SUMMARY STATEMENT

Stiffler v. Hydroblend, Inc. Docket No. 49933

This appeal arose from a wage claim dispute between Pat Stiffler and his previous employer, Hydroblend, Inc. After a conflict arose concerning incentive pay on an allegedly miscoded account, Stiffler filed a complaint for unpaid wages, breach of contract, retaliation, and wrongful termination. The proceedings culminated with two summary judgment orders from the district court where it concluded that: (1) Stiffler was not entitled to treble damages on incentive pay under the Idaho Wage Claim Act; (2) multiple issues were governed by an arbitration provision in Stiffler's 2021 employment agreement; and (3) summary judgment could not be awarded in multiple claims where disputed facts remained at issue. Stiffler appealed the district court's decisions, arguing that he was entitled to treble damages on his incentive pay under Idaho's Wage Claim Act, as well as severance pay under his 2019 employment contract. Stiffler also argued that the district court erred by compelling arbitration of some of his claims.

The Idaho Supreme Court affirmed in part and reversed in part. It concluded that Stiffler was not entitled to treble damages on his incentive pay where Stiffler's commission was tendered within the statutory 10-day limit. The Supreme Court also determined that the 2021 employment agreement governed Stiffler's claim for severance pay—as well as his claims for wrongful termination and contract rescission—and was therefore subject to the contract's mediation and arbitration provision. However, the Supreme Court reversed the district court's dismissal of Stiffler's arbitrable claims in order to "dispose of them." Because the procedures under the Uniform Arbitration Act provide for courts to retain jurisdiction while parties arbitrate claims, the district court should have stayed the proceedings until the parties returned from arbitration for a confirmation and final judgment, or otherwise moved for dismissal of the case.

*** This summary constitutes no part of the opinion of the Court but has been prepared by court staff for the convenience of the public. ***