

PEASE LAW, APC

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Attorneys for Defendant Matt Friedman

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

MELISSA BACELAR, an individual; WAGMOR)	CASE NO. 24STCV01638
PETS, a California non-profit corporation;)	
WYLDER’S HOLISTIC PET CENTER, INC. dba)	DECLARATION OF MATT
THE WAGMOR, a Delaware corporation,)	FRIEDMAN
)	
Plaintiffs,)	
)	
vs.)	
)	
KIM SILL, aka KIMERBLY DAWN DAWSON,)	
an individual; SHELTER HOPE PET SHOP, INC.,)	
a California non-profit corporation; MATT)	
FRIEMDMAN, an individual; FAITH BALLIN,)	
an individual; and DOES 1-500, inclusive,)	
)	
Defendants.)	

I, Matt Friedman, declare:

1. I am over the age of 18 years and competent to testify as a witness. I state the following of my own personal knowledge.
2. It is untrue that I engaged in a campaign to defame the Plaintiffs.
3. I am a documentary filmmaker who has conducted interviews with former employees and customers of Wagmor Pets. These interviews include detailed accounts of their experiences with Wagmor Pets and are in the nature of consumer protection information.
4. I understand that some of these interviews have been posted on the websites thetruthaboutwagmorpets.com and shelterhopepetshop.org, as well as the Instagram accounts [@thetruthaboutwagmorpets](https://www.instagram.com/thetruthaboutwagmorpets) and [@shelterhope_petshop](https://www.instagram.com/shelterhope_petshop). However, I do not own, control, or maintain these websites or Instagram accounts.
5. I have never contacted, communicated with, or coached the 13-year-old Instagram influencer referred to in paragraphs 11-18 of the complaint (the “Minor”). Therefore, the claim that I “told him various lies” (including that Plaintiffs were stalking him in a white Mercedes, that Plaintiffs were sending abusive emails, that Plaintiffs made threats against the Minor, or any other claims) is false.
6. I never implied that my accounts had been hacked or suggested that the Plaintiffs were guilty of “threats” and “cyber bullying.”
7. As I understand, the complaint in this case was sent by Plaintiffs’ attorney to the L.A. Times, California’s Attorney General’s office, and Los Angeles Animal Services in an attempt to deflect from what former Wagmor employees and customers were saying about Plaintiffs..
8. All interviews with these whistleblowers conducted by me as a documentary filmmaker were intended to shed light on Plaintiffs’ business practices. These interviews aim to provide factual information based on the experiences of the interviewees and support the effort to inform the public of relevant issues.
9. I have been presented with no evidence supporting Plaintiffs’ allegations. I believe that this lawsuit is intended to chill free speech and to suppress information that aims to inform the public about the potential fraudulent activities of Wagmor Pets and Melissa Bacelar.

I declare under penalty of perjury under the laws of California the foregoing is true and correct.

Dated: May 29, 2024

By: *Matt Friedman*
Matt Friedman