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

October 31, 2023

HONORABLE CITY COUNCIL

RE: Dodson, Tiani and Lois Dodson v City of Detroit, et al.

Case No: 20-12056 File No: L20-00742 SVD

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 **TWO HUNDRED THOUSAND DOLLARS AND NO/CENTS** (\$200,000.00) is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of TWO HUNDRED THOUSAND DOLLARS AND NO/CENTS (\$200,000.00) and that Your Honorable Body direct the Finance Director to issue a draft in the amount of ONE HUNDRED THOUSAND DOLLARS AND NO/CENTS (\$100,000.00) payable to TIANI DODSON and HER attorney, AKEEL & VALENTINE, PLC; and a draft in the amount of ONE HUNDRED THOUSAND DOLLARS AND NO/CENTS (\$100,000.00) payable to LOIS DODSON and HER attorney, ERNST LAW FIRM, PLC; to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 20-12056, approved by the Law Department.

Respectfully submitted, Sarah V. Domin Sarah V. Domin Senior Assistant Corporation Counsel

APPROVED:

CONRAD MALLETT Corporation Counsel

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

Attachments

RESOLUTION

BY COUNCIL MEMBER

RESOLVED, that settlement of the above matter be and is hereby authorized in the amount

of TWO HUNDRED THOUSAND DOLLARS AND NO/CENTS (\$200,000.00); 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 the amount of ONE HUNDRED THOUSAND DOLLARS

AND NO/CENTS (\$100,000.00) payable to TIANI DODSON and HER attorney, AKEEL &

VALENTINE, PLC; and a separate warrant in the amount of ONE HUNDRED THOUSAND

DOLLARS AND NO/CENTS (\$100,000.00) payable to LOIS DODSON and HER attorney,

ERNST LAW FIRM, PLC; in full payment for any and all claims which Tiani Dodson and Lois

Dodson may have against the City of Detroit and any other City of Detroit employees by reason

of alleged constitutional violations sustained on or about November 9, 2019, and otherwise set

forth in Case No. 20-12056, that said amounts be paid upon receipt of properly executed Releases.

Stipulation and Order of Dismissal entered in Lawsuit No. 20-12056 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