

**TEARMAN SPENCER**  
City Attorney

**ODALO J. OHIKU**  
**ROBIN A. PEDERSON**  
**S. TODD FARRIS**  
**JENNIFER L. WILLIAMS**  
Deputy City Attorneys



Milwaukee City Hall Suite 800 • 200 East Wells Street • Milwaukee, Wisconsin 53202-3551  
Telephone: 414.286.2601 • TDD: 414.286.2025 • Fax: 414.286.8550

**HEIDI WICK SPOERL**  
**KATHRYN Z. BLOCK**  
**THOMAS D. MILLER**  
**PETER J. BLOCK**  
**PATRICK J. MCCLAIN**  
**HANNAH R. JAHN**  
**JULIE P. WILSON**  
**MEIGHAN M. ANGER**  
**ALEXANDER R. CARSON**  
**ALEXANDER T. MUELLER**  
**ALEXANDER D. COSSI**  
**LISA A. GILMORE**  
**TAVISS K. SMITH**  
**KATHERINE A. HEADLEY**  
**L. ANTHONY JACKSON**  
**STACY J. MILLER**  
**MICHAEL C. RADAVIDH**  
**JORDAN M. SCHETTLE**  
**THERESA A. MONTAG**  
**ALEXANDER E. FOUNDOS**  
**JAMES D. LEWIS**  
**TRAVIS J. GRESHAM**  
**KYLE W. BAILEY**  
**JOSEPH M. DOBBS**  
**WILLIAM K. HOTCHKISS**  
**CLINT B. MUCHE**  
**JOANNA FRACZEK**  
Assistant City Attorneys

October 19, 2023

To the Honorable Common Council  
of the City of Milwaukee  
Room 205 – City Hall

Re: Proposed Settlement of Claims In Lawsuit Entitled  
*Chad Vance, et. al. v. City of Milwaukee*  
Milwaukee County Court Case Number 2023-CV-1401

Dear Council Members:

Enclosed please find a proposed resolution. We ask that it be introduced and referred to the Committee on Judiciary and Legislation with the below recommendation to authorize the payment of the settlement amount regarding the claims asserted by the plaintiffs, as well as authorizing the settlement of said case.

This lawsuit involves alleged violations of Wisconsin's wage claims law for non-exempt employees of the Department of Public Works performing snow and ice control operations as it relates to on-call pay. The plaintiffs claim that for the three years preceding the filing of the case, the City's wage policy provided certain employees performing snow and ice control operations with on-call pay during the snow and ice control season. The City engaged in extensive discovery over the past several months. The Parties also engaged in mediation wherein settlement of the claims was recommended by the mediator, retired Magistrate Judge David Jones.



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Because settlement in this matter is deemed appropriate given our review of the case, we recommend payment of the settlement amount of up to \$465,909.77 as provided by the Settlement Agreement, and as further described in the resolution.

Very truly yours,

TEARMAN SPENCER  
City Attorney



ROBIN A. PEDERSON  
Deputy City Attorney

TS/RAP

Enclosure

1068-2023-372/287314