

SUMMARY STATEMENT

Manning v. Micron Technology, Inc.

Docket No. 48195

This appeal arises from the district court's grant of summary judgment in favor of Micron Technology, Inc. (Micron). The case arose when four Micron employees (the Employees) filed a class action complaint against Micron on June 13, 2019, asserting violations of the Idaho Wage Claim Act. At the time, Micron had in place a compensation plan called the Incentive Pay Plan (IPP), in which eligible employees could earn yearly bonuses based on a number of performance metrics. The Employees alleged that the bonuses they received on November 23, 2018, for Micron's 2018 fiscal year should have been greater than they were.

Micron filed a motion for summary judgment, arguing that the Employees' complaint was time-barred by Idaho Code section 45-614 as it existed at the time the Employees brought their complaint. Micron argued that section 45-614's six-month statute of limitations applied to the Employees' complaint because they sought "additional wages," as opposed to "unpaid wages." The district court granted Micron's motion for summary judgment. The Employees timely appealed, arguing that the two-year statute of limitations applied. (In the interim, the statute of limitations for "additional wages" has been increased from six months to one year.)

The Idaho Supreme Court held that the Employees were seeking additional wages within the meaning of Idaho Code section 45-614. As such, the Court held that the six-month statute of limitations applied to the Employees' claims. Because the Employees filed their complaint more than six months after receiving their yearly bonuses, their complaint was time-barred, and the Court affirmed the district court's grant of summary judgment.

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