

WASHINGTON COURT OF APPEALS, DIVISION ONE

Corbin v. Life Care Centers of America, Inc.

Corbin · No. 88134-5-I · Decided April 13, 2026

SUMMARY

The Washington Court of Appeals, Division One, held that the preclusive effect of a class action settlement is determined by the settling parties' intent. Because the prior settlement released absent class members' claims for unpaid COVID-19 testing and screening time, but did not release claims for uncompensated missed meal periods, the court reversed dismissal of Corbin's putative class action and remanded.

CASE DETAILS

COURT	Washington Court of Appeals, Division One
WRITING FOR THE COURT	Birk, J.
JURISDICTION	Washington Court of Appeals, Division One
DECIDED	April 13, 2026
DOCKET	88134-5-I
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from an order granting Life Care's CR 12(b)(6) motion and dismissing a putative class action complaint on claim-preclusion grounds, and from the denial of reconsideration.
STANDARD OF REVIEW	The court reviewed the CR 12(b)(6) dismissal and the application of claim preclusion de novo.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Destiny Corbin, Melanie Andrews v. Life Care Centers of America, Inc.

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QUESTIONS PRESENTED

1. Whether the preclusive effect of a court-approved class action settlement is determined by the settling parties' intent and the scope of the settlement release.
2. Whether the Atkinson class settlement released or otherwise precluded Corbin's claims for uncompensated missed meal periods.
3. Whether dismissal under CR 12(b)(6) was proper.

HOLDINGS

1. The settling parties' intent determines the preclusive effect of a class action settlement agreement rather than general claim-preclusion principles applied without regard to the settlement's scope.
2. The Atkinson settlement released absent class members only from claims for unpaid wages due to COVID-19 testing and screening; it did not release or preclude claims for allegedly uncompensated missed meal periods.
3. Dismissal under CR 12(b)(6) was improper because Corbin's complaint was not barred by claim preclusion on the face of the pleadings and settlement materials considered by the court.

KEY QUOTATIONS

“Thus, “[w]e look to the intent of the settling parties to determine the preclusive effect of a dismissal with prejudice entered in accordance with a settlement agreement, rather than to general principles of claim preclusion.”” (6-7)

“We conclude the parties intended that the absent class members release only claims for unpaid COVID-19 testing and screening. As a result, the Atkinson settlement does not have preclusive effect barring Corbin’s claims for allegedly uncompensated missed meal periods.” (12)

FACTUAL BACKGROUND

Corbin and Andrews were absent class members in the Atkinson class action, which settled claims for unpaid time spent undergoing COVID-19 testing and screening. The approved settlement released absent class members only from claims for unpaid wages due to COVID-19 testing and screening, while the named representatives gave a broader employment-related release. Five days after final approval, Corbin filed a putative class action alleging that Life Care failed to compensate employees for missed meal periods because of understaffing and inadequate enforcement of meal-break policies.

PROCEDURAL HISTORY

Corbin and Andrews, absent members of a settlement class in the Atkinson action, filed a putative class action alleging unpaid compensation for missed meal periods under Washington's Minimum Wage Act. The superior court dismissed the complaint, concluding that claim preclusion barred the claims because they were not asserted in the prior action, and denied reconsideration. The Court of Appeals reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The opinion directs reversal of the superior court's dismissal and remand for further proceedings. It does not provide more specific instructions.

CASES CITED

- Taylor v. Sturgell, 553 U.S. 880, 892 n.5, 128 S. Ct. 2161, 171 L. Ed. 2d 155 (2008)
- Migra v. Warren City School District Board of Education, 465 U.S. 75, 77 n.1, 104 S. Ct. 892, 79 L. Ed. 2d 56 (1984)
- Tavaglione v. Dehkhoda & Qadri, PC, 34 Wn. App. 2d 515, 519, 568 P.3d 1158 (2025)
- P.E. Sys., LLC v. CPI Corp., 176 Wn.2d 198, 203, 289 P.3d 638 (2012)
- San Juan County v. No New Gas Tax, 160 Wn.2d 141, 164, 157 P.3d 831 (2007)
- Jackson v. Quality Loan Serv. Corp., 186 Wn. App. 838, 843, 347 P.3d 487 (2015)
- Carter v. MultiCare Health Sys., 31 Wn. App. 2d 755, 773, 553 P.3d 98 (2024)
- Knuth v. Beneficial Washington, Inc., 107 Wn. App. 727, 31 P.3d 694 (2001)
- Pederson v. Potter, 103 Wn. App. 62, 73, 11 P.3d 833 (2000)
- Hadley v. Cowan, 60 Wn. App. 433, 444-45, 804 P.2d 1271 (1991)
- Wojciechowski v. Kohlberg Ventures, LLC, 923 F.3d 685, 689-91 (9th Cir. 2019)
- Grimes v. Vitalink Communications Corp., 17 F.3d 1553, 1557 (3d Cir. 1994)
- Summers v. Sea Mar Community Health Centers, 29 Wn. App. 2d 476, 504-05, 541 P.3d 381 (2023), review denied sub nom. Barnes v. Sea Mar Community Health Centers, 3 Wn.3d 1002, 549 P.3d 112 (2024)
- Hesse v. Sprint Corp., 598 F.3d 581, 590 (9th Cir. 2010)
- Deien v. Seattle City Light, 26 Wn. App. 2d 57, 65, 527 P.3d 102 (2023)
- Lopez v. Nights of Cabiria, LLC, 96 F. Supp. 3d 170, 181 (S.D.N.Y. 2015)
- Condon v. Condon, 177 Wn.2d 150, 162, 298 P.3d 86 (2013)
- Hearst Communications, Inc. v. Seattle Times Co., 154 Wn.2d 493, 502-04, 115 P.3d 262 (2005)
- C.A. Carey Corp. v. City of Snoqualmie, 29 Wn. App. 2d 890, 907, 547 P.3d 247, review denied, 3 Wn.3d 1012, 554 P.3d 1219 (2024)
- McAdams v. Robinson, 26 F.4th 149, 158 (4th Cir. 2022)
- In re TikTok, Inc., Consumer Privacy Litigation, 713 F. Supp. 3d 470, 487-88 (N.D. Ill. 2024)
- Nunez v. BAE Systems San Diego Ship Repair, Inc., 292 F. Supp. 3d 1018, 1047 (S.D. Cal. 2017)

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