

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
AT KANSAS CITY**

**CRAIG ADAMS and  
JOSEPH W. KNOPP, III**

**Plaintiff,**

**v.**

**THE CITY OF KANSAS CITY, MISSOURI**

**Defendants.**

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**Case No. 4:19-cv-00093**

**PLAINTIFFS' UNOPPOSED MOTION AND  
MEMORANDUM IN SUPPORT OF MOTION TO APPROVE SETTLEMENT**

The Parties have reached an agreement to settle this case. The settlement is fair, reasonable, and beneficial to the class members and should be readily approved. The settlement is the result of over three years of heavily contested litigation between Plaintiffs, who comprise a group of current and former Fire Department employees who received specialty pay, employed by Defendant, and the Defendant, the City of Kansas City, Missouri (collectively "Parties"). The settlement establishes a common fund of **\$1,760,192.83** and provides resolution of a bona fide wage and hour dispute. The projected amounts for each Plaintiff are detailed on Exhibit A attached hereto<sup>1</sup>.

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<sup>1</sup> Exhibit A contains all members of the collective class. Those members submitted consent forms to join the action and were verified by the City to have qualified for specialty or certification pay during the limiting period. Plaintiffs were unable to ascertain damages - i.e., underpayment of overtime, for thirty-seven (37) collective class members because they did not work overtime or the difference between calculated damages and actual pay was zero or less than zero. Those who did not suffer damages but were nevertheless members of the collective class are listed in Exhibit A with empty entries in the "EID" and "Payout" fields.

## I. FACTS AND PROCEDURAL HISTORY

Plaintiffs brought this lawsuit for alleged violations of the Fair Labor Standards Act (hereinafter “the Collective Action”). Plaintiffs sought relief on behalf of a putative class consisting of current and former employees of the Fire Department for the City of Kansas City, Missouri, who had received specialty pay incentives. On January 14, 2020, Judge Maughmer, the predecessor to this Court, conditionally certified a class of current and former firefighters, fire apparatus operators, and captains who received certification or specialty pay at any time since January 10, 2016. Notice of the collective action was issued, and as a result, 473 individuals consented to join the litigation.<sup>2</sup>

After the exchange of extensive, detailed discovery consisting of corporate representative depositions and review of thousands of documents, spreadsheets, compensation data, employee handbooks, training manuals, and pay statements, the Parties began mediating the potential exposure of this case on February 17 2022, before the well-respected Director of the Mediation and Assessment Program, Laurel Stevenson. During that mediation, the Parties received additional input from their retained experts and from the bargaining unit representing the Collective Action members. Although no resolution resulted from the initial mediation the Parties continued negotiating and, over the course of a week the Parties reached an agreement in principal.

Plaintiffs and their counsel believe the claims asserted in the Litigation have merit and that the evidence developed to date supports the claims asserted. Plaintiffs and Plaintiffs’ counsel, however, also recognize and acknowledge the risk, length and expense of continued proceedings necessary to prosecute the litigation through trial and appeal, especially in complex cases like this

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<sup>2</sup> Originally, 473 individuals opted into the collective class. However, after reviewing the pay records, the City moved to strike several members. The City's motion was sustained, leaving 383 individuals in the class.

action, and believe that the Settlement confers substantial benefits upon the class members. Defendant denies Plaintiffs' claims in their entirety and deny any wrongdoing, but wish to avoid the uncertainty and risk attendant with litigation and appeal.

The principal terms of the agreement are as follows:

- 1) Defendant will pay **\$2,060,192.83** to a common fund to compensate Plaintiffs for their overtime work, costs and attorney fees;
- 2) Plaintiffs will receive a share of the settlement proceeds based on and in proportion to the compensable time worked during the three year period prior to their joining the lawsuit;
- 3) Plaintiffs' payments will be classified as wages; and
- 5) The City will administer the settlement and insure all checks are sent to Plaintiffs within seven (7) days of delivery.

