

MASSACHUSETTS SUPREME JUDICIAL COURT

Arias-Villano v. Chang & Sons Enterprises, Inc., 481 Mass. 625

118 N.E.3d 835 (2019) · No. SJC-12548 · Decided March 15, 2019

SUMMARY

The Massachusetts Supreme Judicial Court held that workers who cleaned, inspected, sorted, weighed, and packaged bean sprouts were entitled to overtime pay for hours worked over forty per week. The court narrowly construed the agricultural exemption in G. L. c. 151, § 1A (19), concluding that it covered planting, raising, and harvesting crops but not postharvest activities. The court reversed the defendants’ summary judgment and remanded for further proceedings.

CASE DETAILS

COURT	Massachusetts Supreme Judicial Court
WRITING FOR THE COURT	Budd, J.; Gants, C.J.; Gaziano, J.; Lowy, J.; Cypher, J.; Kafker, J.
JURISDICTION	Massachusetts
DECIDED	March 15, 2019
DOCKET	SJC-12548
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The plaintiffs appealed from cross-summary-judgment rulings in favor of the defendants in an action seeking overtime wages. The Supreme Judicial Court granted the plaintiffs' application for direct appellate review.
STANDARD OF REVIEW	De novo review of the motion judge's statutory-interpretation decision and summary-judgment ruling on an undisputed record.
PRECEDENTIAL VALUE	Published opinion of the Massachusetts Supreme Judicial Court; precedential.
PARTIES	Ana Arias-Villano, Jorge Alvarez, Noelia Gomez-Garcia, Beatriz Perez-Hernandez, Marlyn Sosa-Saucedo, Edwin Merida-Lopez, Jacobo Lopez-Funes, Adrian Cervantes-Acosta, Florindo Alvarado-Argueta, David Pacheco-Herrera, Maria Soto-Aguilera, Ronaldo Carrillo-Funes, Edilmar Morales-Matias, Reynaldo Morales-Morales, Rolando Alvarado-Argueta, Paulino Chaparro-Bravo v. Chang & Sons Enterprises, Inc., Sidney Chang, Tso-Cheng Chang

TOPICS

wage and hour

statutory interpretation

appellate procedure

standard of review

employment law

PRACTICE AREAS

employment law

wage and hour

statutory interpretation

QUESTIONS PRESENTED

1. Whether workers who clean, inspect, sort, weigh, and package bean sprouts are engaged in agriculture and farming within the agricultural exemption to Massachusetts's overtime statute, G. L. c. 151, § 1A (19).
2. Whether the Massachusetts overtime statute's agricultural exemption should be interpreted using the broader definition of agriculture in the Federal Fair Labor Standards Act.
3. Whether the plaintiffs were entitled to overtime compensation for hours worked in excess of forty per week.

HOLDINGS

1. The agricultural exemption in G. L. c. 151, § 1A (19), does not apply to employees who perform postharvesting activities such as cleaning, sorting, weighing, and packaging agricultural commodities.
2. Massachusetts's overtime statute must be broadly construed in light of its remedial purpose, and exemptions from the overtime requirement must be construed narrowly.
3. The broad definition of agriculture in the Federal Fair Labor Standards Act does not govern the meaning of the agricultural exemption in the Massachusetts overtime statute.
4. Because the plaintiffs were not engaged in agriculture and farming within the meaning of the Massachusetts exemption, they were entitled to overtime pay for work performed in excess of forty hours per week.

KEY QUOTATIONS

"We conclude that, under the plain language of the statute and the legislative history, the agricultural exemption does not apply to the plaintiffs, and therefore, they are entitled to overtime wages." (at 625)

"At the outset, we note that, "as a remedial measure, the overtime statute must be broadly construed in light of its purpose, which is in part to compensate for a long work week."" (at 627)

"The definition refers to "growing and harvesting" commodities but does not include postharvesting activities." (at 628)

"By reading the plain language of the exemption in G. L. c. 151, § 1A (19), narrowly to include only the work of planting, raising, and harvesting crops, we give effect to the statutory definition of agricultural and farm work in G. L. c. 151, § 2, as well as to the legislative intent to balance the interests of workers and employers." (at 636)

FACTUAL BACKGROUND

The defendants operated a year-round, 44,000-square-foot facility that used an automated hydroponic process to grow, harvest, package, and distribute bean sprouts. The plaintiffs were not involved in growing the sprouts; they cleaned, inspected, sorted, weighed, and packaged them, cleaned the facility, and discarded waste. They regularly worked more than forty hours per week, sometimes as many as seventy hours, but were not paid overtime for hours exceeding forty.

PROCEDURAL HISTORY

The plaintiffs commenced a civil action in the Massachusetts Superior Court on November 17, 2015, alleging that their employers failed to pay overtime wages for work exceeding forty hours per week. On cross motions for summary judgment, the Superior Court allowed the defendants' motion and denied the plaintiffs' motion, concluding that the plaintiffs' work fell within the agricultural exemption to the Massachusetts overtime statute. The Supreme Judicial Court granted direct appellate review, reversed both rulings, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The matter was remanded to the Superior Court for further proceedings consistent with the opinion. The plaintiffs' motion for summary judgment was to be allowed, and the defendants' motion was to be denied.

CASES CITED

- Boazova v. Safety Insurance Co., 462 Mass. 346, 347 (2012)
- Massachusetts Insurers Insolvency Fund v. Berkshire Bank, 475 Mass. 839, 841 (2016)
- Mullally v. Waste Management of Mass., Inc., 452 Mass. 526, 531 (2008)
- Pyle v. School Committee of S. Hadley, 423 Mass. 283, 285 (1996)
- Boston Police Patrolmen's Ass'n v. Boston, 435 Mass. 718, 719-720 (2002)
- Casseus v. Eastern Bus Co., 478 Mass. 786, 797 (2018)
- Wood v. Executive Office of Communities & Dev., 411 Mass. 599, 604-605 (1992)
- Stenberg v. Carhart, 530 U.S. 914, 942 (2000)
- Bulger v. Contributory Retirement Appeal Bd., 447 Mass. 651, 660 (2006)
- Perez v. Bay State Ambulance & Hosp. Rental Serv., Inc., 413 Mass. 670, 675 (1992)
- Booma v. Bigelow-Sanford Carpet Co., 330 Mass. 79, 82 (1953)
- Commonwealth v. Mogelinski, 466 Mass. 627, 633 (2013)
- Wright v. Collector & Treasurer of Arlington, 422 Mass. 455, 457-458 (1996)
- Swift v. AutoZone, Inc., 441 Mass. 443, 447-449 (2004)
- Valerio v. Putnam Associates Inc., 173 F.3d 35, 40 (1st Cir. 1999)

- *Globe Newspaper Co. v. Boston Retirement Bd.*, 388 Mass. 427, 432-433 (1983)
- *International Fidelity Insurance Co. v. Wilson*, 387 Mass. 841, 854-855 (1983)
- *Somerset v. Dighton Water Dist.*, 347 Mass. 738, 743 (1964)

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