



LAW DEPARTMENT

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December 22, 2022

HONORABLE CITY COUNCIL

RE: Tox Testing, Metro Toxicology Labs, Select Medical Group, and US Health
Pharmaceuticals (Cheryl Gill and Gregory Glenn) v. City of Detroit
Case No: 21-002344-NF (Consolidated Cases: 21-002737-NF and 21-002646-NF)
File No: L21-00219 (Consolidated Matters: L21-00281 and L21-00226)

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 **Twenty-Five Thousand Five-Hundred Dollars and ^{NO}/Cents (\$25,500.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **Twenty-Five Thousand Five-Hundred Dollars and ^{NO}/Cents (\$25,500.00)** and that Your Honorable Body direct the Finance Director to issue a draft in that amount payable to Tox Testing, Metro Toxicology Labs, Select Medical Group, and US Health Pharmaceuticals and **THEIR** attorney, **PUZIO LAW, P.C.**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit Nos. 21-002344-NF, 21-002737-NF, and 21-002646-NF, approved by the Law Department.

Respectfully submitted,

/s/

Gregory B. Paddison

Gregory B. Paddison (P75963)

Senior Assistant Corporation Counsel

APPROVED: January 3, 2023

Conrad Mallett
Corporation Counsel

BY: / s/ Patrick Cunningham

Patrick Cunningham

Supervising Assistant Corporation 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 **Twenty-Five Thousand Five-Hundred Dollars and ^{NO}/Cents (\$25,500.00)**; 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 Tox Testing, Metro Toxicology Labs, Select Medical Group, and US Health Pharmaceuticals and **THEIR** attorney, **PUZIO LAW, P.C.**, in the amount of **Twenty-Five Thousand Five-Hundred Dollars and ^{NO}/Cents (\$25,500.00)** in full payment for any and all claims which Tox Testing, Metro Toxicology Labs, Select Medical Group, and US Health Pharmaceuticals may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about March 2, 2020, and otherwise set forth in Lawsuit Nos. 21-002344-NF, 21-002737-NF, and 21-002646-NF, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit Nos. 21-002344-NF, 21-002737-NF, and 21-002646-NF, and where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

APPROVED: January 3, 2023

Conrad Mallett
Corporation Counsel

BY: /s/Patrick Cunningham

Patrick Cunningham
Supervising Assistant Corporation Counsel

Approved by City Council: _____

Approved by the Mayor: _____