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Attorneys for Plaintiff LANCE HILD, in a Representative capacity only, and on behalf of other members of the public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

LANCE HILD, in a Representative capacity
only, and on behalf of other members of the
public similarly situated

Plaintiff,

v.

WESTSIDE BUILDING MATERIAL
CORPORATION, a California Corporation,
and DOES 1-10, inclusive

Defendant

CASE NO. 37-2021-00041781-CU-OE-CTL

**DECLARATION OF LANCE HILD IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION RE: PAGA SETTLEMENT
APPROVAL**

Date: September 2, 2022

Time: 10:30 a.m.

Dept.: C-70

Judge: Hon. Carolyn Caietti

1 I, Lance Hild, declare as follows:

2 1. I am the named Plaintiff in this matter.

3 2. I make this declaration in support of Plaintiff's Unopposed Motion Re: PAGA Settlement
4 Approval. I am personally familiar with the facts set forth in this declaration and, if called to
5 testify, could and would do so.

6 3. I respectfully request an Enhancement Award, based on the facts set forth below. To confirm,
7 I filed the instant lawsuit in an attempt to remedy, and halt, certain Labor Code violations I
8 believed were being experienced by both myself and other Westside employees.

9 **The Public Nature of the Lawsuit**

10 4. Prior to the filing of this instant lawsuit, I was counseled by my attorneys of the potential
11 stigma of being a Plaintiff in this type of lawsuit. I understood that the Complaint is a "public
12 document," which could be obtained by prospective future employers.

13 5. Despite these risks, I remained committed to prosecuting the lawsuit on behalf of both myself
14 and the other employees.

15 6. I respectfully submit that this factor weighs in favor of an Enhancement Award.

16 **The Risks Incurred If The Case Was "Lost"**

17 7. I was also advised when I brought this case that, had I lost the case, I could have been
18 personally liable for Defendants' costs. I was further advised this could be well into the tens
19 of thousands of dollars for this type of case.

20 8. Despite this risk, I remained committed to prosecuting the lawsuit on behalf of both myself and
21 the other employees.

22 9. I respectfully submit that this factor weighs in favor of an Enhancement Award.

23 **The Requirement That I Resign My Employment With Westside**

24 10. As part of the proposed Settlement of this matter, I was required to resign from my
25 employment with Westside.

26 11. Despite this requirement, I remained committed to participating in the settlement, which I
27 understand benefits both myself and the other employees.

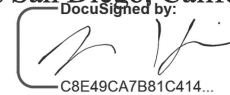
28 12. I respectfully submit that this factor weighs in favor of an Enhancement Award.

Declaration of Lance Hild

The Cooperation With My Attorneys In Prosecuting This Matter

13. To my recollection, I met with my Attorneys (usually Mr. Sullivan) on 5 separate occasions. 2 of those meetings lasted in excess of 2 hours.
14. During these meetings, I would review and explain certain documents numerous documents turned over by Defendants from my employment and explain my role (as well as others) during work. I also helped Mr. Sullivan identify numerous other employees who could support the claims I was making in this lawsuit. I contacted many of these individuals myself to verify their willingness to participate.
15. I also spoke with my attorneys on the phone, on at least 7 other occasions.
16. In total, I estimate that I spent at least 20 hours related to the above mentioned tasks directly working with my attorneys. I also spent at least another 5-7 hours of my own time gathering evidence and outlining issues that I later shared with my attorneys.
17. I respectfully submit that this factor weighs in favor of an Enhancement Award.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 25th day of August, 2022 at San Diego, California.

DocuSigned by:

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Lance Hild