



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

September 28, 2022

HONORABLE CITY COUNCIL

RE: Pioneer Labs and ZMC Pharmacy, LLC, et al. (Eben Ford) v. City of Detroit
Case No: 21-002928-NF
File No: L21-00297 (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 **TWENTY THOUSAND EIGHT HUNDRED DOLLARS AND NO/CENTS (\$20,800.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **TWENTY THOUSAND EIGHT HUNDRED DOLLARS AND NO/CENTS (\$20,800.00)** and that Your Honorable Body direct the Finance Director to issue drafts in the amount of **FIFTEEN THOUSAND DOLLARS AND NO/CENTS (\$15,000.00)** payable to **PIONEER LABS, LLC**, and **ITS** attorneys, **KHURANA LAW FIRM, PC**, and in the amount of **FIVE THOUSAND EIGHT HUNDRED DOLLARS AND NO/CENTS (\$5,800.00)** payable **TO ZMC PHARMACY, LLC**, and **ITS** attorneys, **KHURANA LAW FIRM, PC**, to be delivered upon receipt of a properly executed Release and Stipulation and Order of Dismissal entered in Lawsuit No. 21-002928-NF, approved by the Law Department.

Respectfully submitted,
Yvonne Bradley

/s/ Yvonne Bradley
Supervisor Assistant Corporation Counsel

APPROVED:
CONRAD MALLETT
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 **TWENTY THOUSAND EIGHT HUNDRED DOLLARS AND NO/CENTS (\$20,800.00)**; 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 **PIONEER LABS**, and **ITS** attorneys, **KHURANA LAW FIRM, PC**, in the amount of **FIFTEEN THOUSAND DOLLARS AND NO/CENTS (\$15,000.00)**, and in favor of **ZMC PHARMACY, LLC**, and **ITS** attorneys, **KHURANA LAW FIRM, PC**, in the amount of **FIVE THOUSAND EIGHT HUNDRED DOLLARS AND NO/CENTS (\$5,800.00)**, in full payment for any and all claims which Pioneer Labs and ZMC Pharmacy, LLC, may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about March 6, 2020, and otherwise set forth in Case No 21-002928-NF, that said amount be paid upon receipt of a properly executed Release, Stipulation and Order of Dismissal entered in Case No 21-002928-NF 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: _____

