Exhibit B

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JEFF BATTLES, LEROME THOMAS, STEVEN SPENCER, Individually and on Behalf of All Others Similarly Situated,))))	Case No. 18-cv-04822
Plaintiffs,)	Honorable Marvin E. Aspen
V.)	
SOUTHWEST AIRLINES CO.,))	
Defendant.)	

STIPULATION TO DISMISS CASE IN FAVOR OF INDIVIDUAL ARBITRATION

Plaintiffs Jeff Battles, Lerome Thomas, and Steven Spencer ("Plaintiffs") and Defendant Southwest Airlines Co. ("Defendant"), by and through their respective attorneys, hereby bring this Stipulation to Dismiss Case in Favor of Arbitration. In support of this Stipulation, the Parties state as follows:

1. On July 13, 2018, Plaintiffs filed, on behalf of themselves and all others similarly situated, this putative collective action pursuant to the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §§201 *et seq.*, and putative class action pursuant to Rule 23 of the Federal Rules of Civil Procedure and the Illinois Minimum Wage Law ("IMWL"), 820 ILCS §§105/1 *et seq.*

2. On September 17, 2018, Defendant filed a Motion to Dismiss in Favor of Arbitration ("Arbitration Motion"). (Doc. 13.)

3. On November 29, 2018, the Court granted the Parties' stipulation to stay this case pending a private mediation between the parties. (Doc. 28.)

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4. The parties, including Plaintiff Battles, Plaintiff Thomas, and Plaintiff Spencer and Southwest Airline's in-house counsel, along with their respective attorneys, participated in a private mediation on December 5, 2018 but were unable to reach a settlement.

5. Pursuant to the parties' mediation agreement, the parties stipulate and agree that this case must be dismissed and that Plaintiffs' claims must be submitted to individual arbitration to AAA in accordance with the Southwest Airlines Alternative Dispute Resolution Program.

WHEREFORE, the Parties jointly ask the Court to dismiss this case and to compel individual arbitration with AAA in accordance with the Southwest Airlines Alternative Dispute Resolution Program.

Dated: January 4, 2019

/s/ Ryan F. Stephan Ryan F. Stephan Andrew C. Ficzko **STEPHAN ZOURAS, LLP** 100 N. Riverside Plaza, Suite 2150 Chicago, IL 60606 rstephan@stephanzouras.com aficzko@stephanzouras.com Telephone: 312-233-1550

ATTORNEYS FOR PLAINTIFF

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned counsel for Defendant Southwest Airlines Co. hereby certifies that she caused a true copy of the foregoing document to be filed electronically on January 4, 2019. Notice of this filing will be sent to all parties registered on this Court's ECF system by operation of the Court's electronic filing system.

By: <u>/s/ Melissa Siebert</u>