## **II. QUESTION PRESENTED**

Should the Court grant Plaintiffs' motion to approve the settlement of this case when the settlement is fair, reasonable and provides an immediate, significant benefit to the class members who affirmatively chose to participate, and ends contested litigation prior to trial?

## **III. ARGUMENT**

Approval of the settlement is warranted. An FLSA collective action is not a class action – individuals participating affirmatively choose to be bound and represented by counsel and there are no absent class members whose claims are being settled. *See Brown v. Money Tree Mortgage, Inc.*, 222 F.R.D. 676, 678 (D. Kan. 2004); *Clougherty v. James Vernor Co.*, 187 F.2d 288, 290 (6th Cir. 1951). Thus, the reasons for judicial scrutiny of class action settlements are not present in FLSA opt-in settlements, because absent class members are not bound by the case's outcome.

*Maguire v. Trans World Airlines, Inc.*, 55 F.R.D. 48 (S.D.N.Y. 1972); *Wagner v. Loew's Theatres, Inc.*, 76 F.R.D. 23 (M.D.N.C. 1977).

Nonetheless, courts have held that settlement of an FLSA collective action generally requires court approval because private settlements will not effectuate a valid release for the employer. See *Lynn's Food Stores, Inc. v. U.S.*, 679 F.2d 1350, 1354 (11th Cir. 1982). Accordingly, wage claims under the FLSA are typically settled or compromised in one of two ways. First, under 29 U.S.C. § 216(c), the Secretary of Labor is authorized to supervise payment to employees of unpaid wages owed to them. Second, under a private FLSA enforcement action, district courts may approve settlements resulting from contested litigation over a *bona fide* dispute between the parties. *Lynn's Food Stores*, 679 F.2d at 1353. When the latter option is proposed, as here, the Court should approve the settlement “after scrutinizing the settlement for fairness.” *Id.* (citing *Schulte, Inc. v. Gangi*, 328 U.S. 108 (1946)).

The standard for court approval is straightforward: a district court should approve a fair and reasonable settlement if it was reached as a result of contested litigation to resolve a *bona fide* dispute under the FLSA. *Garcia v. Triumph Foods*, Case No. 11-6046-CV-SJ-ODS (W.D. Mo. 7/12/12) (citing *Lynn's Food Stores, Inc. v. U.S.*, 679 F.2d 1350, 1352-54 (11th Cir. 1982)). First, the court must be satisfied that the settlement was the product of “contested litigation.” *Id.* (citing *Lynn's Food Stores*, 679 F.2d at 1353). Second, the court must inquire as to whether the settlement involves a fair and reasonable resolution of a *bona fide* dispute between the Parties under the FLSA. *Id.* Typically, courts rely on the adversarial nature of a litigated FLSA case resulting in an arms'-length settlement as indicia of fairness. *Id.* If the proposed settlement reflects a reasonable compromise over contested issues, the court should approve the settlement in order to promote the policy of encouraging settlement of litigation. *Id.* Plaintiffs respectfully submit that this Court

should conclude that the parties' settlement is a reasonable resolution of a *bona fide* dispute in contested litigation.

This settlement was the product of arm's-length negotiations by experienced counsel and provides meaningful, significant, monetary relief to all members of the collective class. It also eliminates the very real and inherent risks both sides would bear if this complex litigation continued to resolution on the merits. Under these circumstances, a presumption of fairness should attach to the proposed settlement. *See Lynn's Food Stores*, 679 F.2d at 1354 (courts rely on the adversarial nature of a litigated FLSA case resulting in settlement as indicia of fairness); *see also In re BankAmerica Corp. Securities Litig.*, 210 F.R.D. 694, 700 (E.D. Mo. 2002) ("In evaluating the settlement, the Court should keep in mind the unique ability of class and defense counsel to assess the potential risks and rewards of litigation; a presumption of fairness, adequacy and reasonableness may attach to a class settlement reached in arms-length negotiations between experienced, capable counsel after meaningful discovery") (citations omitted).

