



## 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

March 2, 2021

### HONORABLE CITY COUNCIL

RE: Earnestine Daniels  
Case No: 20-009716-NF  
File No: L20-00602 (RG)

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 **Thirty Five Thousand Dollars and <sup>NO</sup>/Cents (\$35,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **Thirty Five Thousand Dollars and <sup>NO</sup>/Cents (\$35,000.00)** and that Your Honorable Body direct the Finance Director to issue a draft in that amount payable to Earnestine Daniels and their attorney, ROTHSTEIN LAW GROUP PLC, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 20-009716-NF, approved by the Law Department.

Respectfully submitted,

/s/ Raymond Garant

Raymond Garant  
Assistant Corporation Counsel

**APPROVED:**  
LAWRENCE GARCIA  
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 **Thirty Five Thousand Dollars and <sup>NO</sup>/Cents (\$35,000.00)**; 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 Earnestine Daniels and her attorney, ROTHSTEIN LAW GROUP PLC, in the amount of **Thirty Five Thousand Dollars and <sup>NO</sup>/Cents (\$35,000.00)** in full payment for any and all claims which Earnestine Daniels may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about August 7, 2019, and otherwise set forth in Case No. 20-009716-NF, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 20-009716-NF and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED:**  
LAWRENCE GARCIA  
Corporation Counsel

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

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

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