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THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JAMIE ZIMMERMAN, *et al.*,
Plaintiff,
v.
PEACEHEALTH, *et al.*,
Defendants.

No.: 3:22-cv-05960-TL

PLAINTIFFS’ NOTICE OF
SUPPLEMENTAL AUTHORITY

NOTED ON MOTION CALENDAR:
April 6, 2023

Pursuant to LCR 7(n), Plaintiffs bring to the Court’s attention, and submits, as supplemental authority, a copy of the United States Supreme Court’s decision in *Groff v. DeJoy, Postmaster General*, No. 22-174 (United States Supreme Court, June 29, 2023). Without raising arguments, in *Groff*, the Court held “that showing ‘more than a *de minimis* cost,’ as that phrase is used in common parlance, does not suffice to establish ‘undue hardship’ under Title VII.” Slip Op. at 15. The Court further held that “considering ordinary meaning while taking

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1 *Hardison* as a given, we are pointed toward something closer to *Hardison*'s
2 references to 'substantial additional costs' or 'substantial expenditures.'" *Id.* at
3 17. The also Court noted that the lower courts should review "the particular
4 accommodations at issue and their practical impact in light of the nature, 'size
5 and operating cost of [an] employer.'" *Id.* at 18. Finally, the Court held that the
6 "[c]onsideration of other options, such as voluntary shift swapping, would also be
7 necessary." *Id.* at 20.
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9

10 DATED this 29th day of June 2023.

11
12 **SILENT MAJORITY FOUNDATION**

13 /s/Simon Peter Serrano
14 Simon Peter Serrano, WSBA No. 54769
15 Karen L. Osborne, WSBA No.
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20 Counsel for Plaintiffs
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CERTIFICATE OF SERVICE

1
2 I hereby certify that on this 29th day of June 2023, I electronically filed the
3 foregoing document with the Clerk of the United States District Court using the
4 CM/ECF system which will send notification of such filing to all parties who are
5 registered with the CM/ECF system.
6

7 DATED this 29th day of June 2023.
8

9
10 /s/Simon Peter Serrano
11 Simon Peter Serrano
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