

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CHRISTY HUTCHINSON, individually	)	
and on behalf of all others situated,	)	
	)	
Plaintiff,	)	Case No. 3:22-cv-00511
	)	
v.	)	Judge William L. Campbell, Jr.
	)	Magistrate Judge Barbra D. Holmes
FAST PACE MEDICAL CLINIC PLLC	)	
d/b/a FAST PACE HEALTH,	)	
	)	
Defendant.	)	

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**ENTRY OF JUDGMENT**

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On September 13, 2022, opt-in plaintiff, Sonjia Staggs, filed a Notice of Acceptance of Defendant’s Offer of Judgment. (Doc. No. 25). Pursuant to Federal Rule of Civil Procedure 68 and the terms of Defendant’s Rule 68 Offer of Judgment (Doc. No. 25-1 at PageID #144-147), the Clerk hereby enters judgment in favor of opt-in plaintiff, Sonjia Staggs.

s/ Lynda M. Hill  
Lynda M. Hill  
Clerk of Court

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**CHRISTY HUTCHINSON**, *Individually and On* )  
*Behalf of All Others Similarly Situated*, )

Plaintiff, )

v. )

**FAST PACE MEDICAL CLINIC PLLC d/b/a** )  
**FAST PACE HEALTH**, )

Defendant. )

**CASE NO.: 3:22-cv-00511**

**NOTICE OF OFFER OF JUDGMENT PURSUANT TO RULE 68 TO OPT-IN  
PLAINTIFF SONJIA STAGGS AND HER ACCEPTANCE THEREOF**

Opt-in Plaintiff SONJIA STAGGS, [ECF 13-1] by and through her undersigned counsel, pursuant to Fed. R. Civ. P. 68(a), hereby files the notice she served on Defendant on September 13, 2022, accepting Defendant’s Offer of Judgment Pursuant to Rule 68, that was made on August 30, 2022. Plaintiff’s notice of acceptance and a copy of the offer are filed herewith as Exhibit 1. Plaintiff attests through the Certificate of Service below that the notice of acceptance was served on Defendant on September 13, 2022.

Pursuant to Fed. R. Civ. P. 68, the clerk “must [] enter judgment” for Opt-in Plaintiff SONJIA STAGGS, according to the terms of the offer, i.e. the total amount of Ten Thousand Dollars And Zero Cents (\$10,000.00), as well as a separate amount to be determined for all costs and reasonable attorneys’ fees now accrued to the date of the offer.

Dated: September 13, 2022

RESPECTFULLY SUBMITTED,

By: /s Nicholas Conlon

Nicholas Conlon\*

Jason T. Brown\*

Brown, LLC  
111 Town Square Pl Suite 400  
Jersey City, NJ 07310  
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\*Admitted Pro Hac Vice

*Lead Counsel for Plaintiff*

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*Local Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that I served the NOTICE OF OPT-IN PLAINTIFF SONJIA STAGGS' ACCEPTANCE OF OFFER OF JUDGMENT PURSUANT TO RULE 68 (Exhibit 1 hereto) on September 13, 2022 via e-mail and U.S. mail to:

J Stanton Hill (BPR No. 034544)  
(shill@seyfarth.com)  
SEYFARTH SHAW LLP  
2155 Heritage Dr. Ne  
Atlanta, GA 30345  
Telephone: (404) 885-1500

Gerald L. Maatman , Jr.  
(Gmaatman@seyfarth.com)  
Tyler Z. Zmick  
(Tzmick@seyfarth.com)  
Jennifer A. Riley  
(Jriley@seyfarth.com)  
SEYFARTH SHAW LLP  
233 S Wacker Dr. Suite 8000  
Chicago, IL 60606  
Telephone: 312-460-5965  
Fax: 312-460-7965

I further certify that that I served the foregoing NOTICE OF OFFER OF JUDGMENT PURSUANT TO RULE 68 TO OPT-IN PLAINTIFF SONJIA STAGGS AND HER ACCEPTANCE THEREOF on September 13, 2022 to the same counsel via ECF filing and notification.

By: /s/ Nicholas Conlon  
Nicholas Conlon

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**CHRISTY HUTCHINSON**, *Individually and On* )  
*Behalf of All Others Similarly Situated*, )

Plaintiff, )

v. )

**FAST PACE MEDICAL CLINIC PLLC d/b/a** )  
**FAST PACE HEALTH**, )

Defendant. )

**CASE NO.: 3:22-cv-00511**

**NOTICE OF OPT-IN PLAINTIFF SONJIA STAGGS' ACCEPTANCE OF OFFER OF  
JUDGMENT PURSUANT TO RULE 68**

Opt-in Plaintiff SONJIA STAGGS, by and through her undersigned counsel, hereby accepts the Offer of Judgment Pursuant to Fed. R. Civ. P. 68, incorporated herein as Exhibit 1, to allow a judgment to be taken against Defendant and entered in favor of Opt-in Plaintiff SONJIA STAGGS in the total amount of Ten Thousand Dollars And Zero Cents (\$10,000.00), as well as a separate amount to be determined for all costs and reasonable attorneys' fees now accrued to the date of the offer.

