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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

**IN RE USC STUDENT  
HEALTH CENTER  
LITIGATION**

Case No. 2:18-cv-04258-SVW

**SUPPLEMENTAL DECLARATION OF  
JENNIFER M. KEOUGH REGARDING  
NOTICE PROGRAM AND  
SETTLEMENT ADMINISTRATION**

I, JENNIFER M. KEOUGH, declare as follows:

1. I am the Chief Executive Officer (“CEO”) of JND Legal Administration LLC (“JND”), the company retained to serve as Notice and Settlement Administrator in this case. This Declaration is based on my personal knowledge, as well as information provided to me by experienced JND employees and Counsel and if called upon to do so, I could and would testify competently thereto.



- 1 d. Consolidated Amended Class Action Complaint
- 2 Plaintiffs' Amended Consolidated Complaint, filed February
- 3 12, 2019
- 4 e. Motion for Preliminary Approval
- 5 Plaintiffs' Notice of Motion and Motion for Preliminary
- 6 Approval of Class Action Settlement, filed February 12,
- 7 2019, attaching:
  - 8 i. Joint Declaration of Steve W. Berman,
  - 9 Elizabeth A. Kramer, and Annika K. Martin in
  - 10 Support of Plaintiffs' Motion for Preliminary
  - 11 Approval of Class Action Settlement and to
  - 12 Direct Class Notice;
  - 13 ii. Settlement Agreement;
  - 14 iii. Declaration of Jennifer M. Keough Regarding
  - 15 Proposed Notice Program;
  - 16 iv. Declaration of Layn R. Phillips;
  - 17 v. Declaration of Betsayda Aceituno in Support of
  - 18 Motion for Preliminary Approval of Class
  - 19 Settlement;
  - 20 vi. Declaration of Jane Doe 4 in Support of Motion
  - 21 for Preliminary Approval of Class Settlement;
  - 22 vii. Declaration of Jane Doe C.N. in Support of
  - 23 Motion for Preliminary Approval of Class
  - 24 Settlement;
  - viii. Declaration of Jane Doe A.D. in Support of
  - Motion for Preliminary Approval of Class
  - Settlement;
  - ix. Declaration of Jane Doe F.M. in Support of
  - Motion for Preliminary Approval of Class
  - Settlement;

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- x. Declaration of Mehrnaz Mohammadi in Support of Motion for Preliminary Approval of Class Settlement;
- xi. Declaration of Jane Doe A.N. in Support of Motion for Preliminary Approval of Class Settlement;
- xii. Declaration of Jane Doe H.R. in Support of Motion for Preliminary Approval of Class Settlement;
- xiii. Declaration of Jane Doe M.V. in Support of Motion for Preliminary Approval of Class Settlement;
- xiv. Declaration of Jane Doe M.S.;
- xv. Declaration of Jane Doe A.R.;
- xvi. Declaration of Shannon O’Conner; and
- xvii. Proposed Order Granting Plaintiffs’ Motion for Preliminary Settlement Approval, Appointment of Special Master, and to Direct Class Notice.

4. A true and correct copy of the CAFA Notice and list of recipients is attached hereto as Exhibit A.

**DATA TRANSFER**

5. On June 19, 2019, the University of Southern California (“USC”), through its vendor The Claro Group, provided me with a secure file in Los Angeles, California containing, among other information, the names and addresses of Pre-Identified Class Members (those identified through USC’s

1 existing health center records) and Potential Class Members (every woman who  
2 was a student at USC (undergraduate or graduate) at any time between 1989 and  
3 2016). The file contained a total of 177,530 unique Pre-Identified and Potential  
4 Class Members based on exact name, address, and USC Identification Number  
5 (the “Notice List”). Of the 177,530 individuals on the Notice List, 13,670 were  
6 Pre-Identified Class Members and 163,860 were Potential Class Members.  
7

8 6. Prior to mailing notices, JND updated Notice List address  
9 information using data from the National Change of Address (NCOA) database<sup>1</sup>  
10 and advanced address databases.  
11

### 12 **DIRECT MAIL NOTICE**

13 7. Pursuant to the Section 6.1 of the Amended Settlement Agreement,  
14 JND mailed a Notice Packet on July 11, 2019 by USPS First Class Mail, postage  
15 pre-paid, to the 177,530 Pre-Identified and Potential Class Members identified  
16 on the Notice List.  
17

18 8. The Notice Packet for Pre-Identified Class Members contained the  
19 Notice of Proposed Class Action (“Long Form Notice”) with a Pre-Identified  
20

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21 <sup>1</sup> The NCOA database is the official United States Postal Service (“USPS”) technology product which makes change of address information available to  
22 mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This product is an effective tool to update address changes when a person  
23 has completed a change of address form with the USPS. The address information is maintained in the database for 48 months.

1 Claimant ID at the top left of each page of the Long Form Notice that contained  
2 an explanation indicating these women were Pre-Identified as Class Members  
3 through USC's records and would automatically receive a Tier 1 payment and  
4 provided additional Settlement options, and a Tier 2 and 3 Claim Form.

5  
6 9. The Notice Packet for Potential Class Members contained the Long  
7 Form Notice without a Pre-Identified Claimant ID and an explanation that they  
8 must self-identify as Class Members in order to receive a Tier 1 payment and  
9 provided additional Settlement options, a Statement of Settlement Class  
10 Membership Form, and a Tier 2 and 3 Claim Form.

11  
12 10. All Notice Packets also contained a colored insert that provided  
13 information on how to access the Spanish and Chinese translated Settlement  
14 Long Form Notice, Statement of Settlement Class Membership Form, and Tier 2  
15 and 3 Claim Form on the Settlement Website, and a business reply envelope  
16 (either domestic or international depending on Notice List recipient's mailing  
17 address) for Notice recipients to return claim materials to the Settlement Program  
18 postage-prepaid.

19  
20 11. All Notice Packets were mailed in an envelope with call-outs on the  
21 front and back of the envelope identifying that the mailing was Court-ordered to  
22 encourage Notice List recipients to open and read the Notice Packet contents.

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SUPPLEMENTAL DECLARATION OF JENNIFER M.  
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1 Representative copies of the Pre-Identified and Potential Class Member Notice  
2 Packets are attached hereto as Exhibits B and C, respectively.

3 12. As of December 12, 2019, 1,520 Pre-Identified and 20,398 Potential  
4 Class Member Notice Packets have been returned to JND as undeliverable. JND  
5 re-mailed 1 Pre-Identified and 68 Potential Class Member Notice Packets to an  
6 updated address provided by the USPS. In addition, JND performed advanced  
7 address research for the undeliverables without a USPS updated address, and  
8 re-mailed 539 Pre-Identified and 9,238 Potential Class Member Notice Packets to  
9 a new or confirmed updated address.  
10

11 13. As of December 12, 2019, of the 13,670 Pre-Identified Class  
12 Members sent Direct Mail Notice, 12,689 or 93% were deemed delivered and 981  
13 or 7% deemed undeliverable. Of the 163,860 Potential Class Members sent Direct  
14 Mail Notice, 152,700 or 93% were deemed delivered and 11,160 or 7% were  
15 deemed undeliverable.  
16

17  
18 **EMAIL NOTICE**

19 14. Pursuant to the Section 6.1 of the Amended Settlement Agreement,  
20 in addition to Direct Mail Notice, JND disseminated on July 11, 2019 by  
21 electronic mail the court-approved summarized version of the Settlement Notice  
22  
23

1 (“Email Notice”) to 134,197 Notice List recipients who had valid email  
2 address(es) provided in the Notice List data provided by USC. Of the 134,197  
3 individuals on the Notice List with valid email address(es) for Email Notice,  
4 11,836 were Pre-Identified Class Members and 122,361 were Potential Class  
5 Members. The Email Notice to Pre-Identified Class Members contained a Pre-  
6 Identified Claimant ID and the Email Notice to Potential Settlement Class  
7 Members did not contain a Pre-Identified Claimant ID. Representative copies of  
8 the Pre-Identified and Potential Class Member Email Notices are attached as  
9 Exhibits D and E, respectively.  
10

11 15. As of December 12, 2019, of the 11,836 Pre-Identified Class  
12 Members sent Email Notice, 11,318 or 96% were deemed delivered and 518 or  
13 4% were deemed undeliverable. Of the 122,361 Potential Class Members sent  
14 Email Notice, 113,432 or 93% were deemed delivered and 8,929 or 7% were  
15 deemed undeliverable.  
16

17 **SUPPLEMENTAL MEDIA EFFORT**  
18

19 16. Pursuant to Paragraph 6.1 of the Amended Settlement Agreement,  
20 JND executed a supplemental media effort consisting of a social media  
21 (Facebook/Instagram, Twitter, and LinkedIn) and an internet search effort to  
22 optimize clicks to the Settlement Website. JND also placed notice in the *Daily*  
23

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1 *Trojan* (print and digital) and worked with USC to ensure notice postings in an  
2 email blast to the USC Community (faculty, staff, alumni, and students); on  
3 USC's website (i.e., USC's home page, Health Center, Commitment to Change,  
4 News, and Press Room websites); on USC social networks (LinkedIn, Facebook,  
5 and Twitter); in the *Trojan Family*, Alumni Association, Medical Alumni  
6 Association, and Law Alumni Association eNewsletters; and at various locations  
7 throughout the USC campus. JND also distributed a press release of a shortened  
8 summary notice ("Press Release") over PR Newswire's US1 Newswire.  
9

10 17. To supplement Direct Mail and Email Notice, starting July 12, 2019  
11 and ending on September 5, 2019, JND implemented a social media effort  
12 through three leading social media platforms (Facebook/Instagram, LinkedIn,  
13 Twitter). The social media effort delivered a total of 875,712 impressions to  
14 Women 18-54 years of age who on Facebook and Twitter expressed an interest  
15 in USC and who on LinkedIn have listed USC as their college in their profile.  
16 An emphasis was placed on Women 45-54 years of age to accommodate historic  
17 USC Student Health Center records from August 14, 1989 through July 13,  
18 1997. Impressions ran across all devices (i.e., desktop, laptop, tablet, and  
19 mobile).  
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1           18. The social media campaign included a customized Facebook effort  
2 that matched available Class Member email addresses with Facebook accounts  
3 and then targeted those matched Facebook accounts with Facebook ads. Of the  
4 emails provided, approximately 100,000 matched to a Facebook account and  
5 we were able to reach 22,392 of those accounts with Facebook ads during the  
6 supplemental campaign period. In total, 534,487 of the digital impressions were  
7 served through the customized Facebook effort.  
8

9           19. JND also implemented an internet search effort to further extend  
10 notice exposures about the case. When keywords that JND purchased related  
11 to the case were searched through Google search engine, a paid ad with a  
12 hyperlink to the Settlement Website would appear at times on the search engine  
13 results page. These efforts were monitored and optimized so that search ads  
14 appeared above or below organic search results for keywords generating the  
15 most click-throughs to the Settlement Website. Top performing keywords  
16 included: USC Tyndall Settlement; George Tyndall; Dr. George Tyndall; USC  
17 gynecologist; Dr. Tyndall; Dr. Tyndall USC; USC Tyndall USC; ISC Tyndall  
18 Lawsuit; George Tyndall USC; Tyndall Settlement; and USC Settlement.  
19

20           20. Attached hereto as Exhibit F are screenshots of the digital notices as  
21 they appeared on the social media platforms and through Google's search results.  
22  
23

1           21. JND placed a half page notice in the August 21, 2019 (i.e., the  
2 “Orientation/Move-In” Issue which was distributed over four days), August 27,  
3 2019, August 28, 2019, August 29, 2019, August 30, 2019, September 4, 2019,  
4 September 5, 2019, and September 6, 2019 issues of the *Daily Trojan* student  
5 newspaper. The *Daily Trojan* also ran a ninth insertion on September 9, 2019 for  
6 no additional charge. In addition, JND placed a 300 x 250 banner notice that was  
7 rotated on the [dailytrojan.com](http://dailytrojan.com) website from August 21, 2019 through September  
8 20, 2019. Attached as hereto Exhibit G are the notices as they appeared in each  
9 issue of the *Daily Trojan*, as well as a screenshot of the banner notice as it  
10 appeared on [dailytrojan.com](http://dailytrojan.com).  
11

12           22. Pursuant to Paragraph 6.1 of the Amended Settlement Agreement,  
13 JND worked with USC’s marketing team to implement supplemental media  
14 efforts through USC. To commence these efforts, on July 12, 2019, USC sent  
15 an email outreach effort to the “USC Community” which included 17,927  
16 staff, 7,876 faculty, 37,901 continuing students, 2,406 summer 2019 students,  
17 and 217,512 alumni. Attached hereto as Exhibit H is a copy of the email that  
18 was distributed.  
19

20           23. Starting July 12, 2019 and through September 4, 2019, USC  
21 posted notice on various USC websites including USC’s home page, as well  
22  
23

1 as the Health Center, Commitment to Change, News and Press Room websites.  
2 Attached hereto as Exhibit I are screenshots of the notice posting at each of  
3 the USC websites.

4 24. From July 19, 2019 through September 4, 2019, Settlement notice  
5 was posted on USC's social networks, including LinkedIn, Facebook and  
6 Twitter. Attached hereto as Exhibit J are screenshots of the USC social media  
7 postings.  
8

9 25. At JND's direction, USC also posted notice in the July 23, 2019  
10 and August 20, 2019 *Trojan Family* eNewsletter; the August 1, 2019 and  
11 September 5, 2019 USC Alumni Association eNewsletter, with a delivery of  
12 204,991 and 206,684 respectively; the August 22, 2019 USC Medical  
13 Association eNewsletter, which was sent to 2,608 alumni; and the August 22,  
14 2019 USC Law Alumni Association eNewsletter, which was sent to 7,807  
15 alumni and 301 individuals in the Law Leadership Society. Attached hereto  
16 as Exhibit K are the notice postings as they appeared in each of the  
17 eNewsletters.  
18

19 26. To extend Settlement notice exposure, throughout the media  
20 campaign, Settlement notices were posted at various locations throughout the  
21 USC campus, including the Alumni House, Architecture Student Service, Art  
22

1 & Design, Cinematics Arts, Communication & Journalism, Dance, Dentistry,  
2 Dornsife, Education, Engineering, Gerontology, Law Offices, Law Public  
3 Areas, Medicine, Pharmacy, Public Policy, Social Work, Village Dining,  
4 Parkside Restaurant, EVK, University Village North, University Village  
5 McCarthy Honors, University Village McMorrow, University Village Cale  
6 and Irani, Sierra Apartments, Troy East, Pardee Tower, Parkside, Cardinal  
7 Gardens, Century Apartments, and Fluor Tower buildings/locations. Attached  
8 hereto as Exhibit L is a sampling of the on-campus Settlement notice postings.

9  
10 27. On July 12, 2019, JND caused a Press Release to be distributed to  
11 approximately 11,000 media outlets, as well as over 900 news contacts in the  
12 college media industry. Attached hereto as Exhibit M is a copy of the Press  
13 Release. An exact match of the press release was picked up 97 times with a  
14 potential audience of over 95 million.

15  
16 28. JND also monitored press coverage about the Settlement beyond  
17 that of the Press Release and found there to be *extensive* news coverage in  
18 virtually all U.S. markets and 68 different countries worldwide, increasing  
19 exposure and reach to Class Members. From December 8, 2018 through  
20 November 5, 2019, there were over 10,000 mentions related to the Settlement  
21 case matter. Attached hereto as Exhibit N is a copy of the USC Student Health  
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23

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1 Center Monitoring Report, a sample of news coverage, as well as a few of the  
2 articles that appeared.

3 29. The supplemental media and outreach efforts were extensive,  
4 thereby increasing reach well beyond that of the direct notice effort. As of  
5 December 12, 2019, 60.7% of the user traffic to the Settlement Website  
6 occurred during the notice period. Based on the Pre-Identified and Potential  
7 Class Member Direct Mail deliverability of 93%, additional Pre-Identified and  
8 Potential Class Member Email Notice deliverability of 96% and 93%,  
9 respectively, and the Supplemental Media effort, we estimate that Settlement  
10 Notice has reached approximately 95% of the Settlement Class.  
11  
12

### 13 **SETTLEMENT WEBSITE**

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15 30. On February 12, 2019, JND established a Settlement-specific  
16 website (“Settlement Website”), [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com), that allows  
17 Class Members to learn more about the case and proposed Settlement. The  
18 “Home” page provides a summary of the proposed Settlement, key dates, and an  
19 overview of legal rights and options. The “Claims Portal” allowed Pre-  
20 Identified and Potential Class Members to file a Statement of Settlement Class  
21 Membership and Tier 2 and 3 Claim Form and supporting documents through  
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1 the November 8, 2019 claims deadline. An “Important Documents” page  
2 provides downloadable PDF copies of important Court documents as well as the  
3 Long Form Settlement Notice, Statement of Settlement Class Membership  
4 Form, and Tier 2 and 3 Claim Form. The “FAQs” page provides answers to  
5 frequently asked questions which were updated throughout the Notice period in  
6 response to questions from Class Members and changing circumstances such as  
7 the California Legislature’s passage of AB 1510 that extends the California civil  
8 action statute of limitations for damages in certain circumstances. The  
9 Settlement Website also provides a “Check Claim Status” page where those who  
10 have filed Settlement claim(s) can login and monitor claim status and upload  
11 additional documentation. In addition, there are separate pages providing the  
12 Notice Packet materials translated to Spanish and Chinese. There is also a  
13 separate “Key Dates” page and “Contact Us” page detailing how JND can be  
14 reached by email, domestic and international toll-free telephone, as well as mail.  
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17 31. As of December 12, 2019, there were a total 301,620 total views of  
18 the Settlement Website pages and documents and 37,941 unique visitors to the  
19 Settlement Website. JND will continue to maintain the Settlement Website  
20 throughout the Settlement administration process. A true and correct copy of the  
21 Settlement Website as of December 12, 2019 is attached hereto as Exhibit O.  
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SUPPLEMENTAL DECLARATION OF JENNIFER M.  
KEOUGH REGARDING NOTICE PROGRAM AND  
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1           32. JND also maintains an email address,  
2 info@USCTyndallSettlement.com (“Settlement Email Address”), that permits  
3 Pre-Identified and Potential Class Members and other individuals to submit e-  
4 mail inquiries, claim forms, and other documentation to the Settlement program.  
5 As of December 12, 2019, the Settlement Program has handled 3,421 email  
6 communications received to the Settlement Email Address. JND will continue  
7 to maintain the Settlement Email Address throughout the Settlement  
8 administration process.  
9

10           33. To assist Class Members and other individuals in contacting Class  
11 Counsel for assistance and questions, JND also maintains an email address,  
12 [classcounsel@usctyndallsettlement.com](mailto:classcounsel@usctyndallsettlement.com), and voicemail, 1-888-663-1718,  
13 option 8, for Class Counsel. JND sends these emails and messages to Class  
14 Counsel daily for handling. As of December 12, 2019, JND has received 246  
15 voicemails and 125 emails for Class Counsel, which does not include those who  
16 contacted Class Counsel by phone and email directly.  
17  
18

19           **TOLL-FREE INFORMATION AND CLAIM ASSISTANCE LINE**

20           34. On July 11, 2019, JND established a Settlement-specific dedicated  
21 toll-free Interactive Voice Response (“IVR”) number, 1-888.663-1718, for Class  
22  
23  
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1 Members to call for additional information and receive claim assistance. Prior to  
2 July 11, 2019, JND's Claim Assistance Center Team received specialized training  
3 on the specifics of the Settlement program with special training provided by  
4 RAINN (the Rape, Abuse, and Incest National Network) to ensure that Claim  
5 Assistance Center agents had the necessary sensitivities to deal with calls from  
6 victims of sexual abuse and assault.  
7

8 35. As of December 12, 2019, JND has received 3,890 calls to the IVR  
9 and JND's female Claim Assistance Center team has handled 2,774 live calls from  
10 Pre-Identified and Potential Class Members or other individuals. JND will  
11 continue to maintain the toll-free IVR number and assist the Settlement Class  
12 throughout the Settlement administration process.  
13

14 36. JND has received consistently positive feedback in support of the  
15 Settlement Program. Specifically, comments received by email state that we  
16 "made the process seem way less scary and empowered me to share my  
17 experience", that they appreciate the "attention to this sensitive matter", that they  
18 are thankful for the "prompt response and support" and that "interactions on the  
19 phone and over email with your team have been so compassionate and  
20 understanding."  
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**OBJECTIONS**

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2  
3 37. The Pre-Identified and Potential Direct Mail and Email Settlement  
4 Notices informed individuals that anyone who wanted to object to the approval of  
5 the Settlement could do so by submitting a written statement to the Court on or  
6 before October 9, 2019.

7 38. As of December 12, 2019, no Settlement objections have been filed.  
8

9 **EXCLUSION REQUESTS**

10 39. The Pre-Identified and Potential Direct Mail and Email Settlement  
11 Notices informed individuals that anyone who wanted to be excluded from the  
12 Settlement could do so by submitting a written request for exclusion (“opt-out”)  
13 to JND, postmarked on or before November 7, 2019.

14 40. Exclusion requests must have been timely submitted and contain the  
15 following information to be valid:  
16

- 17
- 18 • Full name, address, and telephone number;
  - 19 • The following statement:

20 I want to be excluded from In re USC Student Health Center  
21 Litigation, No. 2:18-cv-04258-SVW (C.D. Cal.), and  
22 understand that by excluding myself, I will not be able to get  
23 any money or benefits from the Settlement.  
24

1                   •       Signature [handwritten].

2           41.     Pursuant to Section 3.6 of the Amended Settlement Agreement, if  
3     an exclusion submission was defective for any of the above requirements, JND  
4     sent a letter within 10 days of receiving the defective submission to advise the  
5     Class Member (if represented the letter is sent via the Class Member’s lawyer who  
6     submitted the exclusion) that the exclusion submission was defective and that the  
7     defect must be cured. Depending on the date of receipt of the defective exclusion  
8     submission, the Class Member was provided the later of (a) the Response  
9     Deadline of November 7, 2019 or (b) 20 calendar days from the date of the cure  
10    letter, whichever date is later.

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13           42.     As of December 16, 2019, JND has received 801 timely and valid  
14    exclusions and 7 invalid exclusions. Of the 801 timely and valid exclusions, 537  
15    match to Pre-Identified Class Members on the Notice List, 227 match to Potential  
16    Class Members on the Notice List, and 37 are self-identified individuals who  
17    cannot be matched to the Notice List based on the information provided in the  
18    exclusion request. The deadline to cure has passed on all 7 invalid exclusions. In  
19    addition, JND received one untimely exclusion requests that was accepted as  
20    timely by the parties and is included in the 801 timely and valid exclusions. Lists  
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1 of the timely and valid and invalid exclusions are attached hereto as Exhibits P  
2 and Q, respectively.

3  
4 **CLAIMS PROCESS**

5 43. The Direct Mail and Email Settlement Notices informed Potential  
6 Class Members that a Statement of Settlement Class Membership Form must be  
7 submitted to participate in Tier 1, Pre-Identified Class Members were informed  
8 that they were already included in Tier 1 and did not need to file a Statement of  
9 Settlement Class Membership Form, and Pre-Identified and Potential Class  
10 Members were both advised of the option of submitting a Tier 2 and 3 Claim  
11 Form, and that all claims must be received through the Settlement Website or  
12 postmarked by mail no later than November 8, 2019.

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14  
15 44. Since my initial Notice Program and Settlement Administration  
16 Declaration was filed on November 18, 2019, JND has continued its de-  
17 duplication analysis of timely claims and additional claims were de-duplicated  
18 by name and address, USC Identification Number, and other unique data fields  
19 to remove duplicate claims filed by individuals through multiple submission  
20 methods (e.g., online and by mail). In addition, JND is in the process of its claim  
21 validation analysis of Tier 1 claims to confirm that claimants meet Settlement  
22

1 eligibility requirements. JND expects to complete the majority of its claim  
2 validation analysis of Tier 1 claims by January 2020 but has preliminarily flagged  
3 and removed 207 claims as erroneously filed.<sup>2</sup> Below is a de-duplicated estimate  
4 of Tier 1, 2, and 3 claims as of December 12, 2019:  
5

<u>CLAIM TYPE</u>	<u>DE-DUPLICATED CLAIMS RECEIVED</u>
Tier 1 (Statement of Settlement Class Membership Form):	4,786 <sup>3</sup>
Tier 2:	1,720
Tier 3:	1,232

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11 45. Of the 4,786 Tier 1 Statement of Settlement Class Membership  
12 Forms submitted, 3,645 preliminarily appear to match to the Potential Class  
13 Members on the Notice List and 1,141 did not and are self-identified or will need  
14 further analysis and/or outreach to confirm Class Membership. In addition,  
15 pursuant to Paragraph 6.4(a)(ii) of the Amended Settlement Agreement,  
16 Settlement Class Members for the period August 14, 1989 to July 13, 1997 must  
17  
18

19 <sup>2</sup> These claims were filed in clusters by individuals that do not match the Notice  
20 List with similar names or addresses (many of which are invalid) with variations  
21 in spacing or characters to avoid de-duplication. JND's analysis is still in process  
22 but we have removed these claims from the estimate of Tier 1, 2, and 3 claims in  
23 this Supplemental Declaration. Of the 207 erroneously filed claims, 182 are Tier  
24 1 claims. Of those 182 Tier 1 claimants, 23 also filed a Tier 2 claim and 2 also  
filed a Tier 3 claim.

<sup>3</sup> 4,786 excludes the 182 Tier 1 claims currently flagged as erroneously filed as well as 144 additional duplicate claims.

1 have their student status confirmed by USC's Registrar's Office records or, if not  
2 a student, must have submitted credible evidence of Class Membership. JND is  
3 in the process of further reviewing and analyzing all Tier 1 Statement of  
4 Settlement Class Membership Forms.

5  
6 46. Of the 1,720 Tier 2 claims filed<sup>4</sup>, 1,129 were filed by Pre-Identified  
7 Class Members on the Notice List, 509 were filed by Potential Class Members  
8 on the Notice List, and 82 were filed by self-identified individuals or will need  
9 further analysis and/or outreach to confirm Class Membership. Settlement  
10 claimants have the option throughout the claims process to switch tiers from a  
11 Tier 2 or 3 claim.

12  
13 47. Of the 1,232 Tier 3 claims filed, 873 were filed by Pre-Identified  
14 Class Members on the Notice List, 330 were filed by Potential Class Members  
15 on the Notice List, and 29 were filed by self-identified individuals or will need  
16 further analysis and/or outreach to confirm Class Membership.

17  
18 48. As of December 12, 2019, JND has received 93 claim submissions  
19 postmarked or received after the November 8, 2019 claims deadline (52  
20 Statement of Class Membership Forms, 28 Tier 2 claims, and 13 Tier 3 claims).

21  
22 <sup>4</sup> Settlement claimants have the option throughout the claims process to switch  
23 tiers from a Tier 2 or 3 claim and have done so since my November 2019  
24 Declaration which is reflected in the decrease of Tier 2 claims and related  
increase of Tier 3 claims.

1 Pursuant to Section 6.7 of the Amended Settlement Agreement, JND will provide  
2 these late claim submissions to the Special Master, once appointed, for evaluation  
3 of whether late claims should be accepted.

4 49. JND is continuing to receive and process all claims to confirm  
5 eligibility and claim deficiencies, perform quality assurance procedures, conduct  
6 further de-duplication and claim validation, and solicit feedback from the parties.  
7 JND's preliminary de-duplication and claims analysis may change prior to any  
8 Settlement payment distribution.  
9

10  
11 **UPDATED PRO RATA ESTIMATE**

12 50. In my Declaration in Response to the Court's Order Dated April 18,  
13 2019, dated May 17, 2019, Docket No. 129-2, JND provided *pro rata* estimates  
14 of the potential ultimate number of claims and the potential likelihood and  
15 quantity of a *pro rata* adjustment to the Tier 2 and Tier 3 awards to assist the  
16 Court in evaluating the Settlement.  
17

18 51. Now that the claims period has closed, JND has updated the *pro*  
19 *rata* estimate using the preliminary de-duplicated number of claims. This  
20 preliminary analysis is being provided prior to confirming eligibility of all  
21 Statement of Settlement Class Membership Form submissions and presumes all  
22  
23  
24

1 claim deficiencies to be addressed at a later date, once claims processing is  
2 complete, would be cured.

3 52. Pursuant to the Amended Settlement Agreement, all Pre-Identified  
4 Class Members and confirmed Class Members who file a Statement of  
5 Settlement Class Membership Form will receive an initial \$2,500 Tier 1 Claim  
6 Award payment. A Class Member filing a Tier 2 claim may receive a Tier 2  
7 Claim Award in the range of \$7,500 to \$20,000 (less the \$2,500 previously  
8 advanced) and a Class Member filing a Tier 3 claim (who participates in the  
9 interview process) may receive a Tier 3 Claim Award in the range of \$7,500 to  
10 \$250,000 (again, less the \$2,500 previously advanced).  
11

12 53. To keep things consistent with our initial estimates provided in my  
13 prior Declaration, we used the same approximate median value for payment  
14 awards at the Tier 2 and Tier 3 levels. For Tier 2 claims, we assumed an average  
15 award from the Panel of \$15,000. For Tier 3 claims, we assumed an average  
16 award from the Panel of \$125,000. Extrapolating those numbers into our  
17 updated estimate yields the following calculations:  
18  
19  
20  
21  
22  
23  
24

**Initial Calculation to Determine Total Aggregate Award Amount:**

17,919 <sup>5</sup> Tier 1 x \$2,500:	\$44.8 million
1,720 Tier 2 x \$15,000:	\$25.8 million
1,232 Tier 3 x \$125,000:	\$154 million
Less Tier 1 Offset for 2,952 Tier 2 and 3 claimants who already received a \$2,500 Tier 1 payment:	(\$7.4 million)
<u>Total Aggregate Award Amount:</u>	\$217.2 million

54. Based on the above estimate of a total aggregate award amount of \$217.2 million, Tier 2 and 3 Claim Awards would receive a *Pro Rata* Adjustment downward of 4% (after Administrative Expenses<sup>6</sup>) as detailed below:

<sup>5</sup> 17,919 includes the 13,670 Pre-Identified Class Members, excluding the 537 Pre-Identified Class Members who submitted a timely and valid exclusion, and the 4,786 Tier 1 Statement of Settlement Class Membership Forms submitted per Paragraph 44 above.

<sup>6</sup> Solely for the purposes of this estimate, we have reduced the Settlement Fund by \$5 million for Administrative Expenses per Section 2.2 of the Amended Settlement Agreement.

**Calculation to Determine *Pro Rata* Adjustment Amount:**

Settlement Fund <sup>7</sup>	\$210 million
Aggregate Award Amount	\$217.2 million
Percentage difference	4% Decrease

**Calculation to Apply *Pro Rata* Adjustment:**

17,919 Tier 1	\$44.8 million
1,720 Tier 2 x (\$15,000 - 4% = \$14,400)	\$24.8 million
1,232 Tier 3 x (\$125,000 - 4% = \$120,000)	\$147.8 million
Less Tier 1 Offset for 2,952 Tier 2 and 3 claimants who already received a \$2,500 Tier 1 payment	(\$7.4 million)
<u>Total Aggregate Award Amount Minus 4% <i>Pro Rata</i> Decrease:</u>	\$210 million

55. As an alternate estimate, if the 981 Pre-Identified Class Members undeliverable by Mail Notice are not issued a Tier 1 Claim Award and the 1,141 Statement of Settlement Class Membership Form submissions, the 82 Tier 2 claim submissions, and the 29 Tier 3 claim submissions that did not preliminarily match to the Notice List, are self-identified, or who need further

<sup>7</sup> This represents the Settlement Fund as of the date of the *pro rata* calculation, by which point the Settlement Fund will have been reduced to pay for Administrative Expenses incurred up to that date per Sections 2.2, 2.34, and 2.35 of the Amended Settlement Agreement. Solely for the purposes of this example, we have reduced the Settlement Fund by \$5 million for Administrative Expenses.

1 analysis and/or outreach to confirm Class Membership were determined  
2 ineligible, the following calculations would result:

3 **Initial Calculation to Determine Total Aggregate Award Amount:**

4 15,797 <sup>8</sup> Tier 1 x \$2,500:	\$39.5 million
5 1,638 Tier 2 x \$15,000:	\$24.6 million
6 1,203 Tier 3 x \$125,000:	\$150.4 million
7 Less Tier 1 Offset for 2,841 Tier 2 and 3 claimants 8 who already received a \$2,500 Tier 1 payment:	(\$7.1 million)
9 <u>Total Aggregate Award Amount:</u>	\$207.4 million

10  
11 56. Based on alternate initial calculation estimates above, there would  
12 be sufficient Settlement Funds to pay all claims in full. Based on the above  
13 estimate of a total aggregate award amount of \$207.4 million, Tier 1, 2 and 3  
14 Claim Awards would receive a *Pro Rata* Adjustment upward of 1% (after  
15 Administrative Expenses<sup>9</sup>) as detailed below:  
16  
17  
18

19  
20 <sup>8</sup> 15,797 includes the 12,689 Pre-Identified Class Members that were deliverable  
21 by Direct Mail Notice, excluding the 537 Pre-Identified Class Members who  
22 submitted a timely and valid exclusion, and the 3,645 Tier 1 Statement of  
23 Settlement Class Membership Forms that match to the Potential Class Members  
24 on the Notice List as of December 12, 2019 per Paragraphs 13 and 45 above.