This litigation was contested and settled months after multiple but unsuccessful mediations on a number of issues, with Laurel Stevenson of the Court's MAP, totaling nearly twenty hours' time. Specifically, after months of data analysis, and after a Judgment of Liability by the Court, the parties were able to reach an agreement after a third mediation, conducted by Ms. Stevenson. Plaintiffs claimed that Defendant failed to pay them specialty pay on hours worked over 99 in a pay period and on overtime hours worked. The City claimed that the specialty pay was figured into the regular rate and all overtime hours were paid at 1.5 times that regular rate. The Defendant claimed that, among other things, that it has complied at all times with the FLSA. Defendants further questioned the damages formula, proposed a counter damages calculation, whether there was a two- or three-year statute of limitations, whether it acted in good faith so as to make

liquidated damages necessary, and whether the matter ought to be de-certified because of factual disparities amongst the collective class. Therefore, both substantive and procedural disputes created obstacles in the litigation, making this a resolution of *bona fide* disputes.

The proposed settlement offers a significant payment to the Plaintiff and participating class members now. Participating class members will receive meaningful awards after costs and attorneys' fees depending on the members' share of the award, calculated as the percentage of total damages alleged as the denominator and individual damages as the numerator for each member. Further, if the settlement is not approved, any recovery through litigation may not occur until after years of litigation and appeals. Or, such recovery may not occur at all after trial and appeal. For these reasons, settlement approval now should be highly favored. *See, e.g., In re BankAmerica*, 210 F.R.D. at 701 (“As courts have recognized, when considering settlement agreements they should consider the vagaries of litigation and compare the significance of immediate recovery by way of the compromise to the mere probability of relief in the future, after protracted and expensive litigation. In this respect, it has been held proper to take the bird in the hand instead of a prospective flock in the bush.”); *see also Lynn’s Food Stores*, 679 F.2d at 1354 (public policy encourages settlement of FLSA litigation); *Little Rock School District v. Pulaski Cnty. Special School District No. 1*, 921 F.2d 1371, 1388 (8th Cir. 1990) (“A strong public policy favors [settlement] agreements, and courts should approach them with a presumption in their favor.”).

Accordingly, Plaintiffs respectfully request that this Court approve the settlement and order that the Plaintiff and the Participating Class Members be paid in accordance with the terms agreed to by the Parties.

#### **IV. PLAINTIFF’S APPLICATION FOR FEES & EXPENSES SHOULD BE APPROVED**

As part of the settlement, Plaintiffs request **\$300,000.00** in attorneys’ fees and costs,

representing seventeen percent (17%) of the settlement fund. The Eighth Circuit has explicitly noted that judicial approval of FLSA settlements “does not extend to review of settled attorney fees . . . .” *Barbee v. Big River Steel, LLC*, 927 F.3d 1024, 1027 (8th Cir. 2019). The Court’s only concern, then, is that the **\$1,760,192.83** remaining of the settlement is fair and reasonable settlement for distribution to participating members.

The fees and expenses requested herein are reasonable. The attorneys’ fees in this case represent approximately 17% of the total settlement amount. Class Counsels’ fee will cover their time spent during the past three years of litigation, as well as deposition costs, and costs for an expert witness, all of which were reasonable and necessary.

### CONCLUSION

The settlement presented is an immediate, very real, very substantial, and appropriate settlement. Plaintiffs, therefore, respectfully request that the Court approve the settlement and attorney’s fees in whole and without delay. Further, Plaintiffs request that the Court stay the case pending administration of the settlement.

Respectfully submitted by,

BOYD KENTER THOMAS & PARRISH, LLC

/s/ Raymond Salva, Jr.

Raymond E. Salva, Jr. Mo. Bar No. 66191

John B. Boyd Mo. Bar No. 23716

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**Attorneys For Plaintiffs**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of March, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel on record.

