



LAW DEPARTMENT

Coleman A. Young Municipal Center
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May 4, 2023

HONORABLE CITY COUNCIL

RE: Gilead Traumatic Brain & Back Rehab, LLC and Sears Transportation, LLC (Assignees of Tinisha Washington) v City of Detroit
Case No: 21-142494 GC
File No: L20-00439 (YRB)

On March 23, 2023, Your Honorable Body approved authority to settle the above identified civil matter in the total amount of \$8,500.00. The total amount of the settlement was incorrect and the settlement amount for each plaintiff was not specified. We, therefore, request that Your Honorable Body rescind the original resolution, adopt the amended resolution submitted herewith and direct the Finance Director to immediately issue drafts totaling **ELEVEN THOUSAND FIVE HUNDRED DOLLARS AND NO CENTS (\$11,500.00)** and that Your Honorable Body direct the Finance Director to immediately issue drafts payable to

1. **GILEAD TRAUMATIC BRAIN & BACK REHAB, LLC and THEIR attorney, ANDREOPOULOS & HILL, PLLC, in the amount of NINE THOUSAND DOLLARS AND NO CENTS (\$9,000.00); and**
2. **SEARS TRANSPORTATION, LLC and THEIR attorney, ANDREOPOULOS & HILL, PLLC, in the amount of TWO THOUSAND FIVE HUNDRED DOLLARS AND NO CENTS (\$2,500.00)**

to be delivered upon receipt of properly executed Releases and Stipulation and Order of Dismissal entered in Lawsuit No. 21-142494 GC approved by the Law Department. **WAIVER OF RECONSIDERATION IS REQUESTED.**

Respectfully submitted,

Yvonne Bradley
Yvonne Bradley
Supervising Assistant Corporation Counsel

APPROVED:
CONRAD MALLET
Corporation Counsel

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

AMENDED RESOLUTION

BY COUNCIL MEMBER _____:

RESOLVED, that the resolution of March 23, 2023 authorizing the settlement in the above matter is hereby **RESCINDED**; and be it further:

RESOLVED that settlement of the above matter be and is hereby authorized in the amount of **ELEVEN THOUSAND FIVE HUNDRED DOLLARS AND ^{NO}/CENTS (\$11,500.00)**; 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:

1. **GILEAD TRAUMATIC BRAIN & BACK REHAB, LLC** and **THEIR** attorney, **Andreopoulos & Hill, PLLC**, in the amount of **OF NINE THOUSAND DOLLARS AND NO CENTS (\$9,000.00)**; and
2. **SEARS TRANSPORTATION, LLC** and **THEIR** attorney, **ANDREOPOULOS & HILL, PLLC**, in the amount of **TWO THOUSAND FIVE HUNDRED DOLLARS AND NO CENTS (\$2,500.00)**

in full payment for any and all claims which Gilead Traumatic Brain & Back Rehab, LLC and Sears Transportation, LLC may have against the City of Detroit and any other City of Detroit employees by reason of alleged injuries sustained by Tinisha Washington on or about March 16, 2017, and otherwise set forth in Consolidated Case No: 21-142494 GC, that said amount be paid upon receipt of properly executed Releases, Stipulation and Order of Dismissal entered in Consolidated Case No: 21-142494 GC and, where deemed necessary by the Law Department a properly executed Medicare/CMS Final Demand Letter.

APPROVED:
CONRAD MALLET
Corporation Counsel

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

Approved by City Council: _____

Approved by the Mayor: _____