<sup>9</sup> Solely for the purposes of this estimate, we have reduced the Settlement Fund  
by \$5 million for Administrative Expenses per Section 2.2 of the Amended  
Settlement Agreement.

**Calculation to Determine *Pro Rata* Adjustment Amount:**

Settlement Fund <sup>10</sup>	\$210 million
Aggregate Award Amount	\$207.4 million
Percentage difference	1% Increase

**Calculation to Apply *Pro Rata* Adjustment:**

15,797 Tier 1 x (\$2,500 + 1% = \$2,525)	\$39.9 million
1,638 Tier 2 x (\$15,000 + 1% = \$15,150)	\$24.8 million
1,203 Tier 3 x (\$125,000 + 1% = \$126,250)	\$151.9 million
Less Tier 1 Offset for 2,841 Tier 2 and 3 claimants who already received a \$2,500 Tier 1 payment	(\$7.1 million)
<u>Total Aggregate Award Amount Plus 1% <i>Pro Rata</i> Increase:</u>	\$209.5 million

**SETTLEMENT ADMINISTRATION FEES AND EXPENSES**

57. JND has performed its responsibilities as set forth in the Amended Settlement Agreement and the Court’s Order Granting Plaintiffs’ Renewed Motion for Preliminary Settlement Approval and to Direct Class Notice, dated June 12, 2019, Docket No. 148 (“Preliminary Approval Order”). As of

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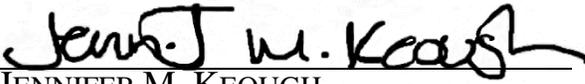
<sup>10</sup> This represents the Settlement Fund as of the date of the *pro rata* calculation, by which point the Settlement Fund will have been reduced to pay for Administrative Expenses incurred up to that date per Sections 2.2, 2.34, and 2.35 of the Amended Settlement Agreement. Solely for the purposes of this example, we have reduced the Settlement Fund by \$5 million for Administrative Expenses.

1 November 30, 2019, JND has billed \$2,195,779.27 in Settlement administration  
2 and Notice fees and expenses.

3 58. JND will continue to administer the Settlement through all phases  
4 of Settlement administration, as required by the Amended Settlement Agreement.  
5 the Preliminary Approval Order, and pursuant to any future Orders of this Court.  
6

7 I declare under penalty of perjury under the laws of the United States of  
8 America that the foregoing is true and correct.

9 Executed on December 23, 2019, in Seattle, Washington.

10  
11   
12 JENNIFER M. KEOUGH

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# **EXHIBIT A**

February 21, 2019

UNITED STATES ATTORNEY GENERAL  
AND THE APPROPRIATE OFFICIALS  
IDENTIFIED IN ATTACHMENT A

**RE: CAFA NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

Dear Sir or Madam:

This Notice is being provided to you in accordance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, in connection with, and on behalf of, the Defendants (listed below) in the below-referenced class action (“the Action”). Plaintiffs’ Notice of and Motion for Preliminary Approval of Class Action Settlement was filed with the United States District Court for the Central District of California on February 12, 2019 and the preliminary approval hearing is scheduled for April 1, 2019.

**Case Name:** *In re: USC Student Health Center Litigation*

**Case Number:** 2:18-cv-04258-SVW-GJS

**Jurisdiction:** United States District Court, Central District of California

**Date Proposed Settlement filed with Court:** February 12, 2019

Pursuant to 28 U.S.C. § 1715(b), the enclosed CD contains the following documents filed in the Action:

- 01 - Complaint.pdf**  
Plaintiff Lucy Chi’s Class Action Complaint, filed May 21, 2018
- 02 - First Amended Complaint.pdf**  
Plaintiffs’ First Amended Complaint, filed May 24, 2018
- 03 - Consolidated Class Action Complaint.pdf**  
Plaintiffs’ Consolidated Complaint, filed August 28, 2018
- 04 - Consolidated Amended Class Action Complaint.pdf**  
Plaintiffs’ Amended Consolidated Complaint, filed February 12, 2019

**05 - Motion for Preliminary Approval.pdf**

Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, filed February 12, 2019, and attaching:

1. Joint Declaration of Steve W. Berman, Elizabeth A. Kramer, and Annika K. Martin in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and to Direct Class Notice;
2. Settlement Agreement;
3. Declaration of Jennifer M. Keough Regarding Proposed Notice Program;
4. Declaration of Layn R. Phillips;
5. Declaration of Betsayda Aceituno in Support of Motion for Preliminary Approval of Class Settlement;
6. Declaration of Jane Doe 4 in Support of Motion for Preliminary Approval of Class Settlement;
7. Declaration of Jane Doe C.N. in Support of Motion for Preliminary Approval of Class Settlement;
8. Declaration of Jane Doe A.D. in Support of Motion for Preliminary Approval of Class Settlement;
9. Declaration of Jane Doe F.M. in Support of Motion for Preliminary Approval of Class Settlement;
10. Declaration of Mehrnaz Mohammadi in Support of Motion for Preliminary Approval of Class Settlement;
11. Declaration of Jane Doe A.N. in Support of Motion for Preliminary Approval of Class Settlement;
12. Declaration of Jane Doe H.R. in Support of Motion for Preliminary Approval of Class Settlement;
13. Declaration of Jane Doe M.V. in Support of Motion for Preliminary Approval of Class Settlement;
14. Declaration of Jane Doe M.S.;
15. Declaration of Jane Doe A.R.;
16. Declaration of Shannon O'Conner; and
17. Proposed Order Granting Plaintiffs' Motion for Preliminary Settlement Approval, Appointment of Special Master, and to Direct Class Notice.

At the time of mailing, it is not feasible to provide a breakdown of the Settlement Class in accordance with 28 U.S.C. § 1715 (b)(7), as Settlement Class data is still being compiled. However, we anticipate that the Settlement Class is sufficiently numerous as to potentially include Settlement Class Members residing in all 50 U.S. states, as well as the District of Columbia, and may include Settlement Class Members residing in U.S. territories and associated states.

If you have any questions regarding the details of the Action and Settlement, please contact Defense Counsels' representatives at:

<b>Counsel for University of Southern California</b>
--

Shon Morgan Quinn Emanuel Urquhart & Sullivan LLP 865 South Figueroa Street, 10th Floor Los Angeles, CA 90017-2543 Phone: (213) 443-3000 E-mail: shonmorgan@quinnemanuel.com
---

For questions regarding this notice, please contact JND at:

JND Class Action Administration  
1100 2nd Ave, Suite 300  
Seattle, WA 98101  
Phone: (800) 207-7160

Regards,

/s/

JND Legal Administration

cc: Class Counsel

CAFA Notice - Attachment A - Service List

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CAFA Notice - Attachment A - Service List

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CAFA Notice - Attachment A - Service List

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CAFA Notice - Attachment A - Service List

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# **EXHIBIT B**

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

*A federal court authorized this Notice. This is not a solicitation from a lawyer.*

**Women who were seen for treatment by Dr. George Tyndall at USC’s Student Health Center may be eligible for benefits from a class action settlement.**

- A Settlement has been reached with the University of Southern California and its Board of Trustees (together “USC”) and with Dr. George M. Tyndall, M.D. (“Dr. Tyndall”) (collectively “Defendants”) in a class action lawsuit. Plaintiffs allege in the lawsuit that Dr. Tyndall assaulted, abused, sexually harassed, committed medical malpractice related to a Women’s Health Issue against, or otherwise acted inappropriately towards, female patients while he was a gynecologist at the USC Student Health Center and that USC failed to respond appropriately.
- The Settlement provides a \$215,000,000 fund for the benefit of certain women who were seen for treatment by Dr. Tyndall at the USC Student Health Center between August 14, 1989 and June 21, 2016. As part of the Settlement, USC is implementing institutional changes to protect students and prevent future abuse, including policy and procedure changes at the Student Health Center; ensuring that its medical personnel act consistently with the best practice standards recognized by the SCOPE program of the American College of Obstetricians and Gynecologists; appointment of an Independent Women’s Health Advocate; and creation of a Task Force—including an independent expert in university best practices related to prevention and response to sexual assault and misconduct—to recommend university-wide changes to prevent sexual violence on campus. A complete description of the changes USC is implementing can be found on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). While no settlement can ever undo what happened, it can provide a measure of resolution, as well as provide a punitive and deterrent effect on the Defendants.
- The Defendants deny all charges of wrongdoing and liability.
- This Notice contains information about the Settlement and the lawsuit. It is critical that you read this entire Notice carefully, because your legal rights are affected whether or not you act. That said, given the traumatic nature of the abuse you may have suffered, please take breaks as you read and seek support if you need it. While it may be difficult, please persevere in reading this entire Notice carefully so that you can arrive at a clear understanding of your legal rights.
- As described in more detail below, the Settlement has a three-tier structure based on your choice of how – and how much – you feel comfortable sharing with the Settlement program. You will automatically receive a Tier 1 guaranteed minimum payment check without needing to do anything. You are also eligible to make a claim for Tier 2 (by filling out the enclosed Claim Form) or Tier 3 (by filling out the Claim Form and participating in an interview).
- All the specialists and experts who make up the team administering and evaluating the Settlement claims have been specially trained in communicating with victims of trauma and harassment. Should you choose to engage with the Settlement program by submitting a Tier 2 or Tier 3 claim, they will ensure your experience is as safe and compassionate as possible and that you will be heard.

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

**YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT**

<u><b>ACTION</b></u>	<u><b>EXPLANATION</b></u>	<u><b>DUE DATE</b></u>
<b>DO NOTHING</b>	You have been pre-identified as a member of the Settlement Class. If you do nothing, you will be included in the Settlement and will receive a payment of \$2,500. You will also give up your right to sue the Defendants about the claims in this case.	
<b>SUBMIT A CLAIM FORM</b>	<p>You can choose to submit a Tier 2 or Tier 3 claim describing your experience as a patient of Dr. Tyndall. Depending on the information you provide and whether you are willing to be interviewed, you could receive as much as \$250,000.</p> <p>For more information about submitting a claim, see the answers to questions 8-10 below.</p> <p>The Court has appointed attorneys to represent Settlement Class Members, and those attorneys are available at no cost to you to help you make your claim. Call 1-888-663-1718 and select Option 8 or email <a href="mailto:ClassCounsel@USCTyndallSettlement.com">ClassCounsel@USCTyndallSettlement.com</a> to schedule an appointment with an attorney.</p> <p>If you submit a claim and receive a payment you give up your right to sue the Defendants about the claims in this case.</p>	November 8, 2019
<b>EXCLUDE YOURSELF</b>	If you choose to exclude yourself (opt out), you will not be included in the Settlement. You will receive no benefits and you will keep any right you currently have to sue the Defendants about the claims in the case.	November 7, 2019
<b>OBJECT</b>	If you do not exclude yourself, and if you disagree with the Settlement, you can write to the Court to explain your objection.	October 9, 2019
<b>GO TO A HEARING</b>	Ask to speak in court about the fairness of the Settlement.	January 6, 2020 at 1:30 p.m.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still must decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved.

**QUESTIONS? CALL TOLLFREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**

**WHAT THIS CLASS NOTICE CONTAINS**

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QUESTIONS? CALL TOLLFREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

## BASIC INFORMATION

### 1. Why did I get this Notice?

If you are a woman who was seen for treatment by Dr. Tyndall at the USC Student Health Center during the period from August 14, 1989 to June 21, 2016, you have the right to know about a proposed Settlement of a class action lawsuit, and your options, before the Court decides whether to approve the Settlement.

This Notice is to inform you about the lawsuit, the proposed Settlement, and your legal rights. The women who sued are called “Plaintiffs.” The doctor and university they sued are called “Defendants.”

### 2. What is this lawsuit about?

Dr. Tyndall was a gynecologist at USC’s Student Health Center from August 14, 1989, until June 21, 2016. Plaintiffs allege that Dr. Tyndall committed medical malpractice related to a Women’s Health Issue and sexually assaulted, abused, and engaged in harassing and offensive behavior towards his female patients at USC. Plaintiffs further allege that USC supervisors and administrators were repeatedly informed of Dr. Tyndall’s misconduct but failed to take the necessary measures to protect his patients. Defendants deny plaintiffs’ allegations. The Court has not decided who is right.

### 3. Why is this a class action?

In a class action, one or more plaintiffs called “Class Representatives” sue on behalf of themselves and other people with similar claims. This group of people is called the “Class” and the people in the class are called “Class Members.” One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

This lawsuit is *In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.). The judge is Stephen V. Wilson of the United States District Court for the Central District of California. **DO NOT – UNDER ANY CIRCUMSTANCES – TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THE SETTLEMENT OR THE CLAIMS PROCESS.**

### 4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendants. Instead, both sides have agreed to a Settlement to avoid the costs and risks of trial and appeals. The Class Representatives and their attorneys think the Settlement is best for the Class.

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

## WHO IS IN THE SETTLEMENT?

### 5. How do I know if I am part of the Settlement?

The Class for the Settlement has been defined as all women who were seen for treatment by Dr. George M. Tyndall at the University of Southern California Student Health Center during the period from August 14, 1989, to June 21, 2016 (a) for Women’s Health Issues, or (b) whose treatment by Dr. George M. Tyndall included an examination by him of her breast or genital areas, or (c) whose treatment included the taking of photographs or videotapes of her unclothed or partially clothed body.

“Women’s Health Issues” includes but is not limited to any issue relating to breast, vaginal, urinary tract, bowel, gynecological, or sexual health, including contraception and fertility. A list of eligible Women’s Health Issues is available on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). If you saw Dr. Tyndall for any of the reasons in that list, you are a Class Member.

You have already been pre-identified (via USC’s records) as a Class Member, and your Claimant ID Number is on the upper left hand corner of each page of this Notice.

### 6. What should I do if I am not sure if I am included in the Settlement?

If you are not sure whether you are in the Class, you can ask for free help and more information by calling the Settlement Administrator at 1-888-663-1718 (international numbers provided below) or sending an email to [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com).

More details about the Class, its claims, and the Settlement can be found in the Amended Settlement Agreement and other documents available on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

## BENEFITS OF THE SETTLEMENT — WHAT YOU GET

### 7. What does the Settlement provide?

#### **Monetary Benefits**

Defendants will pay \$215,000,000 to settle the lawsuit. This fund will be used to pay Class Member claims (see the answers to questions 8-10 below) and expenses associated with notifying Class Members and with administering the Settlement, including compensating an impartial, three-member Panel who will decide how much individual Class Members receive. The fund will also be used to pay any Class Representative service award(s) awarded by the Court.

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### **Institutional Changes at USC**

In addition to monetary benefits, the Settlement requires USC to implement sweeping institutional reforms designed by experts to ensure that the sort of abuse at issue in this case can never happen again. These changes include implementation of university-wide policies to protect USC students and prevent abuse and sexual violence on campus, including policy and procedure changes at the USC Student Health Center. These policies include:

- Increased scrutiny and monitoring of health center employees, including pre-hiring background checks, credential verification, and annual education and performance reviews;
- Improved health center patient practices, including updated sensitive exam practices and allowing students to select a physician based on gender;
- New methods for collecting information about potential misconduct, including through the solicitation of patient feedback and implementation of plain-language notice for recognizing and reporting sexual harassment and gender-based violence;
- Development of new training programs for all USC students and staff designed to prevent sexual misconduct and sexual assault;
- Appointment of an Independent Women's Health Advocate. This independent (non-USC) individual, to be selected jointly by the parties and approved by the Court, will serve a three-year term. The Advocate will (a) receive complaints of improper sexual or racial conduct reported by any patient, student, and/or personnel at the Student Health Center; (b) confirm that all such complaints are investigated by either the USC's Office of Professionalism and Ethics and/or the Office of Equity and Diversity and/or Title IX Officer; and (c) ensure USC compliance with changes required by the Settlement and to report, as appropriate, any failures of this process to USC's Senior Vice President, Legal Affairs and Professionalism. If the Advocate believes the requirements and goals of the Settlement are not being sufficiently addressed by USC, she can raise those concerns to Class Counsel, the Special Master, and ultimately, the Court, for resolution;
- Appointment of an Independent Consultant, selected and compensated by Class Counsel, and having expertise in university best practices related to prevention and response to sexual assault and misconduct, who will be put on the USC Task Force responsible for conducting a wide-ranging climate survey of USC students as well as existing USC policies and procedures for the disclosure, reporting, and response to sexual violence on campus, and make recommendations of changes to implement in light of the survey results. The report and recommendations of the Task Force will be released publicly to the USC community. If the Independent Consultant believes the requirements and goals of the Settlement are not being sufficiently addressed by USC, she can raise those concerns to Class Counsel, the Special Master, and ultimately, the Court, for resolution.

More details about the changes the Settlement requires of USC and the status those changes are available on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

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## 8. How much will my payment from the Settlement be?

How much you get from the Settlement will depend on whether you file a claim and, if you do, what type of claim you file. The details of the claim structure are as follows:

**Tier 1 Payment:** Every Settlement Class Member is eligible for a guaranteed minimum Tier 1 payment of \$2,500 (“Tier 1 payment”), subject to a *Pro Rata* Increase, simply by being a Settlement Class Member.

- (i) Since you are a Class Member who was pre-identified through USC’s existing health center records, you have been pre-identified and assigned a Claimant ID Number and will be mailed a Tier 1 payment representing an initial amount for damages. This Tier 1 payment will be mailed even if you also submit a Tier 2 or Tier 3 Claim Form.

**Tier 2 Claim Award:** You can also choose to submit an online or written Claim Form describing your experience, the impact to you, and/or the emotional distress and/or bodily injury you suffered. Whether you choose to submit a Tier 2 Claim has no effect on your Tier 1 payment; in other words, you will receive your Tier 1 payment regardless. Each Claim Form will be reviewed by an impartial, three-member Panel. If you submit a Claim Form, you may be asked to answer additional questions in writing. An attorney is available to help you with any questions about the Claim Form, at no cost to you. Settlement Class Members who make Tier 2 claims can call 1-888-663-1718, Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com) to schedule an appointment with an attorney.

If the Panel determines that you are eligible for compensation based on your Claim Form, you may be awarded a Tier 2 Claim Award of between \$7,500 and \$20,000 as determined by the Panel. Any Tier 2 Claim Award includes your Tier 1 payment amount. This Tier 2 Claim Award is subject to *Pro Rata* Adjustment up or down as detailed below. If the Panel determines you are not eligible for a Tier 2 Claim Award, you will still keep your Tier 1 payment as a Settlement Class Member.

**Tier 3 Claim Award:** You can also choose to participate in an interview describing your experience, the impact to you, and/or the emotional distress and/or bodily injury you suffered. Class Members who provide an interview along with a Claim Form will be eligible for a Tier 3 Claim Award of between \$7,500 to \$250,000, subject to *Pro Rata* Adjustment, up or down as detailed below.

In addition to a Claim Form describing your experience, the impact to you, and/or the emotional distress and/or bodily injury you suffered, you will be interviewed by a specialist trained in communicating with survivors with sensitivity and compassion, about your experience and its impact on you. Whether you choose to submit a Tier 3 Claim has no effect on your Tier 1 payment; in other words, you will receive your Tier 1 payment regardless.

Based on all information provided, the Panel will determine whether you are eligible for compensation and may award you a Tier 3 Claim Award between \$7,500 and \$250,000. Any Tier 3 Claim Award includes your Tier 1 payment. The Tier 3 Claim Award is subject to *Pro Rata* Adjustment up or down as detailed below. If the Panel determines that you are not eligible for a Tier 3 Claim Award, you will still keep your initial Tier 1 payment as a Settlement Class Member.

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**Pro Rata Adjustments.** Under no circumstances will any of the \$215,000,000 Settlement Amount be returned to the Defendants. A *Pro Rata* Adjustment will be used to ensure all of the Settlement Amount (less Administrative Expenses) goes to Class Members.

After the Panel has received and reviewed all Tier 2 and Tier 3 Claims and allocated Claim Award amounts, the *Pro Rata* Adjustment amount will be calculated by the Settlement Administrator by comparing the total sum of all Claim Awards with the total amount remaining in the Settlement Fund. (There will be less than \$215 million in the Fund because Administrative Expenses will have been paid out of the Fund prior to the *pro rata* calculation.)

If the sum of the Claim Awards *is less than* the amount remaining in the Settlement Fund, there will be a *Pro Rata* Increase applied to all Tier 1, Tier 2, and Tier 3 Claim Award amounts, which means those Claim Awards will all be increased by the same percentage. The percentage increase will be enough to make the sum of the Claim Awards equal the amount of money in the Settlement Fund, or to increase the Claim Award amounts by 50%, whichever comes first. Therefore, the maximum amount claimants could receive would be \$3,750 for Tier 1, \$30,000 for Tier 2, and \$375,000 for Tier 3.

If the sum of the Claim Awards *is more than* the amount remaining in the Settlement Fund, there will be a *Pro Rata* Reduction applied to all Tier 2 and Tier 3 Claim Award amounts, which means those Claim Awards will all be decreased by the same percentage. (There will be no decrease of the Tier 1 Claim Awards.) The percentage decrease will be enough to make the sum of the Claim Awards equal the amount of money in the Settlement Fund, or to decrease the Claim Award amounts by 25%, whichever comes first. Therefore, the lowest possible amount a claimant could receive under the Settlement would be \$2,500 for Tier 1 (i.e., no reduction) and \$5,625 for Tier 2 and Tier 3 (i.e., 25% reduction of lowest possible Tier 2 or 3 Claim Award).

The illustration below is provided to demonstrate the calculation of the *pro rata* adjustment. For the purposes of the illustration, it is assumed that 15,000 Class Members will be eligible to receive the \$2,500 Tier 1 payment. Of those 15,000, it is assumed that 4,000 Class Members or approximately 25% will file either a Tier 2 or a Tier 3 claim; 3,000 of those will file Tier 2 claims and receive an average award of \$15,000 and 1,000 will file Tier 3 claims and receive an average award of \$125,000. These assumptions result in the following calculations:

**Initial Calculation to Determine Total Aggregate Award Amount:**

15,000 Tier 1 x \$2,500	\$37.5 million
3,000 Tier 2 x \$15,000	\$45 million
1,000 Tier 3 x \$125,000	\$125 million
Less Tier 1 Offset for 4,000 Tier 2 and 3 claimants who already received a \$2,500 Tier 1 payment	(\$10 million)
<u>Total Aggregate Award Amount:</u>	\$197.5 million

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**Calculation to Determine *Pro Rata* Adjustment Amount:**

Settlement Fund <sup>1</sup>	\$210 million
Aggregate Award Amount	\$197.5 million
Percentage difference	6% Increase

**Calculation to Apply *Pro Rata* Adjustment:**

15,000 Tier 1 x (\$2,500 + 6% = \$2,650)	\$39.75 million
3,000 Tier 2 x (\$15,000 + 6% = \$ 15,900)	\$47.7 million
1,000 Tier 3 x (\$125,000 + 6% = \$ 132,500)	\$132.5 million
Less Tier 1 Offset for 4,000 Tier 2 and 3 claimants who already received a \$2,500 Tier 1 payment	(\$10 million)
<b><u>Total Aggregate Award Amount Plus 6% <i>Pro Rata</i> Increase:</u></b>	<b>\$209.95 million</b>

If fewer Class Members are eligible to receive the automatic Tier 1 payment, fewer Class Members file Tier 2 or 3 claims, and/or the average Tier 2 and 3 Claim Award amounts are smaller than what is assumed and estimated in the above example, the *Pro Rata* Increase to the Tier 1, 2 and 3 Claim Award amounts would be larger. Conversely, if more Class Members are eligible to receive the automatic Tier 1 payment, more Class Members file Tier 2 or 3 claims, and/or the average Tier 2 and 3 Claim Award amounts are larger than what is assumed and estimated in the above example, then the Tier 2 and 3 Claim Award amounts may receive a *Pro Rata* Reduction.

**Liens.** The amount of money you will receive also depends on any legally enforceable liens on the Claim Award. The amount paid to resolve any liens for Settlement Class Members will be paid out of such Settlement Class Member’s Claim Award.

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<sup>1</sup> This represents the Settlement Fund as of the date of the *pro rata* calculation, by which point the Settlement Fund will have been reduced to pay for Administrative Expenses incurred up to that date per Sections 2.2, 2.34, and 2.35 of the Amended Settlement Agreement. Solely for the purposes of this example, we have reduced the Settlement Fund by \$5 million to account for Administrative Expenses.

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## HOW YOU GET A PAYMENT

### 9. How can I get payment(s) from the Settlement?

#### **Tier 1 Payments**

You were pre-identified through USC's existing health center records and therefore you received this Notice that contains a Claimant ID Number on the upper left-hand corner. You will be sent your Tier 1 payment once the Court grants final approval of the Settlement and certifies the Settlement Class and any appeals are resolved in favor of the Settlement. You need not take any further action at this time regarding your Tier 1 payment. However, you may also choose to submit a Tier 2 or Tier 3 Claim, as discussed below.

#### **Tier 2 and Tier 3 Payments**

All Class Members can choose to submit a Tier 2 or Tier 3 Claim. To do so, you must complete and submit a Claim Form and, for Tier 3, participate in an interview. The Claim Form is available on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com), and you may also request a Claim Form by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com) or by phone 1-888-663-1718 (international numbers provided below). Claim Forms can be completed and submitted to the Settlement Administrator online through the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) or mailed to the Settlement Administrator at the address provided above. You also can schedule your Tier 3 interview on the website or by calling the phone number above.

All claims and submissions in the Settlement will be kept strictly confidential by the Settlement Administrator and Panel. Settlement Class Counsel will seek an order from the Court, called a Qualified Protective Order that will authorize disclosure of information under the Health Insurance Portability and Accountability Act ("HIPAA") for purposes of identifying and resolving any potential medical liens that may be asserted against Settlement Class Members' Claim Awards. Certain information also is required to be provided to Defendants' insurers, and the insurers will keep the information strictly confidential.

For your claim to be valid and timely, your Claim Form **must be received by the Settlement Administrator through the Settlement website ([www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com)) or postmarked by mail no later than November 8, 2019.**

### 10. When will I get my payment(s) from the Settlement?

Once the Court grants final approval of the Settlement and certifies the Settlement Class and any appeals are resolved in favor of the Settlement, you will be sent your Tier 1 payment. If a *Pro Rata* Increase is applied, supplemental Tier 1 payments reflecting the *Pro Rata* Increase will go out after all Tier 2 and 3 claims are determined as indicated below.

Tier 2 and 3 Claim Award payments will not go out until all Tier 2 and Tier 3 claims have been received and reviewed by the Panel and Claim Award amounts allocated by the Panel, and the *Pro Rata* Adjustment amount calculated and applied by the Settlement Administrator.

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Timing updates will be provided on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) and can also be obtained by contacting the Settlement Administrator by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com) or by phone toll-free at 1-888-663-1718 (international numbers provided below). Please do not contact the Court directly.

## 11. What am I giving up to get payment(s) and stay in the Settlement?

In exchange for receiving payment and benefits from the Settlement, you give up your right to sue the Defendants on your own for the claims described in the Amended Settlement Agreement. You will also be bound by any decisions by the Court relating to the Settlement. If you do not wish to give up your right to sue the Defendants, you must exclude yourself from (opt out of) the Settlement.

In return for paying the Settlement Amount and providing certain non-monetary benefits, the Defendants will be released from claims relating to the conduct alleged in the lawsuit and identified in the Amended Settlement Agreement. The Amended Settlement Agreement describes the released claims in further detail. Please read that agreement carefully since those releases will be binding on you as a Class Member if the Court grants final approval of the Settlement. If you have any questions, you can talk with Class Counsel free of charge or you may talk with your own lawyer (at your own expense). The Amended Settlement Agreement and releases are available on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a payment from the Settlement, and you want to keep the right to sue or continue to sue the Defendants, then you must take action to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class.

## 12. How do I opt out of the Settlement?

To exclude yourself from the Settlement, you must send a letter to the Settlement Administrator stating that you wish to be excluded from *In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.). Your written exclusion request must include the following:

- Your full name, address, and telephone number;
- The following statement:  
I want to be excluded from *In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.), and understand that by excluding myself, I will not be able to get any money or benefits from the Settlement.
- Your signature.

You must mail your written exclusion request, **postmarked no later than November 7, 2019** to:

USC Student Health Center Settlement  
c/o JND Legal Administration  
P.O. Box 91235  
Seattle, WA 98111-9335

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

### 13. If I don't exclude myself, can I sue the Defendants for the same thing later?

No. Unless you exclude yourself from the Settlement, you give up any right to sue the Defendants for the claims being released in this Litigation (*In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.), and *Jane Doe I v. University of Southern California et al.*, No. BC713383 (Cal. Super. Ct., L.A. County)).

If you have a pending lawsuit against any of the Defendants, speak to your lawyer as soon as possible; you may need to exclude yourself from this Settlement to continue your own lawsuit.

### 14. If I exclude myself, can I get money from the Settlement?

No. If you exclude yourself from the Settlement, you will not receive payment(s) from the Settlement, but you will keep your legal right to sue the Defendants on your own.

## THE LAWYERS REPRESENTING YOU

### 15. Do I have a lawyer in this case?

The Court has appointed the following lawyers, known as Class Counsel, to represent the Class Members in connection with the Settlement:

Steve Berman  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1201 Second Avenue, Suite 2000  
Seattle, WA 98101  
Phone: 206-623-7292  
Email: USCsettlement@hbsslaw.com

Annika K. Martin  
LIEFF CABRASER HEIMANN and  
BERNSTEIN LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Phone: 415-956-1000  
Email: akmartin@lchb.com

Elizabeth A. Kramer  
GIRARD SHARP LLP  
601 California Street, Suite 1400  
San Francisco, CA 94108  
Phone: 415-981-4800  
Email: ekramer@girardsharp.com

You will not be charged for contacting these lawyers, and they will help you with any questions about your claim at no cost to you. Call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com) to schedule an appointment with an attorney.

If you want to be represented by a lawyer other than Class Counsel, you may hire one at your own expense.

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## 16. How will the lawyers be paid?

After the Settlement has been approved, Class Counsel will ask the Court for payment of attorneys' fees and incurred expenses up to \$25 million to compensate them for their services in this Litigation. Any payment to the attorneys will be subject to Court approval, and the Court may award less than the amount requested. Any attorneys' fees and expenses that the Court approves will not come out of the Settlement Amount but will be paid separately by the Defendants.

When Class Counsel's motion for attorneys' fees and expenses is filed, it will be posted on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). Class Counsel expect to file their motion within 2 weeks after the final fairness hearing currently set for January 6, 2020. Please check the Settlement website regularly after the final fairness hearing if you wish to review Class Counsel's motion for attorneys' fees and expenses. You will have an opportunity to comment on this fee request. The deadline to object to Class Counsel's request for attorneys' fees and expenses will be 30 days after it is filed with the Court and posted to the Settlement website.

If you are represented by a lawyer other than Class Counsel, you are responsible for paying that lawyer's fees and/or costs.

## OBJECTING TO THE SETTLEMENT

### 17. How do I tell the Court that I don't like the Settlement?

If you are a Settlement Class Member and you have objections to any aspect of the Settlement, you may express your views to the Court. You can object to the Settlement only if you do not exclude yourself from the Settlement Class.

You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a larger settlement—the Court can only approve or deny the Settlement the parties have reached. If the Court denies approval of the Settlement, no payments from the Settlement Fund will be made and the Litigation will continue. If that is what you want to happen, you must object.

If you wish to object to the Settlement, you must do so in writing. You may also appear at the final fairness hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney. All written objections and supporting papers must: (a) list your name, address, and telephone number; (b) clearly identify the master case name and number (*In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.)); (c) state whether the objection applies only to the objector, to a specific subset of the Class, or to the entire Class, and state with specificity the grounds for the objection; (d) state whether the Settlement Class Member intends to personally appear and/or testify at the final fairness hearing; (e) include the name and contact information of any and all attorneys representing, advising, or assisting the Settlement Class Member, including any counsel who may seek compensation for any reason related to the Settlement Class Member's objection or comment; (f) state whether any attorney will appear on the Settlement Class Member's behalf at the final fairness hearing, and if so, the identity of that attorney; (g) be submitted to the Court either by mailing to the Clerk, United States District Court for the Central District of California, First Street Courthouse, 350

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W. 1st Street, Suite 4311, Los Angeles, CA 90012 or by filing them in person at any location of the United States District Court for the Central District of California; and (h) be **filed or postmarked on or before October 9, 2019**.

### 18. What's the difference between objecting and opting out?

By excluding yourself from the Settlement, you are telling the Court that you do not want to participate in the Settlement. For that reason, you will not be eligible to receive any benefits from the Settlement and you will not be able to object to it, as it will no longer apply to you or bind you.

By objecting to the Settlement, you are telling the Court you want to participate in the Settlement, but that there is something about it you do not like. If you object, you are still eligible to receive payment(s) from the Settlement (although you will not receive any payment until your objection is resolved).

## THE COURT'S FAIRNESS HEARING

The Court will hold a fairness hearing to decide whether to approve the Settlement. You may attend the hearing, and you may ask to speak, if you wish to, but you are not required to do so.

### 19. When and where will the Court decide whether to approve the Settlement?

The Court will hold its final fairness hearing on January 6, 2020 at 1:30 p.m. at the United States District Court, Central District of California, First Street Courthouse, 350 W. 1st Street, Courtroom 10A, 10th Floor, Los Angeles, CA 90012.

The hearing may be moved to a different date or time without additional direct notice to you. You can check the Court's PACER site, <https://ecf.cacd.uscourts.gov>, or contact the Settlement Administrator at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) or toll-free at 1-888-663-1718 (international numbers provided below), to confirm that the date has not changed.