/s/ Raymond Salva, Jr. \_\_\_\_\_

Attorneys for Plaintiffs





<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
103002	Abraham, James R.	\$1,609.72
101310	Adams, Craig M.	\$23,865.26
103582	Allen, Clayton	\$1,056.04
103292	Alpers, Shannon	\$4,346.82
606729	Alshimaily, Sami	\$693.08
602354	Amos, Kevin R.	\$1,266.53
606382	Angle, Nathaniel	\$2,882.38
602709	Armilio, Nicholas	\$8,684.72
602699	Audus, Cameron	\$71.24
602701	Aumock, Jacob	\$1,731.05
601029	Baker, Derek R.	\$4,555.78
100880	Baker, James D.	\$3,767.97
103758	Baker, Joel T.	\$8,331.57
603875	Beach, Noah	\$421.14
104089	Beaman, Jason A.	\$5,303.90
603620	Beaman, Scott	\$1,289.19
604168	Bechthold, Elizabeth H.	\$13,304.72
104960	Beck, Christin L.	\$10,323.35
	Beery, Taylor	
103279	Belgiere, Salvatore C.	\$1,372.31
101220	Bell, Walter R.	\$2,061.82
104406	Bender, John F.	\$10,791.66
603040	Berardi III, Nicholas	\$5,360.81
603877	Biscari, Leonardo A.	\$3,274.62
603237	Blocher, Gatlin K.	\$230.52
602754	Bounds, Jeremy	\$1,786.48
101855	Bowman, Tim A.	\$10,945.51
101958	Bozarth, Adam S.	\$5,193.45
100891	Braden, Mark M.	\$8,120.78
604713	Bradley, Samuel C.	\$13,303.53
604266	Brinker, Kyle	\$5,301.98
606172	Brinker, Scott	\$51.82
	Brogoto, Nico	
606404	Brown, Nicholas	\$852.25
601035	Brzezinski, Michael	\$67.40
605764	Buckwalter, Jacob L.	\$731.86
605488	Burriss Jr., Charles L.	\$2,251.44
603069	Byers, DeAundre L.	\$2,267.11
	Byrne, Shawn M.	
102919	Cado, Mark A.	\$14,752.79
105038	Caldwell, Justin K.	\$493.04
103287	Campbell, James S.	\$358.19
101306	Canady, Arthour	\$2,302.37

<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
605233	Carey, Daniel J.	\$3,077.17
605956	Carter, Cody	\$6,412.34
601036	Castaneda, John	\$10,621.77
103907	Caw, Emmett C.	\$11,144.68
600008	Chewning, Mathew I.	\$5,491.17
605479	Chowdhury, Cedric	\$86.19
605762	Claire, Thomas S.	\$6,124.72
102960	Clark, Stephen S.	\$671.87
101339	Clement, Thomas	\$2,700.63
601039	Cobbins, Christopher	\$8,599.29
604780	Coday, Alex	\$216.44
603613	Cole, Brian R.	\$498.55
101727	Cole, Phillip L.	\$10,812.70
105034	Collins, Larkin A.	\$3,524.67
	Collins, Michael	
102622	Cook, Brian	\$59.11
605235	Coons, Dale T.	\$1,866.00
603064	Cottrell, Brandon	\$9,393.41
	Covington, Todd D.	
603247	Cox, Jonathan E.	\$1,418.22
605260	Crabtree, Brittany C.	\$2,894.30
101547	Creager, John C.	\$6,694.73
	Crocker, Andrew M.	
	Culver, Joseph A.	
604766	Culver, Quentin	\$14,859.21
103046	Cummings, Ryan M.	\$3,123.38
603068	Cusumano, Matthew C.	\$12,584.40
604756	Dady, Derrick	\$6,643.32
101486	Dailey, Chad J.	\$2,703.56
601041	Damron, Shawn	\$2,351.87
605757	Daniel, Matthew	\$2,384.37
603871	Daraban, Eric	\$11,400.52
100004	Daugherty, Laurie A.	\$6,086.20
603618	Davis, Bryan E.	\$998.34
603889	Davis, Christopher M.	\$4,684.82
603240	Davis, Jason P.	\$4,867.52
100868	Davis, Richard	\$1,016.90
101729	Davis, Shane A.	\$21,593.49
101303	Dean, Joseph F.	\$401.02
603252	Denyer, Wyatt J.	\$1,750.84
103766	Deuschle, Justin	\$5,876.51
605407	Dice, Timothy	\$8,509.32
603623	Disciacca, Joseph M.	\$3,411.95

