



**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

February 1, 2023

**HONORABLE CITY COUNCIL**

RE: Apex Physical Therapy Services, LLC (A. Williams) v City of Detroit  
Case No: 22-185275  
File No: L22-01066 (CLR)

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 **Six Thousand Dollars and <sup>NO</sup>/Cents (\$6,000.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **Six Thousand Dollars and <sup>NO</sup>/Cents (\$6,000.00)** and that Your Honorable Body direct the Finance Director to issue a draft in that amount payable to Apex Physical Therapy Serviced, LLC and its attorneys, Dobson Fowler Williams & Nesi PC, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 22-185275, approved by the Law Department.

Respectfully submitted,

Cheryl L. Ronk  
Senior Assistant Corporation Counsel

**APPROVED:**  
CONRAD MALLETT  
Corporation Counsel

BY: /s/ James D. Noseda  
**James D. Noseda**  
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 **Six Thousand Dollars and <sup>NO</sup>/Cents (\$6,000.00)**; 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 Apex Physical Therapy Services, LLC and its attorney, Dobson Fowler Williams & Nesi PC, in the amount of **Six Thousand Dollars and <sup>NO</sup>/Cents (\$6,000.00)** in full payment for any and all claims which Apex Physical Therapy Services, LLC may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about December 31, 2010, and otherwise set forth in Case No., that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Lawsuit No. 22-185275 and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

**APPROVED:**  
CONRAD MALLETT  
Corporation Counsel

BY: /s/James D. Noseda  
**James D. Noseda**  
Supervising Assistant Corporation Counsel

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

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