At the fairness hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate under the rules governing such settlements. If there are objections or comments, the Court will consider them at that time and may listen to people who have asked to speak at the hearing. The Court will decide whether to approve the Settlement at or after the hearing.

### 20. Do I have to come to the fairness hearing?

No. Class Counsel will answer any questions the Court may have at the fairness hearing, but you may attend at your own expense if you wish to. If you send an objection or comment on the Settlement you do not have to come to the hearing to talk about it. As long as you filed or mailed your written objection on time, the Court will consider it. You may also hire your own lawyer at your own expense to attend the hearing on your behalf, but you are not required to do so.

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

## 21. May I speak at the fairness hearing?

If you send an objection or comment on the Settlement, you may be able to speak at the fairness hearing, subject to the Court's discretion. You cannot speak at the fairness hearing if you exclude yourself from the Settlement.

## IF YOU DO NOTHING

## 22. What happens if I do nothing at all?

If you do nothing and the Settlement is finally approved by the Court, you will receive a Tier 1 payment from the Settlement, and you will be bound by the Court's final judgment and the release of claims detailed in the Amended Settlement Agreement.

## GETTING MORE INFORMATION

## 23. How do I get more information?

This Notice summarizes the Settlement and your rights and options. More details are contained in the Amended Settlement Agreement. You can get copies of the Amended Settlement Agreement and more information about the settlement on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). You also may also contact the Settlement Administrator by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com), by phone toll-free at 1-888-663-1718 (international numbers provided below) or by mail at USC Student Health Center Settlement, c/o JND Legal Administration, P.O. Box 91233 Seattle, WA 98111-9333.

For a more detailed statement of the matters involved in the Litigation or the Settlement, you may review the various documents on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com), and/or the other documents filed in this case by visiting (during business hours) the clerk's office at the United States District Court for the Central District of California, First Street Courthouse, 350 W. 1st Street, Suite 4311, Los Angeles, CA 90012, File: *In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW, or by accessing the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cacd.uscourts.gov>.

**PLEASE DO NOT – UNDER ANY CIRCUMSTANCES – TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THE SETTLEMENT OR THE CLAIM PROCESS.**

Dated: July 11, 2019

By Order of the Court  
United States District Court  
Central District of California

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

Must be received online  
or postmarked by mail no  
later than November 8,  
2019.

USC STUDENT HEALTH CENTER SETTLEMENT  
C/O JND LEGAL ADMINISTRATION  
P.O. BOX 91233  
SEATTLE, WA 98111-9333  
[WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM)

**USC**

You may submit your Claim Form Online at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com)

## TIER 2 AND TIER 3 CLAIM FORM

### GENERAL INSTRUCTIONS

Please review the following instructions before proceeding:

Please note that you may make a Tier 2 or Tier 3 claim, but not both.

In deciding whether to make a Tier 2 or Tier 3 claim, please note the following:

- To make a Tier 2 or Tier 3 claim, you must describe below your experience, and its impact on you.
- To make a Tier 3 claim, you also need to be interviewed by a specialist from the Panel.
- A compensable Tier 2 claim will result in an award between no less than \$7,500 and no more than \$20,000 (subject to *Pro Rata* Adjustment);
- A compensable Tier 3 claim will result in an award between no less than \$7,500 and no more than \$250,000 (subject to *Pro Rata* Adjustment). However, if you decline to participate in the interview you may in no event receive an award which exceeds the Tier 2 Claim Award range between \$7,500 and \$20,000.

If you wish to submit a Tier 2 or Tier 3 claim, please complete Sections A, C, D, E, F, and sign your name in Section G.

You must also fill out Section B only if you are represented by an attorney.

Please note, if you are a Class Member, you are eligible for a guaranteed minimum Tier 1 payment regardless of whether you make a Tier 2 or Tier 3 Claim. Please see the Settlement Website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) for additional information.

**This Claim Form may also be completed online at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).**

**THIS INFORMATION IS HIGHLY CONFIDENTIAL AND WILL NOT BE SHARED WITH ANYONE OTHER THAN THE COURT-APPOINTED EVALUATION TEAM AND USC'S INSURANCE CARRIERS**

## SECTION A: CLAIMANT INFORMATION

<b>1. CLAIMANT NAME:</b>	First	Middle	Last
<b>2. FORMER OR MAIDEN NAME (STUDENT NAME):</b>			
<b>3. DATE OF BIRTH:</b>	_____	_____	_____
	Month	Day	Year
<b>4. SOCIAL SECURITY NUMBER, TAXPAYER ID OR FOREIGN ID NUMBER (IF NOT A U.S. CITIZEN):</b>	_____ - _____ - _____ or _____		
<b>5. CURRENT ADDRESS:</b>	Street Address (including apartment/unit number, if applicable)		
	City		
	State/Province		
	Postal Code	Country	
<b>6. TELEPHONE NUMBER:</b>	( _____ ) - ( _____ ) - _____ - _____ <small>Country Code (if outside the United States)      Area Code      Number</small>		
<b>7. EMAIL ADDRESS:</b>			
<b>8. DATES ENROLLED AT USC:</b>	<b>From:</b> _____ <b>To:</b> _____ <small>Month and Year      Month and Year</small>  <b>School/Department:</b> _____		

**QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**

<b>9. DATE(S) TREATED IF NOT A STUDENT AT USC:</b>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border-bottom: 1px solid black; width: 25%;"></td> </tr> <tr> <td colspan="4" style="text-align: center;">(MM/DD/YYYY)</td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td colspan="4" style="text-align: center;">(MM/DD/YYYY)</td> </tr> </table>					(MM/DD/YYYY)								(MM/DD/YYYY)			
(MM/DD/YYYY)																	
(MM/DD/YYYY)																	
<b>10. IS ENGLISH YOUR FIRST LANGUAGE?</b>	Yes: <input type="checkbox"/> No: <input type="checkbox"/>																
<b>11. IF YOU ANSWERED "NO" TO QUESTION 10, WHAT IS YOUR FIRST/NATIVE LANGUAGE?</b>																	

## SECTION B: ATTORNEY INFORMATION

If you are represented by an attorney, enter the attorney's information in this Section B. (You are only represented by an attorney if you signed a representation agreement or contract hiring that attorney.) If you are not represented by an attorney, skip this section.

<b>1. ATTORNEY NAME:</b>	First	M.I.	Last	Suffix										
<b>2. LAW FIRM NAME:</b>														
<b>3. LAW FIRM MAILING ADDRESS:</b>	Address 1													
	Address 2													
	City													
	State/Province													
	Postal Code	Country												
<b>4. ATTORNEY TELEPHONE:</b>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border-bottom: 1px solid black; width: 20%;"></td> </tr> <tr> <td style="text-align: center;">Country Code (if outside the United States)</td> <td style="text-align: center;">Area Code</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">Number</td> </tr> </table>									Country Code (if outside the United States)	Area Code	-	-	Number
Country Code (if outside the United States)	Area Code	-	-	Number										
<b>5. ATTORNEY EMAIL ADDRESS:</b>														

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

### SECTION C: CLAIM SELECTION

Please select **one** of the following two claim options:

- Tier 2 Claim** (I choose only to provide information by filling out this claim form, and understand that may make me eligible for an award of \$7,500 to \$20,000.)
- Tier 3 Claim** (I choose to provide information by filling out this claim form **and** participating in an interview by the Panel, and I understand that may make me eligible for an award of \$7,500 to \$250,000.)

### SECTION D: TREATMENT BY DR. TYNDALL AT USC

**Please complete the information below. You may use additional sheets of paper to describe your experiences.**

If you need or want any assistance in filling out this Claim Form, the Court has appointed attorneys to represent Class Members, and those attorneys are available at no cost to you to help you. Call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com).

For each date that you were seen by Dr. George Tyndall, please answer the questions below. *Please be as specific as possible. If you can, please indicate the day, month, and year of your appointment. If you cannot recall the month, please try to recall the season of year (fall, winter, spring, summer). Attach additional pages to describe other visits as necessary.*

#### VISIT 1

1. Date:

										/	/								
										(MM/DD/YYYY)									

2. Facility:

3. Was this your first visit to a gynecologist?

Yes:  No:

4. Reason for the appointment you scheduled:

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**8. Where did you meet with Dr. Tyndall (e.g., in his office, examination room, etc.)?**

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Please describe what happened during your appointment with Dr. Tyndall by answering the questions below.

If you need or want any assistance in filling out this Claim Form, the Court has appointed attorneys to represent Settlement Class members, and those attorneys are available at no cost to you to help you. Call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com).

Please include as much detail as possible regarding Dr. Tyndall's physical examination of you, including your recollection of his procedures, if applicable.

**9. Were you asked to disrobe?**

Yes:  No:

**10. If you answered "Yes" above, did you disrobe partially or completely?**

Partially

Completely

**11. If yes, how did you react to this request at the time it occurred?**

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**12. If yes, how do you feel about it now?**

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**13. What was the stated reason for your removing of clothing when Dr. Tyndall asked you to disrobe?**

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**14. Did Dr. Tyndall ask you any odd questions? Did Dr. Tyndall make any comments about your body that seemed unprofessional? If so, please describe in as much detail as you are able to accurately recall.**

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**15. Please describe to the best of your recollection any discussions, remarks, or statements made by Dr. Tyndall. Include what was said by Dr. Tyndall before, during, or after your examination, especially if these comments seemed derogatory, offensive, harassing, or made you feel uncomfortable.**

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**16. Please describe any verbal statements or other demonstrations using gestures, photos, or devices related to alleged sexual education, or descriptions of female or male anatomy, provided by Dr. Tyndall. This might include birth control instructions.**

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**17. Please describe any materials Dr. Tyndall showed or gave you, if applicable.**

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**18. In the process of being examined, were any parts of your body stroked or touched in a manner that made you feel uncomfortable, including, but not limited to, arms, legs, breasts, hair or others?**

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**19. Please provide detail regarding any prescriptions Dr. Tyndall gave you, whether you requested the prescriptions or they were provided without your request, and the stated purpose of the prescriptions by Dr. Tyndall, if applicable.**

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**20. Please describe any diagnoses or recommendations for follow-up Dr. Tyndall gave you, and his explanations.**

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21. Did Dr. Tyndall make any inappropriate sexual comments (e.g., sexual comments that might have made you feel uncomfortable, or that you believe might have been improper, or suspect could have been medically unnecessary)?

Yes:  No:

22. If yes, please describe any such comments. How did you feel about it at the time it occurred?

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23. If yes, how do you feel about it now?

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24. Did Dr. Tyndall digitally penetrate, meaning insert one or more of his fingers into, you vaginally?

Yes:  No:

25. If yes, how did you feel about it at the time it occurred?

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26. If yes, how do you feel about it now?

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27. Did Dr. Tyndall, while penetrating you with his finger(s), move his finger(s) in and out?

Yes:  No:

28. If yes, how did you react at the time this was occurring?

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29. If yes, how do you feel about what happened now?

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30. Did Dr. Tyndall anally penetrate you?

Yes:  No:

31. If yes, how did you feel about it at the time it occurred?

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**32. If yes, how do you feel about it now?**

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**33. Was anyone else present with you and Dr. Tyndall during the visit?**

Yes:  No:

**34. If yes, who was that person (to the best of your recollection)?**

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**35. Please describe in detail (to the best of your recollection) the role of this person in the visit.**

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**39. When did you first feel the behavior you have described above was inappropriate (e.g., that made you feel uncomfortable, or that you believe might have been improper, or suspect could have been medically unnecessary)?**

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**40. Did you tell anyone about the conduct you believe was inappropriate (this includes parents, relatives, friends, attorneys, and law enforcement authorities)?**

Yes:  No:

**41. If yes, who did you tell?**

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**42. If yes, what did you say?**

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43. If yes, when did you tell this person or people about the inappropriate conduct?

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If you had additional visits, please use separate sheets of paper to answer the same questions for each additional appointment you had with Dr. Tyndall.

## SECTION E: IMPACT OF CONDUCT

1. Describe how you felt during your appointment(s) with Dr. Tyndall. Please include as much detail as possible regarding any physical pain or discomfort, as well as mental or emotional feelings or distress you felt at the time, and why.

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2. Describe any mental or emotional distress, or physical pain or discomfort, following your appointment(s) with Dr. Tyndall up to the present time that were related to your interactions with him. Describe when you began to feel this, and how long it lasted.

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**3. Describe how any emotional distress or physical pain or discomfort has affected you and changed over time, including how it has affected your romantic relationship(s) and social functioning, work functioning, or other important aspects of daily life, including for sleep, bathing, irritability, concentration, eating, etc.**

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**4. Had you had any experiences prior to your visit(s) with Dr. Tyndall that you felt constituted inappropriate sexual behavior or abuse? If so, please describe.**

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If you need or want any assistance in filling out this Claim Form, the Court has appointed attorneys to represent Settlement Class members, and those attorneys are available at no cost to you to help you. Call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com).

**5. Have you sought counseling by any healthcare professional for your above-referenced injuries or emotional distress?**

Yes:  No:

**If yes, please describe below. *Anyone listed below will not be contacted without your permission.***

**Date(s) (even if approximate):**

|\_|\_|\_|\_|/|\_|\_|\_|\_|/|\_|\_|\_|\_|\_|\_|\_|\_|\_|\_|  
(MM/DD/YYYY)

|\_|\_|\_|\_|/|\_|\_|\_|\_|/|\_|\_|\_|\_|\_|\_|\_|\_|\_|\_|  
(MM/DD/YYYY)

|\_|\_|\_|\_|/|\_|\_|\_|\_|/|\_|\_|\_|\_|\_|\_|\_|\_|\_|\_|  
(MM/DD/YYYY)

**Name(s) of Professional(s):**

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**Nature of Treatment:**

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**6. Have you sought other treatment by any healthcare professional for your above-referenced injuries or emotional distress?**

Yes:  No:

**If yes, please describe below. *Anyone listed below will not be contacted without your permission.***

**Date(s) (even if approximate):**

|\_|\_|\_|\_|/|\_|\_|\_|\_|/|\_|\_|\_|\_|\_|\_|\_|\_|\_|\_|  
(MM/DD/YYYY)

|\_|\_|\_|\_|/|\_|\_|\_|\_|/|\_|\_|\_|\_|\_|\_|\_|\_|\_|\_|  
(MM/DD/YYYY)

|\_|\_|\_|\_|/|\_|\_|\_|\_|/|\_|\_|\_|\_|\_|\_|\_|\_|\_|\_|  
(MM/DD/YYYY)

**Name(s) of Professional(s):**

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**Nature of Treatment:**

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#5370

USC STUDENT HEALTH CENTER SETTLEMENT  
C/O JND LEGAL ADMINISTRATION  
P.O. BOX 91233  
SEATTLE, WA 98111-9333

Puede encontrar la Notificación del acuerdo de conciliación, el Formulario de Declaración de miembros del grupo del acuerdo en la demanda colectiva, y el Formulario de reclamos para la Categoría 2 y 3 en español, en el sitio web del Acuerdo: [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

中文版和解通知、和解声明、申诉委托人表以及 2 级和 3 级申请表可在和解网站 [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) 获取.

**QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**



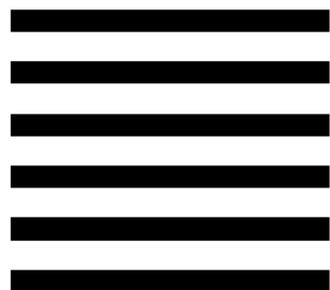
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USC STUDENT HEALTH CENTER SETTLEMENT  
C/O JND LEGAL ADMINISTRATION  
PO BOX 91233  
SEATTLE WA 98111-9926



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TO THE  
UNITED STATES

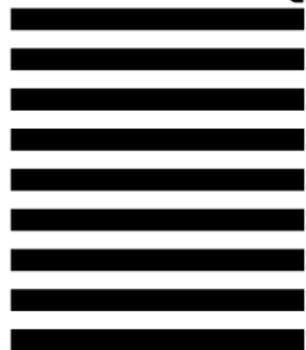
**INT'L BUSINESS REPLY MAIL/REPOSE PAYEE**

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USC STUDENT HEALTH CENTER SETTLEMENT  
C/O JND LEGAL ADMINISTRATION  
PO BOX 91233  
SEATTLE WA 98111-9855  
UNITED STATES OF AMERICA



USC Student Health Center Settlement  
c/o JND Legal Administration  
P.O. Box 91233  
Seattle, WA 98111-9333

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**IMPORTANT COURT-ORDERED INFORMATION**

**IMPORTANT COURT-ORDERED INFORMATION**

# **EXHIBIT C**

**UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA**

*A federal court authorized this Notice. This is not a solicitation from a lawyer.*

**Women who were seen for treatment by Dr. George Tyndall at USC's Student Health Center may be eligible for benefits from a class action settlement.**

- A Settlement has been reached with the University of Southern California and its Board of Trustees (together "USC") and with Dr. George M. Tyndall, M.D. ("Dr. Tyndall") (collectively "Defendants") in a class action lawsuit. Plaintiffs allege in the lawsuit that Dr. Tyndall assaulted, abused, sexually harassed, committed medical malpractice related to a Women's Health Issue against, or otherwise acted inappropriately towards, female patients while he was a gynecologist at the USC Student Health Center and that USC failed to respond appropriately.
- The Settlement provides a \$215,000,000 fund for the benefit of certain women who were seen for treatment by Dr. Tyndall at the USC Student Health Center between August 14, 1989 and June 21, 2016. As part of the Settlement, USC is implementing institutional changes to protect students and prevent future abuse, including policy and procedure changes at the Student Health Center; ensuring that its medical personnel act consistently with the best practice standards recognized by the SCOPE program of the American College of Obstetricians and Gynecologists; appointment of an Independent Women's Health Advocate; and creation of a Task Force—including an independent expert in university best practices related to prevention and response to sexual assault and misconduct—to recommend university-wide changes to prevent sexual violence on campus. A complete description of the changes USC is implementing can be found on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). While no Settlement can ever undo what happened, it can provide a measure of resolution, as well as provide a punitive and deterrent effect on the Defendants.
- The Defendants deny all charges of wrongdoing and liability.
- This Notice contains information about the Settlement and the lawsuit. It is critical that you read this entire Notice carefully, because your legal rights are affected whether or not you act. That said, given the traumatic nature of the abuse you may have suffered, please take breaks as you read and seek support if you need it. While it may be difficult, please persevere in reading this entire Notice carefully so that you can arrive at a clear understanding of your legal rights.
- As described in more detail below, the Settlement has a three-tier structure based on your choice of how – and how much – you feel comfortable sharing with the Settlement program. To receive your Tier 1 guaranteed minimum payment check, simply fill out the enclosed Statement of Class Membership Form. You are also eligible to make a claim for Tier 2 (by filling out the enclosed Claim Form) or Tier 3 (by filling out the Claim Form and participating in an interview).
- All the specialists and experts who make up the team administering and evaluating the Settlement claims have been specially trained in communicating with victims of trauma and harassment. Should you choose to engage with the Settlement program by submitting a Tier 2 or Tier 3 claim, they will ensure your experience is as safe and compassionate as possible and that you will be heard.

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

**YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT**

<u><b>ACTION</b></u>	<u><b>EXPLANATION</b></u>	<u><b>DUE DATE</b></u>
<b>DO NOTHING</b>	You are a potential member of the Settlement Class, but if you do nothing, you will not receive any payment and you will give up your right to sue the Defendants about the claims in this case.	
<b>SUBMIT A CLAIM FORM</b>	<p>In order to receive the guaranteed minimum \$2,500 Tier 1 payment under the Settlement, you must complete the Statement of Class Membership Form enclosed with this Notice (also available at <a href="http://www.USCTyndallSettlement.com">www.USCTyndallSettlement.com</a>).</p> <p>You can also choose to submit a Tier 2 or Tier 3 claim describing your experience as a patient of Dr. Tyndall. Depending on the information you provide and whether you are willing to be interviewed, you could receive as much as \$250,000.</p> <p>For more information about submitting a claim, see the answers to questions 8-10 below.</p> <p>The Court has appointed attorneys to represent Settlement Class Members, and those attorneys are available at no cost to you to help you make your claim. Call 1-888-663-1718 and select Option 8 or email <a href="mailto:ClassCounsel@USCTyndallSettlement.com">ClassCounsel@USCTyndallSettlement.com</a> to schedule an appointment with an attorney.</p> <p>If you submit a claim and receive a payment you give up your right to sue the Defendants about the claims in this case.</p>	November 8, 2019
<b>EXCLUDE YOURSELF</b>	If you choose to exclude yourself (opt-out), you will not be included in the Settlement. You will receive no benefits and you will keep any right you currently have to sue the Defendants about the claims in the case.	November 7, 2019
<b>OBJECT</b>	If you do not exclude yourself, and if you disagree with the Settlement, you can write to the Court to explain your objection.	October 9, 2019
<b>GO TO A HEARING</b>	Ask to speak in court about the fairness of the Settlement.	January 6, 2020 at 1:30 p.m.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still must decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

**QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**

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**QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**

## BASIC INFORMATION

### 1. Why did I get this Notice?

If you are a woman who was seen for treatment by Dr. Tyndall at the USC Student Health Center during the period from August 14, 1989 to June 21, 2016, you have the right to know about a proposed Settlement of a class action lawsuit, and your options, before the Court decides whether to approve the Settlement.

This Notice is to inform you about the lawsuit, the proposed Settlement, and your legal rights. The women who sued are called “Plaintiffs.” The doctor and university they sued are called “Defendants.”

### 2. What is this lawsuit about?

Dr. Tyndall was a gynecologist at USC’s Student Health Center from August 14, 1989, until June 21, 2016. Plaintiffs allege that Dr. Tyndall committed medical malpractice related to a Women’s Health Issue and sexually assaulted, abused, and engaged in harassing and offensive behavior towards his female patients at USC. Plaintiffs further allege that USC supervisors and administrators were repeatedly informed of Dr. Tyndall’s misconduct but failed to take the necessary measures to protect his patients. Defendants deny plaintiffs’ allegations. The Court has not decided who is right.

### 3. Why is this a class action?

In a class action, one or more plaintiffs called “Class Representatives” sue on behalf of themselves and other people with similar claims. This group of people is called the “Class” and the people in the Class are called “Class Members.” One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

This lawsuit is *In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.). The judge is Stephen V. Wilson of the United States District Court for the Central District of California. **DO NOT – UNDER ANY CIRCUMSTANCES – TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THE SETTLEMENT OR THE CLAIMS PROCESS.**

### 4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendants. Instead, both sides have agreed to a Settlement to avoid the costs and risks of trial and appeals. The Class Representatives and their attorneys think the Settlement is best for the Class.

## WHO IS IN THE SETTLEMENT?

### 5. How do I know if I am part of the Settlement?

The Class for the Settlement has been defined as all women who were seen for treatment by Dr. George M. Tyndall at the University of Southern California Student Health Center during the period from August 14, 1989, to June 21, 2016 (a) for Women’s Health Issues, or (b) whose treatment by Dr. George M. Tyndall included an examination by him of her breast or genital areas, or (c) whose treatment included the taking of photographs or videotapes of her unclothed or partially clothed body.

“Women’s Health Issues” includes but is not limited to any issue relating to breast, vaginal, urinary tract, bowel, gynecological, or sexual health, including contraception and fertility. A list of eligible Women’s Health Issues is available on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

If you believe you are a Class Member based on the definition above, and want to participate in the Settlement, you must complete the Statement of Class Membership Form enclosed with this Notice (also available at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com)).

### 6. What should I do if I am not sure if I am included in the Settlement?

If you are not sure whether you are in the Class, you can ask for free help and more information by calling the Settlement Administrator at 1-888-663-1718 (international numbers provided below) or sending an email to [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com).

More details about the Class, its claims, and the Settlement can be found in the Amended Settlement Agreement and other documents available on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

## BENEFITS OF THE SETTLEMENT — WHAT YOU GET

### 7. What does the Settlement provide?

#### **Monetary Benefits**

Defendants will pay \$215,000,000 to settle the lawsuit. This fund will be used to pay Class Member claims (see the answers to questions 8-10 below) and expenses associated with notifying Class Members and with administering the Settlement, including compensating an impartial, three-member Panel who will decide how much individual Class Members receive. The fund will also be used to pay any Class Representative service award(s) awarded by the Court.

#### **Institutional Changes at USC**

In addition to monetary benefits, the Settlement requires USC to implement sweeping institutional reforms designed by experts to ensure that the sort of abuse at issue in this case can never happen again. These changes include implementation of university-wide policies to protect USC students and prevent abuse and sexual violence on campus, including policy and procedure changes at the USC Student Health Center. These policies include:

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

- Increased scrutiny and monitoring of health center employees, including pre-hiring background checks, credential verification, and annual education and performance reviews;
- Improved health center patient practices, including updated sensitive exam practices and allowing students to select a physician based on gender;
- New methods for collecting information about potential misconduct, including through the solicitation of patient feedback and implementation of plain-language notice for recognizing and reporting sexual harassment and gender-based violence;
- Development of new training programs for all USC students and staff designed to prevent sexual misconduct and sexual assault;
- Appointment of an Independent Women’s Health Advocate. This independent (non-USC) individual, to be selected jointly by the parties and approved by the Court, will serve a three-year term. The Advocate will (a) receive complaints of improper sexual or racial conduct reported by any patient, student, and/or personnel at the Student Health Center; (b) confirm that all such complaints are investigated by either the USC’s Office of Professionalism and Ethics and/or the Office of Equity and Diversity and/or Title IX Officer; and (c) ensure USC compliance with changes required by the Settlement and to report, as appropriate, any failures of this process to USC’s Senior Vice President, Legal Affairs and Professionalism. If the Advocate believes the requirements and goals of the Settlement are not being sufficiently addressed by USC, she can raise those concerns to Class Counsel, the Special Master, and ultimately, the Court, for resolution;
- Appointment of an Independent Consultant, selected and compensated by Class Counsel, and having expertise in university best practices related to prevention and response to sexual assault and misconduct, who will be put on the USC Task Force responsible for conducting a wide-ranging climate survey of USC students as well as existing USC policies and procedures for the disclosure, reporting, and response to sexual violence on campus, and make recommendations of changes to implement in light of the survey results. The report and recommendations of the Task Force will be released publicly to the USC community. If the Independent Consultant believes the requirements and goals of the Settlement are not being sufficiently addressed by USC, she can raise those concerns to Class Counsel, the Special Master, and ultimately, the Court, for resolution.

More details about the changes the Settlement requires of USC and the status of those changes are available on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

## 8. How much will my payment from the Settlement be?

How much you get from the Settlement will depend on whether you file a claim and, if you do, what type of claim you file. The details of the claim structure are as follows:

**Tier 1 Payment:** Every Settlement Class Member is eligible for a guaranteed minimum Tier 1 payment of \$2,500 (“Tier 1 payment”), subject to a *Pro Rata* Increase, simply by being a Settlement Class Member.

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

- (i) Each Settlement Class Member who was pre-identified through USC's existing health center records (which cover the period from July 14, 1997, through June 21, 2016) has been pre-identified and assigned a Claimant ID Number and will be mailed a Tier 1 payment representing an initial amount for damages. This Tier 1 payment will be mailed even if you also submit a Tier 2 or Tier 3 Claim Form.
- (ii) Settlement Class Members who were not identified through USC's existing health center records who have completed online or returned by mail a qualifying Statement of Settlement Class Membership will be mailed a Tier 1 payment, representing an initial amount for damages. To qualify, Settlement Class Members must have their student status confirmed by records from USC registrar's office, or, if the Settlement Class Member is not a student, submit credible evidence of class membership. This Tier 1 payment will be mailed even if you also submit a Tier 2 or Tier 3 Claim Form.

**Tier 2 Claim Award:** Each Settlement Class Member can also choose to submit an online or written Claim Form describing your experience, the impact to you, and/or the emotional distress and/or bodily injury you suffered. Whether you choose to submit a Tier 2 Claim has no effect on your Tier 1 payment; in other words, you will receive your Tier 1 payment regardless. Each Claim Form will be reviewed by an impartial three-member Panel. If you submit a Claim Form, you may be asked to answer additional questions in writing. An attorney is available to help you with any questions about the Claim Form, at no cost to you. Settlement Class Members who make Tier 2 claims can call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com) to schedule an appointment with an attorney. to schedule an appointment with an attorney.

If the Panel determines that you are eligible for compensation based on your Claim Form, you may be awarded a Tier 2 Claim Award of between \$7,500 and \$20,000 as determined by the Panel. Any Tier 2 Claim Award includes your Tier 1 payment amount. This Tier 2 Claim Award is subject to *Pro Rata* Adjustment up or down as detailed below. If the Panel determines you are not eligible for a Tier 2 Claim Award, you will still keep your Tier 1 payment as a Settlement Class Member.

**Tier 3 Claim Award:** Each Settlement Class Member can also choose to participate in an interview describing your experience, the impact to you, and/or the emotional distress and/or bodily injury you suffered. Class Members who provide an interview along with a Claim Form will be eligible for a Tier 3 Claim Award of between \$7,500 to \$250,000, subject to *Pro Rata* Adjustment, up or down as detailed below.

In addition to a Claim Form describing your experience, the impact to you, and/or the emotional distress and/or bodily injury you suffered, you will be interviewed by a specialist trained in communicating with survivors with sensitivity and compassion, about your experience and its impact on you. Whether you choose to submit a Tier 3 Claim has no effect on your Tier 1 payment; in other words, you will receive your Tier 1 payment regardless.

Based on all information provided, the Panel will determine whether you are eligible for compensation and may award you a Tier 3 Claim Award between \$7,500 and \$250,000. Any Tier 3 Claim Award includes your Tier 1 payment. The Tier 3 Claim Award is subject to *Pro Rata* Adjustment up or down as detailed below. If the Panel determines that you are not eligible for a Tier 3 Claim Award, you will still keep your Tier 1 payment(s) as a Settlement Class Member.

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**Pro Rata Adjustments.** Under no circumstances will any of the \$215,000,000 Settlement Amount be returned to the Defendants. *Pro Rata* Adjustments will be used to ensure all of the Settlement Amount (less Administrative Expenses) goes to Class Members.

After the Panel has received and reviewed all Tier 2 and Tier 3 Claims and allocated Claim Award amounts, the *Pro Rata* Adjustment amount will be calculated by the Settlement Administrator by comparing the total sum of all Claim Awards with the total amount remaining in the Settlement Fund. (There will be less than \$215 million in the Fund because Administrative Expenses will have been paid out of the Fund prior to the *pro rata* calculation.)

If the sum of the Claim Awards *is less than* the amount remaining in the Settlement Fund, there will be a *Pro Rata* Increase applied to all Tier 1, Tier 2, and Tier 3 Claim Award amounts, which means those Claim Awards will all be increased by the same percentage. The percentage increase will be enough to make the sum of the Claim Awards equal the amount of money in the Settlement Fund, or to increase the Claim Award amounts by 50%, whichever comes first. Therefore, the maximum amount claimants could receive would be \$3,750 for Tier 1, \$30,000 for Tier 2, and \$375,000 for Tier 3.

If the sum of the Claim Awards *is more than* the amount remaining in the Settlement Fund, there will be a *Pro Rata* Reduction applied to all Tier 2 and Tier 3 Claim Award amounts, which means those Claim Awards will all be decreased by the same percentage. (There will be no decrease of the Tier 1 Claim Awards.) The percentage decrease will be enough to make the sum of the Claim Awards equal the amount of money in the Settlement Fund, or to decrease the Claim Award amounts by 25%, whichever comes first. Therefore, the lowest possible amount a claimant could receive under the Settlement would be \$2,500 for Tier 1 (i.e., no reduction) and \$5,625 for Tier 2 and Tier 3 (i.e., 25% reduction of lowest possible Tier 2 or 3 Claim Award).

The illustration below is provided to demonstrate the calculation of the *Pro Rata* Adjustment. For the purposes of the illustration, it is assumed that 15,000 Class Members will be eligible to receive the \$2,500 Tier 1 payment. Of those 15,000, it is assumed that 4,000 Class Members or approximately 25% will file either a Tier 2 or a Tier 3 claim; 3,000 of those will file Tier 2 claims and receive an average award of \$15,000 and 1,000 will file Tier 3 claims and receive an average award of \$125,000. These assumptions result in the following calculations:

**Initial Calculation to Determine Total Aggregate Award Amount:**

15,000 Tier 1 x \$2,500	\$37.5 million
3,000 Tier 2 x \$15,000	\$45 million
1,000 Tier 3 x \$125,000	\$125 million
Less Tier 1 Offset for 4,000 Tier 2 and 3 claimants who already received a \$2,500 Tier 1 payment	(\$10 million)
<u>Total Aggregate Award Amount:</u>	\$197.5 million

**Calculation to Determine *Pro Rata* Adjustment Amount:**

Settlement Fund <sup>1</sup>	\$210 million
Aggregate Award Amount	\$197.5 million
Percentage Difference	6% Increase

**Calculation to Apply *Pro Rata* Adjustment:**

15,000 Tier 1 x (\$2,500 + 6% = \$2,650)	\$39.75 million
3,000 Tier 2 x (\$15,000 + 6% = \$ 15,900)	\$47.7 million
1,000 Tier 3 x (\$125,000 + 6% = \$ 132,500)	\$132.5 million
Less Tier 1 Offset for 4,000 Tier 2 and 3 claimants who already received a \$2,500 Tier 1 payment	(\$10 million)
<u>Total Aggregate Award Amount Plus 6% <i>Pro Rata</i> Increase:</u>	\$209.95 million

If fewer Class Members are eligible to receive the automatic Tier 1 payment, fewer Class Members file Tier 2 or 3 claims, and/or the average Tier 2 and 3 Claim Award amounts are smaller than what is assumed and estimated in the above example, the *Pro Rata* Increase to the Tier 1, 2 and 3 Claim Award amounts would be larger. Conversely, if more Class Members are eligible to receive the automatic Tier 1 payment, more Class Members file Tier 2 or 3 claims, and/or the average Tier 2 and 3 Claim Award amounts are larger than what is assumed and estimated in the above example, then the Tier 2 and 3 Claim Award amounts may receive a *Pro Rata* Reduction.