<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
103481	Doleshal, Brett S.	\$1,139.61
604264	Dooley, George	\$1,535.67
600030	Dougherty, Richard J.	\$6,107.92
104046	Duffy, John O.	\$5,886.84
606388	Dulle, Michael	\$3,644.38
100916	Dunlop, Kyle M.	\$6,159.23
102997	Eddings, Joseph B.	\$6,851.25
102829	Eley, Elliott	\$8,602.59
100547	Ellett, Terry	\$1,986.66
	England, Michael	
102549	Evans, Bruce E.	\$9,154.33
102402	Ewell, Leroy M.	\$9,515.66
605476	Fatall, Zach A.	\$5,395.31
605265	Favoroso, Joseph M.	\$7,686.99
605831	Fennix, Rico	\$4,366.29
104235	Ferguson, Paul A.	\$9,365.68
103780	Ferrante, Tommy J.	\$23,813.11
103024	Ferrara, Joseph D.	\$966.60
605772	Fields, Douglas E.	\$914.31
	Fisher, John	
605954	Fisher, Paul	\$201.56
606381	Fitzwater, Justin	\$283.78
102377	Fitzwater, Michael D	\$18,073.49
605760	Flanders, Thomas R.	\$2,584.26
104884	Foster, Adam C.	\$244.79
102639	Franzeskos, Christopher P.	\$11,969.77
605955	Friedel, Peter D.	\$265.97
	Frisbie, Diana	
603248	Garcia, Nicholas C.	\$7,778.12
606392	Gardner, Zayne	\$2,579.33
603873	Garrett, Dean K.	\$213.91
600026	Gentry, Kerry M.	\$307.06
101688	Germann, John Eric	\$559.01
	Gibson, John	
601911	Gilchrist, Michael E.	\$11,109.32
101309	Gillogly, Scott E.	\$4,909.82
606741	Gillum, Brett	\$453.34
101036	Glasgow, Dennis G.	\$5,539.53
	Golden, Louis J.	
	Goodell, Donald E.	
601898	Goodman, Matthew C.	\$4,619.90
	Green, Robert Dale	
104860	Greene, Jeremy W.	\$11,013.89

<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
102177	Gregg, Bradley	\$6,070.21
104039	Guarino, Joseph	\$8,265.87
	Guerrero, Kelsey	
103288	Hall, Brett J.	\$9,083.05
604761	Hamilton, Westin	\$6,541.01
101324	Hampton, Roosevelt G.	\$4,183.70
603626	Hansen, Peter K.	\$7,569.04
605763	Hardy, Dustin R.	\$1,500.94
103473	Harmon, Byron J.	\$7,277.20
605477	Harris, Gregory J.	\$2,149.71
104988	Hayles, Michael T.	\$9,543.52
605491	Hays, Jarred C.	\$138.56
604760	Hendricks, Kyle	\$4,812.13
103302	Hernandez, Christopher J.	\$7,158.58
102204	Hernandez, Dante M.	\$2,753.27
600027	Hewins, Michael S.	\$249.87
100714	Heyne, Alan A.	\$3,500.66
603608	Hickmon, Adam C.	\$8,616.93
603632	Hille, Robert	\$2,992.05
601027	Hook, Jacob T.	\$2,000.11
104989	Hopkins, Michael R.	\$17,126.37
104190	Houghton, Trevor J.	\$6,368.83
605468	Hyatt, David P.	\$152.21
	Ising, John Z.	
100204	James, Jimmie J.	\$13,626.24
104063	Jasper, Kyle	\$1,574.81
605957	Jimenez, Isaac	\$9,785.38
605958	Johnson, Cody	\$1,081.15
	Johnson, Colby	
104008	Johnson, Mark A.	\$12,734.82
100866	Johnson, Stephen B.	\$14,000.61
605264	Johnson, Zachary S.	\$1,070.68
104071	Jones, Tarshish D.	\$10,749.54
604759	Jones, Tyler D.	\$5,979.99
605466	Jording, Zachary	\$721.76
103678	Joslin, Matthew	\$1,825.84
101950	Juarez, Javier J.	\$5,247.71
605752	Kane, Matthew J.	\$3,295.12
103497	Kanoy, Brian A.	\$11,529.51
604169	Kelley, Matthew	\$4,654.62
102886	Kennedy, Damion S.	\$917.96
601906	Kindall, Darren L.	\$1,221.00
104200	Kindall, Dustin R.	\$13,080.18

