

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE, EASTERN DIVISION

**Laura Canaday, individually and on behalf of all others similarly
situated v. The Anthem Companies, Inc.**

Canaday · No. 1:19-cv-01084-STA-jay · Decided January 26, 2026

SUMMARY

The court acknowledges the parties' notice that they reached an out-of-court settlement in this FLSA action and continues the scheduled trial and pretrial conference. The court grants the parties 45 days to file a joint motion seeking approval of the settlement, with the motion due March 12, 2026.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee, Eastern Division
WRITING FOR THE COURT	S. Thomas Anderson
JURISDICTION	United States District Court for the Western District of Tennessee, Eastern Division
DECIDED	January 26, 2026
DOCKET	1:19-cv-01084-STA-jay
DISPOSITION	other
PROCEDURAL POSTURE	The parties notified the court that they had reached an out-of-court settlement in an FLSA action and jointly requested 45 days to file a motion for approval of the settlement.
STANDARD OF REVIEW	For an FLSA settlement, the district court scrutinizes the proposed agreement for fairness and determines whether it is a fair and reasonable resolution of a bona fide dispute over FLSA provisions.
PRECEDENTIAL VALUE	Nonprecedential procedural order
PARTIES	Laura Canaday, individually and on behalf of all others similarly situated v. The Anthem Companies, Inc.

TOPICS

flsa wage and hour civil procedure

PRACTICE AREAS

employment law

civil procedure

QUESTIONS PRESENTED

1. Whether the parties' notice of settlement satisfied the requirements of Western District of Tennessee Local Rule 83.13(b).
2. Whether the parties should be granted 45 days, rather than the 28 days provided by Local Rule 83.13(b), to file a motion for approval of their FLSA settlement.

HOLDINGS

1. The parties satisfied the notice-of-settlement requirement in Local Rule 83.13(b).
2. The parties were granted 45 days to file a joint motion for approval of their FLSA settlement, with the motion due on or before March 12, 2026.
3. In evaluating an FLSA settlement for fairness, the court examines whether the settlement was achieved in an adversarial context, whether the plaintiffs were represented by attorneys capable of protecting their rights, and whether the settlement reflects a fair and reasonable compromise of the disputed issues.

KEY QUOTATIONS

“A district court must scrutinize a proposed FLSA settlement for fairness and determine whether it is a “fair and reasonable resolution of a bona fide dispute over FLSA provisions.””

“In this analysis, the Court examines three factors: (1) whether the settlement was achieved in an adversarial context, (2) whether the plaintiffs were represented by attorneys who can protect their rights and (3) whether the settlement reflects a fair and reasonable compromise of the issues in dispute.”

FACTUAL BACKGROUND

The parties reported that they had reached an out-of-court agreement resolving their dispute. Because the action involved claims under the Fair Labor Standards Act, the parties sought additional time to submit the settlement for court approval.

PROCEDURAL HISTORY

The case was pending before the United States District Court for the Western District of Tennessee with a non-jury trial and pretrial conference scheduled. After the parties filed a joint notice of settlement, the court continued those dates and granted the parties 45 days to file a joint motion seeking approval of the FLSA settlement.

DISPOSITION

other

CASES CITED

- *Lynn’s Food Stores, Inc. v. United States ex rel. U.S. Dep’t of Labor*, 679 F.2d 1350, 1355 (11th Cir. 1982)
- *Steele v. Staffmark Invs., LLC*, 172 F. Supp. 3d 1024, 1026 (W.D. Tenn. 2016)
- *Lynn’s Food Stores, Inc. v. United States ex rel. U.S. Dep’t of Labor*, 679 F.2d 1350, 1354 (11th Cir. 1982)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE EASTERN DIVISION

LAURA CANADAY, individually and on behalf of all others similarly situated, Plaintiff, v. No.
1:19-cv-01084-STA-jay THE ANTHEM COMPANIES, INC., Defendant.

ORDER ON JOINT NOTICE OF SETTLEMENT

On January 26, 2026, the parties filed a Joint Notice of Settlement (ECF No. 170), reporting that they had reached an out-of-court agreement to resolve their dispute.

Local Rule 83.13(b) requires the parties to any civil action to promptly notify the presiding judge if they reach a settlement. The Rule then gives the parties 28 days to file a final stipulation or motion for dismissal.

The Court finds that the parties have satisfied the notice of settlement required by Local Rule 83.13(b). The Court hereby continues the non-jury trial set for February 23, 2026, and the pretrial conference set for February 13, 2026. Instead of the 28 days granted under the Local Rules for filing a motion or stipulation of dismissal, the parties have requested 45 days to file a motion for approval of their settlement.

In Fair Labor Standards Acts cases, the parties must take the additional step of seeking court approval of any settlement agreement. A district court must scrutinize a proposed FLSA settlement for fairness and determine whether it is a “fair and reasonable resolution of a bona fide dispute over FLSA provisions.” *Lynn’s Food Stores, Inc. v. United States ex rel.*

U.S. Dep’t of Labor, 679 F.2d 1350, 1355 (11th Cir. 1982); *Steele v. Staffmark Invs., LLC*, 172 F. Supp. 3d 1024, 1026 (W.D. Tenn. 2016) (noting the circuit split over “whether settlements or stipulations of dismissal for FLSA claims require court approval” and the fact that the “Sixth Circuit has yet to rule definitively on the question”).

In this analysis, the Court examines three factors: (1) whether the settlement was achieved in an adversarial context, (2) whether the plaintiffs were represented by attorneys who can protect their rights and (3) whether the settlement reflects a fair and reasonable compromise of the issues in dispute. *Lynn’s Food Stores*, 679 F.2d at 1354.

The parties' request to have 45 days in which to file a joint motion for approval of their FLSA settlement is GRANTED. The parties' joint motion is therefore due on or before March 12, 2026. IT IS SO ORDERED. s/ S. Thomas Anderson S. THOMAS ANDERSON UNITED STATES DISTRICT JUDGE Date: January 26, 2026

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