

Miriam L. Schimmel (State Bar No. 185089)  
mschimmel@blackstonepc.com  
Joana Fang (State Bar No. 309623)  
jfang@blackstonepc.com  
Alexandra Rose (State Bar No. 329407)  
arose@blackstonepc.com  
Jared C. Osborne (State Bar No. 335968)  
josborne@blackstonepc.com  
**BLACKSTONE LAW, APC**  
8383 Wilshire Boulevard, Suite 745  
Beverly Hills, California 90211  
Tel: (310) 622-4278 / Fax: (855) 786-6356

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 ARISTOTLE  
DELPILAR 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

**DECLARATION OF ARISTOTLE DELPILAR**

I, Aristotle Delpilar, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am one of the named plaintiffs in the above-entitled action. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Call-The-Car *dba* Call the Car (“Defendant”) as an hourly-paid, non-exempt Customer Service Representative from approximately June 2023 to November 2024.

3. During my employment, I questioned whether Defendant was paying its employees correctly and I believed that I, along with other employees, were not being allowed to take meal and rest breaks lawfully, among other things. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, not providing employees with lawful meal and rest breaks, not reimbursing employees for business expenses, and other related violations.

4. As a result, I decided to seek legal advice about my experience working for Defendant and to obtain information about filing a lawsuit to redress these grievances. In that regard, I contacted Blackstone Law, APC and spoke with their attorneys to gain a better understanding of what it meant to bring a lawsuit under the California Labor Code Private Attorneys General Act of 2004 (“PAGA”). After speaking with them, I decided to retain Blackstone Law, APC to proceed with my individual claims and the representative action pursuant to PAGA.

5. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Defendant, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid and/or non-exempt employees, and helped determine what other documents and information they could obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional

1 information that I had obtained.

2 6. I was always available to answer any questions my attorneys had and to speak and meet  
3 with my attorneys whenever they needed me. I responded to them as quickly as possible and gave  
4 them as much information as I could. I described Defendant's policies, practices, and procedures and  
5 helped my attorneys prepare for and participate in mediation.

6 7. I believe that I have done everything that my attorneys have asked of me and tried, to  
7 the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I think  
8 my efforts helped to get the result obtained in this matter.

9 8. I reviewed the settlement agreement in this matter and discussed it with my attorneys  
10 before I signed it. I have also executed a separate agreement to settle and resolve my individual claims  
11 with Defendant.

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

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

15 Executed on 05/13/2025 at Burbank, California

16 *Aristotle Delpilar*  
17

18 Aristotle Delpilar  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28