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**LAW DEPARTMENT**

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September 18, 2024

**HONORABLE CITY COUNCIL**

**RE: PEDRO HUNTER v CITY OF DETROIT**  
**CASE NO.: 22-013903-NF**  
**FILE NO.: L22-02281**

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 City should agree to the entry of an Order of Dismissal and enter into an Agreement to Arbitrate on the terms and conditions set forth in the following resolution.

We, therefore, request authorization to agree to entry of an Order of Dismissal and to enter into an Agreement to Arbitrate on the terms and conditions set forth in the following resolution and, upon certification by the Law Department that the arbitrators have announced a decision requiring the City to pay a designated sum to **Pedro Hunter**, and that Your Honorable Body direct the Finance Director to issue a draft payable to **Pedro Hunter, and his attorney, Andreopoulos and Hill, PLLC**, in the amount the City is to pay pursuant to the arbitrators' decision, but said draft shall not exceed **One Hundred Fifty Thousand Dollars (\$150,000.00)**.

Respectfully submitted,

Gregory B. Paddison  
Supervising Assistant Corporation Counsel

**APPROVED:**

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Conrad Mallett  
Corporation Counsel

## RESOLUTION

BY COUNCIL MEMBER \_\_\_\_\_ :

**RESOLVED**, that the Law Department is authorized to agree to entry of an Order of Dismissal and to enter into an Agreement to Arbitrate in the case of **Pedro Hunter v City of Detroit**, filed in the Wayne County Circuit Court, Case No.: **22-013903-NF**, on the following terms and conditions:

1. The parties shall submit to arbitration all matters in controversy raised in the above-named lawsuit.
2. The maximum amount of any award to **Pedro Hunter** shall not exceed the amount of **\$150,000.00**. The minimum amount of any award to **Pedro Hunter** shall **ZERO DOLLARS (\$0.00)**.
3. Any award in excess of **\$150,000.00** shall be interpreted to be in the amount of **\$150,000.00**.
4. There shall be no costs, fees, attorney fees or interest taxable with respect to the award rendered by the arbitrators.
5. The award of the arbitrators shall represent a full and final settlement of any amounts due and owing to **Pedro Hunter** for any and all claims arising out of the incident which allegedly occurred on or about December 04, 2021 and/or March 3, 2022 in the City of Detroit, including a waiver of all past, present, and future No-Fault Benefits; however, limited judicial review may be obtained in the Michigan Court of Appeals in accordance with the standards for review of arbitration awards as established by law.
6. Promptly after the arbitrators announce their decision, the Law Department shall inform City Council in writing of that decision.
7. Upon certification by the Law Department that the arbitrators have announced a decision requiring the City to pay part or all \$150,000.00 to **Pedro Hunter**, the Finance Director is authorized to issue a draft drawn upon the proper account in favor of **Pedro Hunter, and his attorney, Andreopoulos and Hill, PLLC** in the amount of the arbitrators' award, **but said draft shall not exceed \$150,000.00**.

**APPROVED:**

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Gregory B. Paddison  
Senior Assistant Corporation Counsel