



LAW DEPARTMENT

Coleman A. Young Municipal Center
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October 25, 2022

HONORABLE CITY COUNCIL

RE: Complete Imaging (Quinn Jenkins and Anita Jenkins) v City of Detroit
Case No: 20-006365-NF
File No: L20-00208 (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 of the PIP claims in the amount of **SEVEN THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$7,500.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle the PIP matter in the amount of **SEVEN THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$7,500.00)** and that Your Honorable Body direct the Finance Director to issue a draft in the amount of **SEVEN THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$7,500.00)** payable to **COMPLETE IMAGING** and ITS attorneys, **THE KHURANA LAW FIRM**, to be delivered upon receipt of a properly executed Release and a Stipulation and Order of Dismissal entered in Lawsuit No. 20-006365-NF, approved by the Law Department.

Respectfully submitted,

/s/ Yuvonne Bradley

Yuvonne Bradley

Supervisor Assistant Corporation Counsel

APPROVED:
CONRAD MALLETT
Corporation Counsel

BY: /s/Jerry L. Ashford
Jerry L. Ashford
Chief of Litigation Attachments

Attachments

R E S O L U T I O N

BY COUNCIL MEMBER _____ :

RESOLVED, that settlement of the above PIP matter be and is hereby authorized in the amount of **SEVEN THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$7,500.00)**; 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 **COMPLETE IMAGING**, and **ITS** attorneys, **THE KHURANA LAW FIRM**, in the amount of **SEVEN THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$7,500.00)**, in full payment for any and all PIP claims which Complete Imaging may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about October 31, 2019, and otherwise set forth in Case No. 20-006365-NF, that said amount be paid upon receipt of a properly executed Release, Stipulation and Order of Dismissal entered in Lawsuit No. 20-006365-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: _____