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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

YVETTE NORTON, et al.,

Plaintiffs,

v.

MAXIMUS INC.,

Defendant.

Case No. 1:14-cv-00030-WBS

**MAXIMUS, INC.’S RESPONSE IN
SUPPORT OF PLAINTIFFS’ MOTION TO
APPROVE SETTLEMENT OF
SUPERVISORS’ CLAIMS**

Defendant MAXIMUS INC. (“MAXIMUS”) files this response in support of Plaintiffs’ Motion to Certify Class and Approve Settlement of Supervisors’ Claims (Dkt. 206). In addition, MAXIMUS has no objection to the Notice to Supervisors of Proposed Settlement (Dkt. 206-2) submitted with the Motion.

MAXIMUS joins the Supervisor Plaintiffs in seeking approval of the settlement because it resolves a bona fide dispute and is a fair and reasonable resolution of the Supervisors’ claims. Although MAXIMUS does not agree that it misclassified the Supervisors, either in terms of the Salary Basis Test or the duties they performed, the settlement will avoid further expense and risk associated with protracted litigation. Based on the record related to the litigation of the

Supervisors' claims, there is no doubt the settlement reflects a reasonable compromise over issues that were actually in dispute. *Gamble v. Boyd Gaming Corp.*, 2015 WESTLAW 4874276 *4 (D. Nev. 2015).

Therefore, together with the Supervisor Plaintiffs, MAXIMUS respectfully requests the Court approve the settlement and enter an order substantially like that entered when the Court approved the partial settlement of the Trainers' claims (Dkt. 139).

DATED this 6th day of December, 2016.

HOLLAND & HART LLP

By s/B. Newal Squyres
B. Newal Squyres, of the Firm
Attorneys for Defendant MAXIMUS Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of December, 2016, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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