



**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

February 15, 2024

**HONORABLE CITY COUNCIL**

**RE: ASHLEE UNIQUE SIMS v CITY OF DETROIT, TYLER SCOTT ALLEYNE,  
JANELLE THOMAS AND JARICK HORNE  
Case No: 22-cv-12992  
File No: L23-00067 RJB**

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 **ONE HUNDRED FIVE THOUSAND DOLLARS and <sup>NO</sup>/Cents (\$105,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **ONE HUNDRED FIVE THOUAND DOLLARS and <sup>NO</sup>/Cents (\$105,000.00)** and that Your Honorable Body direct the Finance Director to issue a draft in that amount payable to **ASHLEE UNIQUE SIMS** and her attorney, **LAW OFFICES OF TODD PERKINS**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No.22-12992, approved by the Law Department.

Respectfully submitted,

Robyn J. Brooks

Robyn J Brooks  
Senior Assistant Corporation Counsel

**APPROVED:**  
CONRAD MALLET  
Corporation Counsel

BY: /s/Signature  
**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 **ONE HUNDRED FIVE THOUAND DOLLARS and <sup>NO</sup>/Cents (\$105,000.00)**; 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 **Ashlee Unique Sims** and her attorney, **LAW OFFICES OF TODD PERKINS** in the amount of **ONE HUNDRED FIVE THOUAND DOLLARS and <sup>NO</sup>/Cents (\$105,000.00)** in full payment for any and all claims which Ashlee Unique Sims may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about, and otherwise set forth in Case No.22-12992, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 22-12992 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