



LAW DEPARTMENT

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September 17, 2024

HONORABLE CITY COUNCIL

RE: Pipkins, Davion v. City of Detroit, et al.
Case No: 23-10614
File No: L23-00162 PH

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 **EIGHTY THOUSAND DOLLARS AND NO/CENTS (\$80,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to submit an offer of judgment pursuant to Fed. R. Civ. P. 68 in the amount of **EIGHTY THOUSAND DOLLARS AND NO/CENTS (\$80,000.00)** and that, in the event that offer is accepted, Your Honorable Body direct the Finance Director to issue a draft in that amount payable to **DAVION PIPKINS** and **HIS** attorney, **GOODMAN HURWITZ & JAMES, PC**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 23-10614 approved by the Law Department.

Respectfully submitted,

/s/ Philip J. Hiltner
Philip Hiltner
Assistant Corporation Counsel

APPROVED:
CONRAD MALLET
Corporation Counsel

BY: /s/Yuvonne R. Bradley
Yuvonne R. Bradley
Supervising Assistant Corporation Counsel

Attachments

R E S O L U T I O N

BY COUNCIL MEMBER _____:

RESOLVED, that an offer of judgment may be made in the above matter pursuant to Fed. R. Civ. P. 68 in the amount of **EIGHTY THOUSAND DOLLARS AND ^{NO}/CENTS (\$80,000.00)** for damages and attorney fees; and be it further

RESOLVED, that in the even the officer if judgment is accepted by Plaintiff the Finance Director be and is hereby authorized and directed to draw a warrant upon the proper account in favor of **DAVION PIPKINS** and **HIS** attorney, **GOODMAN HURWITZ & JAMES, PC**, in the amount of **EIGHTY THOUSAND DOLLARS AND ^{NO}/CENTS (\$80,000.00)** in full payment for any and all claims which **DAVION PIPKINS** may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about 5/29/2020, and otherwise set forth in Case No. 23-10614, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 23-10614 and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

APPROVED:
CONRAD MALLETT
Corporation Counsel

BY: /s/Yuvonne R. Bradley
Yuvonne R. Bradley
Supervising Assistant Corporation Counsel

Approved by City Council: _____

Approved by the Mayor: _____