





**LAW DEPARTMENT**

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July 14, 2025

**HONORABLE CITY COUNCIL**

RE: Michigan Pain Management LLC and Laboratory Specialists of Michigan, LLC (Miles, Zachery) v City of Detroit  
Wayne County Circuit Court Case No: 24-000185-NF  
Citylaw File No: L24-00788(CBO)

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 **Thirteen Thousand Dollars and No/Cents (\$13,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **Ten Thousand Dollars and No/Cents (\$10,000.00)** and that Your Honorable Body direct the Finance Director to issue a draft in the amount of **Ten Thousand Dollars and No/Cents payable to Michigan Pain Management LLC and its attorney, KAJY LAW FIRM, PLLC** and a **second draft in the amount of Three Thousand Dollars and No Cents (\$3,000.00) to Laboratory Specialists of Michigan, LLC and its attorney, KAJY LAW FIRM, PLLC**, to be delivered upon receipt of properly executed Releases and a Stipulation and Order of Dismissal entered in Lawsuit No. 24-000185-NF, approved by the Law Department.

Respectfully submitted,

/s/ Crystal Olmstead  
Crystal Olmstead  
Senior Assistant Corporation Counsel

**APPROVED:**  
CONRAD MALLET  
Corporation Counsel

BY: Eric Gaabo  
/s/ Eric Gaabo  
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 **Thirteen Thousand Dollars and No/Cents (\$13,000.00)**; 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 **Michigan Pain Management LLC and Laboratory Specialists of Michigan,, LLC and its attorney, Kajy Law Firm, PLLC**, in the amount of **Ten Thousand Dollars and No/Cents (\$10,000.00)** and a **second draft in the amount of Three Thousand Dollars and No Cents (\$3,000.00) to Laboratory Specialists of Michigan, LLC and its attorney Kajy Law Firm, PLLC**, in full payment for any and all claims which Michigan Pain Management LLC and Laboratory Specialists of Michigan LLC may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained in Wayne County Circuit Court Case No.24-000185-NF, that said amount be paid upon receipt of properly executed Releases, and a Stipulation and Order of Dismissal entered in Lawsuit No.24-000185-NF and, where deemed necessary by the Law Department, a properly executed Medicare/CMS Final Demand Letter.

**APPROVED:**  
CONRAD MALLETT  
Corporation Counsel

BY: /s/Eric Gaabo  
**Eric Gaabo**  
Supervising Assistant Corporation Counsel

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

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