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15 and all others similarly situated

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 SILVERIO PEREZ, on behalf of
19 himself and all others similarly situated

20 PLAINTIFF,

21 V.

22 ECOLAB PRODUCTION LLC, a
23 Delaware Limited Liability Company;
24 and DOES 1 through 100, inclusive

25 DEFENDANTS.

Case No.: 5:24-cv-01954-SSS-SP

PAGA ACTION

**DECLARATION OF SILVERIO
PEREZ IN SUPPORT OF MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Date: September 11, 2026

Time: 2:00 p.m.

Courtroom: 2

[Honorable Sunshine S. Sykes]

Complaint Filed: July 24, 2024

FAC Filed: October 22, 2024

Date of Removal: September 12, 2024

**DECLARATION OF SILVERIO PEREZ IN SUPPORT OF MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

DECLARATION OF SILVERIO PEREZ:

I, Silverio Perez, declare as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am a former employee of Defendant Ecolab Production LLC (“Defendant”) and worked for Defendant from approximately October 2022 to August 2023.

3. During my employment with Defendant, I worked shifts in excess of eight (8) hours in a workday and in excess of twelve (12) hours in a workday.

4. During my employment with Defendant, it is my understanding that my time (including for meal periods) was rounded, or otherwise not paid based on the actual times I started or stopped working.

5. During my employment with Defendant, I was required to carry and monitor a walkie talkie or similar communication device for the full duration of my work shift, including during meal period and rest periods.

6. I am submitting this declaration in support of the Motion for Approval of PAGA Settlement.

7. I initiated contact with The Myers Law Group, A.P.C. to discuss issues concerning my employment with Defendant. I was concerned that Defendant did not properly pay for all my hours worked and was not properly providing meal periods or rest periods. I was actively involved in this action. I assisted in all aspects of this litigation, including the early investigation period before the lawsuit was filed, providing areas of inquiry to my attorneys, providing my attorneys with copies of my employment records and information, and attending attorney meetings and multiple telephonic conferences. I conservatively estimate I have spent approximately 30-35 hours on this case.

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DECLARATION OF SILVERIO PEREZ IN SUPPORT OF MOTION FOR APPROVAL OF PAGA SETTLEMENT

1 8. I spoke to my attorneys and their staff on numerous occasions to educate
2 my attorneys about Defendant's policies and practices regarding the payment of
3 wages, meal and rest periods, and timekeeping practices. I communicated with my
4 counsel regularly throughout this litigation. Further on February 20, 2026, I
5 participated in the mediation with mediator Steve Pearl, Esq.

6 9. I understand that I am the named plaintiff and representative in the action
7 of *Perez v. Ecolab Production, LLC*, USDC, Central District, Case No. 5:24-cv-
8 01954-SSS-SP. In other words, I understand that I am responsible for representing the
9 interests of the California Labor Workforce Development Agency ("LWDA") and
10 aggrieved employees (or PAGA Employees). Further, I understand that this action
11 was brought on behalf of other similarly situated hourly employees who worked for
12 Defendant in the State of California, and thus I am acting as a representative for the
13 aggrieved employees. I understand that this means I always consider the interest of
14 the LWDA and aggrieved employees just as I would consider my own interests and
15 put the interests of the LWDA and aggrieved employees first in this case. I recognize
16 and accept that any resolution of the lawsuit is subject to court approval and must be
17 designed in the best interest of the LWDA and aggrieved employees, and that I
18 would/did follow the progress of the lawsuit and did provide all relevant facts to my
19 lawyers. I do believe that the settlement before this Court is in the best interest of the
20 LWDA and aggrieved employees.

21 10. I believe that the Private Attorneys General Act Settlement Agreement
22 and Release of Claims in the gross amount of \$550,000.00 obtained on behalf of the
23 LWDA and aggrieved employees in this case is excellent in view of the complex and
24 varied issues involved with the case. Accordingly, I strongly support the settlement in
25 this matter. When I was contemplating settlement, I always kept the best interests of
26 the LWDA and aggrieved employees in mind over my own and I was not willing to
27 settle the matter until I felt it was in the best interest of the LWDA and aggrieved
28 employees.

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1 11. After the mediation on February 20, 2026, my attorneys provided me
2 with a copy of the settlement agreement, which I completely and carefully reviewed.
3 I then signed the settlement agreement and returned it to my attorneys.

4 12. I accepted the potential risk of being liable for the opposing parties' costs
5 if this lawsuit was unsuccessful. I have accepted the stigma of being a PAGA
6 representative in a wage and hour dispute which potentially affected my future
7 employability.

8 13. It is my opinion that the \$15,000.00 request for my representative service
9 award and general release is fair, reasonable, and adequate. My individual wage and
10 hour claims are currently pending in the American Arbitration Association ("AAA")
11 arbitration proceeding *Perez v. Ecolab Production, LLC*, Case No. 01-25-0003-4104,
12 pursuant to this Court's May 27, 2025, Order. Those individual claims will be released
13 as part of this settlement. I actively pursued this PAGA case and these PAGA claims
14 and I have accepted the potential risk of being liable for the opposing parties' costs if
15 we were unsuccessful in this lawsuit. I do understand that the service award, or
16 amount, is not guaranteed and believe the requested amount is fair and reasonable in
17 light of my work experience and the fact that I am giving up my rights to sue
18 Defendant as part of this settlement by signing a general release pursuant to Civil Code
19 §1542.

20 14. While I truly believe that I was doing the right thing in pursuing this case,
21 I do believe that I have paid a price for the greater good of other employees, who will
22 now obtain concrete relief through the terms of the proposed settlement.

23 15. I support the attorneys' request for fees as I believe the combined fee
24 request of one-third of \$550,000.00, or the amount of \$183,333.33, is fair and
25 reasonable. I believe that the reimbursement of litigation costs of \$22,404.29,
26 exclusive of Settlement Administration Costs, is reasonable in light of the excellent
27 work and favorable result my attorneys achieved.

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16. I have discussed the terms of the settlement with my attorneys, as well as reviewed the settlement agreement, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for the LWDA and aggrieved employees and me.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on Aug 12, 2026 at Fontana, California.


Silverio Perez (Aug 12, 2026 10:24:45 PDT)

Silverio Perez