Dated: September 13, 2022

RESPECTFULLY SUBMITTED,

By: /s Nicholas Conlon

Nicholas Conlon\*

Jason T. Brown\*

Brown, LLC

111 Town Square Pl Suite 400

Jersey City, NJ 07310

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*Lead Counsel for Plaintiff*

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800 S. Gay Street, Suite 1100  
Knoxville, TN 37929  
T: (856) 247-0080  
F: (865) 522-0049

*Local Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that I served the foregoing NOTICE OF OPT-IN PLAINTIFF SONJIA STAGGS'

ACCEPTANCE OF OFFER OF JUDGMENT PURSUANT TO RULE 68 on September 13, 2022

via e-mail and U.S. mail to:

J Stanton Hill (BPR No. 034544)  
(shill@seyfarth.com)  
SEYFARTH SHAW LLP  
2155 Heritage Dr. Ne  
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By: /s Nicholas Conlon  
Nicholas Conlon



# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CHRISTY HUTCHINSON, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

FAST PACE MEDICAL CLINIC PLLC d/b/a  
FAST PACE HEALTH,

Defendant.

Case No. 3:22-cv-00511

District Judge William L. Campbell, Jr.

Magistrate Judge Barbara D. Holmes

**OFFER OF JUDGMENT PURSUANT TO RULE 68**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant Fast Pace Medical Clinic PLLC d/b/a Fast Pace Health (“Defendant”) hereby makes an Offer of Judgment to opt-in Plaintiff Sonjia Staggs (“Plaintiff”). The terms of the Offer are as follows:

1. Defendant hereby offers to allow a judgment to be taken against Defendant and entered in Plaintiff’s favor in the total amount of Ten Thousand Dollars And Zero Cents (\$10,000.00) for Staggs, as well as a separate amount to be determined for all costs and reasonable attorneys’ fees now accrued to the date of this offer. This total amount is to be in full and final satisfaction of any and all claims and causes of action of any kind against Defendant that have been asserted or could have been asserted in this lawsuit by or on behalf of Plaintiff against Defendant, and any officers, directors, or employees of Defendant, including those arising under equity, common law, statute, rule, or regulation of each and every federal, state, municipal, or other authority, without limitation.

2. This Offer of Judgment is made solely to avoid the time and expense that continued litigation of this matter will otherwise require. It shall not in any way be construed as

or otherwise deemed an admission by Defendant that it acted wrongfully or failed to act lawfully with respect to Plaintiff or any other persons, or that Plaintiff has any rights whatsoever against Defendant. In accordance with Federal Rule of Evidence 408, this Offer of Judgment, whether accepted or not, is not admissible into evidence in any proceeding.

3. This Offer of Judgment will remain open for fourteen (14) days after service of the Offer of Judgment, as required by Rule 68, at which time the Offer will automatically expire. This Offer of Judgment shall not be filed with the Court unless (a) accepted or (b) in a proceeding to determine costs. If this Offer of Judgment is not accepted within fourteen (14) days, and if Plaintiff fails to receive a more favorable judgment as a result of trial, Defendant will request that it be awarded its costs, including, but not limited to, any expert and attorneys' fees to which it may be entitled under the law, and that Plaintiff be precluded from recovery of any post-offer attorneys' fees or other costs, to the extent available.

Dated: August 30, 2022

Respectfully submitted,

FAST PACE MEDICAL CLINIC PLLC  
d/b/a FAST PACE HEALTH

By: /s/ Gerald L. Maatman, Jr.  
One of Its Attorneys

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Jennifer A. Riley (application for admission forthcoming)  
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Tyler Z. Zmick (application for admission forthcoming)  
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Sarah Bauman (application for admission forthcoming)

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Telephone: (312) 460-5000

**Attorneys for Defendant**

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he caused a copy of the foregoing to be served upon the following counsel of record via e-mail, this OFFER OF JUDGMENT PURSUANT TO RULE 68, on the 30th day of August, 2022:

Justin G. Day  
(jday@milberg.com)  
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/s/ Gerald L. Maatman, Jr.

Gerald L. Maatman, Jr.