**Liens.** The amount of money you will receive also depends on any legally enforceable liens on the Claim Award. The amount paid to resolve any liens for Settlement Class Members will be paid out of such Settlement Class Member’s Claim Award.

## HOW YOU GET A PAYMENT

### 9. How can I get payment(s) from the Settlement?

**Tier 1 Payments**

To receive a Tier 1 payment you must submit a qualifying Statement of Settlement Class Membership Form. The Statement of Settlement Class Membership Form is available on the Settlement website at

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<sup>1</sup> This represents the Settlement Fund as of the date of the *pro rata* calculation, by which point the Settlement Fund will have been reduced to pay for Administrative Expenses incurred up to that date per Sections 2.2, 2.34, and 2.35 of the Amended Settlement Agreement. Solely for the purposes of this example, we have reduced the Settlement Fund by \$5 million to account for Administrative Expenses.

**QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**

[www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com), and you may also request a Statement of Settlement Class Membership Form by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com) or by phone at 1-888-663-1718 (international numbers provided below). Statement of Settlement Class Membership Forms can be completed and submitted to the Settlement Administrator online through the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com), or mailed to the Settlement Administrator at the address provided below:

USC Student Health Center Settlement  
c/o JND Legal Administration  
P.O. Box 91233  
Seattle, WA 98111-9333

### **Tier 2 and Tier 3 Payments**

All Class Members can choose to submit a Tier 2 or Tier 3 Claim. To do so, you must complete and submit a Claim Form and, for Tier 3, participate in an interview. The Claim Form is available on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com), and you may also request a Claim Form by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com) or by phone at 1-888-663-1718 (international numbers provided below). Claim Forms can be completed and submitted to the Settlement Administrator online through the Settlement Website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) or mailed to the Settlement Administrator at the address provided above. You also can schedule your Tier 3 interview on the website or by calling the phone number above.

All claims and submissions in the Settlement will be kept strictly confidential by the Settlement Administrator and Panel. Settlement Class Counsel will seek an order from the Court, called a Qualified Protective Order that will authorize disclosure of information under the Health Insurance Portability and Accountability Act (“HIPAA”) for purposes of identifying and resolving any potential medical liens that may be asserted against Settlement Class Members’ Claim Awards. Certain information also is required to be provided to Defendants’ insurers, and the insurers will keep the information strictly confidential.

For your claim to be valid and timely, your Statement of Settlement Class Membership Form and/or your Claim Form **must be received by the Settlement Administrator through the Settlement website ([www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com)) or postmarked by mail no later than November 8, 2019.**

### **10. When will I get my payment(s) from the Settlement?**

Once the Court grants final approval of the Settlement and certifies the Settlement Class and any appeals are resolved in favor of the Settlement, you will be sent your Tier 1 payment if you have demonstrated your eligibility as a Class Member. If a *Pro Rata* Increase is applied, supplemental Tier 1 payments reflecting the *Pro Rata* Increase will go out after all Tier 2 and 3 claims are determined as indicated below.

Tier 2 and 3 Claim Award payments will not go out until all Tier 2 and Tier 3 Claims have been received and reviewed by the Panel and Claim Award amounts allocated by the Panel, and the *Pro Rata* Adjustment amount calculated and applied by the Settlement Administrator.

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

Timing updates will be provided on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) and can also be obtained by contacting the Settlement Administrator by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com) or by phone toll-free at 1-888-663-1718 (international numbers provided below). Please do not contact the Court directly.

## 11. What am I giving up to get payment(s) and stay in the Settlement?

In exchange for receiving payment and benefits from the Settlement, you will give up your right to sue the Defendants on your own for the claims described in the Amended Settlement Agreement. You will also be bound by any decisions by the Court relating to the Settlement. If you do not wish to give up your right to sue the Defendants, you must exclude yourself from (opt out of) the Settlement.

In return for paying the Settlement Amount and providing certain non-monetary benefits, the Defendants will be released from claims relating to the conduct alleged in the lawsuit and identified in the Amended Settlement Agreement. The Amended Settlement Agreement describes the released claims in further detail. Please read that agreement carefully since those releases will be binding on you as a Class Member if the Court grants final approval of the Settlement. If you have any questions, you can talk with Class Counsel free of charge or you may talk with your own lawyer (at your own expense). The Amended Settlement Agreement and releases are available on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a payment from the Settlement and you want to keep the right to sue or continue to sue the Defendants, then you must take action to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class.

## 12. How do I opt out of the Settlement?

To exclude yourself from the Settlement, you must send a letter to the Settlement Administrator stating that you wish to be excluded from *In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.). Your written exclusion request must include the following:

- Your full name, address, and telephone number;
- The following statement:

I want to be excluded from *In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.), and understand that by excluding myself, I will not be able to get any money or benefits from the Settlement.

- Your signature.

You must mail your written exclusion request, **postmarked no later than November 7, 2019** to:

USC Student Health Center Settlement  
c/o JND Legal Administration  
P.O. Box 91235  
Seattle, WA 98111-9335

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

**13. If I don't exclude myself, can I sue the Defendants for the same thing later?**

No. Unless you exclude yourself from the Settlement, you give up any right to sue the Defendants for the claims being released in this Litigation (*In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.), and *Jane Doe 1 v. University of Southern California et al.*, No. BC713383 (Cal. Super. Ct., L.A. County)).

If you have a pending lawsuit against any of the Defendants, speak to your lawyer as soon as possible; you may need to exclude yourself from this Settlement to continue your own lawsuit.

**14. If I exclude myself, can I get money from the Settlement?**

No. If you exclude yourself from the Settlement, you will not receive payment(s) from the Settlement, but you will keep your legal right to sue the Defendants on your own.

**THE LAWYERS REPRESENTING YOU**

**15. Do I have a lawyer in this case?**

The Court has appointed the following lawyers, known as Class Counsel, to represent the Class Members in connection with the Settlement:

Steve Berman  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1201 Second Avenue, Suite 2000  
Seattle, WA 98101  
Phone: 206-623-7292  
Email: USCsettlement@hbsslaw.com

Annika K. Martin  
LIEFF CABRASER HEIMANN and  
BERNSTEIN LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Phone: 415-956-1000  
Email: akmartin@lchb.com

Elizabeth A. Kramer  
GIRARD SHARP LLP  
601 California Street, Suite 1400  
San Francisco, CA 94108  
Phone: 415-981-4800  
Email: ekramer@girardsharp.com

You will not be charged for contacting these lawyers, and they will help you with any questions about your claim at no cost to you. Call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com) to schedule an appointment with an attorney.

If you want to be represented by a lawyer other than Class Counsel, you may hire one at your own expense.

**QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**

## 16. How will the lawyers be paid?

After the Settlement has been approved, Class Counsel will ask the Court for payment of attorneys' fees and incurred expenses up to \$25 million to compensate them for their services in this Litigation. Any payment to the attorneys will be subject to Court approval, and the Court may award less than the amount requested. Any attorneys' fees and expenses that the Court approves will not come out of the Settlement Amount but will be paid separately by the Defendants.

When Class Counsel's motion for attorneys' fees and expenses is filed, it will be posted on the Settlement website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). Class Counsel expect to file their motion within 2 weeks after the final fairness hearing currently set for January 6, 2020. Please check the Settlement website regularly after the final fairness hearing if you wish to review Class Counsel's motion for attorneys' fees and expenses. You will have an opportunity to comment on this fee request. The deadline to object to Class Counsel's request for attorneys' fees and expenses will be 30 days after it is filed with the Court and posted to the Settlement website.

If you are represented by a lawyer other than Class Counsel, you are responsible for paying that lawyer's fees and/or costs.

## OBJECTING TO THE SETTLEMENT

### 17. How do I tell the Court that I don't like the Settlement?

If you are a Settlement Class Member and you have objections to any aspect of the Settlement, you may express your views to the Court. You can object to the Settlement only if you do not exclude yourself from the Settlement Class.

You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a larger settlement—the Court can only approve or deny the Settlement the parties have reached. If the Court denies approval of the Settlement, no payments from the Settlement Fund will be made and the Litigation will continue. If that is what you want to happen, you must object.

If you wish to object to the Settlement, you must do so in writing. You may also appear at the final fairness hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney. All written objections and supporting papers must: (a) list your name, address, and telephone number; (b) clearly identify the master case name and number (*In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW (C.D. Cal.)); (c) state whether the objection applies only to the objector, to a specific subset of the Class, or to the entire Class, and state with specificity the grounds for the objection; (d) state whether the Settlement Class Member intends to personally appear and/or testify at the final fairness hearing; (e) include the name and contact information of any and all attorneys representing, advising, or assisting the Settlement Class Member, including any counsel who may seek compensation for any reason related to the Settlement Class Member's objection or comment; (f) state whether any attorney will appear on the Settlement Class Member's behalf at the final fairness hearing, and if so, the identity of that attorney; (g) be submitted to the Court either by mailing to the Clerk, United States District Court for the Central District of California, First Street Courthouse, 350 W. 1st Street, Suite 4311, Los

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

Angeles, CA 90012 or by filing them in person at any location of the United States District Court for the Central District of California; and (h) be **filed or postmarked on or before October 9, 2019**.

## 18. What's the difference between objecting and opting out?

By excluding yourself from the Settlement, you are telling the Court that you do not want to participate in the Settlement. For that reason, you will not be eligible to receive any benefits from the Settlement and you will not be able to object to it, as it will no longer apply to you or bind you.

By objecting to the Settlement, you are telling the Court you want to participate in the Settlement, but that there is something about it you do not like. If you object, you are still eligible to receive payment(s) from the Settlement (although you will not receive any payment until your objection is resolved).

## THE COURT'S FAIRNESS HEARING

The Court will hold a fairness hearing to decide whether to approve the Settlement. You may attend the hearing, and you may ask to speak, if you wish to, but you are not required to do so.

## 19. When and where will the Court decide whether to approve the Settlement?

The Court will hold its final fairness hearing on January 6, 2020 at 1:30 p.m. at the United States District Court, Central District of California, First Street Courthouse, 350 W. 1st Street, Courtroom 10A, 10th Floor, Los Angeles, CA 90012.

The hearing may be moved to a different date or time without additional direct notice to you. You can check the Court's PACER site, <https://ecf.cacd.uscourts.gov>, or contact the Settlement Administrator at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) or toll-free at 1-888-663-1718 (international numbers provided below) to confirm that the date has not changed.

At the fairness hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate under the rules governing such settlements. If there are objections or comments, the Court will consider them at that time and may listen to people who have asked to speak at the hearing. The Court will decide whether to approve the Settlement at or after the hearing.

## 20. Do I have to come to the fairness hearing?

No. Class Counsel will answer any questions the Court may have at the fairness hearing, but you may attend at your own expense if you wish to. If you send an objection or comment on the Settlement you do not have to come to the hearing to talk about it. As long as you filed or mailed your written objection on time, the Court will consider it. You may also hire your own lawyer at your own expense to attend the hearing on your behalf, but you are not required to do so.

## 21. May I speak at the fairness hearing?

If you send an objection or comment on the Settlement, you may be able to speak at the fairness hearing, subject to the Court's discretion. You cannot speak at the fairness hearing if you exclude yourself from the Settlement.

## IF YOU DO NOTHING

## 22. What happens if I do nothing at all?

If you do nothing and the Settlement is finally approved by the Court, you will not receive any payment from the Settlement and, if you are a Class Member, you will give up the right to sue Defendants about the claims in this case as you will be bound by the Court's final judgment and the release of claims detailed in the Amended Settlement Agreement.

## GETTING MORE INFORMATION

## 23. How do I get more information?

This Notice summarizes the Settlement and your rights and options. More details are contained in the Amended Settlement Agreement. You can get copies of the Amended Settlement Agreement and more information about the Settlement on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). You also may also contact the Settlement Administrator by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com), by phone toll-free at 1-888-663-1718 (international numbers provided below), or by mail at USC Student Health Center Settlement, c/o JND Legal Administration, P.O. Box 91233 Seattle, WA 98111-9333.

For a more detailed statement of the matters involved in the Litigation or the Settlement, you may review the various documents on the Settlement website, [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com), and/or the other documents filed in this case by visiting (during business hours) the clerk's office at the United States District Court for the Central District of California, First Street Courthouse, 350 W. 1st Street, Suite 4311, Los Angeles, CA 90012, File: *In re USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW, or by accessing the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cacd.uscourts.gov>.

**PLEASE DO NOT – UNDER ANY CIRCUMSTANCES – TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THE SETTLEMENT OR THE CLAIM PROCESS.**

Dated: July 11, 2019

By Order of the Court  
United States District Court  
Central District of California

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).



<p><b>6. TELEPHONE NUMBER:</b></p>	<p>(           ) - (           ) -           -            Country Code (if outside the United States) Area Code Number</p>
<p><b>7. EMAIL ADDRESS:</b></p>	
<p><b>8. DATES ENROLLED AT USC:</b></p>	<p>From: _____ To: _____  Month and Year Month and Year</p> <p>School/Department:  _____</p>
<p><b>9. IS ENGLISH YOUR FIRST LANGUAGE?</b></p>	<p>Yes: <input type="checkbox"/> No: <input type="checkbox"/></p>
<p><b>10. IF YOU ANSWERED "NO" TO QUESTION 9, WHAT IS YOUR FIRST/NATIVE LANGUAGE?</b></p>	<p>_____</p>

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

## PART B. CLAIMANT STATEMENT

(Please fill-in the applicable dates and check boxes below)

During the period from **August 14, 1989, and June 21, 2016**, I was seen for treatment by Dr. George Tyndall at the University of Southern California Student Health Center (a) for Women’s Health Issues, or (b) whose treatment by Dr. George M. Tyndall included an examination by him of my breast or genital areas, or (c) whose treatment included the taking of photographs or videotapes of my unclothed or partially clothed body. “Women’s Health Issues” includes but is not limited to any issue relating to breast, vaginal, urinary tract, bowel, gynecological, or sexual health, including contraception and fertility. A list of Women’s Health Issues is available on the Settlement Website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

Therefore, I hereby claim to be a USC Student Health Center Settlement Class Member.

Specifically, my visit(s) with Dr. Tyndall occurred on or about the following date(s):

_____	_____
Month/Day/Year	Month/Day/Year
_____	_____
Month/Day/Year	Month/Day/Year

1.  I was an undergraduate or graduate student at USC at the time of (at least one of) the above visit(s).

**If you checked box “1”, please provide your USC Student ID Number below (if you know it):**

\_\_\_\_\_

USC ID Number

2.  I was not a student at USC at the time of (any of) the above visit(s).

**If you checked box “2”, please describe the circumstances below under which you came to be treated at the USC Student Health Center:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Note to Claimants:** The Settlement Administrator may contact you to request additional information to verify your eligibility if necessary.

## PART C. CLAIMANT SIGNATURE

(You must print your full name, sign, and date on the lines below)

By signing below, I declare under penalty of perjury that all of the information provided in this Statement of Settlement Class Membership Form is true and complete to the best of my knowledge; (2) I do not object to any resulting disclosures or to the resolution of any potential Liens on my behalf; and (3) I understand that false or misleading information may result in the rejection of my Claim.

\_\_\_\_\_  
Signature

\_\_\_\_/\_\_\_\_/\_\_\_\_  
Date (Month/Day/Year)

\_\_\_\_\_  
Printed Full Name (First, Middle, and Last)

You may file this Statement of Settlement Class Membership Form by mailing to the Settlement Administrator at USC Student Health Center Settlement, c/o JND Legal Administration, P.O. Box 91233, Seattle, WA 98111-9333 or you may file this form online through the Settlement Website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

Your completed form must be submitted online or postmarked by mail **no later than November 8, 2019**.

QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).

#5395

Must be received online  
or postmarked by mail no  
later than November 8,  
2019.

USC STUDENT HEALTH CENTER SETTLEMENT  
C/O JND LEGAL ADMINISTRATION  
P.O. BOX 91233  
SEATTLE, WA 98111-9333  
[WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM)

**USC**

You may submit your Claim Form Online at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com)

## TIER 2 AND TIER 3 CLAIM FORM

### GENERAL INSTRUCTIONS

Please review the following instructions before proceeding:

Please note that you may make a Tier 2 or Tier 3 claim, but not both.

In deciding whether to make a Tier 2 or Tier 3 claim, please note the following:

- To make a Tier 2 or Tier 3 claim, you must describe below your experience, and its impact on you.
- To make a Tier 3 claim, you also need to be interviewed by a specialist from the Panel.
- A compensable Tier 2 claim will result in an award between no less than \$7,500 and no more than \$20,000 (subject to *Pro Rata* Adjustment);
- A compensable Tier 3 claim will result in an award between no less than \$7,500 and no more than \$250,000 (subject to *Pro Rata* Adjustment). However, if you decline to participate in the interview you may in no event receive an award which exceeds the Tier 2 Claim Award range between \$7,500 and \$20,000.

If you wish to submit a Tier 2 or Tier 3 claim, please complete Sections A, C, D, E, F, and sign your name in Section G.

You must also fill out Section B only if you are represented by an attorney.

Please note, if you are a Class Member, you are eligible for a guaranteed minimum Tier 1 payment regardless of whether you make a Tier 2 or Tier 3 Claim. Please see the Settlement Website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) for additional information.

**This Claim Form may also be completed online at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).**



<b>9. DATE(S) TREATED IF NOT A STUDENT AT USC:</b>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border-bottom: 1px solid black; width: 25%;"></td> </tr> <tr> <td style="text-align: center;">(MM/DD/YYYY)</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="text-align: center;">(MM/DD/YYYY)</td> <td></td> <td></td> <td></td> </tr> </table>					(MM/DD/YYYY)								(MM/DD/YYYY)			
(MM/DD/YYYY)																	
(MM/DD/YYYY)																	
<b>10. IS ENGLISH YOUR FIRST LANGUAGE?</b>	Yes: <input type="checkbox"/> No: <input type="checkbox"/>																
<b>11. IF YOU ANSWERED "NO" TO QUESTION 10, WHAT IS YOUR FIRST/NATIVE LANGUAGE?</b>																	

## SECTION B: ATTORNEY INFORMATION

If you are represented by an attorney, enter the attorney's information in this Section B. (You are only represented by an attorney if you signed a representation agreement or contract hiring that attorney.) If you are not represented by an attorney, skip this section.

<b>1. ATTORNEY NAME:</b>	First	M.I.	Last	Suffix										
<b>2. LAW FIRM NAME:</b>														
<b>3. LAW FIRM MAILING ADDRESS:</b>	Address 1													
	Address 2													
	City													
	State/Province													
	Postal Code	Country												
<b>4. ATTORNEY TELEPHONE:</b>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border-bottom: 1px solid black; width: 20%;"></td> </tr> <tr> <td style="text-align: center;">Country Code (if outside the United States)</td> <td style="text-align: center;">Area Code</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">Number</td> </tr> </table>									Country Code (if outside the United States)	Area Code	-	-	Number
Country Code (if outside the United States)	Area Code	-	-	Number										
<b>5. ATTORNEY EMAIL ADDRESS:</b>														

**QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**

### SECTION C: CLAIM SELECTION

Please select **one** of the following two claim options:

- Tier 2 Claim** (I choose only to provide information by filling out this claim form, and understand that may make me eligible for an award of \$7,500 to \$20,000.)
- Tier 3 Claim** (I choose to provide information by filling out this claim form **and** participating in an interview by the Panel, and I understand that may make me eligible for an award of \$7,500 to \$250,000.)

### SECTION D: TREATMENT BY DR. TYNDALL AT USC

**Please complete the information below. You may use additional sheets of paper to describe your experiences.**

If you need or want any assistance in filling out this Claim Form, the Court has appointed attorneys to represent Class Members, and those attorneys are available at no cost to you to help you. Call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com).

For each date that you were seen by Dr. George Tyndall, please answer the questions below. *Please be as specific as possible. If you can, please indicate the day, month, and year of your appointment. If you cannot recall the month, please try to recall the season of year (fall, winter, spring, summer). Attach additional pages to describe other visits as necessary.*

#### VISIT 1

1. Date:

(MM/DD/YYYY)											

2. Facility:

3. Was this your first visit to a gynecologist?

Yes:  No:

4. Reason for the appointment you scheduled:

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**8. Where did you meet with Dr. Tyndall (e.g., in his office, examination room, etc.)?**

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Please describe what happened during your appointment with Dr. Tyndall by answering the questions below.

If you need or want any assistance in filling out this Claim Form, the Court has appointed attorneys to represent Settlement Class members, and those attorneys are available at no cost to you to help you. Call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com).

Please include as much detail as possible regarding Dr. Tyndall's physical examination of you, including your recollection of his procedures, if applicable.

**9. Were you asked to disrobe?**

Yes:  No:

**10. If you answered "Yes" above, did you disrobe partially or completely?**

Partially

Completely

**11. If yes, how did you react to this request at the time it occurred?**

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**12. If yes, how do you feel about it now?**

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**13. What was the stated reason for your removing of clothing when Dr. Tyndall asked you to disrobe?**

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**14. Did Dr. Tyndall ask you any odd questions? Did Dr. Tyndall make any comments about your body that seemed unprofessional? If so, please describe in as much detail as you are able to accurately recall.**

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**15. Please describe to the best of your recollection any discussions, remarks, or statements made by Dr. Tyndall. Include what was said by Dr. Tyndall before, during, or after your examination, especially if these comments seemed derogatory, offensive, harassing, or made you feel uncomfortable.**

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**16. Please describe any verbal statements or other demonstrations using gestures, photos, or devices related to alleged sexual education, or descriptions of female or male anatomy, provided by Dr. Tyndall. This might include birth control instructions.**

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**17. Please describe any materials Dr. Tyndall showed or gave you, if applicable.**

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18. In the process of being examined, were any parts of your body stroked or touched in a manner that made you feel uncomfortable, including, but not limited to, arms, legs, breasts, hair or others?

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19. Please provide detail regarding any prescriptions Dr. Tyndall gave you, whether you requested the prescriptions or they were provided without your request, and the stated purpose of the prescriptions by Dr. Tyndall, if applicable.

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20. Please describe any diagnoses or recommendations for follow-up Dr. Tyndall gave you, and his explanations.

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21. Did Dr. Tyndall make any inappropriate sexual comments (e.g., sexual comments that might have made you feel uncomfortable, or that you believe might have been improper, or suspect could have been medically unnecessary)?

Yes:  No:

22. If yes, please describe any such comments. How did you feel about it at the time it occurred?

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23. If yes, how do you feel about it now?

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24. Did Dr. Tyndall digitally penetrate, meaning insert one or more of his fingers into, you vaginally?

Yes:  No:

25. If yes, how did you feel about it at the time it occurred?

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26. If yes, how do you feel about it now?

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27. Did Dr. Tyndall, while penetrating you with his finger(s), move his finger(s) in and out?

Yes:  No:

28. If yes, how did you react at the time this was occurring?

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29. If yes, how do you feel about what happened now?

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30. Did Dr. Tyndall anally penetrate you?

Yes:  No:

31. If yes, how did you feel about it at the time it occurred?

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**32. If yes, how do you feel about it now?**

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**33. Was anyone else present with you and Dr. Tyndall during the visit?**

Yes:  No:

**34. If yes, who was that person (to the best of your recollection)?**

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**35. Please describe in detail (to the best of your recollection) the role of this person in the visit.**

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**36. Please describe in detail (to the best of your recollection) any discussions Dr. Tyndall had with this person.**

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**37. Please describe in detail (to the best of your recollection) any interactions or discussions you had with this person regarding Dr. Tyndall or your visit.**

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**38. Please describe any discussions you had with anyone at the student health center, after your appointment with Dr. Tyndall concluded, that relate to any concerns or issues that you may have had with your experience with Dr. Tyndall.**

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**39. When did you first feel the behavior you have described above was inappropriate (e.g., that made you feel uncomfortable, or that you believe might have been improper, or suspect could have been medically unnecessary)?**

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**40. Did you tell anyone about the conduct you believe was inappropriate (this includes parents, relatives, friends, attorneys, and law enforcement authorities)?**

Yes:  No:

**41. If yes, who did you tell?**

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**42. If yes, what did you say?**

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43. If yes, when did you tell this person or people about the inappropriate conduct?

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If you had additional visits, please use separate sheets of paper to answer the same questions for each additional appointment you had with Dr. Tyndall.

## SECTION E: IMPACT OF CONDUCT

1. Describe how you felt during your appointment(s) with Dr. Tyndall. Please include as much detail as possible regarding any physical pain or discomfort, as well as mental or emotional feelings or distress you felt at the time, and why.

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2. Describe any mental or emotional distress, or physical pain or discomfort, following your appointment(s) with Dr. Tyndall up to the present time that were related to your interactions with him. Describe when you began to feel this, and how long it lasted.

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**3. Describe how any emotional distress or physical pain or discomfort has affected you and changed over time, including how it has affected your romantic relationship(s) and social functioning, work functioning, or other important aspects of daily life, including for sleep, bathing, irritability, concentration, eating, etc.**

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**4. Had you had any experiences prior to your visit(s) with Dr. Tyndall that you felt constituted inappropriate sexual behavior or abuse? If so, please describe.**

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If you need or want any assistance in filling out this Claim Form, the Court has appointed attorneys to represent Settlement Class members, and those attorneys are available at no cost to you to help you. Call 1-888-663-1718 and select Option 8 or email [ClassCounsel@USCTyndallSettlement.com](mailto:ClassCounsel@USCTyndallSettlement.com).

**5. Have you sought counseling by any healthcare professional for your above-referenced injuries or emotional distress?**

Yes:  No:

**If yes, please describe below. *Anyone listed below will not be contacted without your permission.***

**Date(s) (even if approximate):**

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(MM/DD/YYYY)

**Name(s) of Professional(s):**

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**Nature of Treatment:**

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**6. Have you sought other treatment by any healthcare professional for your above-referenced injuries or emotional distress?**

Yes:  No:

**If yes, please describe below. *Anyone listed below will not be contacted without your permission.***

**Date(s) (even if approximate):**

\_\_\_\_\_|\_\_\_\_\_|\_|/\_\_\_\_\_|\_\_\_\_\_|\_|/\_\_\_\_\_|\_\_\_\_\_|\_\_\_\_\_|\_\_\_\_\_|\_\_\_\_\_|\_\_\_\_\_|  
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(MM/DD/YYYY)

**Name(s) of Professional(s):**

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**Nature of Treatment:**

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## SECTION G: SIGNATURE

By signing below, I declare under penalty of perjury, that: (1) all of the information provided in this Claim Form, and any attachments, is true and complete to the best of my knowledge; (2) I authorize the Settlement Administrator to contact the healthcare insurance providers identified on this Claim Form per the Settlement Agreement, and I do not object to any resulting disclosures or to the resolution of any potential Liens on my behalf; and (3) I understand that false or misleading information may result in the rejection of my Claim.

\_\_\_\_\_  
Signature

\_\_\_\_\_|\_|/\_\_\_\_\_|\_|/\_\_\_\_\_|\_|\_\_\_\_\_|\_|  
Date (Month/Day/Year)

\_\_\_\_\_  
Printed Full Name (First, Middle, and Last)

You may submit this Tier 2 or Tier 3 claim by completing this hard copy claim form and mailing it to the Settlement Administrator at USC Student Health Center Settlement, c/o JND Legal Administration, P.O. Box 91233, Seattle, WA 98111-9333 or you may file your claim online through the Settlement Website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

#5420

USC STUDENT HEALTH CENTER SETTLEMENT  
C/O JND LEGAL ADMINISTRATION  
P.O. BOX 91233  
SEATTLE, WA 98111-9333

Puede encontrar la Notificación del acuerdo de conciliación, el Formulario de Declaración de miembros del grupo del acuerdo en la demanda colectiva, y el Formulario de reclamos para la Categoría 2 y 3 en español, en el sitio web del Acuerdo: [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

中文版和解通知、和解声明、申诉委托人表以及 2 级和 3 级申请表可在和解网站 [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) 获取.

**QUESTIONS? CALL TOLL FREE 1-888-663-1718 (USA AND CANADA), +1-800-953-0227 (MEXICO), +800-666-64001 (INTERNATIONAL), 1-080-0140-2826 (CHINA MOBILE SOUTH), 1-080-0714-2807 (CHINA MOBILE NORTH), EMAIL [INFO@USCTYNDALLSETTLEMENT.COM](mailto:INFO@USCTYNDALLSETTLEMENT.COM), OR VISIT [WWW.USCTYNDALLSETTLEMENT.COM](http://WWW.USCTYNDALLSETTLEMENT.COM).**



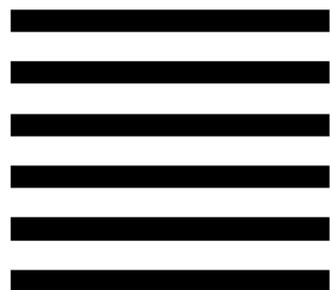
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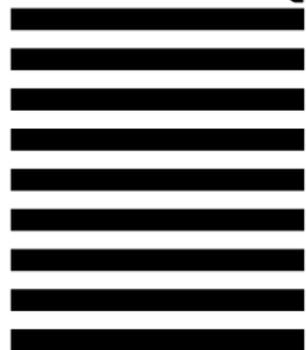
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**IMPORTANT COURT-ORDERED INFORMATION**

**IMPORTANT COURT-ORDERED INFORMATION**

# **EXHIBIT D**

To: [Class Member Email Address]

From: info@USCTyndallSettlement.com

Subject: Notice of USC Student Health Center Settlement

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**Claimant ID No. [JND Name Number]**

Dear [Class Member Name]:

## **Women who were seen for treatment by Dr. George Tyndall at USC's Student Health Center may be eligible for benefits from a class action settlement.**

**Para obtener la notificación en español, llame al 1-888-663-1718 (a continuación se indican los números internacionales) o visite [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).**

**如需获取中文通知，请致电 1-888-663-1718（下方提供的国际号码）或访问 [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).**

**Why did I get this Notice?** A Settlement has been reached in a class action lawsuit pending in the United States District Court for the Central District of California ("Court") titled *In re: USC Student Health Center Litigation*, No. 2:18-cv-04258-SVW ("Litigation"). According to existing records, you may be a "Settlement Class Member." The purpose of this Email Notice is to inform you of the Litigation, the Settlement, and your legal rights. Please also visit the Settlement Website: [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

**What is the Litigation about?** Dr. George M. Tyndall ("Dr. Tyndall") was a gynecologist at the University of Southern California Student Health Center from August 14, 1989 to June 21, 2016. The women who sued (the "Plaintiffs") allege that Dr. Tyndall assaulted, abused, sexually harassed, committed medical malpractice related to a Women's Health Issue, or otherwise acted inappropriately towards female patients and that the University of Southern California and Board of Trustees of the University of Southern California (together, "USC") failed to respond appropriately. Dr. Tyndall and USC (collectively "Defendants") deny these allegations. The Court has not decided who is right. The parties have agreed to the Settlement to avoid the costs and risks of a lengthy trial and appeals process.

**Who is a Settlement Class Member?** The Settlement Class has been defined as all women who were seen for treatment by Dr. George M. Tyndall at the University of Southern California Student Health Center during the period from August 14, 1989 to June 21, 2016 (a) for Women's Health Issues, or (b) whose treatment by Dr. George M. Tyndall included an examination by him of her breast or genital areas, or (c) whose treatment included the taking of photographs or videotapes of her unclothed or partially clothed body. "Women's Health Issues" includes but is not limited to any issue relating to breast, vaginal, urinary tract, bowel, gynecological, or sexual health, including contraception and fertility. A list of Women's Health Issues is available on the Settlement Website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

**What are the terms of the Settlement?** Defendants will pay two hundred and fifteen million dollars to settle the lawsuit. This fund will be used to pay Class Member claims. You have been pre-identified as a Class Member and will be included in the Settlement Class and sent a guaranteed minimum payment of two thousand five hundred dollars ("Tier 1 payment") without having to do anything else. Additionally, you also have the option to submit a Claim Form describing the experience, impact, and/or the emotional distress and/or bodily injury you suffered and be eligible for seven thousand five hundred dollars to twenty thousand dollars ("Tier 2 Claim Award") or, provide an interview along with a Claim Form, and be eligible for seven thousand five hundred dollars to two hundred fifty thousand dollars ("Tier 3 Claim Award"). An impartial Panel will evaluate Claim Forms, and interviews will be conducted by specialists trained in communicating with victims of trauma and harassment. All claims and submissions in the Settlement will be kept strictly confidential by the Settlement Administrator and Panel. Certain information is required to be provided to Defendants' insurers, and the insurers will keep the information strictly confidential.

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

In addition to monetary benefits, the Settlement requires USC to implement sweeping institutional reforms designed by experts to ensure that the sort of abuse at issue in this case can never happen again. These changes include implementation of university-wide policies to protect students and prevent abuse and sexual violence on campus, including policy and procedure changes at the USC Student Health Center. Additional information and Claim Forms are available on the Settlement Website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). **The deadline to submit a Claim Form is November 8, 2019.**

**What are the other options for Settlement Class Members?** If you don't want to be legally bound by the Settlement, you must exclude yourself by November 7, 2019. Unless you exclude yourself, you will give up your right to sue the Defendants on your own for the claims being released in the Settlement. You will also be bound by any decisions by the Court relating to the Settlement. However, if you exclude yourself, you cannot receive payment(s) from the Settlement. If you don't request exclusion, you may object to the Settlement by October 9, 2019.

