

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

JULIE A. SU,
Acting Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

UMR, INC.,

Defendant.

CIVIL ACTION NO. 3:23-CV-00513

District Judge William M. Conley

Magistrate Judge Anita M. Boor

**PARTIES' JOINT NOTICE OF AGREEMENT IN PRINCIPLE TO SETTLE CASE AND
MOTION TO VACATE DEADLINES**

Plaintiff Julie A. Su, Acting Secretary of Labor, U.S. Department of Labor (the "Acting Secretary") and Defendant UMR, Inc. ("UMR") hereby notify the Court that the parties have reached an agreement in principle to settle this case. The parties respectfully request that the Court vacate all currently pending deadlines (*see* Dkts. 27 and 40), and request the Court's permission to file a proposed Consent Judgment by December 5, 2024.

[signatures on next page]

Dated: October 18, 2024

For Defendant:

/s/ Geoffrey M. Sigler

GEOFFREY M. SIGLER (*pro hac vice*)

MATTHEW S. ROZEN (*pro hac vice*)

ANDREW G.I. KILBERG (*pro hac vice*)

Gibson, Dunn, Crutcher LLP

1050 Connecticut Ave. NW

Washington, DC 20036

Tel: 202-955-8500

gsigler@gibsondunn.com

mrozen@gibsondunn.com

akilberg@gibsondunn.com

KEVIN ST. JOHN

Bell Giftos St. John LLC

5325 Wall Street, Ste. 2200

Madison, WI 53718

Tel: 608-216-7990

kstjohn@bellgiftos.com

For the Acting Secretary:

SEEMA NANDA

Solicitor of Labor

CHRISTINE Z. HERI

Regional Solicitor

JEFFERY S. ROGOFF

Regional Solicitor

/s/ Lydia Fakis

LYDIA J. FAKLIS

Office of the Solicitor

U.S. Department of Labor

230 S. Dearborn St., Ste. 844

Chicago, IL 60604

Tel: 312-353-7837

molte.elisabeth.p@dol.gov

faklis.lydia.j@dol.gov

ROSEMARY ALMONTE

Office of the Solicitor

U.S. Department of Labor

201 Varick St., Ste. 983

New York, NY 10014

Tel: 646-264-3668

almonte.rosemary@dol.gov