

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

Jonathan Luttrell v. Hardeman County, Tennessee Government

Luttrell · No. 24-1105-STA-cgc · Decided December 3, 2025

SUMMARY

The United States District Court for the Western District of Tennessee addresses the parties’ notice of settlement in an FLSA-related civil action. The Court finds that the parties complied with the local settlement-notice rule and establishes deadlines for notifying the Court if the settlement is rejected or for seeking approval if it is approved by the county commission.

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	December 3, 2025
DOCKET	24-1105-STA-cgc
DISPOSITION	other
PROCEDURAL POSTURE	The parties notified the court that they had reached a settlement in an FLSA action, subject to approval by the Hardeman County Commission. The court entered an order addressing the notice of settlement and the steps required depending on whether the Commission approved the settlement.
STANDARD OF REVIEW	The court stated that an FLSA settlement must be scrutinized for fairness and approved only if it represents a fair and reasonable resolution of a bona fide dispute over FLSA provisions. The court identified consideration of the adversarial nature of the settlement, adequacy of attorney representation, and fairness and reasonableness of the compromise.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation
PARTIES	Jonathan Luttrell v. Hardeman County, Tennessee Government

TOPICS

flsa

wage and hour

civil procedure

PRACTICE AREAS

Fair Labor Standards Act

employment law

civil procedure

QUESTIONS PRESENTED

1. Whether the parties satisfied the settlement-notice requirements of Local Rule 83.13(b).
2. What additional procedure applies to a proposed settlement of the parties' FLSA claims.
3. What deadlines and notifications are required depending on the County Commission's approval or rejection of the settlement.

HOLDINGS

1. The parties satisfied the settlement notice required by Local Rule 83.13(b).
2. The proposed FLSA settlement requires an additional step of seeking court approval, and the district court must scrutinize the agreement for fairness and determine whether it is a fair and reasonable resolution of a bona fide dispute over FLSA provisions.

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

Jonathan Luttrell and Hardeman County reached an agreement to resolve their dispute in an FLSA action. The agreement required approval by the Hardeman County Commission, which was scheduled to consider it at a special-called meeting on December 9, 2025.

PROCEDURAL HISTORY

The parties filed a Notice of Settlement on November 26, 2025, and informed the court on December 2, 2025, that the County Commission would consider the settlement at a special-called meeting on December 9, 2025. The court found that the parties complied with Local Rule 83.13(b), directed them to report promptly if the Commission rejected the settlement, and required a motion for court approval within 28 days of the meeting if the Commission approved it.

DISPOSITION

other

CASES CITED

- *Lynn's Food Stores, Inc. v. United States ex rel. U.S. Department of Labor*, 679 F.2d 1350, 1354-55 (11th Cir. 1982)
- *Steele v. Staffmark Investments, LLC*, 172 F. Supp. 3d 1024, 1026 (W.D. Tenn. 2016)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE EASTERN DIVISION _____ JONATHAN LUTTRELL, Plaintiff, vs. Case No. 24-
1105-STA-cgc JURY DEMANDED HARDEMAN COUNTY, TENNESSEE, GOVERNMENT
Defendant.

ORDER	ON	NOTICE	OF	SETTLEMENT
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On November 26, 2025, the parties filed a Notice of Settlement (ECF No. 53), reporting that they had reached an agreement to resolve their dispute.

The parties also indicated that the Hardeman County Commission would need to approve the settlement. On December 2, 2025, the parties notified the Court that the Commission would take up the settlement at a special-called meeting on December 9, 2025. 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). 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.

In the event the County Commission does not approve the settlement, the parties should notify the Court within 3 days of the special-called meeting. In the event the County Commission does approve the settlement, the parties' motion for approval of their settlement (or any request to extend the deadline to file a motion for approval) is due within 28 days of the special-called meeting.

IT IS SO ORDERED. s/S. Thomas Anderson S. THOMAS ANDERSON UNITED STATES
DISTRICT JUDGE Date: December 3, 2025

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