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11 Attorneys for Plaintiff Benjamin Edward Seilhamer and Trevor West,
12 individually, and on behalf of all others similarly situated.

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF LOS ANGELES**

15 BENJAMIN EDWARD SEILHAMER and
16 TREVOR WEST, individually and on behalf
17 of all others similarly situated,

18 Plaintiffs,

19 v.

20 GUITAR CENTER STORES, INC.; and
21 DOES 1 through 20, inclusive,

22 Defendants.

Case No. 23STCV00544

Assigned For All Purposes To:

Hon. Elihu M. Berle

Dept. 6

23 **DECLARATION OF BENJAMIN**
24 **EDWARD SEILHAMER IN SUPPORT**
25 **OF PLAINTIFFS' MOTION FOR**
26 **PRELIMINARY APPROVAL OF**
27 **CLASS AND REPRESENTATIVE**
28 **PAGA SETTLEMENT**

1 I, Benjamin Edward Seilhamer, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify,
3 I could and would do so competently under oath. I make this declaration, with the help of a
4 translator, in support of my Motion for Preliminary Approval of Class Action Settlement.

5 2. I worked for Defendant Guitar Center Stores, Inc. ("Defendant") as a non-exempt
6 employee in the position of Music Instructor from about June 2021 to February 2022.

7 3. Based on my experience and knowledge of Defendant's wage and hour policies
8 and my familiarity with its employment practices, I worked with my attorneys to bring claims on
9 my own behalf as well as on behalf of other non-exempt employees of Defendant.

10 4. I am seeking to become a Class Representative in this case. I believe my
11 experiences are similar to Defendant's other non-exempt employees. I believe we were all subject
12 to the same employment policies and practices.

13 5. I do not have any conflicts with other non-exempt employees that would hinder my
14 ability to represent them. Therefore, I believe I will adequately represent Defendant's other non-
15 exempt employees.

16 6. My interests as a named plaintiff in this litigation are not adverse to the interest of
17 the other non-exempt employees. My interests are the same as the interests of the other non-exempt
18 employees because we were all subject to the same policies and practices and were similarly injured
19 by Defendant's company-wide policies and practices. I am seeking the same recovery on behalf of
20 myself and other non-exempt employees, which is to collect unpaid wages, meal period premiums,
21 rest period premiums, and penalties that are owed by Defendant.

22 7. I have always kept the best interests of the other non-exempt employees while
23 performing my duties as the named plaintiff in this action. I have been committed throughout the
24 course of this litigation to vigorously prosecuting this case on behalf of myself and the other non-
25 exempt employees. I believe that I have demonstrated my ability to advocate for the interests of the
26 other non-exempt employees by initiating this lawsuit, providing documents to my attorneys
27 pertaining to my employment with Defendant, keeping in regular contact with my attorneys
28 regarding the status of the lawsuit, providing my attorneys with any information needed to continue

1 to prosecute this action, remaining available during the two full-days of mediation, and reviewing
2 the settlement and its terms to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary, and will continue
4 to make myself available to assist in this case in the future as needed.

5
6 I declare under penalty of perjury under the laws of the State of California that the foregoing
7 is true and correct and that this declaration was executed on July 22, 2025 in California.

8
9 
Benjamin Seilhamer (Jul 23, 2025 06:48:02 PDT)
Benjamin Edward Seilhamer