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[Additional Counsel of Record listed on the Signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al., individually and
on behalf of others similarly situated,

Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No. 3:18-cv-01477-AB

**NOTICE OF SETTLEMENT OF
INDIVIDUAL CLAIMS**

In response to the Court’s directions set forth by ECF No. 620, Plaintiffs Kelly Cahill, Heather Hender, Lindsay Elizabeth, and Sara Johnston (“Plaintiffs”) and Defendant Nike, Inc. (“Nike”) (collectively the “Parties”) through their respective counsel hereby confirm that they have finalized settlement agreements related to the Plaintiffs’ individual claims, which the Parties expect to be signed today. Plaintiffs Cahill, Elizabeth and Johnston have resolved all their claims against Nike. Plaintiff Hender has resolved her individual retaliation and other non-class claims against Nike but retains her class claims so that she may participate in the proposed class settlement and seek appointment to serve as a class representative of the proposed settlement class.¹ However, Plaintiff Hender intends to settle those claims as part of the class settlement and does not wish to move forward with trial of her individual claims. As previously ordered, the Parties will provide a status report by April 11, 2025 on the status of the class claims, and Plaintiffs anticipate moving for preliminary approval of the proposed class settlement by that date or shortly thereafter.

In light of the foregoing, the Parties ask the Court to take any remaining pre-trial deadlines as well as the March 2025 trial off-calendar.

Dated: February 21, 2025

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ James Kan

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¹ These individual settlements on behalf of the four plaintiffs are not dependent or conditioned upon the Court’s approval of any proposed class settlement. The Parties agreed to the settlement, in principle, that formed the basis for the individual settlements separate and apart from any settlement on behalf of a putative class.

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Dated: February 21, 2025

Respectfully submitted,

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Attorneys for Nike, Inc.

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: February 21, 2025

Respectfully submitted,

/s/ James Kan

James Kan