



LAW DEPARTMENT

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September 27, 2022

HONORABLE CITY COUNCIL

RE: D. Savage, LLC, et al. v. Officer Matthew Bray, et al.
Case No: 21-cv-11242
File No: L21-00490 BP

The Law Department requests authorization to make Federal Rule of Civil Procedure 68 settlement offers for **Five Thousand Dollars and No/Cent (\$5,000.00)** each to Plaintiffs Curtis Williams and Jeanne Walsh, individually. If the offers are accepted, the Court will enter a judgment for those amounts and the City must issue payment accordingly.

Based upon our review of the facts and particulars of this lawsuit, which are set forth in a confidential memorandum that is being separately hand-delivered to each member of Your Honorable Body, it is our considered opinion that a settlement judgment in the amount of **Five Thousand Dollars and No/Cent (\$5,000.00)** each to Plaintiffs Curtis Williams and Jeanne Walsh is in the best interest of the City of Detroit.

We, therefore, request Your Honorable Body to authorize the Law Department to serve a Rule 68 Offer of Judgment for **Five Thousand Dollars and No/Cent (\$5,000.00)** to Curtis Williams and a Rule 68 Offer of Judgment for **Five Thousand Dollars and No/Cent (\$5,000.00)** to Plaintiff Jeanne Walsh.

Respectfully submitted,
/s/Ben Patterson

Ben Patterson
Senior Assistant Corporation Counsel

APPROVED:
CONRAD MALLETT
Corporation Counsel

BY: /s/James D. Noseda
James D. Noseda
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 as to Curtis Williams and Jeanne Walsh be and is hereby authorized in the total amount of **Ten Thousand Dollars and NO/Cents (\$10,000.00)**; and be it further

RESOLVED, that the City Law Department be and is hereby authorized to serve a Federal Rule of Civil Procedure 68 Offer to Accept Judgment for **Five Thousand Dollars and No/Cent (\$5,000.00)** on Curtis Williams and a Federal Rule of Civil Procedure Rule 68 Offer of Judgment for **Five Thousand Dollars and No/Cent (\$5,000.00)** on Plaintiff Jeanne Walsh, in full payment for any and all claims which Curtis Williams and Jeanne Walsh 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. 21-cv-11242.

APPROVED:
CONRAD MALLETT
Corporation Counsel

BY: /s/James D. Noseda
James D. Noseda
Supervising Assistant Corporation Counsel

Approved by City Council: _____

Approved by the Mayor: _____