

plaintiff, his partner, defendant POLANSKI, according to the custom, practice or policy of the defendant CITY OF DETROIT, stood by and did nothing to stop the assaults and batteries upon the plaintiff.

13. Defendants PONGRACZ and POLANSKI transported plaintiff to the Detroit police precinct located at Fort and Green. During the ride, defendant PONGRACZ continued to verbally abuse the plaintiff by calling her foul and slanderous names and he threatened to kill her husband and her children.

14. When defendants PONGRACZ and POLANSKI arrived with the plaintiff at the precinct garage, defendant PONGRACZ dragged plaintiff out of the police car and she complained about her foot. Defendant PONGRACZ then brutally stomped on her bare, injured foot with his heel while defendant POLANSKI stood by and watched according to the custom, practice or policy of the defendant CITY OF DETROIT.

15. When defendants POLANSKI and PONGRACZ took the plaintiff into the precinct station, the plaintiff complained to other officers in the station about the assaults and batteries committed upon her by defendant PONGRACZ and about his drunken condition.

16. While at the Fort and Green police station, the plaintiff was searched and she was held there until she was transported by two unknown police officers to Receiving Hospital for medical attention to her injured foot.

17. At Detroit Receiving Hospital, the police officers chained plaintiff by her left foot and left arm to a