LAW DEPARTMENT

Coleman A. Young Municipal Center 2 Woodward Avenue, Suite 500 Detroit, Michigan 48226-3437

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June 9, 2025

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 TWO HUNDRED TWENTY-FIVE THOUSAND DOLLARS AND NO/CENTS (\$225,000.00) 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 TWO HUNDRED TWENTY-FIVE THOUSAND DOLLARS AND NO/CENTS (\$225,000.00) and that, in the event that the offer is accepted, Your Honorable Body direct the Finance Director to issue a draft in that amount payable to **DAVION PIPKINS** and **HIS** attorneys, GOODMAN HURWITZ & JAMES, PC, and LARENE & KRIGER, PLC, 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 Senior Assistant Corporation Counsel

APPROVED:

CONRAD MALLETT Corporation Counsel

BY: /s/Jerry L. Ashford

> Jerry L. Ashford Chief of Litigation

Attachments

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 TWO HUNDRED TWENTY-FIVE THOUSAND DOLLARS

AND NO/CENTS (\$225,000.00) for damages and attorney fees; and be it further

RESOLVED, that in the event the offer of 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 attorneys, GOODMAN HURWITZ & JAMES, PC, and

LARENE & KRIGER, PLC, in the amount of TWO HUNDRED TWENTY-FIVE

THOUSAND DOLLARS AND NO/CENTS (\$225,000.00) 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 May 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/Jerry L. Ashford

Jerry L. Ashford Chief of Litigation

Approved by City Council:

Approved by the Mayor: _____