



LAW DEPARTMENT

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November 3, 2023

HONORABLE CITY COUNCIL

RE: TOX TESTING LABS, TOX TEST., INC., PRO TOX. TESTING, DETROIT METRO RX
CASE NO: 21-163240-GC
FILE NO: L21-00770 (AA)

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 **FIVE THOUSAND DOLLARS and NO/Cents (\$5,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **FIVE THOUSAND DOLLARS and NO/Cents (\$5,000.00)** and that Your Honorable Body direct the Finance Director to issue three drafts in the amount of **ONE THOUSAND EIGHT HUNDRED DOLLARS and NO/Cents (\$1,800)** payable to **PRO TOXICOLOGY TESTING and THEIR attorneys, HIRSCH, GAUGIER & KHAN; ONE THOUSAND SIX HUNDRED DOLLARS and NO/Cents (\$1,600.00)** payable to **TOX TESTING LABS d/b/a PARAGON DIAGNOSTICS and THEIR attorneys HIRSCH, GAUGIER & KHAN; ONE THOUSAND SIX HUNDRED DOLLARS and NO/Cents (\$1,600.00)** payable to **DETROIT METRO RX, and THEIR attorneys HIRSCH, GAUGIER & KHAN**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 21-163240-GC, approved by the Law Department.

Respectfully submitted,
/s/ Alfred Ashu
Alfred Ashu
ACC

APPROVED:
CONRAD MALLET
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 **FIVE THOUSAND DOLLARS and NO/Cents (\$5,000.00)**; and be it further

RESOLVED, that the Finance Director be and is hereby authorized and directed to draw three warrant upon the proper account in favor of **PRO TOXICOLOGY TESTING and THEIR attorneys, HIRSCH, GAUGIER & KHAN** in the amount of **ONE THOUSAND EIGHT HUNDRED DOLLARS and NO/Cents (\$1,800)**; **TOX TESTING LABS d/b/a PARAGON DIAGNOSTICS and THEIR attorneys HIRSCH, GAUGIER & KHAN** in the amount of **ONE THOUSAND SIX HUNDRED DOLLARS and NO/Cents (\$1,600.00)** and **DETROIT METRO RX** in the amount of **ONE THOUSAND SIX HUNDRED DOLLARS and NO/Cents (\$1,600.00)** in full payment for any and all claims which Plaintiffs may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about **11/24/2018**, and otherwise set forth in Case No.21-163240-GC, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No.21-163240-GC and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

APPROVED:
CONRAD MALLET
Corporation Counsel

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

Approved by City Council: _____

Approved by the Mayor: _____