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11 Attorneys for Plaintiffs
 WILLIAM MULLER and ANTONIO KNEZEVICH,
 12 individually and on behalf of all others similarly situated

13 *[Additional Counsel Listed on Next Page]*

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

16 IN RE UKG INC CYBERSECURITY
 17 LITIGATION

CASE NO. 22-CV-00346-SI

CLASS ACTION

18 _____
 19 THIS DOCUMENT RELATES TO:
 20 All Actions

**DECLARATION OF PLAINTIFF
 WILLIAM MULLER IN SUPPORT OF
 MOTION FOR ATTORNEYS FEES,
 COSTS, AND SERVICE AWARDS**

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

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1 I, William Muller, declare and state as follows:

2 1. My name is William Muller and I am a named plaintiff in this action. I am an
3 employee of PepsiCo and was significantly affected by the ransomware attack against UKG, Inc.
4 that occurred in December 2021 and which crippled PepsiCo's timekeeping and payroll systems
5 for many months. I have personal knowledge of the matters stated herein and could and would
6 testify competently about them if called upon to do so. I make this declaration in support of the
7 motion by all plaintiffs for an award of attorneys' fees, costs, settlement administration expenses,
8 and service awards to the named plaintiffs.

9 2. I understand that, as a class representative, I have certain duties and
10 responsibilities to the class, and I believe that I have fairly represented the interests of all class
11 members during the entire course of this action. My counsel provided me with information
12 regarding class actions, how they work, and what my duties would be as the class representative.
13 I agreed to serve as a class representative in this matter so that Defendant would enhance security
14 measures to ensure similar breaches and disruptions of payroll and time keeping applications do
15 not occur in the future and to seek to recover damages on behalf of myself and others similarly
16 situated to me. I understand that the settlement in this case is subject to this Court's approval to
17 ensure that it is in the best interest of class as a whole. I have no conflicts with the members of
18 the class.

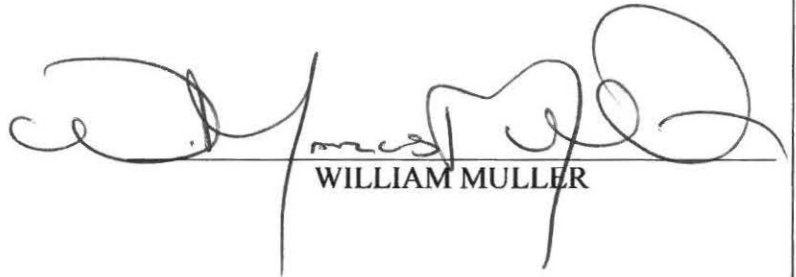
19 3. The settlement agreement in this case provides that Plaintiffs may request approval
20 by the Court of service awards in the amount of up to \$7,500 each for their time and effort in
21 spearheading and prosecuting this case and obtaining monetary relief for the class. I spent a
22 substantial amount of time and effort in prosecuting this case, including researching and retaining
23 counsel, extensive meetings with counsel to substantiate the factual bases of the claims,
24 producing relevant documents and information, participating in regular communication with
25 counsel throughout the duration of the case regarding the case status and strategy going forward,
26 and providing the facts and evidence to prove the allegations in the complaint. I demonstrated a
27 strong commitment to this case. In particular, in the early stages of this case, I spent significant
28 time in gathering other class members — including dozens of other employees at PepsiCo — to

1 report their experiences, volunteer to be interviewed by counsel, and provide additional factual
2 support for the case. I remained available to counsel as needed throughout the duration of the
3 case. I would estimate that in total I have spent in excess of 20 hours assisting in the prosecution
4 of this case over the last two years.

5 4. Further, I have taken a substantial risk by electing to have my name as part of the
6 public record in this lawsuit, including fears of retaliation by my employer for my involvement in
7 this and other previous lawsuits against them relating to wage issues. Any time I attempt to seek
8 new employment or am under investigation by a prospective employer, any search for lawsuits
9 brought by me will be disclosed and I will have to deal with the possible stigma of bringing a
10 class action lawsuit. I have faced those risks head on because I believe pursuing this case was
11 important and the right thing to do, to protect myself and others against harm from both data
12 breaches and wage violations.

13
14 I declare under penalty of perjury under the laws of the United States that the foregoing is
15 true and accurate.

16 Execute this 9th day of August, 2023, at FRESNO, California.

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WILLIAM MULLER