The detailed Settlement Notice is available at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) and explains how Settlement Class Members may request exclusion or object.

The Court will hold a final fairness hearing, currently scheduled for January 6, 2020 at 1:30 p.m. (Pacific) to decide whether to approve the Settlement. You may ask to appear or speak at the hearing but you are not required to do so. The hearing may be moved to a different date or time without additional direct notice to you. Check the Settlement Website to confirm the date has not changed.

**How to get more information?** To learn more about the Settlement, and review related Court documents, visit [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). You may also contact the Settlement Administrator by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com), by phone toll-free at 1-888-663-1718 (USA and Canada), +1-800-953-0227 (Mexico), +800-666-64001 (International), 1-080-0140-2826 (China Mobile South), 1-080-0714-2807 (China Mobile North), or by mail at USC Student Health Center Settlement, c/o JND Legal Administration, P.O. Box 91233, Seattle, WA 98111-9333.

# **EXHIBIT E**

To: [Class Member Email Address]

From: info@USCTyndallSettlement.com

Subject: Notice of USC Student Health Center Settlement

---

Dear [Class Member Name]:

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To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

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# **EXHIBIT F**

# USC - Digital Screenshots

1

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# USC - Digital Screenshots

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Women who were treated by Dr. George Tyndall at USC Student Health Center between August 1989 and June 2016 may be affected by a class action settlement. Learn how to receive benefits.



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USC Patients of Dr. Tyndall | From August 1989 to June 2016 

 [www.usctyndallsettlement.com](http://www.usctyndallsettlement.com)

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You May Get Benefits From a Class Action Settlement

# **EXHIBIT G**

# Silent Sam should inform VKC name change

The Von KleinSmid Center is named after Rufus Von KleinSmid, a eugenicist.

By CHRISTOPHER ARANDA

Staff Writer

As USC enters a new chapter with President Carol Folt at the helm, she has the unique opportunity to use her experience as the chancellor of the University of North Carolina, Chapel Hill to effect change at the University.

One of Dr. Folt's final acts at UNC was to remove the pedestal of a Confederate statue known as "Silent Sam" from its location on UNC's campus.

USC has faced a similar issue with the Von KleinSmid Center — named after Rufus Von KleinSmid, a former president of the University who was a known racist and eugenicist. While USC created a task force on nomenclature to consider guidelines for renaming campus structures, little has been done to make significant changes.

Folt should make it one of her first actions as president to rename VKC and start addressing other statues and structure names

that no longer align with the University's values, like Traveler, USC's mascot white horse that may have been named after Confederate General Robert E. Lee's horse, Traveller.

Von KleinSmid was the University's fifth president, but he also founded a eugenicist organization in Pasadena and wrote a paper advocating for the forced sterilization of people of color.

It's clear that Von KleinSmid's actions and views have no place in today's society, and therefore his name should have no place on USC's campus.

When Folt removed Silent Sam's pedestal from UNC, the *Los Angeles Times* reported that, initially, Folt advocated for the statue to become part of a "truly strong interactive [learning] center that tells our full history of this university."

While moving the statue from a place of glorification to a learning space where people could truly understand the history behind the statue could have been a conciliatory move, Folt quickly realized that it was better for USC's community to remove the monument entirely.

The decision drew criticism from conservative members of the UNC community — in fact, it resulted in UNC's board of governors removing Folt from her position as chancellor months before she had planned on leaving.

Folt understood that she would risk her job by removing Silent Sam, yet she still chose to take the strongest possible action. As USC's president, she should act with similar strength in renaming VKC.

President Folt has come to a university rocked by scandals. Students have lost trust in the University administration, and it's Folt's duty to regain that trust by responding to students' demands and needs.

Students have advocated for the University to reconsider VKC's name for years, yet the school has taken little action.

Folt's experience with Silent Sam proves that she is willing to take substantial steps to changing campus structures — by changing VKC's name, she can show USC students that she is committed to righting wrongs from USC's history.



Daily Trojan file illustration

# USC should educate its students on off-campus housing

Landlords are prone to take advantage of students renting for the first time.

By BREANNA DE VERA

Staff Writer

Not a lot of things in life are guaranteed, and for USC juniors and seniors, that list includes on-campus housing.

USC only guarantees housing for underclassmen, leaving older students to fend for their own leases and rents without the experience or education they need to make informed decisions. USC should provide better housing education and resources for students living off campus — many of these students are leasing for the first time and can be taken advantage of by local landlords and housing companies.

Housing insecurity is a major problem for college students, and it can be hard for them to perform well academically when they are desperately searching for an affordable place to live, struggling to pay rent or have suboptimal living conditions due to landlord or property owner negligence.

A 2015 report by the United States Department of Housing and Urban Development found that colleges systematically underestimate students' off-campus living costs. For example, the USC 2019-20 Cost of Attendance summary puts room and board at \$15,916, which is just a bit higher than the average academic year cost of a one-bedroom apartment on-campus at USC Village and a residential meal plan. As a result of the expensive on-campus housing options, local landlords have also increased rents to be competitive with University-offered housing.

According to Rent Café, a nationwide rent listing service, the monthly average rent for an apartment in University Park is \$3,809, over \$1,000 more than the average apartment rent in Los Angeles, which is \$2,508. Local landlords take advantage of the limited student housing and students' resulting desperation to find a place by increasing rents.

Asking USC to lower on-campus rent prices is a fight unto its own, but at the very least, the University has an obligation to keep track of the housing offered around campus, ensuring that enough of it is available and affordable to students.

USC can do this by better educating its students about the process of finding housing and keeping local landlords accountable, whether by tracking their rent prices in an online database or compiling and addressing student complaints about certain landlords and housing companies.

Local landlords also often fail to uphold their housing contracts because students lack other housing options and don't have the resources to hold their landlords accountable. In an investigation conducted by the *Daily Trojan* last spring, several students reported that Mosaic Student Communities, one of the largest student housing companies around campus, delayed responding to complaints. One student reported a termite infestation that was left unaddressed for a month. The Delta Kappa Alpha house, which is owned by Mosaic, never had a broken front door lock replaced — a safety concern that persisted for two years.

Students have also opened lawsuits against Mosaic for misusing their security deposits for maintenance repairs, which should have been regularly conducted and shouldered by Mosaic.

One way USC could assist students looking for off-campus housing is by creating a directory list of reputable housing companies

and landlords in the area. Students should be able to leave reviews and comments about their experiences, so that future renters have an idea of what to expect. Several universities like the University of Maryland, Boston University and the University of Miami offer databases like this so that their students have an idea of the housing available in the area and know that these companies and landlords are recognized by the University community.

USC could also provide education for first-time renters — whether online on the USC Housing website or in an email to students when they end their on-campus housing contracts. There are many resources online for those who look, but none that are specific to students who live in the University Park area.

While USC may not have the space to provide all of its students guaranteed on-campus housing, it does have an obligation to its students who are left to find housing on their own. USC should provide them the education and resources they need to find an affordable, stable and well-kept place to live.



Shideh Ghandeharizadeh | Daily Trojan

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### STUDENT SEXUAL AND PROTECTED CLASS TYPES OF MISCONDUCT

- Sexual misconduct
- Intimate partner violence
- Stalking
- Violation of an interim measure
- Malicious dissuasion
- Retaliation
- Harassment based upon a protected class

### PROTECTED CHARACTERISTICS

- Race
- Color
- National origin
- Ancestry
- Religion
- Sex
- Gender
- Gender identity
- Gender expression
- Sexual orientation
- Age
- Physical disability
- Medical condition
- Mental disability
- Marital status
- Pregnancy
- Veteran status
- Genetic information

### SERVICES WE PROVIDE

- Equitable investigations
- Supportive measures
  - Avoidance of contact directives
  - Academic accommodations
  - Gender identity letters to faculty
  - and more
- Trainings for the campus community
- Tracking reports for patterns and campus climate



## Higher education arms race must end

USC's lavish spending improves its prestige but ignores student needs.

By JACOB MEQUET

Staff Writer

At the heart of the dichotomy between USC's wealthy and elite status and the frequent feelings of neglect many of its students have endured is a trend that has taken hold throughout the country: the higher education arms race — universities' growing propensity to spend lavishly on superficial sources of appeal like non-academic facilities, campus beautification and famous faculty and lecturers that signal wealth and prestige but have minimal effect on students' educational experience.

During C. L. Max Nikias' presidency, USC time and again proved its full-throated embrace of the higher education arms race. From 2010 to 2018 alone, USC fully renovated the Lyon Center and the Heritage Hall athletics complex, and it opened the Uytensu Aquatics Center. The University hired former California Governor Arnold Schwarzenegger and former U.S. Army general David Petraeus as faculty members, two men who had no experience in higher education at the time they were hired and have not taught regularly since. USC opened the Tutor Campus Center, which has some academic utility with a few classrooms and lecture halls on the second floor but boasts a campus dining center and a large indoor event space as its primary features. And it finished construction of USC Village, perhaps the University's greatest example of ostentatious spending, complete with retailers, high-end restaurants and a host of other new amenities.

In statements announcing

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# New cafe to replace Nekter

C&G Juice Co. says it will provide similar smoothie options more efficiently.

By ERICA HUR  
Staff Writer

Nestled between the School of Architecture and the Roski School of Fine Arts lies what used to be the Nekter Juice Bar. Now, it's a USC-owned and operated cafe called C&G Juice Co. where students can enjoy a revamped menu of healthy bowls. The soft opening for the cafe was Aug. 22.

Similar to Nekter, C&G Juice Co. will serve juices, smoothies and açai bowls. According to Garry Marschall, senior associate director of USC Hospitality, the team felt they could create a space that serves healthier and cheaper options on the go.

"We were with Nekter for five years and believed that we could do this ourselves and do it better," Marschall said. "I was approached about this idea before looking at the contract and when it would end ... and then we decided that we should look at when this [new cafe] would be viable for us."

Marschall explained that although the products will be similar, USC Hospitality is working on elevating C&G Juice Co.'s ingredients and efficiency. He said the University used to purchase frozen açai packs from Nekter, which would take longer to blend. The new cafe will instead use products from the açai company Sambazon, which provides semi-frozen açai to make service quicker without compromising the texture or flavor.

"Instead of taking an açai bowl between three to five minutes to make because of all the blending, we are now able to do it in one to two minutes, so the speed of service will be much quicker with basically the same product," Marschall said.

The menu isn't finalized, but Marschall said ingredients in the cafe's three main products range from vegetables like kale and spinach to fruits like pineapples and mangos. To develop their own signature drinks and smoothies, Marschall said the cafe received help from a research and development chef and the previous manager of Nekter.

He also said School of Architecture dean Milton Curry and Roski dean Lynn Kirk played a role in several taste tests, since the cafe will be located in their schools.

The restaurant will also partner with various companies to sell items that aren't available at other food vendors on campus. USC Hospitality is collaborating with local company Positive Foods to provide fresh salads and meal replacements. The cafe will carry vegetarian and vegan options from Café Gratitude, an organic, plant-based food chain. According to Marschall, the cafe will also sell fresh roasted coffee from Intelligentsia Coffee and make its own orange juice.

Naaman Bautista, USC Hospitality's food service assistant manager, said the cafe will also emphasize sustainability by selling glass mason jars that customers can bring back to refill their drinks with a one-dollar discount.

Those who bring their own



Photo courtesy of Gabrielle Ronson

C&G Juice Co. will partner with local food companies Positive Foods and Café Gratitude to provide organic, fresh and vegan meals and snacks for students.

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# Phi Kappa Tau fraternity reestablishes following 30-year hiatus



Phi Kappa Tau fraternity returned to Greek Row, marking the largest expansion at USC in the past five years. Krystal Gallegos | Daily Trojan

The fraternity's revival marks the largest Greek organization expansion in five years.

By **SASHA DAVIS**  
Assistant News Editor

After a 30-year hiatus, Phi Kappa Tau fraternity was officially approved by the University in Spring 2019 to return to Greek Row, marking USC's largest Greek expansion in five years.

After experiencing financial troubles in 1988 that led to its eventual dissolution, students reestablished the fraternity with a focus on anti-hazing policies and strengthening community relationships.

Phi Kappa Tau, which was established as USC's fourth fraternity in 1918, gained 30 members at the end of the 2018-19 school year.

"Our chapter was always in good standing and was never kicked off for hazing or anything like that," Phi Kappa Tau president Seth Novosel said.

According to Phi Kappa Tau Vice President of Alumni

Relations Beau Classen, many alumni continued the organization's traditions throughout the chapter's 30-year hiatus. Novosel, a senior majoring in business administration, said the fraternity's Chairman of the Board of Governors Rick Rice hosted weekly tailgates for alumni and was a major player in advocating for the chapter's reestablishment.

"I think they just wanted their fraternity back [and] they just wanted kids to have the same bond they did," said Classen, a senior majoring in communication.

According to Novosel, the University previously restricted Greek life to its 23 fraternities. He said Phi Kappa Tau waited for an opening to reestablish their chapter, which came when several hazing allegations resulted in some fraternities losing recognition on campus in the last five years.

The University officially opened expansion opportunities in 2016, Novosel said. Alongside Rice and other alumni, Phi Kappa Tau's national organization approached USC about restarting their chapter. Darryl Thompson, associate director of organizational growth, said the national chapter met with USC in spring 2016 to consider bringing the chapter back to campus.

The national organization also had to get approval from the Interfraternity Council to reestablish the chapter, IFC President Matteo Mendoza said.

Novosel said IFC and the Office of Fraternity and Sorority Leadership and Development worked together to assess the organization's proposal. Once the proposal was approved last October, the national organization began recruitment for leadership positions within the chapter as part of the reestablishment process.

According to Novosel, the summer-long recruitment process required in-person visits with members of the national organization, speeches outlining their qualifications and phone interviews with higher-ranked staff at the national headquarters in Oxford, Ohio.

"The membership that they were able to achieve in their first semester on campus is nothing short of impressive," Mendoza said. "I think it's a testament to the strength of Greek life that they're already seeing so much success."

Phi Kappa Tau's progress was also recognized at the IFC's awards ceremony. The fraternity was recognized with the Rise of Troy award for its excellence in recruitment.

Additionally, Novosel received the award for Emerging Greek Leader of the Year for his efforts in coordinating the expansion.

Now entering its second operating semester, Phi Kappa Tau is promoting a staunch policy against hazing, since numerous fraternities have lost recognition due to hazing violations in recent years.

"Our founding was predicated upon a similar [anti-hazing] circumstance. [The founding members] saw that as an opportunity to change [hazing culture]" Thompson said of the USC chapter.

Novosel said he is proud of the efforts the IFC is making to move away from a supposed hazing culture.

"I think Matteo has done a fantastic job of really making a change on this culture and I think this year we are really going to notice that change," Novosel said.

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# ARTS & ENTERTAINMENT

PAGE 6 | THURSDAY, AUGUST 29, 2019 | WWW.DAILYTROJAN.COM/LIFESTYLE

## USC alumni-produced horror film blends thrills with satire

**FILM**  
**READY OR NOT**  
Length: 95 min.  
Genre: Horror  
Rating: R  
Release Date: Aug. 21, 2019  
★★★★☆

By **BETHEHEM ZERIHUN**  
Staff Writer

In the post-“Get Out” era of horror-comedy, it’s difficult to see new films without the veil of the movies’ shadow. “Ready or Not,” a horror comedy produced by USC alumnus Tripp Vinson and James Vanderbilt, is no freer of that burden than any other new horror film. From the moment the camera pulls away from a sinister shot of a devil playing cards to a strictly humorous scene, it is difficult to avoid that connection.

To its credit, the film never feels like a cheap copy of the former but almost like a logical alternative. Here, instead of race relations, the cinematic conversation centers on the rich. Yet, the film never feels preachy, nor does it obsess itself with forcing social commentary.

The movie consistently walks a tightrope between seemingly opposing conventions and ideas. The opening scene is dim and gloomy in typical horror or thriller movie fashion. The scene that immediately ensues, along with the timing and stylistic decisions of the title cards, makes the film feel like it might be a light-hearted comedy, yet the film is neither. At times it favors drama or leans into its grier elements, but never for long and never free of another thematic or genre dimension.

The movie’s ability to introduce social commentary in a way that is immediately visible, but not



Photo from IMDb

“Ready or Not” stars Samara Weaving and is produced by USC alumni Tripp Vinson and James Vanderbilt. It was released on Aug. 21.

especially forced or obsessive, is commendable. It’s obvious “Ready or Not” is poking fun at the 1% by positioning the richest characters as the most evil — we see this most directly with the way that Charity Le Domas is portrayed.

The most striking feature of this

film is not its ability to catapult us from emotion to opposing emotion or from character allegiance to opposing character allegiance, rather it is the remarkable ability to do both at once — to make the viewer both hate a character and root for them against all others, to have

laugh and be repulsed by any singular action.

Unexpectedly (and even more proficiently than “Get Out”), “Ready or Not” is masterful in its manner of evoking emotional plurality, in the viewer, especially in a way where the joke or gore feels earned

and genuine. When there’s a shot of the main character, Grace (Samara Weaving) getting injured, for instance, it never feels like it’s for the sake of blood.

The film’s weakest moments were mostly with respect to specific characters and performances, mostly early on in the film. Aunt Helene, played by Nicky Guadagni, in particular, feels a bit cartoonish in her villainy. Her introductory shots and much of the performance felt cheap or embellished. Given the surrounding performances and overall sincerity of the film, much of her character felt drawn on. In the beginning, some of Andie MacDowell’s boisterous Becky Le Domas performance was also distracting.

Yet the film had many layered and believable performances by its leads. Adam Brody did a wonderful job of showing Daniel Le Domas’ internal struggle in a manner that felt rounded and emotionally impactful. Mark O’Brien’s character, Alex Le Domas, has a series of devastating and shocking experiences, the toll of which O’Brien demonstrated beautifully. And finally Weaving, who played the protagonist Grace, did a beautiful job of making each additional devastation feel new and affecting.

This film felt absurd yet logical. The premise and actions taken by the characters were always surprising, but never lost their sense of inevitability.

“Ready or Not” was delightful to watch. The story feels original and compelling while maintaining a lot of emotional dexterity and control, which is a credit to screenwriters Guy Busick and Ryan Murphy as well as many of the actors. It truly does meet, and in some respects exceed, the “Get Out” benchmark.

## L.A.’s Grand Central Market is rapidly tainting its legacy

Christina Tiber

EATING L.A. BEFORE IT EATS ITSELF



In the midst of a dinner rush at Grand Central Market, secluded from the main arteries of the food hall gushing with people, I’m sitting perched on a barstool, staring at a wall of bagged tostadas. In front of me is a plate piled high with fresh shrimp ceviche, speckled with crisp cucumber and cilantro. A single bite and the sounds of the market are drowned out with the crunch of tostada, complementing the bright ceviche with the subtle flavors of toasted corn and oil.

La Tostaderia was one of my favorite restaurants in Grand Central Market. Despite its high prices, I liked the staff, and the tostadas were —

“Hey, have you ever heard of Yerba Mate?”

I stop, mid-chew, to stare up at the bearded 20-something leaning against the bar next to me.

“What?” I ask. Does he not register my headphones? The book in my hand? The fact that I am sitting alone?

“Have you ever heard of Yerba Mate?”

“Well, yeah.”  
“It’s way healthier than that stuff.” He gestures to the can of Monster Energy beside my plate of ceviche.

“Oh, yeah, energy drinks are kind of a vice of mine.”  
“Well Yerba Mate’s got a lot of caffeine in it, but it’s all natural. Tastes good too.”

“Oh, OK.” Who was this guy? Was he a Yerba Mate salesperson? Why was he telling me what to drink?

“Yeah. I work at Belcampo, I just had to come over and tell you.”

“Thanks.”  
“Would you maybe wanna go out sometime?”

I think the best way to describe Grand Central Market as it currently stands is by the Belcampo Meat Co. employee who tried to shame me into dating him.

Grand Central Market encapsulates everything good and bad about current restaurant trends in Los Angeles. Most of the food is expertly-crafted, varied and fresh, albeit at a high price point. There’s obvious respect for the city’s history, but there’s also an ambition to break into a new audience and to start new fads. And, in the pursuit of creating something new, Grand Central Market has erased something old.

The market is a surviving relic from more than a century ago, weathering the drastic changes Downtown Los Angeles has seen. When it was first established, it catered to the elite higher class living in the city, functioning as a traditional market for those who could afford fresh meat and produce. As the rich left downtown in the coming decades, Grand Central Market became a primarily Latinx shopping center, selling imported produce and spices from Mexico. To this day, Latinx influence permeates throughout the food hall — vendors like Tacos a Tumbas, Chiles Secos and Valeria’s Chiles and Spices have been around for decades.

In the early 2010s, Grand Central Market underwent a series of transformations, introducing new vendors to revitalize the struggling dining center. Over the next few years, the market became a pioneering food hall and quintessential



Photo courtesy of Grand Central Market

Since 1917, the LA Grand Central Market has housed hundreds of food vendors, but as new ones set up shop, established vendors are slowly being driven out.

tourist destination. Vendors like Eggslut and Sari Sari Store have garnered critical acclaim, while restaurants like the vegan Ramen Hood or nostalgia-centered PBJ. LA have tapped into new markets within the city. The entire market smells of a hundred different

things at once — grilling meat, cooking garlic, waffle cones, fresh masa. The narrow hallways between stalls are constantly filled with eager-eyed visitors overwhelmed by neon signs and the sheer spectacle of it all.

While the owners of Grand

Central Market claim that the new business draws in all types of people, it is clear that these new customers are mostly white, well-off or tourists. Legacy vendors are overlooked in light of newer, more popular stalls, and the sweeping hand of gentrification across

downtown has displaced many of their regulars. The historical Grand Central Market is quickly being forgotten.

In a way, Grand Central Market serves as a microscopic view of the changing landscape across East and Downtown Los Angeles, as richer, whiter populations push out Latinx communities and attract new businesses. It demonstrates the excellent culinary progress this city has made but also showcases the ugliness such an expansion brings with it.

Ironically, Grand Central Market has completed a full circle, catering to the rich yet again. And despite the undoubted impact it has made on L.A.’s food culture in recent years, I can’t help but feel torn eating there.

Also, who the hell thinks that insulting someone’s taste is going to make them want to date you? I gave him my number but never texted him back.

Christina Tiber is a senior writing about food. Her column, “Eating L.A. Before It Eats Itself,” runs every other Thursday.

## Upperclassmen at Roski give advice to incoming freshmen

Roski School of Art and Design upperclassmen welcome new students.

By **ELIZABETH SHAFFER**  
Staff Writer

Roski School of Art and Design is embedded in Los Angeles and boasts a symbiotic relationship with the city. L.A. holds the largest art museum in the western United States, the Los Angeles County Museum of Art, Gagosian Gallery and the Getty Museum all within a few miles of one another — and from USC.

For incoming and current Roski students, that proximity offers the thrilling possibility for new experiences and opportunities. However, as a first-time college student, navigating a new university and a new metropolis may be overwhelming.

“L.A. is a haven for creatives,” said Lily Krausz, a junior majoring in art. “There is inspiration everywhere — museums, activities, people. Roski encourages you to get involved with the broader arts community in L.A. as well, with lots of field trips and assignments that show you what the arts scene has to offer. We are right next to downtown L.A. which has an awesome arts district, which is a great source to draw inspiration from.”

Talia Malchin, a junior at Roski majoring in design, notes the importance of art in all L.A. communities. “Whether it be within Roski, which has its own endless variety of styles and passions for art or around campus across all majors, students that are drawn to L.A. seem to be



Daily Trojan file photo

The Roski School of Art and Design, which offers three undergraduate degrees, allows undergraduate students to construct and display their own exhibits throughout the year.

generally into their different forms of art like music, fashion or photography,” Malchin said. “L.A. also has infinite opportunities to experience high quality art from so many different cultures, so there’s no shortage of inspiration.”

At Roski, students do not major in a specific medium but rather have the freedom to choose a more personalized path. From digital media to printmaking classes, Roski students are given the freedom to tailor their education to fit individual passions.

“Spend time getting to know your Roski cohort,” Krausz said. “That’s where your professional developments will be made and it’s important to make connections there. Join a club outside of Roski to avoid feeling pigeonholed.”

Outside of her classes, Krausz has consulted on student magazines and has enjoyed being a part of a creative team. She also mentioned that if students join Greek life, members can design apparel or merchandise — another way Roski students can

embed their talents and values in other spheres. Malchin plays club soccer and enjoys finding friends that she might not have crossed paths with otherwise.

“Get close to faculty,” Krausz recommended. “They are your resource, don’t go through the motions — small class sizes and studio courses means professors are your best source for creative direction.”

Malchin also advises newcomers to maintain connections with faculty. “I had a lot of repeat professors and

it’s great to have that relationship going into a new class,” Malchin said. “Ask questions and don’t be afraid to be honest about your opinion.”

One of Malchin’s favorite experiences was working on her final for her drawing class freshman year.

“I was super ambitious with the project and ended up ordering way too few materials and had to improvise, but it ended up even better than I had intended,” she said. “It was a great learning experience for both planning and executing future products.”

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## ST. BROWN | Youngest brother continuing tradition

| continued from page 5 |

football outside, catch around, they were always a step faster than me because they were older."

The eldest of the three St. Brown children, Equanimeous, is a wide receiver for the Green Bay Packers. The middle child, Osiris, is a senior wideout at Stanford.

Most children placed in Amon-Ra's position would feel the weight of inevitably enormous expectations. Not this one, though — that sort of thing just doesn't affect St. Brown.

"I never feel pressure for anything," he said. "The only pressure you have is the pressure you put on yourself."

It's not pressure but competition that makes St. Brown go. Sophomore quarterback JT Daniels has known and played with St. Brown since they were both in seventh grade, and while Trojan fans are just getting familiar with the high achieving wideout, it's nothing new for USC's signal-caller.

"He's competitive in everything he does," Daniels said, recalling a time when St. Brown nearly broke a controller after his long-time quarterback beat him in FIFA. "No matter if it's fashion, Madden, [NBA] 2K — everything."

Competition is inherent with St. Brown; he lives off it, feeds off it, moves because of it. Competing against his brothers played a big role in developing that mindset, but one doesn't have to look outside his family to find another driving source of his competitive nature.

Amon-Ra, Osiris and Equanimeous are the sons of one of the most successful bodybuilders of the 1980s: three-time Mr. World and two-time Mr. Universe John Brown.

Naturally, Brown had each of his three sons hitting the gym around the time most kids were getting acclimated to second grade.

"I think I was seven years old when I started lifting," St. Brown said. "Lifting was innate in us because he pushed that in us really early on. So I think we really got the edge on other kids growing up, being stronger than them, because obviously our dad was a weightlifter. He pushed us in the weight room, so just being stronger than the kid in front of us really helped us growing up."

Is that around the time St. Brown began to dominate on the gridiron? After all, bench pressing 135 pounds at age 8 would figure to separate him from kids who likely first saw the inside of a gym around 12.

His quarterback isn't so sure. He thinks St. Brown's been on a different level for quite a bit longer.

"Probably since birth," Daniels said. "He's always been Amon."

John Brown is a tough father who wants nothing but the best for his three similarly-aged kids who all play the same sport at a high level. There are comparisons to be drawn between the St. Browns and the infamous Ball family, but the youngest receiver doesn't see it that way.

"When we're all on the football field or in the weight room, when he's training us, he's our coach, he's really tough," St. Brown said. "But then outside of that he's a really loving father, and he's going to be just a normal father, have fun with us, joke around ... [people] kind of see us in that same way, but I think we're two kind of different families."

St. Brown's father has been training his children in the weight room and guiding their diet for years, and Daniels has seen the effects of Brown's influence first hand.

"He wasn't even tired after the first [fall] practice," Daniels said. "He ran four and a half miles. That's like, sprinting. Two and a half hours, he ran four and a half miles, and it was like nothing for him."

St. Brown's physical fitness has helped him become one of the Pac-12's best receivers after just one year at the collegiate level. A five-star product out of Anaheim, St. Brown led the Trojans with 60 receptions in 2018, piling up 750 yards and three touchdowns on the season.

He's doing everything he can to bring USC back to the top of the college football stratosphere. St. Brown came to USC with the intention of winning games and picking up a few Heismans along the way, so don't expect him to take any prisoners this year. After all, this is Amon-Ra St. Brown — whose father added "St." to his kids' last names and named his youngest after one of the most important Egyptian gods. He is destined for greatness.

The trilingual sophomore, just as fluent in German and French as he is in dominating on Saturdays, is carving his own path and doesn't plan on stopping anytime soon. Equanimeous and Osiris motivate him to be better, but Amon-Ra's plans are far greater than surpassing those two.

If you ever run into St. Brown around campus, ask him who holds the throne between him and his brothers. He'll give you the same answer that any youngest child would give but few would actually believe:

"You're looking at him right now."

You might be skeptical at first, but the look in his eyes as he delivers those six words should tell you all you need to know.

St. Brown doesn't just believe it. He knows it. And he's ready to prove it.



Photo courtesy of USC Athletics

## FOOTBALL

| continued from page 6 |

Pola-Mao and sophomore Talanoa Hufanga have just seven starts between them.

On the ground, Fresno State should be a middle-of-the-pack unit. Lead back junior Ronnie Rivers was effective last season — averaging a healthy 5.6 yards per game and scoring 10 touchdowns — yet he only accrued 132 carries. With the uncertainty surrounding the Bulldogs' passing offense, don't be too surprised to see them lean further on the run game this week than they did last year.

### PREDICTION: 35-17, USC

Despite the uncertainty surrounding the Trojans, the raw talent on the roster should be more than enough to overcome a Fresno State team that lost most of its best performers from last year. The story would be different if this was last year's Bulldog squad, but it isn't. Expect the deficiencies of the Trojan roster to show — hiccups from Daniels, offensive line miscues and secondary blunders are likely to be noticeable Saturday. Even still, the talent of the new-look Trojans and their new direction as a team will likely be enough to overwhelm Fresno State.

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**Norman Pearlstine** (center) discusses his role as the executive editor of the *Los Angeles Times* and the need to stay up to date with constant changes in journalism. Pearlstine is joined by professor Geoffrey Cowan (left) and School of Journalism Director Gordon Stables (right).

Maxim Haskell | Daily Trojan

# LA Times editor speaks at USC

Norman Pearlstine discussed the role of social media in the journalism industry.

By **MAXIM HASKELL**  
Staff Writer

*Los Angeles Times* Executive Editor Norman Pearlstine spoke at the Sheindlin Forum in Wallis Annenberg Hall Tuesday, discussing the importance of unbiased media coverage and the future of the changing journalism industry.

Annenberg Dean Willow Bay introduced Pearlstine, who was joined by Professor Geoffrey Cowan and School of Journalism Director Gordon Stables.

“I view [the *Times* as] a window to the future,” said Pearlstine, who was hired as executive editor of the *Times* in June 2018. “I think that it’s one of those things that the stories come from anywhere and you try to empower people to go with the things that they think are important.”

Pearlstine spoke about the decline of print and how technology and social media have presented new challenges for news consumption.

“We get the bulk of our revenue from print, and you start every January saying that if you’re lucky, the decline will be no more than 10%, but with the recognition that the decline of print revenue will be more than that,” Pearlstine said.

Stables asked Pearlstine about the role technology has played in transforming news distribution, specifically the role of podcasts in today’s media.

“I think it’s still early days for podcasts,” Pearlstine said. “It’s not clear to me what the model is long-term, but I think when you live in a part of the world where traffic defines your life, podcasts resonate.”

While Pearlstine said the news industry faces relentless pressure from digitalization, finances aren’t his only concern.

“One of the reasons our country is so divided is I can spend all day communicating with people who have the same opinion as me,” Pearlstine said. “How do you maintain the integrity of your content in a world where most of the people who see your content have an intermediary, be it Facebook, Google, Twitter or Apple News, where everything they’re trying to do is to homogenize the feed where you don’t differentiate what we’re trying to do from what lots of other people are trying to do?”

When discussing the challenges of leading a newsroom, Pearlstine said it all starts with understanding community and identity.

“We begin by saying, ‘What does the brand of the *L.A. Times* give us license to do? What does the collective intelligence of the people enable us to do without the brand?’”

Pearlstine expressed concern toward the reliance on social media as a news source and urged caution when balancing revenue and honest media coverage.

“The brilliance of the ways that technology has changed information for the first time, choice really resides with the reader,” Pearlstine said. “At the same time if we’re doing our job, we will insight you with the things you

| see **TIMES**, page 3 |

## LEGAL NOTICE – USC TYNDALL SETTLEMENT

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by Dr. George Tyndall at  
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# ARTS & ENTERTAINMENT

PAGE 4 | THURSDAY, SEPTEMBER 5, 2019 | WWW.DAILYTROJAN.COM/LIFESTYLE

## Improv group plays for the biggest laughs



Photo courtesy of Spoiler Alert

**Spoiler Alert** performs every Tuesday night at 10 p.m. at Tommy's Place. According to group member Cameron Bennett, constantly practicing improvisational comedy teaches performers valuable listening skills.

Spoiler Alert, a student-run comedy group, focuses on long-form improvisation.

By **BRYN GOLDSTEIN**  
Staff Writer

Spoiler Alert wants you to have fun at its shows. However, there will always be people having more fun than you — the performers themselves.

