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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Case No.: 3:22-cv-00346-SI

**DECLARATION OF ADAM BENTE**

IN RE UKG INC CYBERSECURITY  
LITIGATION

Hearing Date: November 17, 2023  
Hearing Time: 10:00 a.m.  
Judge: Hon. Susan Illston  
Courtroom: 1 – 17th Floor

THIS DOCUMENT RELATES TO:

All Actions.

1                    **DECLARATION OF ADAM BENTE**

2                    I, Adam Bente, declare and state as follows:

3                    1.            I am a resident of the State of California and am over 18 years of age. The following facts  
4 are stated from the my personal knowledge, except those facts stated on information and belief, which I  
5 believe to be true and correct, and if called as a witness, I could and would testify competently thereto  
6 under oath. I am the named plaintiff and class representative in this action against Defendant UKG, Inc.  
7 (“Defendant” or “UKG”).

8                    2.            I make this declaration in support to Class Counsel’s Motion for Attorneys’ Fees, Costs,  
9 and Service Awards.

10                  3.            I understand that, as a class representative, I have certain duties and responsibilities to the  
11 class, and I believe that I have fairly represented the interests of all class members during the entire course  
12 of this action.

13                  4.            My counsel provided me with information regarding class actions, how they work, and  
14 what my duties would be as the class representative. I agreed to serve as a class representative in this  
15 matter so that Defendant would enhance measure to ensure similar breaches and disruptions of payroll  
16 and time keeping applications do not occur in the future and to seek to recover damages on behalf of  
17 myself and other similarly situated to me.

18                  5.            I understand that the Settlement in this case is subject to this Court’s approval to ensure  
19 that it is in the best interest of class as a whole. I have no conflicts with the members of the class.

20                  6.            I understand that my attorneys are submitting an application to this Court for a service  
21 award to compensate me for my unique contributions to the success of this action in the amount of \$7,500.  
22 This amount is only .0010% of the total economic benefit to the class of \$7,000,000-\$7,500,000 and  
23 .0013% of the total common fund of \$5,500,000-\$6,000,000. I believe this amount is fair and reasonable  
24 compensation for my efforts in this case and the risks I have taken in pursuing a fair recovery for the class.

25                  7.            As a class representative, I assumed a fiduciary role to the class. I agreed to (1) consider  
26 the interests of the class just as I would consider my own interests and, in some cases, to put the interests  
27 of the class before my own interests; (2) actively participate in the lawsuit, as necessary, by among other  
28 things, answering interrogatories, producing documents to Defendants, and giving testimony; (3) being

1 available to travel, if necessary; (4) recognize and accept that any resolution of the lawsuit by dismissal  
2 or settlement, is subject to court approval, and must be designed in the best interest of the class as a whole;  
3 and (5) follow the process of the lawsuit and provide all relevant facts to my attorneys. I agreed to take on  
4 these responsibilities in exchange for a proportionate share of the funds made available to for the  
5 distribution to the class. I had no guarantee of a service award.

6 8. Filing this lawsuit subjected me to particular risks that class members will not experience.  
7 In particular, after the filing of my lawsuit, my employer at the time, the Family Health Centers of San  
8 Diego, Inc., threatened my position should I not remove all references of my employer from the  
9 Complaint. This request left me feeling threatened and worried about my future employment. I thereafter  
10 continued the action after changing employers. The activities I have performed have included but have  
11 not been limited to: obtaining legal counsel, speaking with my legal counsel on numerous occasions,  
12 assisting them in gathering information, identifying the claims brought in this case, gathering documents  
13 relevant to the lawsuit and being available for in person conference or hearing if necessary, such as sitting  
14 for a deposition and at trial. I have also spent time carefully reviewing the Settlement, and other case-  
15 related documents on my own and with my counsel to make sure that the Settlement and other work my  
16 attorneys performed are in the best interest of the class.

17 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
18 is true and correct to the best of my knowledge.

19 Executed on August 9 2023, in San Diego, California

20  
21 Adam Bente

Adam Bente (Aug 9, 2023 17:58 PDT)

22 ADAM BENTE  
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