

INSIGHTS + NEWS

Client Alert: International Employers Take Note – The Massachusetts Wage Act Can Have Global Reach

BY TRACY THOMAS BOLAND AND BENJAMIN J. HINKS • DECEMBER 12, 2025

The United States District Court for the District of Massachusetts recently held that an employee based in Ukraine had standing to sue his employer under the Massachusetts Wage Act (the “Wage Act”) (see *Serebrennikov v. Proxet Group LLC*, No. 1:22-cv-12051-IT). The plaintiff, who primarily worked in the Ukrainian office of a Massachusetts software company, claimed the company failed to pay him over \$500,000 in salary, vacation, bonuses, and expenses.

To determine whether the employee had standing under the Wage Act, the District Court applied precedent from the First Circuit Court of Appeals to assess whether Massachusetts had the “most significant relationship” to the parties. In doing so, the District Court considered the following factors:

- Location of the employer’s headquarters;
- Where the employee’s work was performed;
- Employee’s interactions with Massachusetts;
- Choice-of-law clauses in employment agreements; and
- Other states’ connections to the parties.

On balance, the District Court found that Massachusetts had the strongest connection to the parties’ employment relationship. Among the determinative factors were that the employer’s headquarters and only U.S. office are in Massachusetts. Additionally, the plaintiff reported to Massachusetts management, supported the company’s U.S. operations, and his employer-issued tax forms listed the company’s Massachusetts address (indicating payment came from Massachusetts). As such, the plaintiff had standing to bring a claim under the Wage Act.

KEY TAKEAWAYS FOR EMPLOYERS

- The Massachusetts Wage Act can apply extraterritorially.
- An employee’s physical location is not determinative; employers must instead assess whether the employment relationship is significantly tied to Massachusetts.
- Massachusetts companies should review their employment agreements and classification practices for global and out-of-state workers.

Employers who have questions related to this alert are advised to contact their [employment counsel at Bowditch](#).