Remember when you thought that winging that speech for your communication class would be easy? You know how that turned out. Imagine being in a group whose goal it was to wing, well, everything. Enter Spoiler Alert, an improv group founded in 2011 whose goal is to spread joy at USC.

Spoiler Alert performs a signature long-form/short-form hybrid style of improv, which comes in two forms: the episode, in which the group improvises a 45-minute episode of a fictional TV show created from audience suggestions of genre and title, with "commercial breaks" consisting of improv games, and a mono-scene, which is one 30-minute scene that takes place in the same room with the same characters.

The goal in each of these approaches to long-form improv is not to be the funniest person in the room. Rather, it's to share truths that the audience can relate to.

"There's this philosophical idea in comedy and in improv specifically that the funniest thing you can ever do in any moment is tell the truth," Liam

Clancy, the president of Spoiler Alert, said. "The audience likes to see their lives validated in some sense because they want to know that they're not alone, and by showing that relationships can be weird and complicated. That's funny enough. You don't have to try to tell jokes."

Potential new members enter auditions, which consist of a group of four to five auditioners playing an assigned improv game while the group watches, according to Clancy, a junior majoring in economics and neuroscience. They "steamroll," a term in improv that means making the scene all about themselves. During last season's auditions, the auditioners that remained silent but handled the steamrolling situation in a mature fashion were the

ones that stood out to Clancy and were among the ones offered callbacks.

"The other thing we really look for in auditions are people who are different than our troupe now," Clancy said. "Everyone in our troupe is very different, from a very different background, has very different hobbies, and that's part of what makes us good. You can only improvise on stuff that you know, so we all like to have a very broad knowledge base."

Spoiler Alert rehearses twice a week for two hours at a time. This is the only shared trait among their rehearsals.

"We're always trying to vary it up, do something different, practice a different muscle, practice a different

| see **SPOILER**, page 5 |

## Tailgates need wine

**Ted Wint**  
LET'S WINE DOWN



Trojan Football season is here — and with that comes the weekly ritual of tailgating with friends and fellow Trojans. While beer might be the drink of choice for many on game day, wine can be a better alternative for those who want to spice things up just a bit.

Burgers and hot dogs are the main staples of any tailgate experience and they can largely dictate which wines you should drink in the moment. The key to understanding which to pair with food is being aware of the condiments and toppings. These little choices will take wine drinkers on a journey with their wine — hopefully one you'll enjoy if you keep these few notes in mind.

**Note No. 1:** If you're addicted to pickles and ketchup, you'll want to choose a refreshing wine to even out that heavy vinegar. A wine like 2018 Quinta da Lixa Loureiro (\$10) from Vinho Verde, Portugal with its rosy, citrusy taste is the way to go. It's as casual as you want your tailgate to be.

**Note No. 2:** If you're feeling a bit fancy, such as with a burger or hot dog topped with caramelized onions and blue cheese, an overly fruity wine will help add balance. A Radius Cabernet (\$11) from Columbia Valley, WA, is the perfect match. This delicious Cabernet will remind you of the homemade jams your grandmother made for you with its aroma of red fruits and black cherries. It's a sure crowd-pleaser with a surprising finish, so be sure to bring an extra bottle to share with friends.

**Note No. 3:** Wine-drunk is preferred if you're planning on actually watching the game. The term "beer belly" exists for a reason — beer can make you bloated. If you're like me, and going to the game means taking hundreds of photos for Instagram, then you definitely don't want to look bloated in your gameday outfit. Maybe a bit of wine could assist you in making small talk so it seems like you actually understand the game, because I sure don't.

**Note No. 4:** This is perhaps the most important note. Wine is for every occasion. It's never too pretentious or snobby to drink wine, even if it's at a tailgate. For so long, wine has been unapproachable for most people, with names that most people cannot pronounce and the financial costs associated with it. But don't let these factors stop you from enjoying wine.

You don't need to know how to pronounce it properly since it's very likely most people around you won't know either, and those who do are probably too drunk to care. There are plenty of wines like the ones mentioned that are both affordable and taste just as delicious as the expensive ones that are out of reach for college students.

Drinking wine and tailgating might seem like an odd pairing at first, but the possibilities are endless if you give the combination a chance. In the end, always remember that a red solo cup is a great equalizer and tailgates are meant to be fun, so don't let anyone stop you from consuming the drink of your choice.

*Ted Wint is a senior writing about wine culture for the Daily Trojan. His column "Let's Wine Down" runs every other Thursday.*

## Roski artist's paintings portray Alaskan landscape

Natalie Treadwell, a senior at Roski presents her latest exhibit at Lindhurst Gallery.

By **GRACE BAIN**  
Staff Writer

There's no doubt that the Roski School of Art and Design is full of talented students, but few have a story like Alaskan native Natalie Treadwell, whose latest exhibit focuses on natural resource development and consumption in her home state of Alaska, specifically the production of oil.

"These are places that we don't see and that we don't talk about," Treadwell said of her exhibit titled "Crude." "I've had to create a language through the art to talk about the reality of these places."

Treadwell's work features oil paintings, adding squid and octopus ink to emphasize the benefit of natural materials. The exhibit, now located in the Helen Lindhurst Fine Arts Gallery, displays paintings such as "The Trans-Alaska Pipeline" and "Refill" on large canvases. Treadwell says it took her over 30 hours to complete each piece.

"I wanted to have an honest conversation about our resource use and really be able to point to the areas that they're coming from and talk about the



Photo courtesy of Natalie Treadwell

Natalie Treadwell presented her latest exhibit "Crude" on Sep. 3. Treadwell paintings, all done with oil on canvas, each highlight a region or landmark, such as the Trans-Alaska Pipeline, in her home state Alaska.

| see **ARTIST**, page 5 |



Photo courtesy of Spoiler Alert

Founded in 2011, Spoiler Alert participates in various comedy festivals such as Fracas Improv Festival, Sketchella and the Improv du Jour festival.

## SPOILER | Group holds performances every week

| continued from page 4 |

skill," said Cameron Bennett, a Spoiler Alert member majoring in economics.

Sometimes, the group does compassion meditation sessions during which each person brings up a question about improv and a prompt about their day, and each person responds to what the others have posed. It allows the members of Spoiler Alert to enter the headspace necessary to begin improvising and to release some of the baggage of their day.

What began as an extracurricular for the members of Spoiler Alert has slowly influenced their daily lives. For instance, an improv rule from the Upright Citizens Brigade — an improv and sketch comedy group founded in 1990 — of noticing the first unusual thing in a scene has allowed Clancy to become more attentive to the interesting and humorous occurrences constantly around him.

Bennett believes that improv has allowed him to foster the skill of truly listening to the people around him.

"There's this other concept in improv ... yes, and' ... at the core of it, it means, the only way you can continue

to develop your scene and add onto it and improvise is if you're 100% listening to what the other person is saying and accepting that as the truth of that scene and then adding onto it," Bennett said. "Like never saying no to what someone else is bringing to the table, always taking that idea, and that's incredibly useful just in life."

While growing up, Spoiler Alert member Ruby Marker felt that her comedy was perceived as irritating by others due to her gender. However, being a member of Spoiler Alert has given her a community that appreciates her contributions.

"Being around people that give 100% of themselves to support you ... has made me understand how much people can be there for me and how I can feel free to be weird and myself," said Marker, a freshman majoring in theatre. "I found a lot more confidence."

Spoiler Alert performs every Tuesday night at 10 p.m. at Tommy's Place. Auditions for the group will be held this Friday, Sept. 6 from 5 to 7 p.m. and 7 to 9 p.m. and on Saturday from 11 a.m. to 1 p.m. and 1 to 3 p.m. outside of Taper Hall.

## ARTIST

| continued from page 4 |

misconceptions about developing these places," Treadwell said.

She explained that most people often misunderstand that the taking of natural resources does not always correlate with just environmental destruction — for Alaska, its directly linked to the state's economy.

Treadwell's interest in art sparked when she dropped her Spanish major and decided to take a painting class at the University of Notre Dame. She eventually got invited to become one of the 12 Young Explorers on the Heart of the Arctic cruise. Already in love with her homeland, this trip furthered her interest in the North, its culture and the resources it provides for the rest of the planet.

Now a senior at USC majoring in art and geographic information science and technology, Treadwell shares these intertwined passions with a greater audience.

"The reality is that we use these resources, [like oil], every single day all around the world, and it's one of our main sources of economy in Alaska," Treadwell said. "We have an incredible amount of land up there that's not developed, but there are some pretty great places to get natural resources."

According to the Alaska Permanent Fund, Alaskans get repaid through tax returns for the resources taken from their state, which, Treadwell said, debunks the misconception that energy development is only beneficial for one specific corporation. Instead, the taking of Alaskan materials is advantageous for both Alaskans, the companies that produce the materials from nature and the rest of the world.

With her art, Treadwell informs her audience of the positive acts natural resource development create for the environment that are often ignored.

"I was really trying to make work that maybe in some ways glorifies [natural resource development], but also just shows it as it is," Treadwell said. "Whoever comes and looks at it can make a decision about it based on how they feel."

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# DAILY TROJAN

FRIDAY, SEPTEMBER 6, 2019 | STUDENT NEWSPAPER OF THE UNIVERSITY OF SOUTHERN CALIFORNIA SINCE 1912 | VOL. 198, NO. 8



Seanna Latiff | Daily Trojan

**Undergraduate Student Government** President Trenton Stone and Vice President Mahin Tahsin have helped make several changes so far this year, including extending free Lyft hours and expanding the Trojan food pantry.

## USG | Student leaders hope to rebuild after scandal

| continued from page 3 |

popularly elected by them.” Stone said in a previous *Daily Trojan* article. “And that applies when it comes to staff and faculty, they’re all elected and can hopefully adequately represent their constituents.”

Stone said there have been a number of scandals in the past within USC and USC that have distracted from the mission of the undergraduate experience and thrown USC into national scrutiny.

But Tahsin said issues like the college admissions scandal — which was revealed in an FBI investigation in March right before the start of her and Stone’s term — drive her and other students to create change at USC.

In light of these incidents, she said USC has been working to “break out of the silos that exist to push forward a more united value system.” Stone said there has been an upward swing in administrative accountability and a drastic increase in the inclusion of students — both from USC and from other groups — on committees, task forces and in the general conversation.

Stone and Tahsin have also worked

throughout the summer to plan their agenda for the new school year.

Stone and Tahsin worked with the Office of Student Affairs to reduce the amount of fees student organizations pay for facilities when they host events. The partnership helped them set aside \$15,000 in waiver fees for organizations to draw from throughout the school year.

USG also launched diversity and sustainability training Aug. 30 that requires recognized student organizations to send five representatives to participate in these trainings and take exams to show what they learned. USG also hopes to make a system where branches of USG can collaborate to form task forces in order to address various campus issues.

“It might be something like an incident of sexual assault or a scandal, but it could also be a long term advocacy project like expanding Lyft hours,” Stone said. He said that they are working on pairing these student task forces with administrative ones, so they can work hand in hand on tackling these campus issues.

Stone and Tahsin are also focused on improving wellness initiatives across campus. One of these efforts include working with the Campus Wellbeing and Education Office to implement Ask Ari, a virtual wellness assistant platform that answers questions for students, faculty and staff.

Other efforts to improve student life include increasing direct funding to registered student organizations, expanding free Lyft hours depending on what time the sun sets and improving the Trojan food pantry, which will move from Parkside Apartments to a space next Cafe 84.

“It’s going to have a big industrial kitchen,” Stone said. “It will also have a Director of Student Wellbeing who will be able to help students register for things like CalFresh and connect to different resources in the community.”

Truman Fritz, USG senior director of communications, said he aims to improve accountability and transparency in USG to encourage more students to express what improvements they would like to see.

“We really want to emphasize that USG [is] here for you, we are your student government, we represent you, all 20,000 students,” Fritz said.

Fritz and the rest of USG believe in the importance of fostering an environment in which students have a source to go to with their problems, where every student’s voice is heard.

After a successful pilot of a multi-stream waste system, Sustainability Director Isabella Caltabiano said her department will first implement the system in freshman residential colleges. She hopes to eventually install the multi-stream recycling, waste and compost bins in all residential colleges.

“On top of that, I’m looking to collaborate with President Folt and find ways that we can make USC more sustainable on a greater scale. This will be the first time we have the administration really backing us and propelling us forward,” she said, referring to Folt’s background as an environmental scientist.

With new administrators including Folt, Zukoski and Vice President for Student Affairs Winston Crisp, Stone and Tahsin said they hope to see USC transform its value system to help students, faculty and staff feel more included and informed, and that the culture of the University begins to shift.

“Everytime we come back, we have big events, we go to the football game, we feel proud to be Trojans — but there have definitely been issues over the last couple of years that have eaten away at the pride for a lot of people,” Stone said.

Ultimately, Stone believes that there are a lot of the right people in the right positions forming good relationships that together can help bring that pride back for everyone.

## Lavender Lounge, LGBT Resource Center to downsize

The center will move to a new space in the Student Union next to the cultural centers.

By SASHA DAVIS  
Assistant News Editor

The LGBT Resource Center and Lavender Lounge will move its offices to the fourth floor of the Student Union later this semester, LGBT Resource Center Director Kelby Accardi-Harrison confirmed Aug. 30.

According to Accardi-Harrison, the move, which does not have a finalized date, is the result of years of administrative decisions that led to student protests and organizational complaints regarding size of the office space.

According to Monique Allard, who served as interim vice president of student affairs until Winston Crisp assumed the position Aug. 16, the Resource Center will lose approximately 27 sq. ft. in its new office space on the fourth floor. According to Allard, the relocation will situate the Resource Center and Lounge alongside the Center for Black Cultural Student Affairs, the Latinx Chicana Student Affairs and Student Affairs and Asian and Pacific American Student Services.

“All of the cultural and resource centers, otherwise known as the Student Equity and Inclusion areas, have been working toward

providing more intercultural and intersectional programming to support students’ multiple identities,” Allard said.

According to Allard, students who utilize the LGBT Resource Center often frequent the other student cultural resource centers, placing great weight on the importance of recognizing diverse identities as a reason to relocate the LGBT Resource Center.

According to Accardi-Harrison, the decision to relocate the center and Lavender Lounge with the other cultural organizations is a step in the right direction and indicates improved administrative coordination with the Resource Center.

“I do think it’s meeting a need by creating a better, more hopeful space in the sense of intersectional identity,” Accardi-Harrison said. “I honestly feel the administration feels the same way. Ideally there would be more square footage.”

According to Accardi-Harrison, the Division of Student Affairs discussed this move for a few years and had kept the Resource Center notified of the decision’s progress. Accardi-Harrison said she provided feedback to Student Affairs and discussed the center’s long-standing troubles with the current office size.

“We definitely want to be on the fourth floor, but even losing a small amount of square footage is going

| see ROOM, page 13 |



Daily Trojan file photo

The LGBT Resource Center expanded to include the Lavender Lounge in 2017 as a comfortable and safe space for students to relax. With the office moving to the fourth floor of the Student Union, both areas will decrease in size.

## USG President, VP focus on transparency, campus wellness

USG leaders hope to improve wellness, sustainability and communication on campus.

By DYLAN DEPUY  
Staff Writer

Trenton Stone and Mahin Tahsin take on this year of change as the Undergraduate Student Government president and vice president, respectively. Though the student leaders took office in April, they have set an agenda of ambitious goals for the year, which includes improving student wellness, stressing University-wide sustainability and increasing dialogue with University administration.

They have led the University since the end of the last academic year, after campaigning as a write-in ticket on promises of student representation, increased administrative accountability, improved student resources, a reconfigured health and safety system and an open campus climate.

When Stone and Tahsin first joined USG in 2017, neither of them expected to run for an elected position — let alone for president and vice president. Stone proposed the idea of joining the election as write-in candidates last January after only one ballot, former USG Senators Michaela Murphy and Meagan Lane, entered the race by the initial deadline. He partnered with Tahsin, and the two hoped to provide another option for students come the election.

“We really wanted to be the best that we could for the student body



Seanna Latiff | Daily Trojan

**Undergraduate Student Government** President Trenton Stone (right) and Mahin Tahsin hope to increase campus involvement in University decisions this year. They formalized Trojan Council, a group of faculty, student and staff leaders.

and focus on the student experience and perspective, more so than we’ve seen in the past,” Stone said.

Stone, a junior studying international relations and philosophy, and Tahsin, a senior studying business administration and economics, have previous experience working together within USG’s funding branch. Tahsin served as the director of the professional and academic fund,

where Stone applied to be a delegate in September 2017. Stone was also a senate aide in the legislative branch at the time.

“It was so cool to see the amount of resources and the amount of people that were engaged with student government,” Stone said. “We have almost 500 people that will touch our organization in some way this year, and to see all of them so passionate

about a similar mission was so impactful to me.”

One year after her starting with USG, Tahsin was brought on to serve as the director of the discretionary fund, and Stone took on her previous position heading the professional and academic fund to provide funding for events programmed by student-run, undergraduate organizations.

“Both of our backgrounds within

USG were within the funding branch, which allows you to see a lot of different interests of students through one specific position,” Tahsin said. “And I think that really helped us understand how to work with students, administrators, or any different parties and make sure that we are pushing forward the students’ interest first.”

Stone highlighted the presidential search committee as an example of the lack of student representation in administrative decisions. Stone and former Graduate Student Government President Joycelyn Yip were later included in the provost search committee that recently announced its decision to appoint University at Buffalo Provost Charles Zukoski.

“Everyone seems adequately represented on the provost search committee,” Stone said. He said that including students in the decision is effective and feasible.

One of Stone and Tahsin’s first actions of the semester was to formalize Trojan Council, a group composed of leaders in USG, GSG, Academic Senate and Staff Assembly. The group plans to hold an open forum with University President Carol Folt and other administrators this semester.

According to Stone, this council would be able to play a larger role at USC by prioritizing the voices of faculty, students and staff when making decisions.

“You can’t have all 20,000 undergraduates at the table, but you have a vice president and president that were

| see USG, page 2 |

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# ARTS & ENTERTAINMENT

PAGE 4 | MONDAY, SEPTEMBER 9, 2019 | WWW.DAILYTROJAN.COM/LIFESTYLE

## THORNTON WEEK

From the Editors —

In our efforts to highlight the arts on our campus throughout the semester, the Daily Trojan will be spotlighting the various artistic schools at USC as they kick off their year of events, exhibits, screenings and performances.

This Friday, the Thornton School of Music will host its first concert of the semester with the Thornton Symphony performing Shostakovich's 10th Symphony. In anticipation, this week we will be highlighting a different faculty member, student or program, spotlighting everything that makes the School of Music special.

## A timeline of the Thornton School of Music

By GRACE BAIN  
Staff Writer

### 1880

On Sept. 14, 1880, USC established its very first structure, later known as Widney Hall. The building originally accommodated USC's School of Music.

### 1884

The USC School of Music was founded, making it the first professional school at the University. Of USC's first 100 graduates, music students made up around half of the population.

### 1920s

The Department of Musical Organizations, under the leadership of Harold William Roberts, took over the Trojan Marching Band, campus glee clubs and other musical troupes.

### 1922

Thornton faculty and alumni performed at The Hollywood Bowl, where the Los Angeles Philharmonic also performs.

### 1934

Arnold Schoenberg, a famous Austrian music theorist and composer, moved to Hollywood and taught a composition class in Mudd Philosophy Hall. He was known for his unorthodox way of teaching musical harmony.

### 1946

KUSC, USC's flagship radio station, began broadcasting and highlighting Thornton student performances. KUSC eventually became one of the largest broadcasters of classical music in the nation.

### 1947

The Carrie Jacobs Bond scholarship was established. Carrie Jacobs Bond, a Thornton alumna, was the first woman to establish a music publishing firm in the United States.

### 1948

The Los Angeles Opera was founded, and USC alumna Marilyn Horne made her debut at Shrine Auditorium under the conducting of Carl Ebert.

### 1953

Marilyn Horne, a famed mezzo-soprano, began her career at USC. In Thornton, she studied voice with USC professors William Vennard and Gwendolyn Koldofsky and participated in German soprano Lotte Lehman's master classes. In 1954, she played the voice of Dorothy Dandridge from the movie Carmen Jones.

### 1960s

String performers William Primrose, Jascha Heifetz and Gregor Piatigorsky taught master classes at USC.

### 1964

The Dorothy Chandler Pavilion opened. At American composer Steve Reich's birthday tribute, the Los Angeles Philharmonic performed, featuring USC staff member Jascha Heifetz as a soloist.

### 1974

The Gregor Piatigorsky Chair in Violoncello was established, honoring the famed Russian cellist, who taught at USC from 1962 until his death. Other notable holders of this Chair have included USC professors Lynn Harrell, Ronald Leonard and Eleonore Schoenfeld.

### 1979

The USC Trojan Marching Band became the largest number of musicians to ever perform on a single in the recording of "Tusk" with Fleetwood Mac.

### 1984

LA hosted the Olympics, and composer John Williams, a Thornton collaborator and alumnus, won a GRAMMY for "Olympic Fanfare and Theme."

### 1999

Flora L. Thornton donated \$25 million to the USC School of Music. This gift was the largest contribution to an American music school at the time.

### 2003

Walt Disney Concert Hall opened, which now hosts the L.A. Master Chorale, led by Thornton alumnus Grant Gershon.

### 2004

Famous violinist Midori Goto joined the USC Thornton faculty.

### 2004

Four USC students won a GRAMMY for their group the Los Angeles Guitar Quartet, which they established in the 1980s.

### 2007

USC alumnus and Distinguished Professor of Composition Morten Lauridsen was awarded the National Medal of the Arts for his compositions of outstanding choral works.

### 2008

USC Thornton established the popular music performance major, a first of its kind at a top-tier university. The major combines courses on musical training, production, technology and entertainment law.

### 2009

USC Thornton celebrated its 125th anniversary with performances including the USC Thornton Symphony conducted by Michael Tilson Thomas, USC Thornton Choral artists and The Steve Miller Band.

### 2012

Alice Schoenfeld, a professor of violin, donated \$3 million toward a new symphonic hall for Thornton, now known as the Alice and Eleonore Schoenfeld Symphonic Hall.

### 2013

The *Hollywood Reporter* listed USC Thornton School of Music as a top music school in America and a "springboard to the industry."

### 2013

Glenn Dieterow, who had the longest tenure out of any other former concertmaster, stepped down from the New York Philharmonic to become the Robert Mann Chair in Strings and Chamber Music. Robert Mann, a Juilliard alumni, was a famous violinist and founder of the Juilliard String Quartet.

### 2013-2014

Gimel "Young Guru" Keaton joined the USC Thornton staff as an artist-in-residence. Keaton is a Grammy-nominated DJ and a music producer who has worked with rapper Jay-Z.

### 2013

In September 2013, USC Thornton students performed in Bovard Auditorium with Elton John.

### 2014

Michael Tilson Thomas was named a Judge Widney professor of music at USC. This honor allows Thornton students to work directly with Thomas, one of America's most famous classical musicians and a two-time alumnus of Thornton, himself.

### 2014

The GRAMMY Museum named the USC Thornton School of Music as its first official university affiliate.

### 2019

In honor of USC student Victor McElhaney, who was killed in an off-campus shooting, the USC Black Alumni Association established a scholarship to support and encourage success for black music students at Thornton. McElhaney was also honored with a posthumous degree.

## Sephora hosts annual beauty event at the Shrine Auditorium

"Sephoria" gave attendees the chance to interact with influencers and win prizes.

By KITTY GUO  
Staff Writer

"It feels like Christmas morning."

Gathered outside the Shrine Auditorium, waiting for the ushers to throw open the doors, there was, indeed, an excited energy to the crowd. The anticipation in the air was palpable — the kind of anticipation where you know you're really to secure a lot of shit you really, really want.

Cosmetics retailer Sephora's two-day beauty extravaganza, Sephoria, took place over the weekend at the Shrine. 75 brands participated in the massive festival, billed as the "Coachella of beauty." The festival gave participants a chance to score new limited-edition products, meet their favorite makeup artists and influencers, get free full-face makeovers and load their cameras rolls with enough content to last a month.

As the crowd swarmed into the hall, they were greeted by a line of tents, a shiny playground extending as far as the eye could see. Brands were grouped together in sections, loosely based on category: makeup, skincare or fragrance.

The pop-up exhibit aesthetic was in full force at Sephoria, heartily embraced by every brand in attendance. Crammed into close quarters, each booth jockeyed to outdo its neighbor and earn the free advertising that accompanies an appearance on your Instagram page. Neon signs, sparkly disco balls, flashing strobe lights — nothing was too garish or too gauche.

Some sections had the help of a schtick. In the Glam Game Room, brands such as Nudestixcks and Kaja filled claw machines with lipstick samples and heart-shaped sunglasses (but no worries if you failed to get anything, as representatives were quick to hand you a consolation prize anyway). In the Garden section, greenhouse-inspired beauty ruled. Farmacy filled its space with Claes Oldenburg-esque oversized cherries; Gucci made liberal use of pampas grass; Innisfree shrouded an entire wall in verdant vines. In the Home Spa, clean beauty brands such as Bite Beauty and Herbivore Botanicals cozied up with crystals and succulents, showing off their paraben-free, sulfate-free Sephora Green Leaf Stamp of Approval.

Other brands were merely separated into color-coded neighborhoods and left to fend for themselves. Some honorable mentions are Fenty Beauty's lip gloss carousel, Tatcha's miniature bamboo forest and Charlotte Tilbury's Broadway marquee lights. And, of course, the surefire method for attracting a crowd, eye candy: Patrick Ta, Huda Beauty and Sol de Janeiro all hired shirtless studs to pose for pictures.

"This is literally like Disneyland," I heard someone say as they walked past me, and the comparison is apt. Throughout the entire time I was there, I didn't stop to sit down once, too worried that I'd miss something, some once-in-a-lifetime experience. I willingly lingered in long lines, positive that the two-minute encounter at the end would be worth the 20-minute wait.

For four hours, I lapped it all up. I snapped selfies. I eagerly surrendered to the capable hands of beautiful women who knew what they were doing when they brushed glitter onto my eyelids and sprayed oil in my hair. I let myself be swept along and convinced of the magical properties of CBD-infused lotion. I needed it; I needed everything, or at least, I needed a free sample of everything.

Only at the very end, with five

minutes to spare, did I find a seat, satisfied that I'd wrung every last drop of — enjoyment? value? — from Sephoria. I was exhausted; my feet hurt from all the walking. Little girls streaked by, shrieking at the Ariana Grande blasting through the loudspeakers. Someone slipped out from behind a curtain, and I strained to catch a peek — just stacks and stacks of cardboard boxes.

So that was Sephoria, then, behind the glamorous fantasy: lots of boxes. Ultimately, it was a picture-perfect facade designed to sell you something — a vision of beauty, a vision of perfection, a vision of happiness once beauty and perfection had been attained, preferably through a \$150 eye cream.

There was one more perk to be redeemed as the festival wound down. As festival-goers shuffled toward the exit, Sephora representatives doled out swag bags laden with goodies. General admission ticket holders received bags containing around \$250 worth of products. VIP ticket holders walked out with a bag valued at \$900. I took it and wondered when I was going to use all this.



Kitty Guo | Daily Trojan

Known as the "Coachella of beauty," the event featured 75 brands and dozens of activities.

## LEGAL NOTICE — USC TYNDALL SETTLEMENT

**Women who were treated by Dr. George Tyndall at USC Student Health Center between August 1989 and June 2016 may be affected by a class action settlement.**

**Learn how to receive benefits.**  
**www.USCTyndallSettlement.com**  
**1-888-663-1718**

## Finding the perfect digital hangover cure isn't easy

Rowan Born



INTERNET CULTURED

When I think of summer, I think of endless sunny days, freedom from the everyday mundane routines and time to explore new avenues of self-expression. While some may have had a picturesque season, I on the other hand had a summer lived through the internet (not as boring as it sounds, I promise). And as summer comes to a close, what do I have to say about social media? Frankly, I'm over it.

I mean, not *entirely*, but hear me out.

To clarify, no, I didn't just spend the entire summer switching between scrolling through Instagram or Twitter on my phone (*that* would have been quite boring). Overall, I had a great summer with pockets of adventure. I was in Los Angeles with my friends, I spent many weekends on the beach and I had my dream internship at an influencer marketing company. With all of those activities

in mind, though, my work life and my personal life converged digitally. When I wasn't posting about my own whereabouts, I was at a 9-to-5 where I had to critically think about brands and their relevance as they pertain to consumption via influencers.

Don't get me wrong — I loved my job. I felt like I had spent my whole life preparing to discuss my knowledge of the social media sphere with like-minded professionals. But what was once a passion quickly watered down to simply being my everyday.

To some degree, I liked the hive-mind setting, as up until that point I had seldom found so many professional mentors who took a vested interest in being as serious about the field as I am. I watched YouTube videos as I worked — as did everyone else — only to turn around to my co-worker to spill the latest influencer tea. Later, I'd go to a meeting with a client to discuss how their campaign was doing in relation to how their social posts were performing on various platforms. The next day, I sat in on a trend report that laid out how the digitally-native Gen-Z population (me!) functions socially and as consumers. I was captivated by all of it, and I left every day feeling like a starry-eyed kid who, with the light from

her phone screen reflecting in her eyes, had just been told all of her wild dreams could come true.

Then I would go home, go to the gym (sometimes), hang out with friends, lay in bed, keep on scrolling and repeat.

My last column from Fall 2018 touched upon the dangers of intersecting one's personal and digital lives too much, but instead of experiencing that from the influencer side, I got a good look from the outside-in on the management side. If the goal of this column is to dive deep into how the online world plays an active role in shaping our everyday lives, then my internship was the manifestation of just that. I pulled engagement rates on various influencer posts. I assisted talent at VidCon (the highlight of my summer, easily) and saw a brand activation I worked on come to life. I finessed my way into all the big influencer parties and watched David Dobrik bounce around filming his vlog. Simply put, it felt like my life had turned into one big YouTube video.

On the last night of VidCon, I managed to secure the VIP of VIP wristbands to the biggest influencer party, where on the upper level of the House of Blues Anaheim I was rubbing elbows with all of the creators I

admired growing up. As I looked over the balcony at a scene that looked oddly reminiscent of a USC frat party, I thought to myself, "I've really made it." I had managed to be exactly where I wanted and more. But when I stepped back, I couldn't help but still feel like something was missing. I was in limbo — present in a space that was relevant digitally, but beyond that, where was its merit?

During my internship, my company released a report titled "The Social Media Hangover," which expanded upon how 51% of Gen-Z and Millennials dream of a life without social media. Ever since, I've been stuck on the word hangover when describing my tolerance for social media because, per the association of the word, I've had a hard time stomaching it lately. When I open my phone and scroll through Instagram, the intrigue is lost almost immediately. I can barely sit through a YouTube video anymore. Even the self-deprecating humor on Twitter that usually gets a laugh out of me isn't doing it.

But I'm okay with that. Instead, I've allowed my attention to turn inward, allowing me to contemplate who I am independent of social media: manifesting that outward by spending time with loved ones and

tackling what physical life has to throw at me.

I was hesitant about continuing this column for a third semester because, despite my love for social media, my digital hangover made me feel that the whole subject was trivial and ready to be tossed. Even though I'm not presently as inundated with social media as I had been for the past three months, I must acknowledge that world is still out there and more powerful than ever. But I write about this subject mindfully, because while discussing TikTok, Instagram and YouTube in this space is all business, there are more things to see, scandals to be uncovered and changes to be made. How we will relate our real lives online, then, will only continue to unfold as life churns on ahead.

I invite you to join me on my journey to find my digital balance throughout this semester. Welcome back to Internet Cultured.

Rowan Born is a junior majoring in journalism and law, history and culture. She is also the social media director of the Daily Trojan. Her column, "Internet Cultured," runs every other Monday.

# DAILY TROJAN

News Arts & Entertainment Sports Opinion Classifieds Projects

## TURNING THE PAGE: CAROL FOLT PROMISES A STUDENT-DRIVEN PRESIDENCY



By MIA SPEIER  
August 21, 2019 in Featured  
The University's 12th president sat down with the Daily Trojan to discuss her plans for sustainability, transparency and campus culture.

[All](#) / [Blogs](#) / [Lifestyle](#) / [Multimedia](#) / [News](#) / [Opinion](#) / [Sports](#)

-  AUGUST 21, 2019  
**Letter from the Editors: Calling all Artists**
-  AUGUST 21, 2019  
**A time of crisis: Reflecting on three years of turmoil at USC**
-  AUGUST 21, 2019  
**Football looks to bounce back with Harrell on board**
-  AUGUST 21, 2019  
**From the Editor-in-Chief: We're ready for a new beginning.**
-  AUGUST 21, 2019  
**Renovated coliseum set to reopen its doors**

## LETTER FROM THE EDITORS: CALLING ALL ARTISTS



By NATALIE OGANESYAN AND ISA UGGETTI  
August 21, 2019 in News  
We're turning a new leaf, shifting our focus, changing our name.

## A TIME OF CRISIS: REFLECTING ON THREE YEARS OF TURMOIL AT USC



By ANDREA KLICK AND MIA SPEIER  
August 21, 2019 in News  
Here are some of the greatest challenges USC has faced in the past few years.

## LAMBDA CHI ALPHA PURCHASES FRATERNITY HOUSE



By SASHA DAVIS  
August 21, 2019 in News  
The fraternity raised \$140,000 to buy the property after a four-year campaign.

Thursday, August 22, 2019

 Daily Trojan  
17,329 likes  
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USC'S INDEPENDENT STUDENT NEWSPAPER SINCE 1912.

