



**LAW DEPARTMENT**

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May 2, 2024

**HONORABLE CITY COUNCIL**

**RE: ALLAN SCHWARTZ MEDICAL CTR PC (TOMMY WATKINS) V CITY OF  
DETROIT  
CASE NO: 23-156620-GC  
FILE NO: L23-00584 (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 **TWO THOUSAND SIX HUNDRED DOLLARS and <sup>NO</sup>/Cents (\$2,600.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **TWO THOUSAND SIX HUNDRED DOLLARS and <sup>NO</sup>/Cents (\$2,600.00)** and that Your Honorable Body direct the Finance Director to issue a draft in that amount payable to **ALLAN SCHWARTZ MEDICAL CENTER, PC (Tommy Wakins)** and **THEIR** attorney, **REIFMAN LAW FIRM, PLLC**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. **23-156620-GC**, approved by the Law Department.

Respectfully submitted,

/s/ ROBYN J. BROOKS

Robyn J Brooks

Sr. Assistant Corporation Counsel

**APPROVED:**  
CONRAD MALLETT  
Corporation Counsel

BY: /s/ Krystal A. Crittendon  
**Krystal A. Crittendon**  
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 amount of **TWO THOUSAND SIX HUNDRED DOLLARS and <sup>NO</sup>/Cents (\$2,600.00)**; 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 **ALLAN SCHWARTZ MEDIAL CENTER PC (TOMMY WATKINS)** and **THEIR** attorney, **REIFMAN LAW FIRM, PLLC**, in the amount of **TWO THOUSAND SIX HUNDRED DOLLARS and <sup>NO</sup>/Cents (\$2,600.00)** in full payment for any and all claims which **ALLAN SCHWARTZ MEDIAL CENTER PC (TOMMY WATKINS)** may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about **05/18/2022**, and otherwise set forth in Case No.23-156620-GC, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No.23-156620-GC and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED:**  
CONRAD MALLETT  
Corporation Counsel

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