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 8 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA
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10 ALLEN MUNRO *et al.*,
 11 *Plaintiffs,*
 12 v.
 13 UNIVERSITY OF SOUTHERN
 CALIFORNIA, *et al.*,
 14 *Defendants.*

Case No. 2:16-cv-06191-VAP-E

DECLARATION OF DANIEL C. WHEELER

DATE: August 14, 2023
 TIME: 2:00 p.m.
 Courtroom 6A

Hon. Virginia A. Phillips

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1 I, Daniel C. Wheeler, declare as follows:

2 1. I am a named Plaintiff and Class Representative in this case.

3 2. I have been employed by the University of Southern California since 2007
4 and I participate in the University of Southern California Defined Contribution Plan
5 and the University of Southern California Tax-Deferred Annuity Plan.

6 3. When this case was filed, on August 17, 2016, I held the position of Network
7 Administrator at the University of Southern California and accepted the risk of
8 retaliation from USC or its officers.

9 4. I have been an active participant throughout this litigation and have dedicated
10 significant time to the prosecution of this lawsuit. My attorneys sent me the case
11 documents which I reviewed, and they also discussed with me the status of the case
12 and issues regarding the case throughout these six years of litigation. I also
13 searched my own documents in preparing responses for Rule 26 disclosures and
14 responses to 19 interrogatories and 30 requests for production of documents. I
15 gave my deposition in this case over 3 hours and prepared for that deposition for
16 approximately 2 hours. Additionally, I was prepared to testify at trial, if necessary.
17 I estimate that I spent 20-30 hours over the six years plus this case has been
18 pending in these activities.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed: Jun 29, 2023

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22 Daniel Wheeler (Jun 29, 2023 18:49 PDT)
Daniel C. Wheeler

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