



**LAW DEPARTMENT**

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October 27, 2022

**HONORABLE CITY COUNCIL**

RE: **KENDRICK SCOTT v. CATHERINE ADAMS, et al**  
19-12718  
L19-00767(JLA)

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 **Eight Million Two Hundred Fifty Thousand Dollars and NO/Cents (\$8,250,000.00)** is in the best interest of the City of Detroit.

The Plaintiff has requested that a group of structured settlements, in which some payments are deferred, be used to resolve this matter. We, therefore, request authorization to settle this matter in the amount of **Eight Million Two Hundred Fifty Thousand Dollars and NO/Cents (\$8,250,000.00)** and that Your Honorable Body direct the Finance Director to issue one draft in the amount of **Four Million Four Hundred Fifty Thousand Five Hundred Six Dollars and Sixty-Nine Cents (\$4,450,506.69)** payable to Kendrick Scott and his attorneys Emery Celli Brinckerhoff Abady Ward & Maazel LLP, a second draft in the amount of **Two Million Seven Hundred Seventy Three Thousand Three Hundred Sixty Dollars and Ninety-Nine Cents (\$2,773,360.99)** payable to MetLife Assignment Company, Inc., a third draft in the amount of **Five Hundred Twenty-Six Thousand One Hundred Thirty-Two Dollars and Thirty-Two Cents (\$526,132.32)** payable to Structured Assignments, SCC, and a final draft in the amount of **Five Hundred Thousand Dollars and No Cents (\$500,000.00)** payable to Dominion Assignment Company (Switzerland) SPC Limited, all drafts to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 19-12718, approved by the Law Department.

Respectfully submitted,

/s/ Jerry L. Ashford  
Chief of Litigation

**APPROVED:**  
CONRAD L. MALLETT, JR.  
Corporation Counsel

BY: /s/Charles N. Raimi  
**Charles N. Raimi**  
Deputy Corporation Counsel  
Attachments

**R E S O L U T I O N**

**BY COUNCIL MEMBER \_\_\_\_\_:**

**RESOLVED**, that settlement of the above matter is hereby authorized in the amount of **Eight Million Two Hundred Fifty Thousand Dollars and NO/Cents (8,250,000.00)**; and be it

**RESOLVED**, that the Finance Director be and is hereby authorized and directed to draw warrants upon the proper account in the amount of:

- (1) Four Million Four Hundred Fifty Thousand Five Hundred Six Dollars and Sixty-Nine Cents (\$4,450,506.69) payable to Kendrick Scott and his attorneys Emery Celli Brinckerhoff Abady Ward & Maazel LLP;**
- (2) Two Million Seven Hundred Seventy-Three Thousand Three Hundred Sixty Dollars and Ninety-Nine Cents (\$2,773,360.99) payable to MetLife Assignment Company, Inc.;**
- (3) Five Hundred Twenty-Six Thousand One Hundred Thirty-Two Dollars and Thirty-Two Cents (\$526,132.32) payable to Structured Assignments, SCC;  
and**
- (4) Five Hundred Thousand Dollars and No Cents (\$500,000.00) payable to Dominion Assignment Company (Switzerland) SPC Limited.**

These payments are in full payment for any and all claims which Kendrick Scott may have against the City of Detroit and any other City of Detroit employees by reason of alleged wrongful imprisonment beginning on or about May 8, 1999, and as otherwise referenced and described in Case No. 19-12718, that said amounts be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 19-12718 and, where deemed necessary by the Law Department, a properly executed Medicare/CMS Final Demand Letter.

**APPROVED: October 30, 2022**

CONRAD L. MALLETT, JR.  
Corporation Counsel

BY: /s/Charles N. Raimi  
**Charles N. Raimi**  
Deputy Corporation Counsel

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

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