



**LAW DEPARTMENT**

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June 24, 2024

**HONORABLE CITY COUNCIL**

RE: **Harold Sullivan, as Personal Representative of the Estate of India Sullivan  
v. City of Detroit, et al**  
Case No: 20-002329-NI  
File No: L20-00142(GBP)

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 **EIGHT HUNDRED THOUSAND Dollars and <sup>NO</sup>/Cents (\$800,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **EIGHT HUNDRED THOUSAND Dollars and <sup>NO</sup>/Cents (\$800,000.00)** and that Your Honorable Body direct the Finance Director to issue a draft in that amount payable to Harold Sullivan, as Personal Representative of the Estate of India Sullivan and **its attorney**, MEYERS LAW, PLLC, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 20-002329-NI, approved by the Law Department.

Respectfully submitted,  
Gregory B. Paddison  
Senior Assistant Corporation Counsel

**APPROVED:**  
Conrad Mallett  
Corporation Counsel

BY: /s/ Conrad Mallett  
**Conrad Mallett**  
Corporation Counsel

Attachment

**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 **\$800,000.00**; 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 Harold Sullivan, as Personal Representative of the Estate of India Sullivan and its attorney, MEYERS LAW, PLLC, in the amount of **\$800,000.00** in full payment for any and all claims which Harold Sullivan, as Personal Representative of the Estate of India Sullivan may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about December 04, 2017, and otherwise set forth in Case No. 20-002329-NI, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 20-002329-NI and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED:**  
Conrad Mallett  
Corporation Counsel

BY: /s/ Conrad Mallett  
**Conrad Mallett**  
Corporation Counsel

Approved by City Council: \_\_\_\_\_

Approved by the Mayor: \_\_\_\_\_