

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: MONDELÉZ DATA BREACH  
LITIGATION

Master File No. 1:23-cv-03999

Hon. Jorge L. Alonso

IN RE: BRYAN CAVE LEIGHTON  
PAISNER, LLP DATA BREACH  
LITIGATION

Master File No. 1:23-cv-04249

Hon. Jorge L. Alonso

**PLAINTIFFS' UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement, the Declaration of William B. Federman in Support of Plaintiffs' Unopposed Motion for Preliminary Approval and its exhibits thereto, and all prior pleadings and proceedings had herein, Plaintiffs Michael Shields, Daniel Berndt, Augustyn Wiacek, Diedra Clay, and Julio Perez (the "Mondelēz Plaintiffs") and Plaintiffs Eric Flores and Rock Meyer (the "BCLP Plaintiffs") (collectively, "Plaintiffs") move pursuant to Federal Rule of Civil Procedure 23 for and Order: (1) granting preliminary approval of the proposed Settlement; (2) preliminarily certifying a class for purposes of Settlement; (3) appointing Plaintiffs as Class Representatives; (4) appointing William B. Federman, Gary Klinger, A. Brooke Murphy, and Raina Borrelli as Class Counsel; (5) approving the Parties' proposed form and method of giving notice of the pendency of this action and the Settlement to the Settlement Class; (6) directing that notice be given to the Settlement Class; (7) scheduling a hearing at which time the Court will consider the request for final approval of the Settlement and request for attorneys' fees, expenses, and service awards to Plaintiffs; and (8) granting such other relief and further relief as the Court deems just and proper.

Plaintiffs have conferred with Defendants Bryan Cave Leighton Paisner LLP and Mondelēz Global LLC regarding this motion, and they do not oppose the relief requested in this Motion.

Date: October 4, 2024

Respectfully Submitted,

By: s/ A. Brooke Murphy

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*Proposed Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2024, I electronically filed the foregoing document using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

*/s/ A. Brooke Murphy*