



LAW DEPARTMENT

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October 24, 2022

HONORABLE CITY COUNCIL

RE: Sean Hayes et al v City of Detroit
Case No: 20-008694-NF
File No: L20-00455 (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 **One HUNDRED FORTY-THREE THOUSAND TWO HUNDRED DOLLARS AND NO/CENTS (\$143,200.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **ONE HUNDRED FORTY-THREE THOUSAND TWO HUNDRED DOLLARS AND NO/CENTS (\$143,200.00)** and that Your Honorable Body direct the Finance Director to issue drafts in the amount of (1) **TWENTY TWO THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$22,500.00)** payable to **ADRIAN WOOD** and **HIS** attorneys, **APPLEBAUM & STONE, PLC**; (2) **SEVENTEEN THOUSAND DOLLARS AND NO/CENTS (\$17,000.00)** payable to **OMAR ROSS** and **HIS** attorneys, **APPLEBAUM & STONE, PLC**; (3) **TWENTY THOUSAND DOLLARS AND NO/CENTS (\$20,000.00)** payable to **REGINALD HENDERSON** and **HIS** attorneys, **APPLEBAUM & STONE, PLC**; (4) **FORTY THOUSAND DOLLARS AND NO/CENTS (\$40,000.00)** payable to **NORTHLAND RADIOLOGY, INC.** and **ITS** attorneys, **GARY R. BLUMBERG P.C.**; (5) **TWENTY TWO THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$22,500.00)** payable to **SCAN CLEAR, LLC** and **ITS** attorneys, **ERSKINE LAW**; (6) **ONE THOUSAND TWO HUNDRED DOLLARS AND NO/CENTS (\$1,200.00)** payable to **PRIME REHABILITATION SERVICES, LLC** and **ITS** attorneys, **ERSKINE LAW**; (7) **SEVEN THOUSAND DOLLARS AND NO/CENTS (\$7,000.00)** PAYABLE TO **PRISM LAB, LLC** and **ITS** attorneys, **ERSKINE LAW**; (8) **SEVEN THOUSAND DOLLARS AND NO/CENTS (\$7,000.00)** payable to **JOINT AND SPINE SPECIALISTS, PLLC** and **ITS** attorneys, **ERSKINE LAW**; and (9) **SIX THOUSAND DOLLARS AND NO/CENTS (\$6,000.00)** payable to **RENEW PHYSICAL THERAPY** and **ITS** attorneys, **ISSA FAWAZ LAW, PLC**; to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 20-008694-NF, approved by the Law Department.

Respectfully submitted,

/s/ Yuvonne Bradley

Yuvonne Bradley

Supervising Assistant Corporation Counsel

APPROVED:
Conrad Mallett
Corporation Counsel

BY: /s/Jerry L. Ashford
Jerry L. Ashford

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 **ONE HUNDRED FORTY-THREE THOUSAND TWO HUNDRED DOLLARS AND NO/CENTS (\$143,200.00)**; 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 (1) **ADRIAN WOOD** and HIS attorneys, **APPLEBAUM & STONE, PLC** in the amount of **TWENTY TWO THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$22,500.00)**; (2) **OMAR ROSS** and HIS attorneys, **APPLEBAUM & STONE, plc** in the amount of **SEVENTEEN THOUSAND DOLLARS AND NO/CENTS (\$17,000.00)**; (3) **REGINALD HENDERSON** and HIS attorneys, **APPLEBAUM & STONE, PLC** in the amount of **TWENTY THOUSAND DOLLARS AND NO/CENTS (\$20,000.00)**; (4) **NORTHLAND RADIOLOGY, INC.** and ITS attorneys, **GARY R. BLUMBERG, P.C.** in the amount of **FORTY THOUSAND DOLLARS AND NO/CENTS (\$40,000.00)**; (5) **SCAN CLEAR, LLC** and ITS attorneys, **ERSKINE LAW** in the amount of **TWENTY TWO THOUSAND FIVE HUNDRED AND NO/CENTS (\$22,500.00)**; (6) **PRIME REHABILITATION SERVICES, LLC** and ITS attorneys, **ERSKINE LAW** in the amount of **ONE THOUSAND TWO HUNDRED DOLLARS AND NO/CENTS (\$1,200.00)**; (7) **PRISM LAB, LLC** and ITS attorneys, **ERSKINE LAW** in the amount of **SEVEN THOUSAND DOLLARS AND NO/CENTS (\$7,000.00)**; (8) **JOINT AND SPINE SPECIALISTS, PLLC** and ITS attorneys, **ERSKINE LAW** in the amount of **SEVEN THOUSAND DOLLARS AND NO/CENTS (\$7,000.00)**; and

(9) **RENEW PHYSICAL THERAPY** and **ITS** attorneys, **ISSA FAWAZ LAW, PLC** in the amount of **SIX THOUSAND DOLLARS AND NO/CENTS (\$6,000.00)**; in full payment for any and all claims which Adrian Wood, Omar Ross, Reginald Henderson, Northland Radiology, Inc., Scan Clear, LLC, Prime Rehabilitation Services, LLC, Prism Lab, LLC, Joint and Spine Specialists, PLLC and Renew Physical Therapy may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about 12/09/2019, and otherwise set forth in Case No. 20-008694-NF, said amounts to be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 20-008694-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: _____