

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

March 07, 2025

## HONORABLE CITY COUNCIL

RE: **Danielle Brazziel and Aryion Brazziel –v- City of Detroit, et al** Case No: 2:25-cv-10267 File No: L25-00094 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 in the amount of up to **Thirty-Five Thousand Dollars and Zero Cents** (\$35,000.00) 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 deem such acceptance as a settlement and to direct the Finance Director to issue a draft in the amount of up to **Thirty-Five Thousand Dollars and Zero Cents** (\$35,000.00) payable to **Danielle Brazziel and Aryion Brazziel** and their attorneys, **PERKINS LAW GROUP, PLLC** and **LAW OFFICES OF JOEL B. SKLAR** to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No.: 2:25-cv-10267, approved by the Law Department.

Respectfully submitted, Gregory B. Paddison Senior Assistant Corporation Counsel

APPROVED: April 11, 2025 Conrad Mallett Corporation Counsel

BY: /s/Patrick Cunningham

Patrick Cunningham Supervising Assistant Corporation Counsel

Attachments

## <u>R E S O L U T I O N</u>

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

**RESOLVED**, that an Offer of Judgment made pursuant to Fed. R. Civ. Proc. 68 in the above matter be and is hereby authorized in the amount of **\$35,000.00**; and be it further

**RESOLVED**, that in the event that the Offer of Judgment is accepted by Plaintiff, that the Finance Director be and is hereby authorized and directed to draw a warrant upon the proper account in favor of **Danielle Brazziel and Aryion Brazziel** and their attorneys, **PERKINS LAW GROUP**, **PLLC** and **LAW OFFICES OF JOEL B. SKLAR**, in the amount of up to **\$35,000.00**, 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, and otherwise set forth in Case No. 2:25-cv-10267, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 2:25-cv-10267 and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

APPROVED: April 11, 2025 Conrad Mallett Corporation Counsel

BY: /s/Patrick Cunningham **Patrick Cunningham** Supervising Assistant Corporation Counsel

Approved by City Council:

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