News Tips >

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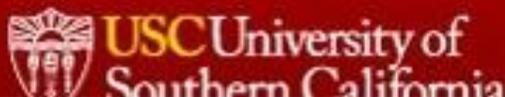
**LEGAL NOTICE — USC TYNDALL SETTLEMENT**

**Women treated by Dr. Tyndall at the USC Student Health Center may be affected by a class action settlement.**

Tweets by @dailytrojan

 **Daily Trojan**   
@dailytrojan  
Apply   
[https://twitter.com/DT\\_Sports/status/1164319578723237888](https://twitter.com/DT_Sports/status/1164319578723237888)

# **EXHIBIT H**



**NOTICE**

Date: July 12, 2019

To: USC Students, Faculty and Staff

From: University Communications

Re: Legal Class Notifications of Tyndall Class Action Settlement

On June 13, 2019, the U.S. District Court Central District of California granted preliminary approval for the \$215 million federal class action settlement to compensate patients who received women's health services from George Tyndall at the Student Health Center.

As part of the settlement, notice will be provided to potential members of the class in a variety of ways. Beginning July 12, 2019, a court appointed independent settlement administrator will provide public notices on websites, social media, alumni communications, campus publications and physical campus locations like dining and residence halls.

Providing notice in this comprehensive manner helps address our hope to bring about a fair, respectful and certain resolution for those who were affected, and to help the healing process for our community.

Through the settlement, the university also is instituting additional reforms to build upon the impactful changes we have already made to improve our university. To learn more, please visit: <https://change.usc.edu/change-progress-dashboard-grid/>.

If you would like to learn more about the settlement, please visit the independent settlement administrator's website at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) or email [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com) or call 888-663-1718.

# **EXHIBIT I**

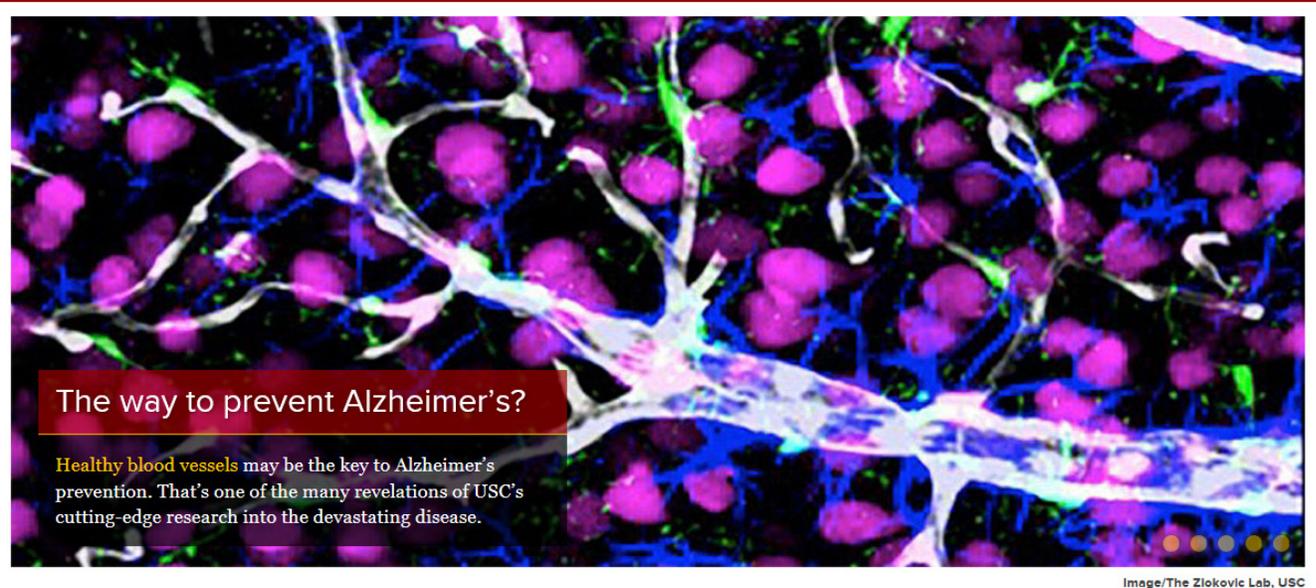
# USC - Website Postings

1

## HOMEPAGE POST

https://www.usc.edu/

about administration admission academics research patient care community arts global initiatives



**The way to prevent Alzheimer's?**

Healthy blood vessels may be the key to Alzheimer's prevention. That's one of the many revelations of USC's cutting-edge research into the devastating disease.

Image/The Zlokovic Lab, USC

**Settlement notice for patients of former USC gynecologist George Tyndall**

Women who were patients treated by former USC gynecologist George Tyndall from **Aug. 14, 1989, to June 21, 2016**, may be affected by a class action settlement. Visit <https://www.usctyndallsettlement.com> for further information from the settlement administrator, or call 888-663-1718 or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

## HOMEPAGE POST - COLOR UPDATE 7.19.19

Learn more

Read the full story at **USC News**

Learn more

For Journalists

Investigative Updates

**Settlement notice for patients of former USC gynecologist George Tyndall**

Women who were patients treated by former USC gynecologist George Tyndall from **Aug. 14, 1989, to June 21, 2016**, may be affected by a class action settlement. Visit <https://www.usctyndallsettlement.com> for further information from the settlement administrator, or call 888-663-1718 or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

**Campus Locations**

University Park Campus (Map)  
213-740-2311

Health Sciences Campus (Map)  
323-442-2000

- Visit USC
- Careers at USC
- Office Directory
- Campus Safety

**Tommy Cam**



TommyCam

**Hecuba Cam**



HecubaCam

**To Report an Emergency**

Call the **USC Department of Public Safety**

University Park Campus:  
213-740-4321

Health Sciences Campus:  
323-442-1000

# USC - Website Postings

2

## USC STUDENT HEALTH CENTER POST

https://studenthealth.usc.edu/

### Locations

<p><b>Engemann Student Health Center</b></p> <p>University Park Campus 1031 West 34th St. Los Angeles, CA 90089</p> <p><a href="#">Directions</a></p>	<p><b>Eric Cohen Student Health Center</b></p> <p>Health Sciences Campus 1510 San Pablo St. Suite 104 Los Angeles, CA 90033</p> <p><a href="#">Directions</a></p>
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### Announcements

<p><b>Settlement Notice for patients of former USC gynecologist George Tyndall</b></p> <p>Women who were patients treated by former USC gynecologist George Tyndall from August 14, 1989 to June 21, 2016 may be affected by a class action settlement.</p> <p><a href="#">All news &gt;</a></p>	<p><b>Regional Health Advisory on Measles</b></p> <p>Although there are no measles cases confirmed at USC, the recent outbreak in Los Angeles County has given us an opportunity to remind members of our community how to protect themselves against this preventable and serious disease.</p>
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## USC STUDENT HEALTH CENTER POST 2

https://studenthealth.usc.edu/settlement-notice-for-patients-of-former-usc-gynecologist-george-tyndall/

**USC Student Health**  
Part of Keck Medicine of USC

USC University of Southern California

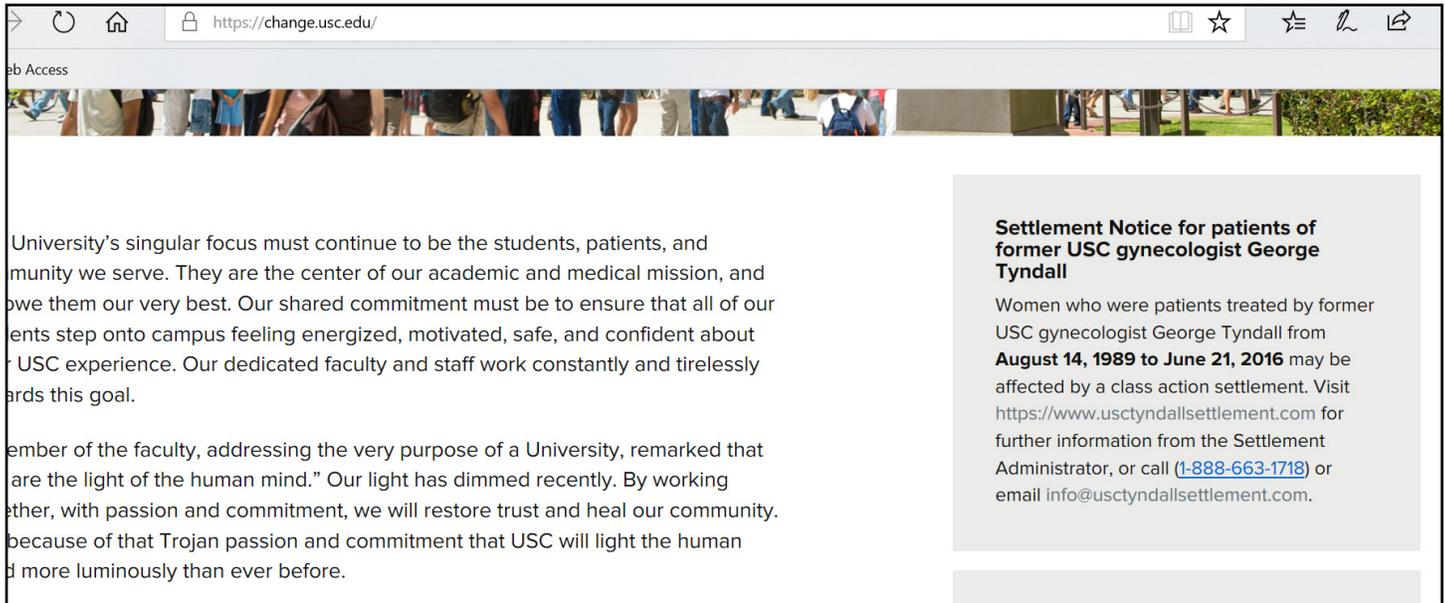
For New Students Services MySHR Login Emergencies Patient Feedback Search

Home > News > Settlement Notice for patients of former USC gynecologist George Tyndall

### Settlement Notice for patients of former USC gynecologist George Tyndall

Women who were patients treated by former USC gynecologist George Tyndall from **August 14, 1989 to June 21, 2016** may be affected by a class action settlement. Visit [usctyndallsettlement.com](http://usctyndallsettlement.com) for further information from the Settlement Administrator, or call (1-888-663-1718) or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

## COMMITMENT TO CHANGE



bb Access

University's singular focus must continue to be the students, patients, and community we serve. They are the center of our academic and medical mission, and owe them our very best. Our shared commitment must be to ensure that all of our students step onto campus feeling energized, motivated, safe, and confident about their USC experience. Our dedicated faculty and staff work constantly and tirelessly towards this goal.

A member of the faculty, addressing the very purpose of a University, remarked that we are the light of the human mind." Our light has dimmed recently. By working together, with passion and commitment, we will restore trust and heal our community. Because of that Trojan passion and commitment that USC will light the human world more luminously than ever before.

**Settlement Notice for patients of former USC gynecologist George Tyndall**

Women who were patients treated by former USC gynecologist George Tyndall from **August 14, 1989 to June 21, 2016** may be affected by a class action settlement. Visit <https://www.usctyndallsettlement.com> for further information from the Settlement Administrator, or call [1-888-663-1718](tel:1-888-663-1718) or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

# USC - Website Postings

## NEWS POST

https://news.usc.edu/

**USC News** USC University of Southern California

**Health**

**CAPILLARY CROSS SECTION**

The diagram illustrates a cross-section of a capillary within brain tissue. A central red circle represents the **BLOOD** inside the vessel. This is surrounded by a layer of **ENDOTHELIAL CELL**s, which are connected by **TIGHT JUNCTION**s. Outside the endothelial layer is the **PERICYTE** layer. Surrounding the capillary are **ASTROCYTE**s and **NEURON**s, with **BRAIN TISSUE** filling the rest of the space.

**Healthy blood vessels may be the answer**

**Editor's Picks**

**Settlement notice for patients of former USC gynecologist George Tyndall**

July 12

**Unique scholarship turns higher ed dream into reality for kids from military families**

July 12

**Does pre-ordering groceries help shoppers make healthier choices?**

July 10

**Unshaken: After an earthquake, USC**

## PRESS ROOM POST

https://pressroom.usc.edu/

nazard.

[more experts](#)

**News Releases**

**Settlement Notice for patients of former USC gynecologist George Tyndall**

July 12, 2019

**SOURCE ALERT**  
**Will Trump keep fighting for Census citizenship question?**

July 11, 2019

**SOURCE ALERT**  
**USC experts talk space travel 50 years after first moon walk**

July 9, 2019

**Statement regarding UCSD case**

**USC News**

**Settlement notice for patients of former USC gynecologist George Tyndall**

Women who were patients treated by former USC gynecologist George Tyndall from Aug. 14, 1989, to June 21, 2016, may be affected by a class action settlement.

**Unique scholarship turns higher ed dream into reality for kids from military families**

High school students from military families aren't always sure what to expect from college. That's where the USC Provost's Pre-College Scholarship for Military Families comes in.

# USC - Website Postings

5

## PRESS ROOM AND NEWS POST 2

Press Room

a resource for journalists



**Find an Expert**  
Search USC faculty experts by name or topic

**News Releases**  
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**USC In The News**  
News coverage of the University of Southern California

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Subscribe to News Releases

### Settlement Notice for patients of former USC gynecologist George Tyndall

July 12, 2019

*Women who were patients treated by former USC gynecologist George Tyndall from August 14, 1989 to June 21, 2016 may be affected by a class action settlement.*

*Visit <https://www.usctyndallsettlement.com> for further information from the Settlement Administrator, or call (1-888-663-1718) or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).*

*In addition, USC statements and resources are available at <https://change.usc.edu/settlement/>*

The following press release was distributed July 12 by JND Legal Administration:

News Releases

**Settlement Notice for patients of former USC gynecologist George Tyndall**

July 12, 2019

**SOURCE ALERT**

**Will Trump keep fighting for Census citizenship question?**

July 11, 2019

**SOURCE ALERT**

**USC experts talk space travel 50 years after first moon walk**

July 9, 2019

# **EXHIBIT J**

# USC - Social Media Postings

1

## FACEBOOK PREVIEW POST

Facebook Page

 **University of Southern California** Just now

Settlement notice for patients of former USC gynecologist George Tyndall

Women who were patients treated by former USC gynecologist George Tyndall from Aug. 14, 1989, to June 21, 2016, may be affected by a class action settlement.

Visit <https://www.usctyndallsettlement.com> for further information from the settlement administrator, or call 888-663-1718 or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

[HTTPS://WWW.USCTYNDALLSETTLEMENT.COM](https://www.usctyndallsettlement.com)  
**Home | USC Student Health Center Litigation Settlement**  
This is the settlement website for the USC Student Health Cent...

 Like  Comment  Share

## LINKEDIN PREVIEW POST

LinkedIn Pages

 **University of Southern California** Just now

Settlement notice for patients of former USC gynecologist George Tyndall

Women who were patients treated by former USC gynecologist George Tyndall from August 14, 1989, to June 21, 2016, may be affected by a class action settlement.

Visit [www.usctyndallsettlement.com](http://www.usctyndallsettlement.com) for further information from the settlement administrator, or call 888-663-1718 or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

**Home | USC Student Health Center Litigation Settlement**  
<https://www.usctyndallsettlement.com>

 Like  Comment  Share

## TWITTER PREVIEW POST

Twitter

 **USC** @USC · Just now

Women who were patients treated by former USC gynecologist George Tyndall from August 14, 1989, to June 21, 2016, may be affected by a class action settlement. Visit [www.usctyndallsettlement.com](http://www.usctyndallsettlement.com) for further information from the settlement administrator or call 888-663-1718.

[www.usctyndallsettlement.com](http://www.usctyndallsettlement.com)

# **EXHIBIT K**

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usc

Family

July 2019 | For alumni and friends of the University of Southern California



## Opioid Opt Out

Pain relief without opioids? Over-the-counter medications and mind-body therapies offer effective ways to manage pain—with less risk of addiction. »

## Food for Thought

A diet tailored to your DNA could put you in greater control of your health. Learn about a growing new



field that combines nutrition, genetics and genomics. »

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**LEGAL NOTICE — USC TYNDALL SETTLEMENT**

**Women treated by Dr. Tyndall at the USC Student Health Center may be affected by a class action settlement.**

**MORE FEATURED STORIES**



**THE TROJAN TICKET**

## Box-Office Champs

From *Star Wars* to *Avengers*, USC alumni have led 21 of the top 25 most successful films in Hollywood history. See which blockbuster movies got their magic touch from Trojans. »



**ARE YOU PROTECTED?**

## Vax Facts

With measles recently on the rise, Keck Medicine of USC doctors offer tips to help protect you from the highly contagious disease. »



**DESTINATION VACATION**

## Diving into History

Students are diving to the bottom of Lake Tahoe to explore sunken boats. They're documenting the history behind the best part of summer: vacation. »



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## The Current Issue

Read more university and alumni stories online. »

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Would you like to receive updates about the university's ongoing commitment to change, including enhancements to student health, culture change and implementation of best practices?

**Sign up for USC's monthly "Change" e-newsletter. »**

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Past Issues

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# USC Family

August 2019 | For alumni and friends of the University of Southern California



## Brave, Not Perfect

Anna Cockrell '19 was a standout track and field star with a stellar GPA. She didn't let on that she was struggling with depression behind a veneer of perfection. In an emotional commencement speech, she finally broke her silence about finding help. »



## Overcoming Hard Knocks

In tough times, what makes one person wilt while another bounces right back? Researchers are studying resilience and its health benefits. »

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**LEGAL NOTICE — USC TYNDALL SETTLEMENT**

**Women treated by Dr. Tyndall at the USC Student Health Center may be affected by a class action settlement.**

### MORE FEATURED STORIES



A DIFFERENT GAME PLAN

## NBA Insider

By day, Arye Abraham is a third-year law student. By night, the basketball fan's scoops about NBA player moves have gotten the attention of the Twitterati. »



IN GOOD COMPANY

## Your Small Business Questions Answered

If you want to start a business but you're unsure on the legal details, you're not alone. A USC Gould



TROJAN THROWBACK

## Going Back in Time to '69

From love-ins to single-sex dorms, USC student life has come a long way in 50 years. Here's a look back at Trojan life



# USConnection



The Official E-Newsletter of the USC Alumni Association

August 2019



## Job Listings

### Tidings from Troy

Dear Fellow Trojan,

Later this month, the newest members of the Trojan Family, the Class of 2023, will arrive on campus, brimming with anticipation and excitement, to begin the next chapter in their lives. They arrive at the dawn of a new era at USC under the leadership of Dr. Carol L. Folt, who has begun her tenure as our university's 12th president.



It's a transformative time for all of us in the university and alumni communities; there's an energy and renewed sense of purpose in the air, as we start the school year on a very high note: in the 2019-20 U.S. News and World Report rankings of the nation's best hospitals, Keck Medical Center of USC made the Honor Roll, i.e., the top 20, coming in at #16. More...

[Coldwell Banker Commercial WESTMAC: Commissioned Sales Associate](#)

[Department of State Hospitals-Coalinga: Clinical Lab Technologist](#)

[South Bay Workforce Investment Board: AmeriCorps Teacher's Assistant-English, Social Studies, Math](#)

[More Job Listings](#)

[Engage with Trojans](#)

## Alumni Headlines

## Alumni Benefits

Michael Tilson Thomas '67, MM '76 has been named one of this year's Kennedy Center Honorees.

## Young Alumni Spotlight



How did George Lucas '66 and Steven Spielberg become two of Hollywood's most influential filmmakers? The immersive podcast [Blockbuster](#), created by [Matt Schrader](#) '11 (pictured) and produced by a team of Trojans, chronicles their rise to fame in fascinating detail.

## Alma Matters

### LEGAL NOTICE — USC TYNDALL SETTLEMENT

#### Women treated by Dr. Tyndall at the USC Student Health Center may be affected by a class action settlement.

##### [Message to alumnae and other women who have received letter from settlement administrator](#)

USC has put together information, including answers to frequently asked questions, for women with questions about the settlement package received in the mail. The arrival of this package may have caught you off guard, and we are eager to help you understand what your next steps might be.

##### [USC appoints Winston Crisp as new head of Student Affairs](#)

The former vice chancellor for student affairs at the University of North Carolina at Chapel Hill will oversee more than 300 employees responsible for everything from recreational sports to nearly 1,000 student organizations.

##### [Troy Camp kids return to forest years later as USC students](#)

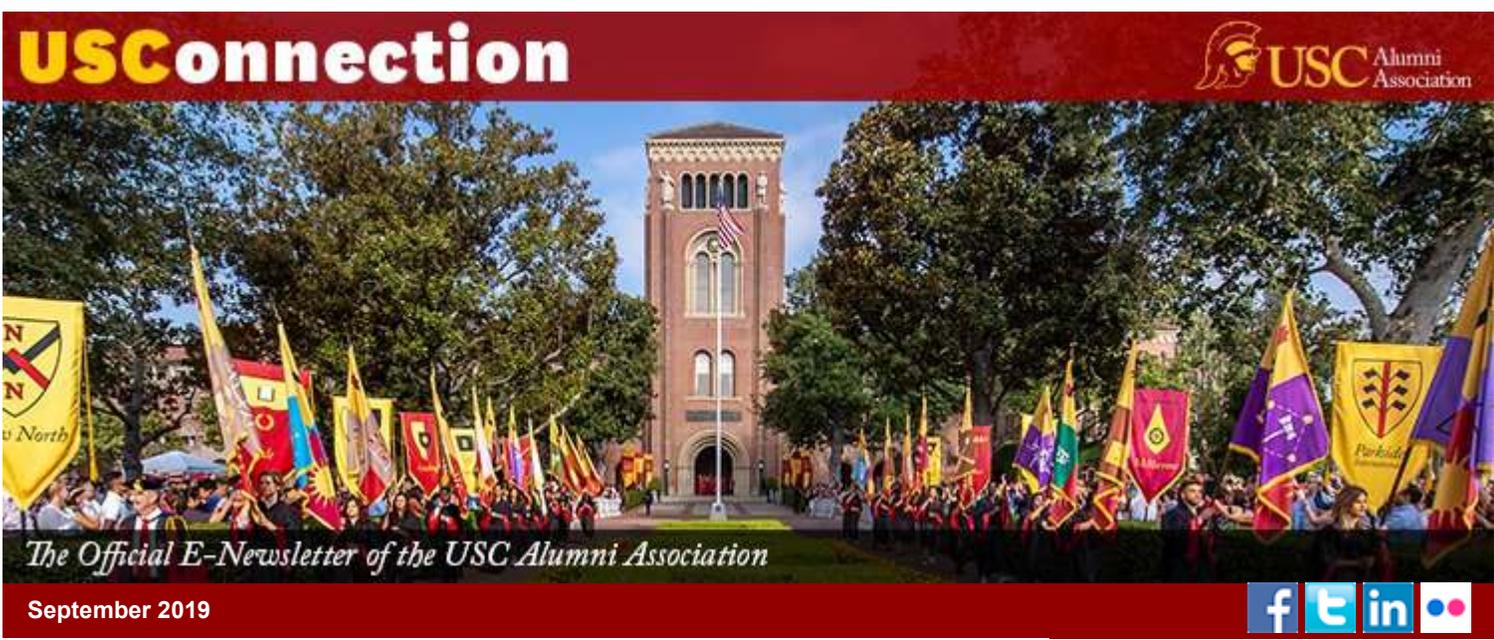
They created unforgettable memories as children in USC's mentorship program. Now these Trojans are helping the next generation of campers build confidence and make lifelong friends.

##### [USC Gould Immigration Clinic helps reunite Cameroonian brothers](#)

Clinton and Gerard Tibuck, who had been separated since 2015, were reunited after a USC law student helped Clinton win asylum.

##### [Olympic gold medalist Dain Blanton named USC beach volleyball head coach](#)

Blanton previously served as an assistant coach and helped lead USC to three national titles.



## Tidings from Troy

Dear Fellow Trojan,

On September 20, we will celebrate the **inauguration** of Dr. Carol L. Folt as USC's 12th president. The formal ceremony will bring Trojans and USC supporters to Alumni Park on University Park Campus to mark the official start of a new era at our beloved alma mater. All alumni are invited to attend the ceremony, which will be livestreamed on the **USC homepage**, so Trojans worldwide can be a part of this historic moment.

After hearing her speak or meeting her, you immediately understand why Dr. Folt was the unanimous choice of USC's Presidential Search Committee. **More...**



## Job Listings

**[California Institute of Technology: Research Technician Assistant](#)**

**[Los Angeles City Attorney's Office: Paralegal 1 - PLU](#)**

**[Uber Hiatt Search Partners: Human Resources Senior Associate](#)**



### **Macki Alvarez-Mena '18**

Growing up in Miami, Macki Alvarez-Mena '18 dreamed of becoming a designer. Today, she is the first USC alum to have a full apparel and accessory line sold at USC Bookstores.

## Alma Matters

### LEGAL NOTICE — USC TYNDALL SETTLEMENT

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### **Arthur C. Bartner begins 50th season as Trojan Marching Band director**

The 50th and final season for the longtime Trojan Marching Band director will be one of celebrations and milestones.

### **General (Ret.) Ellen M. Pawlikowski named Judge Widney Professor at USC**

A nationally recognized leader in science and engineering, Pawlikowski will join the USC Viterbi School of Engineering faculty this fall.

### **USC's Street Medicine team brings the hospital to the homeless**

Staffers spend their days combing the streets of Los Angeles, building rapport with patients and providing the in-person medical care they so desperately need.

### **Former USC Athletic Director Mike McGee Dies**

During his tenure, more than 50 Trojan teams finished in the Top 10 at their NCAA championships, including four that won NCAA titles.

## Trojan Travel

[View in browser](#)

Keck School of  
Medicine of USC



**TALK** *(The Alumni Link for Keck)*

Summer 2019



## Commencement 2019

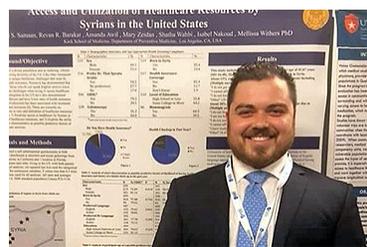
The Galen Center roared with cheers and laughter as late-night TV talk show host Jimmy Kimmel shared levity, as well as his own family's personal health struggles, to help send off 192 new doctors at the 134th Keck School of Medicine of USC Commencement.

[Read More »](#)



### *Alumni Spotlight* **Fred Weaver**

On April 24, Fred Weaver, MD, MMM, professor of surgery at the Keck School of Medicine of USC and chief of the division of vascular surgery, formally took over as chief of staff for Keck Hospital of USC.



### *Student Spotlight* **Jamil Samaan**

When he was 10 years old, Jamil Samaan and his family came to the United States from Syria. School was a struggle — he didn't speak any English.

[Read More »](#)



### *Faculty Spotlight* **Peter Marshall**

Peter Marshall, MD, joined the division of pulmonary, critical care and sleep medicine (PCCSM) as the inaugural vice-chief of critical care on June 1, 2019.

[Read More »](#)

**Alumni Annual Meeting and Health Conference - CME**

Friday, October 18  
Registration Opens Soon

**Class Reunion Weekend (Classes ending in 4s and 9s)**

Friday, October 18  
Registration Opens Soon

**Homecoming Picnic and Game**

Saturday, October 19  
Registration Opens Soon

**Scholarship Luncheon**

Thursday, November 21  
[RSVP »](#)

Contact us for more information on these upcoming events.

Grant to support patient diversity in cardiac surgery clinical trials

LEGAL NOTICE — USC TYNDALL SETTLEMENT

**Women treated by Dr. Tyndall at the USC Student Health Center may be affected by a class action settlement.**

Message to alumnae and other women who have received letter from settlement administrator

USC has put together information, including answers to frequently asked questions, for women with questions about the settlement package received in the mail. The arrival of this package may have caught you off guard, and we are eager to help you understand what your next steps might be.

## Stay Connected

### Alumni Resources

- [SCAA Facebook Page](#)
- [Request Official Documents](#)
- [Update your Contact Information](#)
- [Obtain Official Transcripts](#)
- [Trojan Travel](#)
- [CME Calendar](#)
- [Support Medical Scholarships](#)
- [TALK Archives](#)
- [Contact the Office of Alumni Relations](#)

### Dean of the Keck School of Medicine



**Laura Mosqueda, MD**  
Dean, Keck School of Medicine of USC  
Professor of Family Medicine  
May S. and John H. Hooval Dean's Chair in Medicine



Published for the alumni, parents and friends of the Keck School of Medicine of USC  
Molly Gervais - Senior Director of Development, Medical Education  
Elliott Law - Online Programs Manager

Please contact us at [ksomalum@usc.edu](mailto:ksomalum@usc.edu) or (213) 821-7065 with questions or to share a story.



## USC, L.A. Leaders Reintroduce the Renovated Coliseum

*The completed \$315 million project — funded via private donations, including United Airlines’ naming gift — prepares the stadium for its next 100 years.*

Looking better than ever despite being nearly a century old, the renovated United Airlines Field at the Los Angeles Memorial Coliseum made its public debut on August 15 at the gala ribbon-cutting.

“Today we celebrate what our city leaders, our local community and the larger Trojan Family can accomplish when we work together and dream together,” USC President Carol L. Folt told the hundreds of people gathered at in front of the stadium’s signature peristyle. [Read more.](#)

*\*Shared from USC News*

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## Living Her Passion

*Elle Fersan is Director of the Provost’s Immigrants and Global Migration Initiative at USC Gould.*

Eliane "Elle" Fersan is passionate about immigration and global migration. Born and raised in Lebanon, Fersan’s own experiences have had a lasting effect on her interests, activism and career. “I grew up in Lebanon during the Syrian occupation of my country. Witnessing ongoing conflict and corruption inspired my early activism,” she says. “I wanted to play my part as a citizen and change the

[See more events.](#)

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**QUESTIONS?** Email [alumni@law.usc.edu](mailto:alumni@law.usc.edu)  
USC Gould School of Law  
699 Exposition Boulevard  
Los Angeles, CA 90089-0071

Share this email:



[Manage](#) your preferences | [Opt out](#) using TrueRemove™

Got this as a forward? [Sign up](#) to receive our future emails.

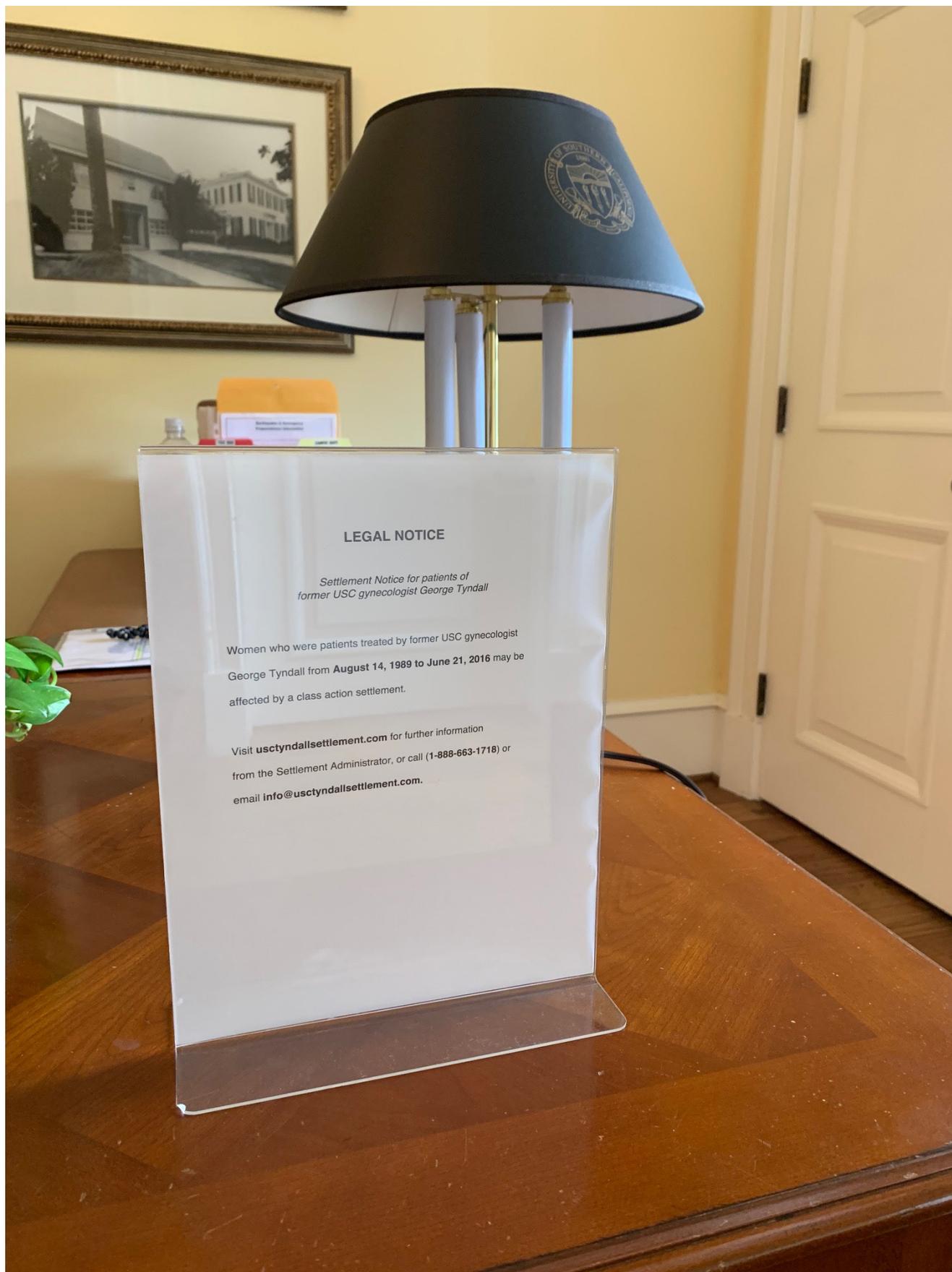
View this email [online](#).

