



**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

July 15, 2025

**HONORABLE CITY COUNCIL**

RE: **LaDonna Crutchfield –v- City of Detroit, et al**  
Case No: 2:25-cv-10514  
File No: LIT-0034 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 **Ninety Thousand Dollars and <sup>NO</sup>/Cents (\$90,000.00)** 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 **Ninety Thousand Dollars and <sup>NO</sup>/Cents (\$90,000.00)** payable to **LaDonna Crutchfield** and her attorney, **LAW OFFICES OF IVAN L. LAND, P.C.**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No.: 2:25-cv-10514, approved by the Law Department.

Respectfully submitted,  
Gregory B. Paddison  
Senior Assistant Corporation Counsel

**APPROVED: July 18, 2025**  
Conrad Mallett  
Corporation Counsel

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

Attachment

R E S O L U T I O N

**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 **\$90,000.00**; 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 **LaDonna Crutchfield** and her attorney, **LAW OFFICES OF IVAN L. LAND, P.C.**, in the amount of up to **\$90,000.00**, 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-10514, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 2:25-cv-10514 and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED: July 18, 2025**  
Conrad Mallett  
Corporation Counsel

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

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

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