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**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 24, 2025

**HONORABLE CITY COUNCIL**

RE: **Lamonte Jackson-Gibson and Toriel Dixon –v- Reginald Beasley**  
Case No: 2:20-cv-12765  
File No: L21-00038 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 an Offer of Judgment pursuant to Federal Rule of Civil Procedure 68 in the amount of **Two-Hundred Thirty-Five Thousand Dollars and Zero Cents (\$235,000.00)** is in the best interest of the City of Detroit.

We, therefore, request Your Honorable Body to authorize an Offer of Judgment; and, in the event that Plaintiffs accept the Offer, to direct the Finance Director to issue a draft in the amount of **Two-Hundred Thirty-Five Thousand Dollars and Zero Cents (\$235,000.00)** payable to **Lamonte Jackson-Gibson and Toriel Dixon** and their attorney, **FIEGER, FIEGER, KENNEY & HARRINGTON** to be delivered upon receipt of written notice of acceptance of an offer of judgment or, alternatively, upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No.: 2:20-cv-12765, approved by the Law Department.

Respectfully submitted,  
Gregory B. Paddison  
Senior Assistant Corporation Counsel

**APPROVED: February 28, 2025**  
Conrad Mallett  
Corporation Counsel

BY: /s/Jerry L. Ashford  
**Jerry L. Ashford**  
Chief of Litigation

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 **Two-Hundred Thirty-Five Thousand Dollars and <sup>NO</sup>/Cents (\$235,000.00)**; 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 **Lamonte Jackson-Gibson and Toriel Dixon** and their attorney, **Fieger, Fieger, Kenney & Harrington**, in the amount of **Two-Hundred Thirty-Five Thousand Dollars and <sup>NO</sup>/Cents (\$235,000.00)** in full payment for any and all claims which Plaintiffs may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about June 8, 2019, and otherwise set forth in Case No. 2:20-cv-12765, that said amount be paid upon receipt of written notice of acceptance of an Offer of Judgment, or, alternatively, properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 2:20-cv-12765 and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED: February 28, 2025**

Conrad Mallett  
Corporation Counsel

BY: /s/Jerry L. Ashford

**Jerry L. Ashford**  
Chief of Litigation

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

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