

EXHIBIT 2

**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.

Civil Action No.: Case 1:21-cv-10752-PBS

DECLARATION OF CATHERINE K. RUCKELSHAUS

I, Catherine K. Ruckelshaus, declare under penalty of perjury as follows:

1. I currently serve as the General Counsel and Legal Director of the National Employment Law Project (“NELP”), and I have worked as an attorney for NELP since 1995.
2. I submit this Declaration in support of the proposed *cy pres* distribution to NELP for residual settlement funds in the above class action.
3. Founded in 1969, NELP is a leading advocacy organization with the mission to build a just and inclusive economy where all workers have expansive rights and thrive in good jobs. Together with local, state, and national partners, NELP advances its mission through transformative legal and policy solutions, research, capacity-building, and communications. *See generally* <https://www.nelp.org/>. NELP’s administrative offices are located at 90 Broad Street, Suite 1100 in New York City.

4. NELP has worked to shift narratives, demand just policies, and expand rights related to: adopting “just cause” laws; advancing fair chance licensing; ensuring worker health and safety; expanding unemployment benefits; advocating for a just COVID-19 recovery; combating wage theft and forced arbitration laws; raising the minimum wage and fighting; wage preemption; securing rights, benefits, and protections, for gig and contract workers; and increasing capacity to build Black, immigrant worker power in the South.

5. NELP’s victories over the last decade have impacted the lives of an estimated 100 million workers and their families. NELP leads and collaborates in fights for higher pay and just benefits, secure and safe jobs, and support at each stage in a worker’s life. NELP seeks to build worker power and challenge rules that allow corporate harm and undue power.

6. NELP has collaborated in projects and representations in all 50 states plus the District of Columbia and Puerto Rico. In 2020-2021 alone, NELP provided services in 39 states (plus the District of Columbia and Puerto Rico), provided 284 technical assistance sessions, supported the capacity of 35 worker centers, and testified in 24 congressional, state, or local hearings.

7. NELP relies almost entirely on funding through grants and by individual and organization donations. NELP anticipates an increased need for general support of all of its programs, due to macroeconomic pressures on our funders that have resulted in smaller grants over the coming few years.

8. NELP and its staff receive regular commendations and recognition for its integrity and work with communities in need. A few recent examples include a 2022 award as one of the Top Non-Profit Times’ Power and Influence for NELP Director Rebecca Dixon, a coveted Rockefeller Foundation scholarship to the Bellagio Residency for scholars, and a 2018

commendation from the National Committee on Safety & Health for its research and support for worker safety and health, to name just a few.

9. NELP has received numerous *cy pres* awards from over 50 class collective and action lawsuits since 2018, from cases providing for unpaid wages and workplace damages for low-paid workers. These funds have allowed NELP to serve more workers across the country, promote best practices for combating wage theft, and ensuring better compliance in job sectors where violations persist.

I declare under penalty of perjury under the laws of the United States, pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed in New York, New York on 2/23/2023.

DocuSigned by:

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CATHERINE K. RUCKELSHAUS