<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
604757	King, Carl	\$5,764.55
102154	Kinney, James B.	\$1,010.41
103217	Klebenstone, Michael A.	\$1,543.67
102815	Knaebel, David J.	\$4,834.15
606270	Knight, Nathan	\$2,966.02
601023	Knopp, Joseph W.	\$8,293.48
604341	Knutson, Blake	\$14,106.66
603017	Koehler, Ryan	\$4,815.75
603625	Koepke, Joshua M.	\$5,552.71
601912	Kowalski, Michael R.	\$2,299.52
103216	Krupco, Michelle M.	\$662.27
603610	Langston, Derek	\$588.72
603235	Lanio, Matthew T.	\$9,224.17
604059	Larkey, Kyle	\$680.62
604647	Lassiter, Jesse	\$461.32
605269	Levene, Ian M.	\$158.94
101912	Linard, Scott N.	\$18,870.85
605462	Lind, Caleb T.	\$792.88
	Lipari, Andrew	
601049	Lipari, Anthony	\$6,066.47
100894	Loar, Amy	\$4,268.76
605465	Lockridge, Kristian B.	\$2,564.81
605268	Long, Kameron R.	\$7,634.79
604646	Lossman, Shawn	\$13,367.59
	Loya, Xavier C.	
603617	Luke, Nicholas J.	\$10,605.67
601009	Lunt, Chad A.	\$948.77
103992	Lynch, Brian	\$788.21
600033	Lynch, Justin	\$2,983.13
101740	Lynn, Ryan	\$11,776.35
	Maddux, Jason J.	
104052	Malone, Tad	\$5,690.88
601905	Mange, Anthony V.	\$951.15
607040	Marcuzzo, Nicholas	\$1,592.86
102371	Marquez, Jorge L.	\$10,561.11
103602	Marsalla, Eric M.	\$2,218.04
101241	Marshall, Steven D.	\$13,698.76
104017	Martin, Anthony S.	\$7,024.96
102199	Martin, Ronald B.	\$6,629.32
102769	Martin, Sharon A.	\$227.71
605251	Martinat, Christopher F.	\$1,461.83
103552	Martinez, Scott M.	\$307.26
602341	May, Kaleb D.	\$4,878.54

