

October 18, 2018

Dan Ruben  
Executive Director  
Equal Justice America  
13540 East Boundary Road Building II, Suite 204  
Midlothian, VA 23112

Dear Mr. Ruben:

I write to express my gratitude for the Equal Justice America Fellowship funding that helped make my summer experience at Bet Tzedek Legal Services' Employment Rights Project ("ERP") possible. As a summer law clerk, I had the opportunity to join the work of ERP's seasoned and dedicated attorneys as well as their wonderful clients in the struggle to ensure workplace justice and end wage theft in Los Angeles. This summer also allowed me to develop a variety of skills that are essential to my goal of becoming a strong advocate for workers, especially immigrant workers, as they seek economic justice.

Low-wage workers in Los Angeles face rampant wage theft: workers receive less than the minimum wage, do not receive overtime hours, and face retaliation when they speak up. It was a privilege to collaborate with workers, almost entirely in Spanish, through every step of their long path to justice. The first step is the intake interview: I conducted dozens of intake interviews at ERP's biweekly clinic and others organized by workers' centers. Next, I worked with clients on factual development of their cases, including developing narratives about retaliation, calculating their unpaid wages and overtime, and researching defendant employers. Then, I drafted wage claims, retaliation narratives, demand letters, or other filings. Throughout the process, I received top quality training from ERP attorneys with decades of experience.

Employers, especially those in the car wash and garment industries, frequently falsify pay records, and threaten their workers, including with the prospect of deportation. ERP's clients bravely come forward in the face of this, and it was a privilege to work with them. I developed a strong relationship with one worker throughout the summer as we developed her complex claim totaling over \$100,000 against a number of defendants. We were able to develop a number of strong arguments and the prospects at hearing look good. In another case, I worked with a convenience store worker on her

claim for unpaid wages. We were able to successfully negotiate a settlement for her unpaid wages at her administrative hearing. In a third case, four car wash workers had filed wage claims when they were paid under the minimum wage, only to face immigration-status-based threats and virulent racism by their employer. We worked together to draft anti-retaliation complaints that may mean the employer will have to pay the workers tens of thousands of dollars.

I am grateful to have received your support this summer. With it, we were able to vindicate individual workers' rights and push the needle on a pervasive problem. Further, the experience has informed my focus during this year and will continue to shape my journey as an advocate.

Sincerely,

Matthew Erle  
UCLA School of Law  
Class of 2020

Writer's direct line: (323) 648-4707  
Writer's email: mdecarolis@bettzedek.org



*via email, katie@equaljusticeamerica.org*

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Executive Director  
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Midlothian, VA 23112

Dear Mr. Ruben:

I am a staff attorney at Bet Tzedek Legal Services' Employment Rights Project ("ERP"). I was one of Matthew Erle's supervising attorneys this summer.

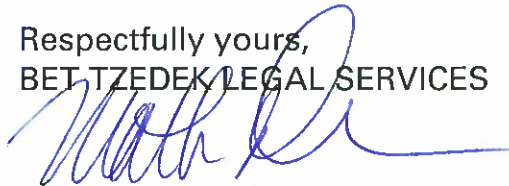
The ERP represents low-wage workers in Los Angeles, America's wage theft capital, as they vindicate their employment rights. We conduct intake interviews during our semi-monthly walk-in clinic and through our relationships with organizers at worker centers like the CLEAN Car Wash Campaign. We then represent workers in their claims for unpaid wages, overtime, and retaliation through settlement or proceedings at the California Labor Commissioner. Since it opened in 1999, the Project has helped more than 5,400 workers through direct representation and class actions – winning more than \$36 million in judgments and settlements.

Matt contributed to numerous cases this summer at all different stages of the process. He conducted intake interviews and helped identify legal issues. He worked with three workers to draft retaliation claims against their car wash employer who had made explicitly immigration-status-based threats against them for requesting their unpaid overtime. He worked with a garment worker on her claims against her former employer and several fashion brands for over one hundred thousand dollars in unpaid wages. He drafted demand letters and

conducted legal research and writing. Matt made a significant positive contribution to our work at a critical time. He especially excelled at taking initiative and at factual investigations, as reflected in his very positive final evaluation. His Spanish-language skills were also key to successfully working with our clients.

It was a pleasure having Matt intern with ERP for summer 2018. If you have any questions, please do not hesitate to contact me at (323) 648-4707 or [mdecarolis@bettzedek.org](mailto:mdecarolis@bettzedek.org). Thank you.

Respectfully yours,  
BET TZEDEK LEGAL SERVICES



Matthew E. DeCarolis  
Staff Attorney