

ALEXANDER MORRISON & FEHR LLP

Michael S. Morrison (SB #205320)
Erin Lim (SB # 323930)
1900 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel: (310)-394-0888
Fax: (310) 394-0811
mmorrison@amflp.com
elim@amflp.com

Attorneys for Plaintiffs and the Proposed Class

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

IN RE UKG INC CYBERSECURITY
LITIGATION

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

**DECLARATION OF CINDY
VILLANUEVA IN SUPPORT OF
PLAINTIFFS’ NOTICE OF MOTION AND
MOTION FOR ATTORNEYS’ FEES**

THIS DOCUMENT RELATES TO:

All Actions.

**Date: November 17, 2023
Time: 10:00 a.m.
Dept.: Courtroom 1, 17th Floor
Judge: Honorable Susan Illston**

DECLARATION OF CINDY VILLANUEVA

I, Cindy Villanueva, declare as follows:

1. I am an individual over the age of 18-years-old. I am a Named Plaintiff/Class Representative in the above-captioned lawsuit. I have personal knowledge of all the facts stated herein. As such, I could and would competently testify to these facts in court, under oath, if requested to do so.

2. I was an employee whose employer made use of Defendant UKG Inc.'s ("Defendant UKG") cloud-based software and received notice from Defendant UKG that my personal identifiable information may have been disclosed as a result of an alleged data breach which is the subject of this litigation.

3. I am not a professional plaintiff.

4. I have not been convicted of a felony.

5. I am not closely aligned or related to my counsel, or any other attorneys at their firm.

6. I can fairly and adequately represent the interest of the class and I do not have an interest adverse to the other class members.

7. As I have suffered from the same kinds of privacy violations as a result of the alleged data breach, I have a substantial interest in the outcome of this lawsuit.

8. After I first contacted my attorneys, I had an initial consultation and subsequent conversations regarding the potential claims. I spent considerable time locating my documents I received from Defendant UKG, including notice documents received from Defendant UKG, and documents from my care. I also spent additional hours reviewing the documents with my attorneys. We discussed potential claims and legal options.

9. I have taken my duties as a class representative in this case seriously and have assisted my counsel in the prosecution of this lawsuit. Specifically, as a named Plaintiff in the case, I was informed my deposition would likely be taken, that preparation and the deposition itself could potentially take several days and that it may likely be difficult while answering questions under oath especially if it were videotaped. I started thinking about the deposition and preparing myself for it early so I would be prepared and comfortable when the date and time were set. My deposition was

1 not taken, but I feel I would have been ready if it had been.

2 10. During the case I was informed by my counsel that the Company had agreed to
3 mediate this case with Defendant UKG, and I was informed of the mediation process, and what to
4 expect. In preparing for this mediation, I actively helped my attorneys, Mr. Lebe and Mr. Gershman,
5 prepare for the mediation, including through multiple phone calls regarding my experiences with
6 Defendant UKG and providing what information I could. For the mediation I made myself
7 personally available to speak with my attorneys if they needed my input or assistance during the
8 mediation.

9 11. Sometime after the agreement to settle, and after multiple revisions, my attorneys
10 sent the agreement for me to review and sign. I reviewed the settlement agreement thoroughly.
11 After reading the agreement, I consulted with my attorneys before consenting to the terms in the
12 settlement agreement.

13 12. I believe this was a good settlement for my fellow class members. They are receiving
14 money they would not have otherwise had if I had not filed this case and done all of this work. I
15 take great pride in that.

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