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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

**THE PEOPLE OF THE STATE OF  
ILLINOIS, *ex rel.* KWAME RAOUL,  
Attorney General of Illinois,**

**Plaintiff,**

**vs.**

**VERYABLE, INC.**

**Defendant.**

**Case No. 2025CH00350**

**PLAINTIFF'S UNOPPOSED MOTION FOR ORDER APPROVING CONSENT  
DECREE**

Plaintiff, the People of the State of Illinois, by Kwame Raoul, Attorney General of Illinois, moves without opposition for an order approving the Consent Decree attached as Exhibit 1 to this Motion, which resolves all claims pleaded in the Complaint attached as Exhibit 2.

1. The Attorney General filed a complaint against Veryable, Inc. ("Veryable"), alleging that Veryable failed to pay their employees premium overtime wages for time worked in excess of forty hours per week in violation of the Illinois Minimum Wage Law ("IMWL"), 820 ILCS 105/1 *et seq* and failed to pay minimum payments for cancelled temporary labor assignments in violation of the Illinois Day and Temporary Labor Services Act ("IDTLSA"), 820 ILCS 175/1 *et seq*.

2. The parties have now engaged in comprehensive negotiations and have reached a settlement agreement to resolve all claims. The terms of the settlement are memorialized in the proposed Consent Decree attached as Exhibit 1.

3. Plaintiff requests the Court to approve the proposed Consent Decree attached as Exhibit 1 to this Motion. The Consent Decree provides for Veryable to make a total payment

of \$320,000 to a settlement fund to resolve the Attorney General's claims against them. A third-party claims administrator will issue notice to 874 employees listed in Exhibit A to the Consent Decree via mail and email, and the employees will be invited to submit a claim form to receive their apportioned settlement payments. If any employees cannot be located, their shares will be held by the Illinois Department of Labor after the fund closes.

4. The individual settlement payments will be calculated based on the claimant percentages listed in Exhibit A of the Consent Decree. Plaintiff derived these percentages from time and pay records produced by Veryable. Each claimant's award will equate to their owed overtime wages dating to September 9, 2018. Additionally, Veryable have agreed to implement practices outlined in the Consent Decree and to prevent any future violations of the IMWL and IDTLA.

5. The settling parties believe they were fully aware and adequately informed of all facts necessary to evaluate the case for settlement and believe the settlement reached in this matter is a good outcome for the affected employees. The parties reached the settlement embodied in this Consent Decree having given due consideration as to the risks, potential damages, costs, time, and resources, the claims and defenses asserted, and the relative strengths in the claims and defenses. The parties believe the terms of the settlement are fair and reasonable.

6. All parties have agreed to the terms of the Consent Decree, as evidenced by their signatures thereon. Entry of the Consent Decree will dispose of the claims raised against Veryable in the Complaint and all those claims that could have been alleged based on the facts in the Complaint and will most efficiently further the ends of justice in this case. Plaintiff accordingly moves, without opposition, for the Court to approve and enter the Consent Decree.

For these reasons, Plaintiff respectfully requests that the Court enter an order approving and entering the Consent Decree resolving this case.

Respectfully Submitted:

THE PEOPLE OF THE STATE OF ILLINOIS,  
*ex rel.* KWAME RAOUL,  
Attorney General of Illinois

Dated: January 15, 2024

By: /s/ Jack Cramer  
Jack Cramer  
Assistant Attorney General  
115 S. La Salle St.  
Chicago, Illinois 60603  
Phone: (217) 687-6528  
[jack.cramer@ilag.gov](mailto:jack.cramer@ilag.gov)  
Attorney No. 99000