



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 23, 2022

HONORABLE CITY COUNCIL

RE: Rite Way Rehab, Inc., et al. (Eben Ford) v. City of Detroit et al.
Case No: 21-1009071-NF
File No: L21-00742(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 SIXTEEN THOUSAND FIVE HUNDRED FIFTY DOLLARS AND NO/CENTS (\$116,550.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **ONE HUNDRED SIXTEEN THOUSAND FIVE HUNDRED FIFTY DOLLARS AND NO/CENTS (\$116,550.00)** and that Your Honorable Body direct the Finance Director to issue a draft in the amount of **ONE HUNDRED SIXTEEN THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$116,550.00)** payable to **CHIROONE CENTERS OF MICHIGAN, PLLC, FIRST RESPONSE TRANSPORTATION, INC. and RITE WAY REHAB, INC.** and **THEIR** attorneys, **KOUSSAN HAMOOD, PLC**, to be delivered upon receipt of a properly executed Release and Stipulation and Order of Dismissal entered in Lawsuit No. 21-009071-NF, approved by the Law Department.

Respectfully submitted,
/s/ Yvonne Bradley
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 **ONE HUNDRED SIXTEEN THOUSAND FIVE HUNDRED FIFTY DOLLARS AND NO/CENTS (\$116,550.00)**; 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 **CHIROONE CENTERS OF MICHIGAN, PLLC, FIRST RESPONSE TRANSPORTATION, INC. and RITE WAY REHAB, INC. and THEIR** attorneys, **KOUSSAN HAMOOD, PLC**, in the amount of **ONE HUNDRED SIXTEEN THOUSAND FIVE HUNDRED FIFTY DOLLARS AND NO/CENTS (\$116,550.00)**, in full payment for any and all claims which **CHIROONE CENTERS OF MICHIGAN, PLLC, FIRST RESPONSE TRANSPORTATION, INC. AND RITE WAY REHAB, INC.** 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. 21-009071-NF, that said amount be paid upon receipt of a properly executed Release, Stipulation and Order of Dismissal entered in Lawsuit No. 21-009071-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: _____