



October 2, 2023

HONORABLE CITY COUNCIL

RE: BASF Corporation v City of Detroit
Wayne County Circuit Court Case No. 23-005801-CB
File No. L23-00251

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 the following settlement in the best interests of the City of Detroit:

The City will execute a quit claim deed conveying any interest it may have in 3311 Bourke, Detroit, MI (Parcel Number 12005263-4) to Sabaa Enterprises Inc. (“Sabaa”) for the consideration of (1) \$1,760; (2) Plaintiff’s dismissal and waiver of any and all claims BASF may have against the City of Detroit and any other City of Detroit employees as set forth in the case entitled “BASF Corporation v City of Detroit,” Wayne County Circuit Court Case No. 23-005801-CB (“the Civil Action”), without costs or attorney fees to any party, upon receipt of a properly executed Release, Stipulation and Order of Dismissal entered in Lawsuit No. 23-005801-CB, approved by the Law Department.

We, therefore, request authorization to settle Plaintiff’s claims in this matter in the manner set forth above.

Respectfully submitted,
Eric B. Gaabo
Senior Assistant Corporation Counsel

APPROVED:
CHARLES N. RAIMI
Deputy Corporation Counsel

BY: /s/James D. Noseda
James D. Noseda
Supervising Assistant Corporation Counsel

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 manner set forth below:

1. The City will execute a quit claim deed conveying any interest it may have in 3311 Bourke, Detroit, MI (parcel Number 12005263-4) to Sabaa Enterprises Inc. (“Sabaa”) for the consideration of \$1,760.
2. Plaintiff will dismiss all claims in the case entitled “BASF Corporation v City of Detroit,” Wayne County Circuit Court Case No. 23-005801-CB (“the Civil Action”) with prejudice and without costs in favor of any party.
3. Plaintiff will waive and release any and all claims BASF may have against the City of Detroit and any other City of Detroit employees which were or could have been set forth in the case entitled “BASF Corporation v City of Detroit,” Wayne County Circuit Court Case No. 23-005801-CB (“the Civil Action”), in a form approved by the Law Department.

APPROVED:

CHARLES L. RAIMI
Deputy Corporation Counsel
BY: /s/James D. Noseda
James D. Noseda
Supervising Assistant Corporation Counsel

Approved by City Council: _____

Approved by the Mayor: _____