



**LAW DEPARTMENT**

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March 31, 2023

**HONORABLE CITY COUNCIL**

RE: Rite Way Rehab Inc., et al. (Eben Ford) v. City of Detroit  
Case No: 23-001219-NF  
File No: L23-00080 (YRB)

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 **EIGHTEEN THOUSAND SEVEN HUNDRED DOLLARS AND NO/CENTS (\$18,700.00)** is in the best interest of the City of Detroit.

We, therefore, request authorization to settle this matter in the amount of **EIGHTEEN THOUSAND SEVEN HUNDRED DOLLARS AND NO/CENTS (\$18,700.00)** and that Your Honorable Body direct the Finance Director to issue drafts (1) in the amount of **TWELVE THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$12,500.00)** payable to **RITE WAY REHAB, INC.** and **THEIR** attorneys, **KOUSSAN HAMOOD, PLC**; (2) **TWO THOUSAND SEVEN HUNDRED DOLLARS AND NO/CENTS (\$2,700.00)** payable to **FIRST RESPONSE TRANSPORTATION, INC.** and **THEIR** attorneys, **KOUSSAN HAMOOD, PLC**; and (3) **THREE THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$3,500.00)** payable to **CHIROONE CENTERS OF MICHIGAN, PLLC**, and **THEIR** attorneys, **KOUSSAN HAMOOD, PLC**, to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 23-001219-NF, approved by the Law Department.

Respectfully submitted,

Yvonne Bradley

Yvonne Bradley

Supervisor Assistant Corporation Counsel

**APPROVED:**

CONRAD MALLET

Corporation Counsel

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

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 **EIGHTEEN THOUSAND SEVEN HUNDRED DOLLARS AND NO/CENTS (\$18,700.00);** 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 (1) **RITE WAY REHAB, INC. and THEIR** attorneys, **KOUSSAN HAMOOD, PLC**, in the amount of **TWELVE THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$12,500.00);** (2) **FIRST RESPONSE TRANSPORTATION, INC. AND THEIR ATTORNEYS, KOUSSAN HAMOOD, PLC**, in the amount of **TWO THOUSAND SEVEN HUNDRED DOLLARS AND NO/CENTS (\$2,700.00);** and (3) **CHIROONE CENTERS OF MICHIGAN, PLLC., and THEIR** attorneys, **KOUSSAN HAMOOD, PLC**, in the amount of **THREE THOUSAND FIVE HUNDRED DOLLARS AND NO/CENTS (\$3,500.00)**, in full payment for any and all claims which Rite Way Rehab, Inc., First Response Transportation, Inc. and Chiroone Centers of Michigan, PLLC., may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained on or about March 6, 2020, and otherwise set forth in Case No. 23-001219-NF, that said amount be paid upon receipt of properly executed Releases, and Stipulation and Order of Dismissal entered in Lawsuit No. 23-001219 NF 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: \_\_\_\_\_