



LAW DEPARTMENT

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December 20, 2021

HONORABLE CITY COUNCIL

RE: Montgomery, John v COD and John Doe
Case No: 19-007064-NI
File No: L19-00300(PH)

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 it is in the best interest of the City of Detroit to issue settlements in the amounts of

- **EIGHTEEN THOUSAND DOLLARS AND ^{NO}/CENTS (\$18,000.00) for ISPINE, PLLC;**
- **FIFTEEN THOUSAND DOLLARS AND ^{NO}/CENTS (\$15,000.00) for ADVANCE PAIN CARE, PLLC;**
- **FOUR THOUSAND FIVE HUNDRED DOLLARS AND ^{NO}/CENTS (\$4,500.00) for RELIABLE ONE TRANSPORTATION, LLC; and**
- **ONE THOUSAND FIVE HUNDRED DOLLARS AND ^{NO}/CENTS (\$1,500.00) for AFFILIATED DIAGNOSTICS OF OAKLAND, LLC**

We, therefore, request authorization to settle this matter in above amounts and that Your Honorable Body direct the Finance Director to issue drafts in the above amounts payable to

- **ISPINE, PLLC, and ITS attorney, BASHORE GREEN LAW GROUP;**
- **ADVANCE PAIN CARE, PLLC, and ITS attorney, KAUFMAN, PAYTON, AND CHAPA;**
- **RELIABLE ONE TRANSPORTATION, LLC, and ITS attorney, HAQUE LEGAL, PLC; and**
- **AFFILIATED DIAGNOSTICS OF OAKLAND, LLC, and ITS attorney, THE DOLLAR LAW FIRM;**

to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 19-007064-NI, approved by the Law Department.

Respectfully submitted,

Philip Hiltner

Philip Hiltner

Assistant Corporation Counsel

APPROVED: December 20, 2021

CHARLES RAIMI

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 amounts OF **EIGHTEEN THOUSAND DOLLARS AND ^{NO}/CENTS (\$18,000.00)** for **ISPINE, PLLC**; **FIFTEEN THOUSAND DOLLARS AND ^{NO}/CENTS (\$15,000.00)** for **ADVANCE PAIN CARE, PLLC**; **FOUR THOUSAND FIVE HUNDRED DOLLARS AND ^{NO}/CENTS (\$4,500.00)** for **RELIABLE ONE TRANSPORTATION, LLC**; and **ONE THOUSAND FIVE HUNDRED DOLLARS AND ^{NO}/CENTS (\$1,500.00)** for **AFFILIATED DIAGNOSTICS OF OAKLAND, LLC**; and be it further

RESOLVED, that the Finance Director be and is hereby authorized and directed to draw warrants upon the proper account in favor of to following:

- **ISPINE, PLLC**, and **ITS** attorney, **BASHORE GREEN LAW GROUP**, in the amount of **EIGHTEEN THOUSAND DOLLARS AND ^{NO}/CENTS (\$18,000.00)**;
- **ADVANCE PAIN CARE, PLLC**, and **ITS** attorney, **KAUFMAN, PAYTON, AND CHAPA**, in the amount of **FIFTEEN THOUSAND DOLLARS AND ^{NO}/CENTS (\$15,000.00)**;
- **RELIABLE ONE TRANSPORTATION, LLC**, and **ITS** attorney, **HAQUE LEGAL, PLC**, in the amount of **FOUR THOUSAND FIVE HUNDRED DOLLARS AND ^{NO}/CENTS (\$4,500.00)**;
- **AFFILIATED DIAGNOSTICS OF OAKLAND, LLC**, and **ITS** attorney, **THE DOLLAR LAW FIRM**, in the amount of **ONE THOUSAND FIVE HUNDRED DOLLARS AND ^{NO}/CENTS (\$1,500.00)**;

in full payment for any and all claims which the above may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about 06/08/2018, and otherwise set forth in Case No.19-007064-NI, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No.19-007064-NI and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

APPROVED: December 20, 2021

CHARLES RAIMI
Corporation Counsel

BY: /s/Krystal A. Crittendon

Krystal A. Crittendon
Supervising Assistant Corporation Counsel

Approved by City Council: _____

Approved by the Mayor: _____