



**LAW DEPARTMENT**

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February 25, 2022

**HONORABLE CITY COUNCIL**

RE: Tox Testing, Inc. et al. (Byron Haynes) v City of Detroit  
Case No: 20-013993-NF  
File No: L20-00858(CLR)

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 **EIGHTEEN THOUSAND DOLLARS AND <sup>NO</sup>/CENTS (\$18,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **EIGHTEEN THOUSAND DOLLARS AND <sup>NO</sup>/CENTS (\$18,000.00)** and that Your Honorable Body direct the Finance Director to issue a draft in that amount payable to **TOX TESTING, INC, PRO TOXICOLOGY TESTING** and **THEIR** attorney, **PUZIO LAW PC**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 20-013993-NF, approved by the Law Department.

Respectfully submitted,

Cheryl Ronk  
Cheryl Ronk  
Assistant Corporation Counsel

**APPROVED**  
CHARLES RAIMI  
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 settlement of the above matter be and is hereby authorized in the amount of **EIGHTEEN THOUSAND DOLLARS AND <sup>NO</sup>/CENTS (\$18,000.00)**; 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 **TOX TESTING, INC., PRO TOXICOLOGY TESTING** and **THEIR** attorney, **PUZIO LAW PC**, in the amount of **EIGHTEEN THOUSAND DOLLARS AND <sup>NO</sup>/CENTS (\$18,000.00)** in full payment for any and all claims which **TOX TESTING, INC. OR PRO TOXICOLOGY TESTING** may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about 6/26/2019, and otherwise set forth in Case No.20-013993-NF, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No.20-013993-NF and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED:**  
CHARLES RAIMI  
Corporation Counsel

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

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

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