
Chief of Litigation

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 **SIXTY-FIVE THOUSAND FOUR HUNDRED DOLLARS AND NO/CENTS (\$65,400.00)**; and be it further.

**RESOLVED**, that the Finance Director be and is hereby authorized and directed to draw a warrant upon the proper account in favor of (1) **ALDEVON PRIMM** and **HIS** attorneys, **APPLEBAUM & STONE, PLC** in the amount of **TEN THOUSAND FOUR HUNDRED DOLLARS AND NO/CENTS (\$10,400.00)**; (2) **CHRISTOPHER HOLDEN** and **HIS** attorneys, **APPLEBAUM & STONE, PLC** in the amount of **THIRTY-TWO THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$32,500.00)**; and (3) **ADRIAN WOOD** and **HIS** attorneys, **APPLEBAUM & STONE, PLC** in the amount of **TWENTY-TWO THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$22,500.00)**; in full payment for any and all claims which Aldevon Primm, Christopher Holden, and Adrian Wood may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about 12/09/2019, and otherwise set forth in Case No. 20-008694-NF, said amounts to be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 20-008694-NF and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED:**  
CONRAD MALLETT  
Corporation Counsel

BY: /s/Jerry L. Ashford  
**Jerry L. Ashford**  
Chief of Litigation

Approved by City Council: \_\_\_\_\_

Approved by the Mayor: \_\_\_\_\_