



**LAW DEPARTMENT**

October 21, 2022

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

**HONORABLE CITY COUNCIL**

RE: Veronica Menchaca, Spine, Sports & Occupational Medicine PC and Preferred Rehab, Inc.  
v City of Detroit, Department of Transportation and Jose Arturo Santos  
Case No: 21-008582-NF  
File No: L21-00602 (PP)

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 **FIVE THOUSAND THREE HUNDRED AND FIFTY DOLLARS AND <sup>NO</sup>/CENTS (\$5,350.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **FIVE THOUSAND THREE HUNDRED AND FIFTY DOLLARS AND <sup>NO</sup>/CENTS (\$5,350.00)** and that Your Honorable Body direct the Finance Director to issue a draft in the amount of **THREE HUNDRED AND FIFTY DOLLARS AND <sup>NO</sup>/CENTS (\$350.00)** payable to **SPINE, SPORTS & OCCUPATIONAL MEDICINE PC** and **THEIR** attorneys, **DOUGLAS S. DOVITZ, P.C.**, and a draft in the amount of **FIVE THOUSAND DOLLARS AND <sup>NO</sup>/CENTS (\$5,000.00)** payable to **PREFERRED REHAB, INC.** and **THEIR** attorneys, **DOUGLAS S. DOVITZ, P.C.** to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 21-008582-NF, approved by the Law Department.

Respectfully submitted,

/s/Patricia J. Porter  
**Patricia J. Porter**  
Assistant Corporate Counsel

**APPROVED:**  
CONRAD MALLETT  
Corporation Counsel

BY: /s/Yuvonne R. Bradley  
**Yuvonne R. Bradley**  
Supervising Assistant Corporate Counsel

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 **FIVE THOUSAND THREE HUNDRED AND FIFTY DOLLARS AND <sup>NO</sup>/CENTS (\$5,350.00)**; 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) **PREFERRED REHAB, INC.** and **THEIR** attorney, **DOUGLAS S. DOVITZ, P.C.**, in the amount of **FIVE THOUSAND DOLLARS AND <sup>NO</sup>/CENTS (\$5,000.00)** and (2) **SPINE, SPORTS & OCCUPATIONAL MEDICINE PC** and **THEIR** attorneys, **DOUGLAS S. DOVITZ, P.C.**, in the amount of **THREE HUNDRED AND FIFTY DOLLARS AND <sup>NO</sup>/CENTS (\$350.00)** in full payment for any and all claims which Intervening Plaintiffs Spine, Sports & Occupational Medicine PC and Preferred 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 August 3, 2020, and otherwise set forth in Case No. 21-008582-NF, that said amounts be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal of the Intervening Complaint be entered in Lawsuit No. 21-008582-NF and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED:**  
**CONRAD MALLETT**  
Corporation Counsel

BY: /s/Yuvonne R. Bradley  
**Yuvonne R. Bradley**  
Supervising Assistant Corporate Counsel

Approved by City Council: \_\_\_\_\_

Approved by the Mayor: \_\_\_\_\_