

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

KRYSTYNNA WINKOWSKI,
Plaintiff,
v.
HOSPITAL AUTHORITY OF THE
METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY
d/b/a NASHVILLE GENERAL
HOSPITAL AT MEHARRY,
Defendant.

No. 3:14-CV-1177

Judge Haynes

Handwritten notes: ONA 8/11, This action is TRANSFERRED to the Honorable Judge Trauger for further proceedings. Includes signature and date 7-21-14.

JOINT MOTION TO CONSOLIDATE

Plaintiff, Krystynna Winkowski, and Defendant, the Hospital Authority of the Metropolitan Government of Nashville and Davidson County ("Defendant"), respectfully move to consolidate this action with Case No. 3:13-cv-0815, Lucius High & Carla Hilgert v. Hospital Authority of the Metropolitan Government of Nashville & Davidson County. The Lucius High lawsuit ("Case No. 13-815") was filed on August 13, 2013, and a case management order was subsequently entered. The case was thereafter conditionally certified as a collective action under the Fair Labor Standards Act, 29 U.S.C. §§ 201 et seq., by agreement of the parties.

Ms. Winkowski did not file a notice opting in to the collective action in Case 13-815 and, instead, filed a separate lawsuit. Because her allegations arise from the same policies and practices at issue in the Lucius High lawsuit, and the Defendant and legal claims at issue are the same, consolidation of this case with the earlier-filed case will advance the interest of judicial economy. Accordingly, the parties request that this case