

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JAVIER RODRIGUEZ, JORGE
ESQUILIN, HARRY CHARCALIS, and
DARREN COUTURIER, individually and
on behalf of all persons similarly situated,

Plaintiffs,

v.

TRI-WIRE ENGINEERING SOLUTIONS,
INC.; COMCAST CORPORATION; and
COMCAST CABLE COMMUNICATIONS
MANAGEMENT, LLC,

Defendants.

No.: 1:21-cv-10752

Hon. Patti B. Saris, U.S.D.J.

**PLAINTIFFS' UNOPPOSED MOTION TO ENLARGE PAGE LIMIT AS TO
PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF THE SETTLEMENT**

Plaintiffs Javier Rodriguez, Jorge Esquilin, Harry Charcalis, and Darren Couturier ("Plaintiffs") respectfully request that this Court extend the page limit for the Memorandum of Law in Support of Plaintiffs' Motion for Approval of Collective Settlement and Preliminary Approval of Class Action Settlement ("Motion for Preliminary Approval") from 20 pages to 30 pages. As grounds for this Motion, Plaintiffs state as follows:

1. Pursuant to Local Rule 7.1.(b)(4), a memorandum in support of a motion may not exceed 20 pages without leave of Court.

2. Plaintiffs and Defendants Comcast Corporation and Comcast Cable Communications Management, LLC, have reached a proposed settlement in this action, and have executed a written settlement agreement (the "Settlement"). Plaintiffs are in the process of preparing their Motion for Preliminary Approval of the Settlement, and will be filing that motion

on March 17, 2023. *See* ECF 102-103.

3. The proposed settlement encompasses five provisional state law classes in addition to an FLSA collective. Here, Plaintiffs must present in their Motion for Preliminary Approval an extensive amount of procedural history, explanation of the Settlement's terms, and legal analysis under the framework of both Federal Rule of Civil Procedure 23 and the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*, and will thus require a memorandum of more than 20 pages, and up to 30 pages in support of their Motion.

4. Defendants Comcast Corporation and Comcast Cable Communications Management, LLC have agreed not to oppose the requested relief.

5. There is good cause for the requested enlargement and such enlargement will not prejudice the rights of any party.

For the reasons cited herein, Plaintiffs respectfully request that the Court grant an enlargement of the page limitation to allow up to 30 pages for Plaintiffs' Memorandum of Law in support of their Motion for Preliminary Approval.

Dated: March 16, 2023

Respectfully submitted,

/s/ Michelle S. Lim
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*Attorneys for Plaintiffs, the Collective, and
the Proposed Classes*

CERTIFICATE OF CONFERENCE

In accord with LR 7.1(a)(3), I hereby certify that Plaintiffs' counsel has conferred with counsel for Defendants Comcast Corporation and Comcast Cable Communications, LLC and that Defendants assent to the relief requested.

Dated: March 16, 2023

/s/ Michelle S. Lim

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2023, a copy of this document was served by electronic filing on all counsel of record.

/s/ Michelle S. Lim