

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

April 17, 2023

## HONORABLE CITY COUNCIL

## RE: ADJONI YOUNG V VERNON TURNER, CITY OF DETROIT DEPARTMENT OF TRANSPORTATION, KAREN CLAUDIA TARVER AND JANE DOE CASE NO.: 20-003124-NF AND 22-003447-NI FILE NO: L20-00145 and L22-01057

We have reviewed the above-captioned lawsuits, 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 AND TWENTY THOUSAND Dollars and** <sup>NO</sup>/Cents (\$120,000.00) is in the best interest of the City of Detroit.

We, therefore, request authorization to settle these matters for a global resolution in the amount of **ONE-HUNDRED AND TWENTY THOUSAND Dollars and** <sup>NO</sup>/Cents (\$120,000.00), which would include a waiver of all past, present and future benefits, and that Your Honorable Body direct the Finance Director to issue a draft in that amount payable to **ADJONI YOUNG and HER attorney, PADILLA LAW GROUP,** to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal of **ADJONI YOUNG'S** claims against Defendants entered in Lawsuit Nos: 20-003124-NF and 22-003447-NI, approved by the Law Department.

Very truly yours,

*Krystal A. Crittendon* Krystal A. Crittendon

Attachments

APPROVED: CONRAD MALLETT Corporation Counsel

BY: /s/ Jerry L. Ashford Jerry L. Ashford Chief of Litigation

## <u>R E S O L U T I O N</u>

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## BY COUNCIL MEMBER

**RESOLVED**, that settlement of the above matter be and is hereby authorized in the amount of **ONE-HUNDRED AND TWENTY THOUSAND Dollars and** <sup>NO</sup>/**Cents** (\$120,000.00); 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 **ADJONI YOUNG and her attorney**, **PADILLA LAW GROUP**, in the amount of **ONE-HUNDRED AND TWENTY THOUSAND Dollars and** <sup>NO</sup>/**Cents** (\$120,000.00) in full payment for any and all claims which **ADJONI YOUNG** may have against the City of Detroit, Operator Vernon Turner, and any other City of Detroit employees by reason of alleged injuries sustained on or about **March 27, 2019**, and otherwise set forth in Lawsuit Nos: 20-003124-NF and 22-003447-NI, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in **Lawsuit Case Nos. 20-003124-NF and 22-003447-NI** 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: \_\_\_\_\_