<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
605961	McCrary, Jacob	\$3,677.57
603868	McDonough, Connor	\$934.01
102202	McGowan, Michael C.	\$8,777.70
602344	McKeithen, Reggie L.	\$9,912.25
102411	McKiddy, Scott P.	\$766.47
102156	McKinstry, Stephen	\$7,589.16
603009	McLoughlin, Matthew	\$702.74
101955	McMahon, Kevin J.	\$6,690.63
104019	Melton, Thomas R.	\$6,634.14
606119	Mentzer, Garrett	\$2,431.73
603065	Meuschke, Brett	\$1,694.34
600044	Michaels, Stephen A.	\$6,278.44
602335	Milano, Paul J.	\$5,061.86
604716	Miller, Eric	\$3,243.72
	Miller, Ryan M.	
603057	Minard, Adam A.	\$476.95
605254	Moe, Tunamafata I.	\$458.34
102372	Molle, Carl J.	\$59.47
102375	Moore, Bryan E.	\$6,656.21
602591	Moore, Jesse C.	\$54.47
606719	Morales, Blake	\$690.06
605460	Morris, Sean S.	\$1,103.66
100244	Morrow, John N.	\$44,934.12
605492	Muller, Nicholas A.	\$267.25
104974	Nelson, Christopher R.	\$11,867.11
600045	Niemeyer, Jason M.	\$1,417.97
605242	Olivas, Emilio X.	\$3,009.27
104420	Olivas, Juan A.	\$13,359.50
103774	Olmedo, Michael J.	\$917.17
600575	O'Rear, Matthew S.	\$7,705.06
601904	Orscheln, Dustin T.	\$887.76
101332	Ortega, Joseph J.	\$18,799.95
100908	OSullivan, Brian J.	\$1,046.41
	Ott, John D.	
104028	Page, Richard A.	\$17,293.82
102824	Palacios, Robert N.	\$7,294.49
605483	Pape, Lucas C.	\$462.79
102162	Parison, John H.	\$8,924.85
603624	Parker, Nicholas M.	\$947.71
	Paul, Travis D.	
603633	Perez, Nicholas S.	\$4,541.25
103764	Perry, Chadwick A.	\$17,581.01
102883	Petit, Michael	\$14,175.96

<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
103334	Petrie, Robert B.	\$9,396.92
602869	Phalp, Scott	\$5,818.36
104616	Pham, Dung V.	\$9,598.19
605484	Phillips, David J.	\$2,143.40
102631	Phillips, Donald G.	\$10,634.23
604771	Powell, Jacob	\$2,808.20
600049	Purnell, David M.	\$1,015.98
102884	Purtle, Daniel	\$5,628.46
	Quick, Richard D.	
602343	Quintero, David J.	\$6,220.13
103771	Ragland, Jesse B.	\$1,869.00
103743	Ragusa, Steven R.	\$2,422.27
104185	Rangel, Xavier	\$2,943.01
603891	Ransom, Willie D.	\$5,807.24
604265	Rehmann, John	\$7,238.32
606720	Renick, Christien	\$2,756.74
101029	Reynolds, Rebecca S.	\$13,458.63
103728	Reynolds, Todd M.	\$11,738.02
605454	Richards, Jon E.	\$3,719.72
602799	Ritter, Michael	\$2,340.15
	Roark, Christopher M.	
603932	Robards, David	\$3,848.00
605832	Roberts, William	\$1,252.00
102986	Robinson, Pleaze	\$3,720.66
103281	Rogers, Michael A.	\$7,706.61
	Roughton, Darrel J.	
603246	Roumas, Nicholas J.	\$808.94
101577	Russell, Christopher S.	\$344.13
605414	Sanders, Deatre	\$2,556.77
603630	Sanders, Jaymes J.	\$3,389.45
603627	Santi, Anthony M.	\$1,355.30
606716	Scales III, H	\$115.73
102352	Scammahorn, Steven L.	\$14,235.48
605234	Scarlett, Logan J.	\$336.05
102956	Schake, Steven W.	\$7,099.40
105208	Schemel, Donald	\$159.04
603870	Schenkelberg, Michael J.	\$407.95
603236	Schmidt, Derek	\$10,601.43
603629	Schneider, Ryan J.	\$1,552.63
102368	Scholl, John F.	\$11,330.89
	Schwent, Aaron	
600037	Seelig, Ariel J.	\$3,515.85
606397	Selleck, David	\$555.92

