

September 16, 2022

Dan Ruben
Executive Director
Equal Justice America
13540 East Boundary Road
Building II – Suite 201
Midlothian, VA 23112

RE: Experience at Greater Boston Legal Services as an Equal Justice America Fellow

Dear Mr. Ruben,

During my internship at GBLS, I did direct client work, conducted legal research, and drafted memos, demand letters, and motions. I worked with 7 different clients, most of whom had issues with wage theft. I conducted intakes, interviewed clients, and worked with my supervisors to figure out next steps for their potential claims. My cases were supervised by David McKenna, Emma Hornsby, Hannah Tanabe, Jason Salgado, and Audrey Richardson.

One of my cases early into the internship was a UI appeal. A client had lost their appeal for unemployment, so I drafted a complaint for judicial review after listening to the appeal hearing. I worked with a supervising attorney and paralegal in editing the complaint and it was submitted to Quincy District Court. I also had the opportunity to write another motion – this time with a different attorney and my fellow intern.

Together, we drafted a motion for summary judgment on the issue of employment classification for a client who had not received all her wages and was essentially fired for having COVID. The motion went through the elements of employee classification to show that even though our client was assigned jobs through an app, she was still an employee, and therefore was covered under the applicable wage laws. The supervising attorney on this case will be arguing that motion in September, and in preparation, I attended a meeting he had with our Litigation Director to listen to feedback and finetune the strategy of the case.

In addition to writing motions, I also wrote a demand letter for a client who did not receive years' worth of overtime payments and severely injured his back while working for his employer. The employer created shell companies to pay our client and other workers to avoid liability under wage laws, so we referred the case to the Massachusetts Attorney General's Fair Labor Division for further investigation.

I conducted several interviews with the client before submitting a complaint to the AG's office, along with a letter outlining some more specific facts about the case, including a wage chart and a spreadsheet with other vulnerable workers. I did not expect to do any work around U and T visas, which I honestly had no understanding of until this summer. One of the clients I spoke with initially came to us about missing overtime wages and wrongful termination. However, as the supervising attorney and I dug deeper into her case, we discovered that she had been trafficked from El Salvador to work with the owners of her restaurant. We conducted a few

more interviews with the client before deciding to write a letter to the Department of Labor to open an investigation.

Unfortunately, there is still much more to be done on this case, including working on the client's U/T visa applications, which I was not able to do. However, in another case, I learned more about the U/T visa application process. This client was another victim of labor trafficking and had a very traumatic experience with his employer at a pizza parlor.

What I found to be remarkable about my work this summer was that all the clients I worked with were immigrants and often had immigration issues along with whatever employment claim that led them to GBLS. I was deeply troubled by how my clients were exploited in such inhumane ways, leading to a host of other issues, including the deterioration of their health. The stories of my clients had mirrored the story of my own family in certain ways, so I felt particularly compelled to ensure they reached some sense of stability. My experience at GBLS as an EJA fellow informed a lot about how I now think about our local economy – more specifically, I've learned the extent to which our city is built upon the labor of immigrants who continue to be denied the most basic legal protections. In the end, this work inspired me to continue pursuing a career in public interest. I'm grateful to EJA for the opportunity to do the work I have always dreamed of doing.

Thank you,
Jessica Rahmoune
Boston University School of Law