



**LAW DEPARTMENT**

May 6, 2022

Coleman A. Young Municipal Center  
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Detroit, Michigan 48226-3437

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**HONORABLE CITY COUNCIL**

RE: Walter Purvis, United Lab RX, Cares Transportation, and Go Beyond Physical Therapy, LLC v City of Detroit  
Case No: 21-001840-NI  
File No: L21-00349 (YRB)

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 **NINETY THREE THOUSAND SEVEN HUNDRED FIFTY DOLLARS AND NO/CENTS (\$93,750.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **NINETY THREE THOUSAND SEVEN HUNDRED FIFTY DOLLARS AND NO/CENTS (\$93,750.00)** and that Your Honorable Body direct the Finance Director to issue four (4) drafts in the amount of (1) **EIGHTY-TWO THOUSAND DOLLARS AND NO/CENTS (\$82,000.00)** payable to **WALTER PURVIS** and **HIS** attorneys, **REIFMAN LAW FIRM**; (2) **FIVE THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$5,500.00)** payable to **UNITED LAB RX, LLC** and **ITS** attorneys, **MAKKI LAW, PLLC**; (3) **TWO THOUSAND DOLLARS AND NO/CENTS (\$2,000.00)** payable to **CARES TRANSPORTATION** and **ITS** attorneys, **MAKKI LAW, PLLC**; and (4) **FOUR THOUSAND TWO HUNDRED FIFTY DOLLARS AND NO/CENTS (\$4,250.00)** payable to **GO BEYOND PHYSICAL THERAPY, LLC** and **ITS** attorney, **ERVIN G. TINAJ, PLLC**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 21-001840-NI, approved by the Law Department.

Respectfully submitted,

/s/ Yvonne Bradley

Yvonne Bradley

Supervisor Assistant Corporation Counsel

**APPROVED:** \_\_\_\_\_  
CONRAD MALLET  
Corporation Counsel

BY: /s/Jerry L. Ashford  
**Jerry L. Ashford**  
Chief of Litigation  
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 **NINETY THREE THOUSAND SEVEN HUNDRED FIFTY DOLLARS AND <sup>NO</sup>/CENTS (\$93,750.00)**; and be it further

**RESOLVED**, that the Finance Director be and is hereby authorized and directed to draw warrants upon the proper account in favor of (1) **WALTER PURVIS** and **HIS** attorneys, **REIFMAN LAW FIRM**, in the amount **OF EIGHTY-TWO THOUSAND DOLLARS AND <sup>NO</sup>/CENTS (\$82,000.00)**; (2) **UNITED LAB RX, LLC** and **ITS** attorneys, **MAKKI LAW, PLLC** in the amount of **FIVE THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$5,500.00)**; (3) **CARES TRANSPORTATION** and **ITS** attorneys, **MAKKI LAW, PLLC** in the amount of **TWO THOUSAND DOLLARS AND NO/CENTS (\$2,000.00)**; and (4) **GO BEYOND PHYSICAL THERAPY, LLC** and **ITS** attorney, **ERVIN G. TINAJ, PLLC** in the amount of **FOUR THOUSAND TWO HUNDRED FIFTY DOLLARS AND NO/CENTS (\$4,250.00)** in full payment for any and all claims which **WALTER PURVIS, UNITED LAB RX, LLC, CARES TRANSPORTATION** and **GO BEYOND PHYSICAL THERAPY, LLC** may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about September 28, 2019, and otherwise set forth in Case No. 21-001840-NI, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. L21-00349 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: \_\_\_\_\_