<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
604734	Serfass, Matthew	\$326.42
101941	Serrone, Domenic P.	\$8,193.26
102143	Seymour, Anthony P.	\$12,613.32
602843	Shafer, Joshua	\$215.13
104421	Shaumeyer, Steven R.	\$148.29
	Silvey, Matthew	
	Sirna, Anthony F.	
605458	Sisney, Matthew	\$4,419.40
100862	Skeen, T J.	\$6,335.87
602846	Smith, Jeremy W.	\$2,565.62
603254	Smith, Joseph	\$690.23
104062	Smith, Michael W.	\$8,062.06
101649	Smith, Thomas G.	\$74.41
604715	Snowden, Connor	\$9,194.44
602603	Sok, Samath	\$350.36
601892	Sola, Anthony J.	\$66.22
606278	Somers, Christopher M.	\$152.68
603028	Spallo, Andrew J.	\$4,053.43
602857	Speaks, Daniel	\$383.25
600572	Spence, Nathan D.	\$10,275.00
600022	Spicer, Steven M.	\$5,996.57
603628	St. Onge, Derek R.	\$8,455.06
605237	Stadler, Kevin M.	\$605.50
605252	Stalker, Meredith N.	\$853.58
	Stanberry, Tad J.	
605411	Staples, Tristram J.	\$737.34
606019	Steiger, Brock	\$4,583.42
	Steinbrugge, Edward D.	
604774	Stenner, Colton J.	\$439.95
603562	Stephens, Corey	\$5,144.89
604775	Still, Lanai	\$1,383.08
604724	Strawn, Tyler	\$2,417.80
	Studna, Shaun A.	
603888	Sullivan, Blake R.	\$1,647.32
102304	Surratt, Curtis E.	\$5,071.94
601006	Taylor, Brian M.	\$14,538.50
603896	Taylor, Tevin	\$3,050.08
605953	Taylor-Ohmes, Jason	\$5,248.60
104316	Teeple, Jeremie M.	\$3,616.21
603062	Termini, Andrew C.	\$3,972.93
603063	Terry, Jeremy L.	\$4,182.75
601021	Thomas, Shaun N.	\$4,026.13
101341	Thornton, Matthew R.	\$885.96



<u>EID</u>	<u>NAME</u>	<u>PAYOUT</u>
605473	Tiller, Sean E.	\$2,030.62
	Titus, Essie M.	
101927	Trader, Jesse A.	\$10,526.06
605767	Trillin, Gabriel D.	\$232.27
606400	Tripp, Luke	\$321.87
606401	Tritico, Andrew	\$33.57
605758	True, Stephen D.	\$3,809.14
104032	Tuder, James M.	\$3,443.09
	Van Horn, Michael G	
102941	Vandegrift, Steve L.	\$10,195.60
101337	Vandermillion, Christopher	\$18,185.91
104531	Vaters, Steven R.	\$2,327.07
100265	Vela, Matthew J.	\$10,393.09
100264	Vela, Matthew P.	\$5,699.14
105040	Verren, Paul M.	\$475.66
	Vinson, Loren	
100920	Vitale, Anthony J.	\$5,728.60
606279	Vonderharr, Ryan	\$1,875.76
600328	Walker, Kalan	\$1,601.39
601038	Walker, Samuel	\$2,601.60
100842	Wallace, Christopher A.	\$1,922.87
604167	Walsh, Matthew	\$64.18
605461	Walsh, Zachary R.	\$5,602.30
100108	Warfield, Kenneth N.	\$12,082.56
102422	Weaver, Jared P.	\$148.63
600279	Weaver, Wiley	\$2,026.88
101592	Wegner, Corby J.	\$1,544.32
605487	Wilson, Lancing D.	\$490.95
605457	Winfrey, Tyler J.	\$10,370.45
101483	Woods, Donnel L.	\$8,087.15
100882	Wright, Joseph W.	\$5,136.73
101890	Young, John L.	\$8,717.72
	Young, William M.	
605494	Zaheed, Rashad A.	\$796.66
104142	Zamora, Gerardo	\$2,384.85
104189	Zaner, Paul L.	\$1,239.47
	Ziegler, James R.	
104554	Ziglinski, Christopher H.	\$832.87
104494	Zuniga, Andre B.	\$21,551.67
604263	Zych, Evan	\$2,203.13
		\$1,760,192.83