

PREFACE

The United States Supreme Court decided two cases with potentially far-reaching impact under the Age Discrimination in Employment Act of 1967 (ADEA) in 2009. In June 2009, *Gross v. FBL Financial Services, Inc.* held that the ADEA does not authorize an alleged mixed-motives age discrimination claim. In April, 2009, *14 Penn Plaza LLC v. Pyett* held that a provision in a collective-bargaining agreement that clearly and unmistakably requires union members to arbitrate ADEA claims is enforceable as a matter of federal law. In addition to summarizing the holdings and impact of those 2009 decisions, this Cumulative Supplement provides updates based on appellate and trial court decisions across the country through December 31, 2008.

The Supplement follows the organization of the Main Volume, *Age Discrimination in Employment Law*. The text does not contain headings where there have been no significant developments under that heading since publication of the Main Volume; but the table of contents of each chapter makes it clear, by the presence or absence of page number entries, exactly where in the volume updating material has been included.

The extensive contributions of the associate editors and contributing editors to the preparation of this Supplement are very gratefully acknowledged. This Supplement incorporates updates to developments concerning the ADEA noted in the midwinter meeting reports of the ADEA Subcommittee to the ABA Labor and Employment Section's Committee on Federal Labor Standards Legislation. This FLSL is truly a vibrant, working Committee and I am honored to be a member. I also thank the Section of Labor and Employment Law for its support and encouragement in this endeavor. There are a large number of others who made valuable contributions without which this project could not have been completed; among these, very special thanks are due to Tim Darby and Karen Ertel of BNA Books, and my firm's dedicated research librarian, Nan Crotty.

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Editor-in-Chief

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