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Attorneys for Plaintiffs DAMON SILER and
ARISTOTLE DELPILAR, individually, and
on behalf of Aggrieved Employees pursuant
to the California Private Attorneys General Act

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

DAMON SILER and ARISTOTLE
DELPILAR, individually, and on behalf of
Aggrieved Employees pursuant to the
California Private Attorneys General Act,

Plaintiffs,

vs.

CALL-THE-CAR dba CALL THE CAR, a
California Corporation; CALL-THE-CAR,
LLC dba CALL THE CAR, a California
Limited Liability Company; and DOES 1
through 25, inclusive,

Defendants.

Case No. 24STCV07514

Honorable David S. Cunningham
Department SS11

**DECLARATION OF DAMON SILER IN
SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF PAGA
SETTLEMENT AND AWARD OF PAGA
COUNSEL FEES PAYMENT, PAGA
COUNSEL LITIGATION EXPENSES
PAYMENT, REPRESENTATIVE
ENHANCEMENT PAYMENT, AND
ADMINISTRATION EXPENSES
PAYMENT**

Date: September 5, 2025
Time: 11:00 a.m.
Department: 11

Complaint Filed: March 25, 2024
FAC Filed: August 16, 2024

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1 helped my attorneys prepare for and participate in mediation.

2 6. I understood that in the event this matter did not settle and proceeded with trial, I would
3 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
4 responsibilities that are necessary for this lawsuit.

5 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
6 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
7 also understood there was a risk of losing any current job and/or income due to the time that I would
8 have to miss work in order to fulfill my duties and responsibilities in this matter, including having to
9 attend the trial, if needed. Most importantly, I believe that by pursuing this case, I have taken a
10 significant risk because future employers can easily find out that I sued my prior employer, and that
11 may negatively impact my ability to find employment within this industry – and even outside of it –
12 in the future. In contrast, the other employees who will be receiving money from this lawsuit did not
13 have to file a claim or take the risk that I took in bringing this action.

14 8. I reviewed the settlement agreement in this matter and discussed it with my attorneys
15 before I signed it.

16 9. I believe that I have done everything that my attorneys have asked of me and tried, to
17 the best of my ability, to seek relief for the Aggrieved Employees and the State of California. In total,
18 I have spent approximately 40 to 45 hours participating in this case as described above. I think my
19 efforts helped to get the result obtained in this matter.

20 10. I understand that any resolution of this lawsuit on a representative basis is subject to
21 court approval. At all times throughout the course of this litigation I have considered the interests of
22 the Aggrieved Employees above my own personal interests.

23 11. I respectfully request that the Court approve and award me a Representative
24 Enhancement Payment in the amount of \$10,000.00 for my efforts and active participation in the case
25 and for the broader, general release of all claims that I have or may have against Defendant in
26 connection with the settlement. Taking into consideration the time that I dedicated to this case, I
27 believe that this amount is reasonable.

28 12. I am not related to anyone associated with Blackstone Law, APC.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct.

3 Executed on 05/13/2025 at San Bernardino, California

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