IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

CHAD LYONS; and CHRISTIAN TAVERAS, individually and on behalf of others similarly situated, Plaintiffs, vs. IR LABS DE, LLC; and SOURCETEK, INC. Defendants.	)	Case No. 4:24-cv-00002-SHL-SBJ **JOINT STATUS REPORT**

COME NOW Chad Lyons and Christian Taveras ("Plaintiffs") and IR Labs, LLC ("IR Labs") and SourceTek, Inc. ("SourceTek") (collectively, "Defendants"), by and through their undersigned counsel, and provide the Court with the following Joint Status Report in advance of the status conference scheduled for January 15, 2025.

1. Plaintiffs in this matter have asserted a class action and collective action against Defendants for alleged violations of the federal Worker Adjustment and Retraining Notification Act ("WARN") and the Fair Labor Standards Act ("FLSA"), which claims Defendants deny.

2. The Parties have exchanged documents, payroll data, timekeeping data, and other information and have thoroughly investigated the claims and defenses. The Parties have engaged in extensive settlement negotiations, including an all-day mediation session on May 22, 2024, presided over by an experienced third-party mediator, the Honorable John A. Jarvey, which resulted in an agreement in principle to resolve the FLSA claims of a defined group of employees of IR Labs. However, at the mediation, the Parties were unable to resolve any of the other claims asserted. Thereafter, the Parties continued to exchange information and engage in extensive

negotiations to resolve the remaining claims. In mid-September, the Parties reached an agreement in principle to resolve the FLSA and WARN claims of a separate, defined group of employees of SourceTek. In late September, the Parties reached an agreement in principle to resolve the WARN claims and other claims of a separate, defined group of employees of IR Labs.

3. After all the substantive claims were resolved in principle, the Parties started to exchange information and engage in extensive negotiations to resolve the remaining claims for attorneys' fees and costs. In December 2024, Plaintiffs and IR Labs reached an agreement in principle to resolve Plaintiffs' claims for attorneys' fees and costs, though some issues remain.

4. Further, since the substantive claims were resolved in principle, the Parties have prepared a formal settlement agreement and exchanged numerous drafts. The settlement agreement is nearly finalized, though some details remain to be worked out. The Parties have also started preparing other settlement documents, including a joint motion for settlement approval, as well as a notice of settlement and claim form to be sent to a defined group of IR Labs employees. IR Labs has also obtained quotes from third-party settlement administrators to perform various settlement administration tasks set forth in the settlement agreement.

5. There has been some delay due to a large tree falling on the house of counsel for IR Labs during Hurricane Helene, as well as typical holiday delays for the Parties during November and December. Nevertheless, the Parties expect to finalize all the settlement documents and submit a joint motion for settlement approval within the next 30 days.

6. The Parties leave it to the Court's discretion whether to proceed with the status conference scheduled for January 15, 2025.

By: */s/William Robert Gignilliat, IV*

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CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which sent notification of such filing to all the Parties.

/s/ Randall D. Armentrout
Randall D. Armentrout