This email was sent to [staff@law.usc.edu](mailto:staff@law.usc.edu).

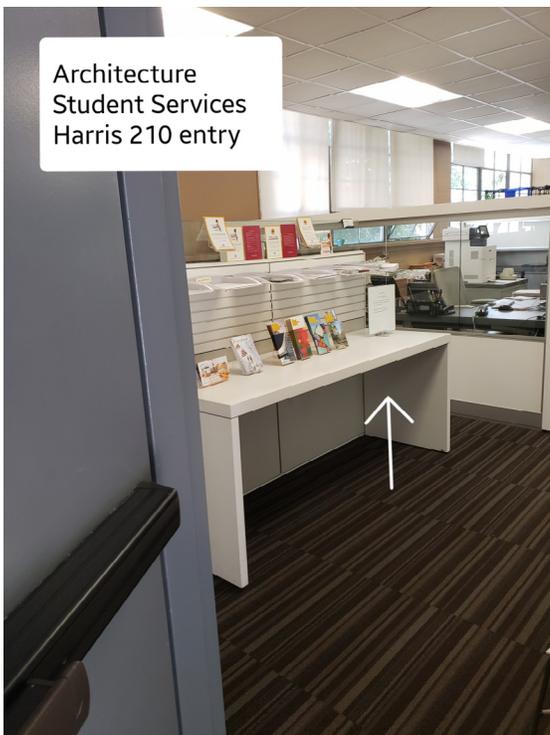
To continue receiving our emails, add us to your address book.

# **EXHIBIT L**

# ALUMNI HOUSE



# ARCHITECTURE



# ART AND DESIGN

## LEGAL NOTICE

### Settlement Notice for patients of former USC gynecologist George Tyndall

Women who were patients treated by former USC gynecologist George Tyndall from **August 14, 1989 to June 21, 2016** may be affected by a class action settlement. Visit [usctyndallsettlement.com](http://usctyndallsettlement.com) for further information from the Settlement Administrator, or call (1-888-663-1718) or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

# CINEMATIC ARTS

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email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).



# Employee Rights

## Under the National Labor Relations Act

---

The National Labor Relations Act (NLRA) guarantees the right of employees to organize and bargain collectively with their employers, and to engage in other protected concerted activity or to refrain from engaging in any of the above activity. Employees covered by the NLRA\* are protected from certain types of employer and union misconduct. This Notice gives you general information about your rights, and about the obligations of employers and unions under the NLRA. Contact the National Labor Relations Board (NLRB), the Federal agency that investigates and resolves complaints under the NLRA, using the contact information supplied

# COMMUNICATION AND JOURNALISM

**Annenberg School for Communication  
Emergency Information**

Each building has a team of volunteers that have been trained to help everyone in the building respond to an emergency situation. In the earthquake, or evacuation, each team member is instructed with a brightly colored emergency card distributed by building occupants and emergency services, such as the fire department.

**Reporting Emergencies**

To report an emergency:  
Call 313-740-6323  
Address: USC SAFETY PLAN 1000  
SHELTERS, CA 90089



**EMERGENCY SUPPLIES**

The emergency kits are located in AUC 1.0A.

**ANNENBERG SCHOOL FOR COMMUNICATION  
EVACUATION ASSEMBLY AREA**

In the event of an evacuation, the building team will guide all occupants to E.P. Hubert Park.

**BASIC EMERGENCY PROCEDURES**

- In the event of an emergency (fire, earthquake, medical, power outage), for assistance call Department of Public Safety (DPS) at 311 or 740-6323.
- In the event of a fire, remain calm. Do not panic. Do not use elevators. Leave the building immediately. Call for help (311 or 740-6323), with exact location where (Use Abbrev.)
- During an earthquake, Drop, Cover, and Hold on. These actions under a sturdy table, or use an interior wall away from windows and heavy objects. If outside, stay away from windows and other hazards. Report any injuries to DPS at 311 or 740-6323.
- In the event of an Active Shooter (Gun Run, Walk, Fight):  
 Run: Escape the area if possible.  
 Hide: Stay hidden in a secure place. Do not attempt to fight. Cover yourself, turn off lights, block the door.  
 Fight: If no other choice, use force to attack and neutralize the shooter.  
 Report: Report any injuries to the Emergency Notification system. Update your cell phone or text to report any information.

For USC information in a major emergency, call 311 or 740-6323 or go to <http://usc.com/emergency> on site.

Fire Safety & Emergency Planning Office - Cal. 100

**LEGAL NOTICE**

Settlement Notice for patients of former USC gynecologist George Tyndal

Women who were patients treated by former USC gynecologist George Tyndal from August 14, 1989 to June 21, 2014 may be affected by a class action settlement.

Visit [uscTyndalSettlement.com](http://uscTyndalSettlement.com) for further information from the Settlement Administrator, or call (1-800-663-1718) or email [info@uscTyndalSettlement.com](mailto:info@uscTyndalSettlement.com).

**PROTECT YOURSELF DURING AN EARTHQUAKE**

**DROP COVER HOLD ON**



**Drop where you are, onto your hands and knees**

**If a sturdy table or desk is nearby, crawl underneath it for shelter**

**Under shelter, hold on to the table with one hand**

**In a lecture hall, stadium or theater:** Drop to the ground in front of your seat. Cover your head with your arms, and hold on to your neck with both hands until the shaking stops.

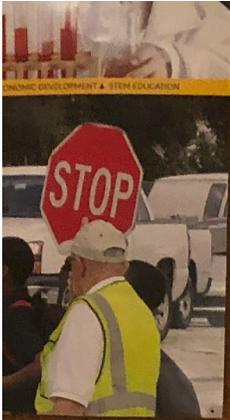
**In bed:** Stay in bed and cover your head and neck with a pillow. Keeping your arms extended to your head is essential.

**Outdoors:** Move to an open area if you can before the six second pause begins. Move from the buildings, walkways, and other hazards. Then Drop, Cover and Hold On.

**Laboratory:** Move to the counter and hold on to it. Do not touch anything on the counter. If you cannot hold on, drop, cover and hold on. Do not use an elevator or other means not specifically designed for use in an emergency. Do not use an elevator. Do not use an elevator. Do not use an elevator. Do not use an elevator.

USC Fire Safety & Emergency Planning

**DANCE**



## PROTECT YOURSELF DURING AN EARTHQUAKE

### DROP

Drop where you are, onto your hands and knees

### COVER

If a sturdy table or desk is nearby, crawl underneath it for shelter

### HOLD ON

Under shelter, hold on to the table with one hand

**In a lecture hall, stadium or theater:**  
Drop to the ground in front of your seat. Cover your head with your arms, and Hold On to your neck with both hands until the shaking stops.

**In bed:**  
Stay there and cover your head and neck with a pillow, keeping your arms as close to your head as possible.

**Outdoors:**  
Move to a clear area if you can safely do so, avoid power lines, trees, signs, buildings, vehicles, and other hazards. Then Drop, Cover, and Hold On.

**Laboratory:**  
Move to the corridor and take cover next to an interior wall. If the corridor is far away, but the lab has an adjoining office or other room not containing hazardous materials (e.g., a microscopical room) and close by, then drop, cover, and hold in the space.

USC Fire Safety & Emergency Planning

**Work Injuries and Illnesses**

Year: 2018

U.S. Department of Labor

OSHA 301 (Rev. 10-2016)

Establishment information

Name: UNIVERSITY OF SOUTH ALABAMA, UNIVERSITY PARK, CALHOUN

Address: 900 UNIVERSITY BLVD, UNIVERSITY PARK, AL 36688

City: UNIVERSITY PARK, STATE: AL

Employment information

Employer's name: UNIVERSITY OF SOUTH ALABAMA

Employer's address: 900 UNIVERSITY BLVD, UNIVERSITY PARK, AL 36688

Employer's phone: 205-890-1000

Employee's name: [Redacted]

Employee's address: [Redacted]

Employee's phone: [Redacted]

Date of injury/illness: [Redacted]

Time of day: [Redacted]

Location: [Redacted]

Activity: [Redacted]

Equipment used: [Redacted]

Weather conditions: [Redacted]

Other information: [Redacted]

Signature: [Redacted]

Supervisor's name: [Redacted]

Supervisor's address: [Redacted]

Supervisor's phone: [Redacted]

Supervisor's signature: [Redacted]

OSHA 301 (Rev. 10-2016)

### LEGAL NOTICE

*Settlement Notice for patients of former USC gynecologist George Tyrdall*

Women who were patients treated by former USC gynecologist George Tyrdall from August 14, 1989 to June 21, 2016 may be affected by a class action settlement.

Visit [uscnyrdallsettlement.com](http://uscnyrdallsettlement.com) for further information from the Settlement Administrator, or call (1-888-663-1718) or email [info@uscnyrdallsettlement.com](mailto:info@uscnyrdallsettlement.com).

## PROTECT YOURSELF DURING AN EARTHQUAKE

### COVER

If a sturdy table or desk is nearby, crawl underneath it for shelter

### HOLD ON

Under shelter, hold on to the table with one hand

**In a lecture hall, stadium or theater:**  
Drop to the ground in front of your seat. Cover your head with your arms, and Hold On to your neck with both hands until the shaking stops.

**In bed:**  
Stay there and cover your head and neck with a pillow, keeping your arms as close to your head as possible.

**Outdoors:**  
Move to a clear area if you can safely do so, avoid power lines, trees, signs, buildings, vehicles, and other hazards. Then Drop, Cover, and Hold On.

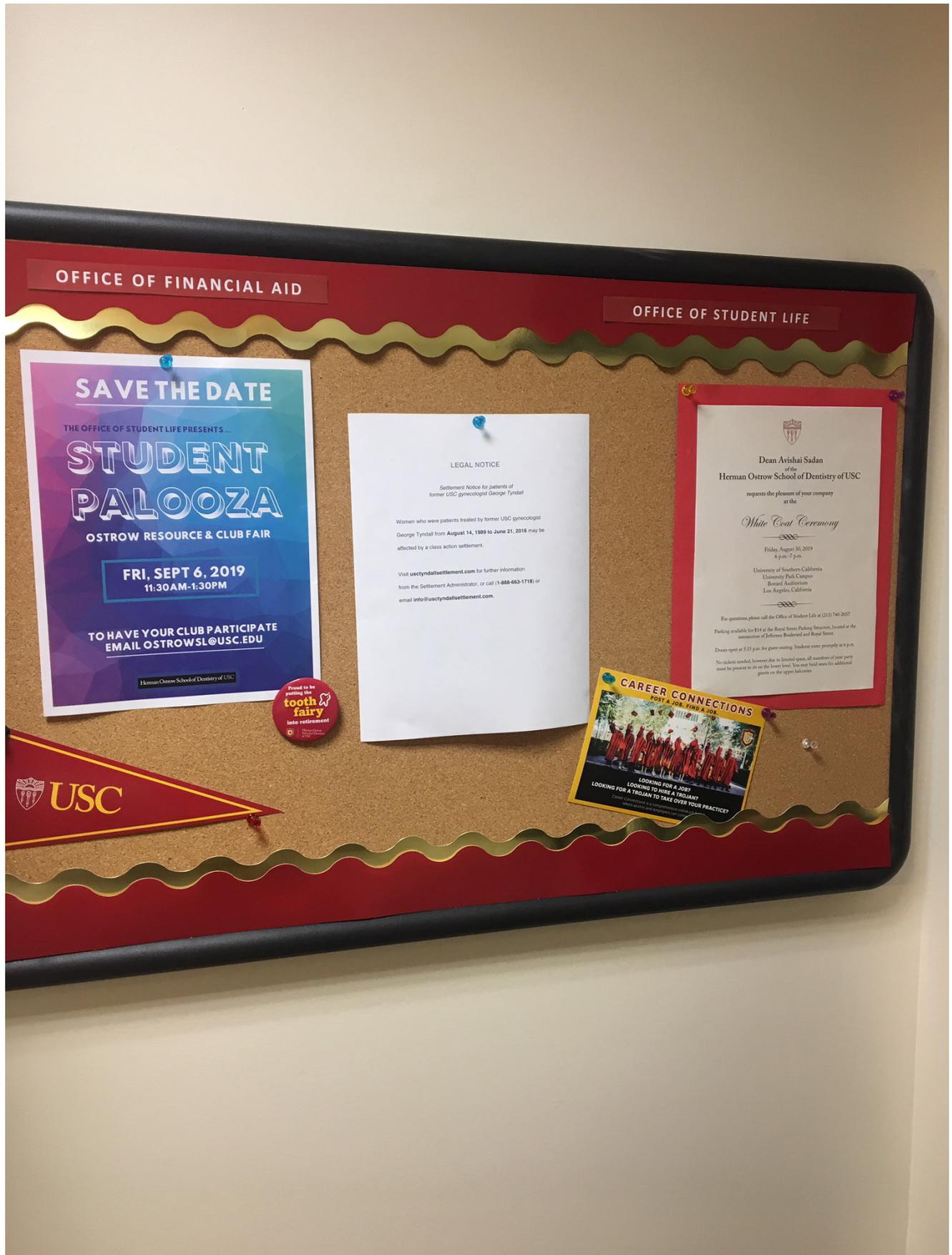
**Laboratory:**  
Move to the corridor and take cover next to an interior wall. If the corridor is far away, but the lab has an adjoining office or other room not containing hazardous materials (e.g., a microscopical room) and close by, then drop, cover, and hold in the space.

### Teaching Schedule and Repertory and Performance Schedules on your cell phone!

1. Go to the AppStore and search for "TeamUp."
2. Download the app. It's free!
3. Search for the Kaufman Teaching Schedule calendar by entering this code:  
`ksfgni76e6pirzg9g9`
4. Search for the Rep and Performance Schedule calendar by entering this code:  
`ks79g9dr2tpces2y36`
5. Open the calendars on your phone!

*If you have any problems, contact Jason at [davenpo@usc.edu](mailto:davenpo@usc.edu)*

# DENTISTRY



# DORNSIFE

## ACB

https://doi.org/10.1038/s41586-018-0589-x  
..., Smith, G. J., Cutter, G. A., & Bruland, K. W. (1997). The response of trace element redox couples to suboxi  
graphic Research Papers, 44(1), 113-134.



**USC** University of  
Southern California

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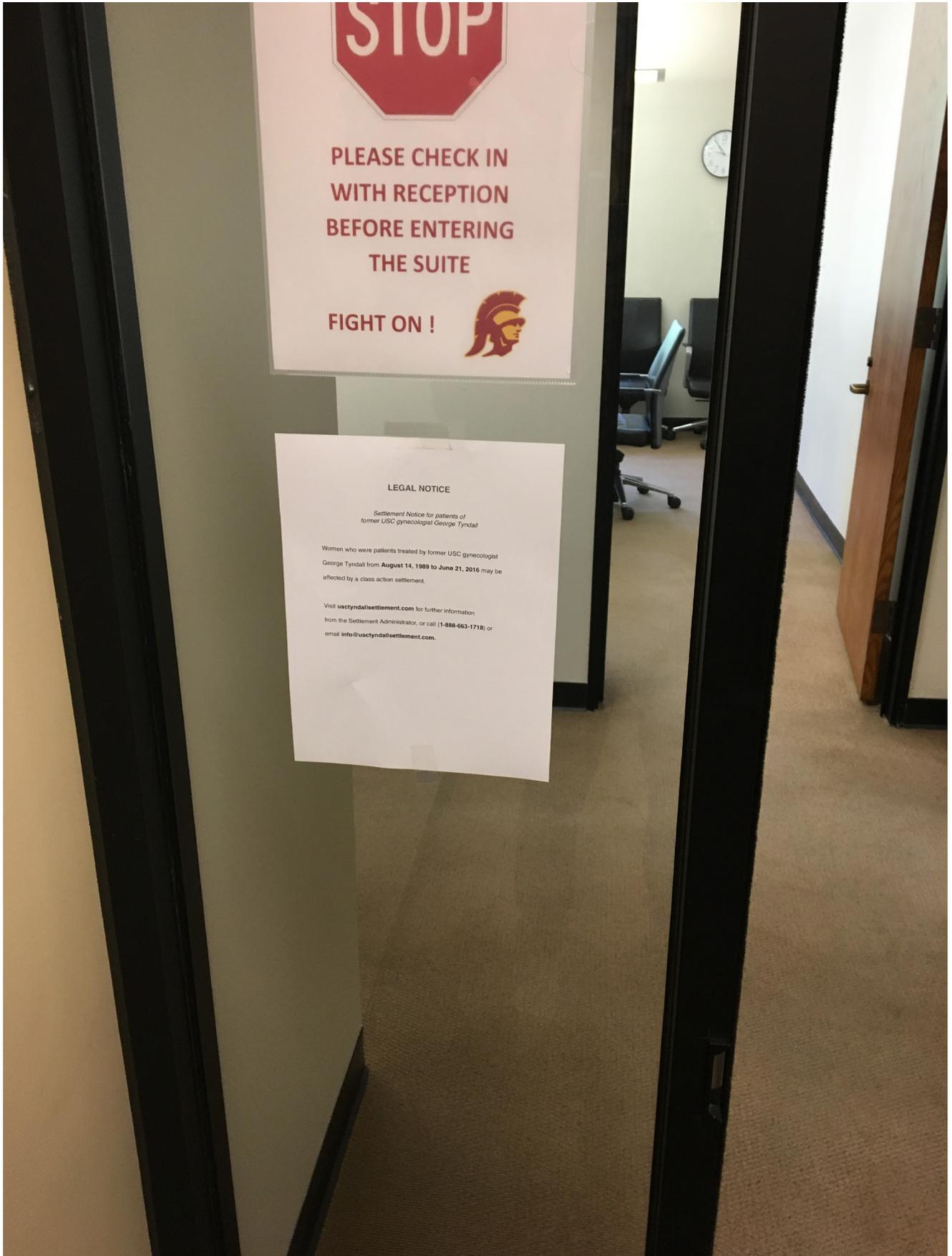
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ACB

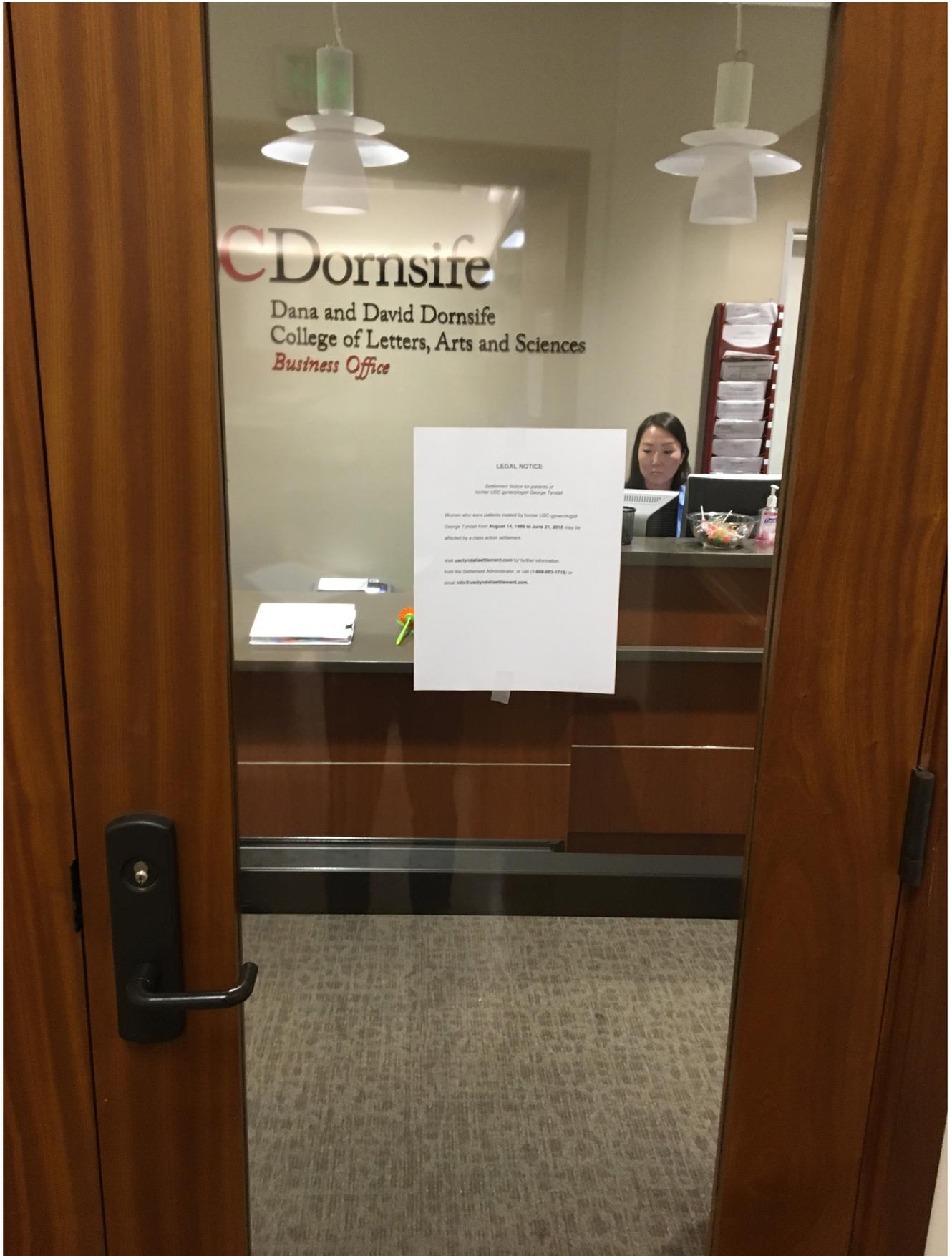
4<sup>th</sup> floor.

Right Wing.

**DORNSIFE**  
ADM



**DORNSIFE**  
AHF



**DORNSIFE**  
AHN

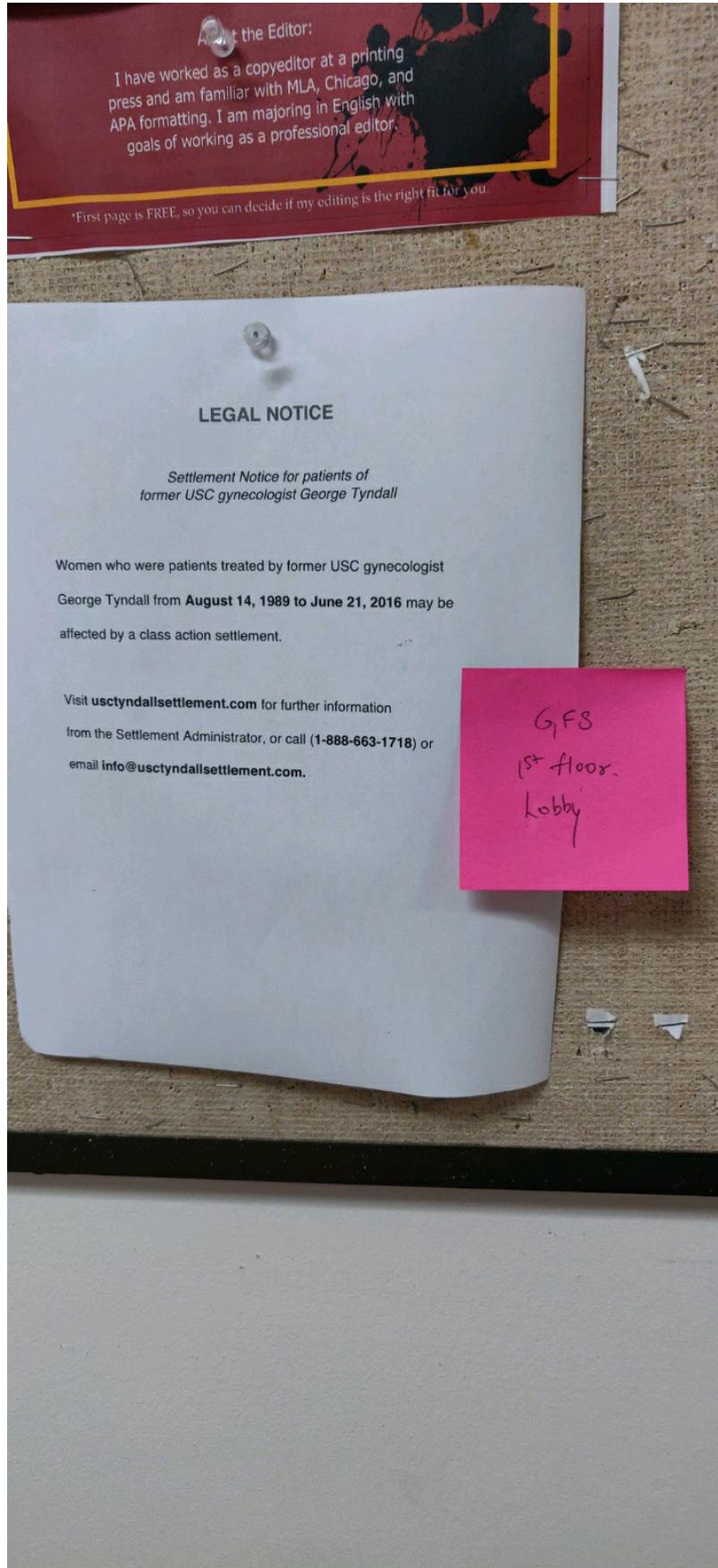
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email **info@usctyndallsettlement.com**.

Korean Institute  
Right by front  
Room

**DORNSIFE**  
**GFS**



**About the Editor:**  
I have worked as a copyeditor at a printing press and am familiar with MLA, Chicago, and APA formatting. I am majoring in English with goals of working as a professional editor.  
\*First page is FREE, so you can decide if my editing is the right fit for you.

**LEGAL NOTICE**

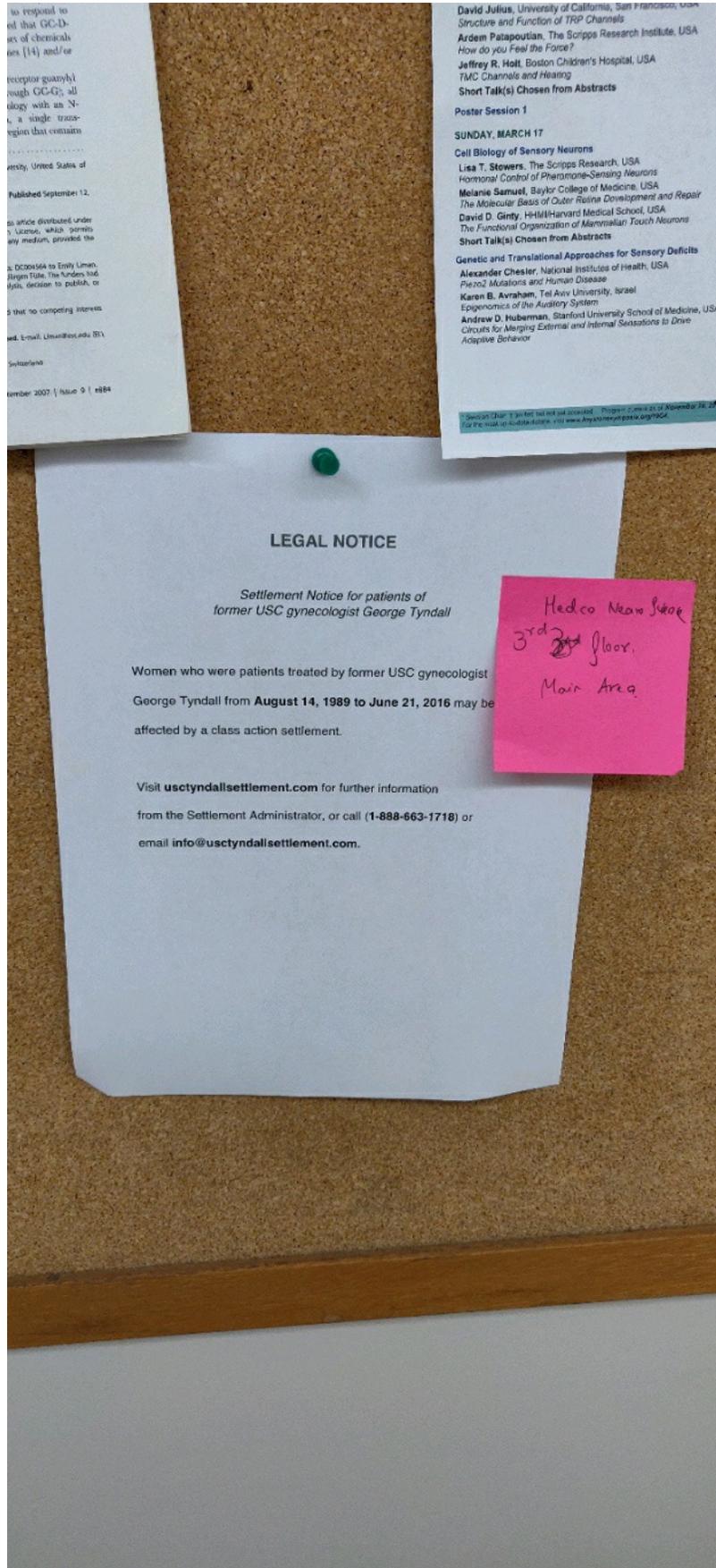
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email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

GFS  
1st Floor  
Lobby

**DORNSIFE**  
**HNS**



**DORNSIFE**

**JEF**

Fire Safety & Emergency Planning Office - CAL 120

## LEGAL NOTICE

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JEF 150  
Bulletin Board

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JEP

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JEP

Inside Building

**DORNSIFE**  
**KAP**

## LEGAL NOTICE

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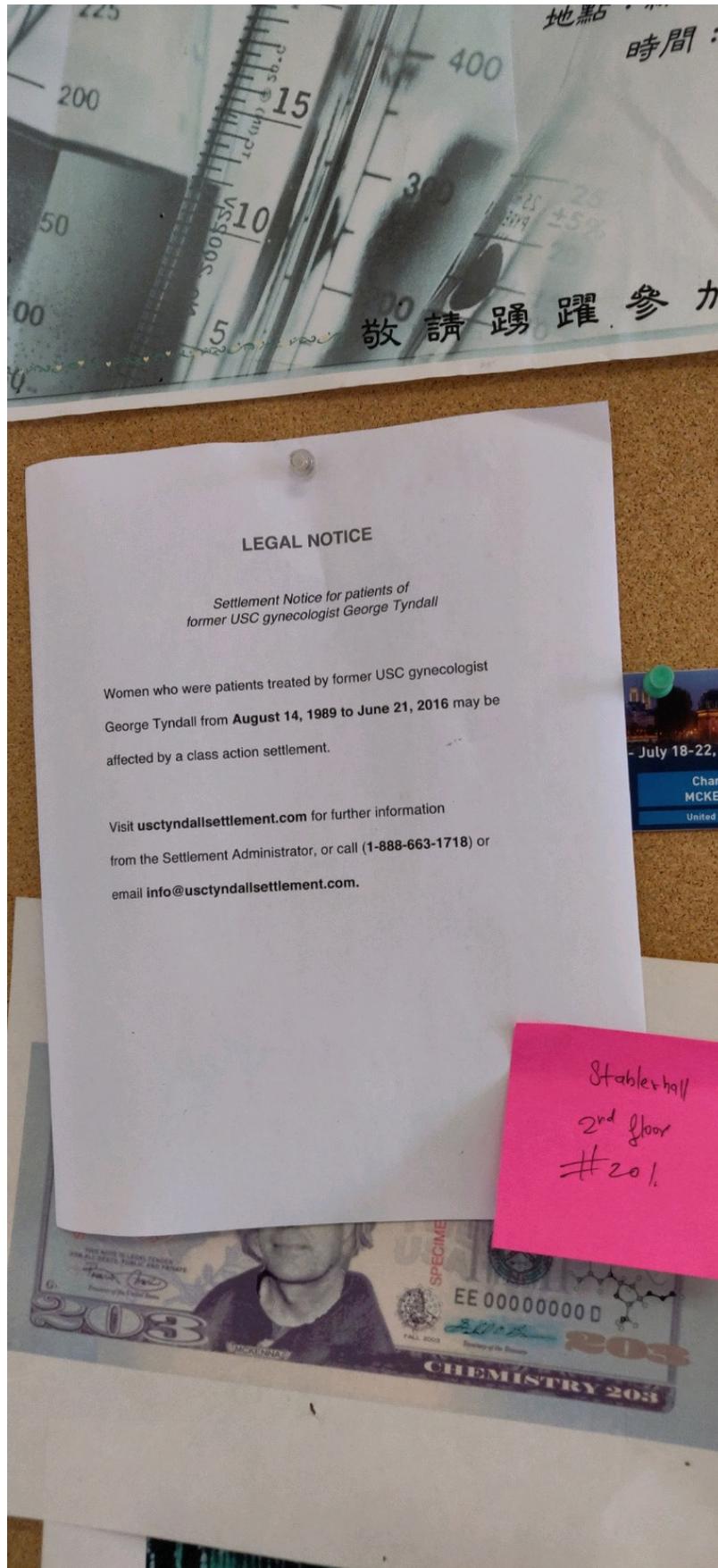
KAP FL 2

Bulletin ~~by~~

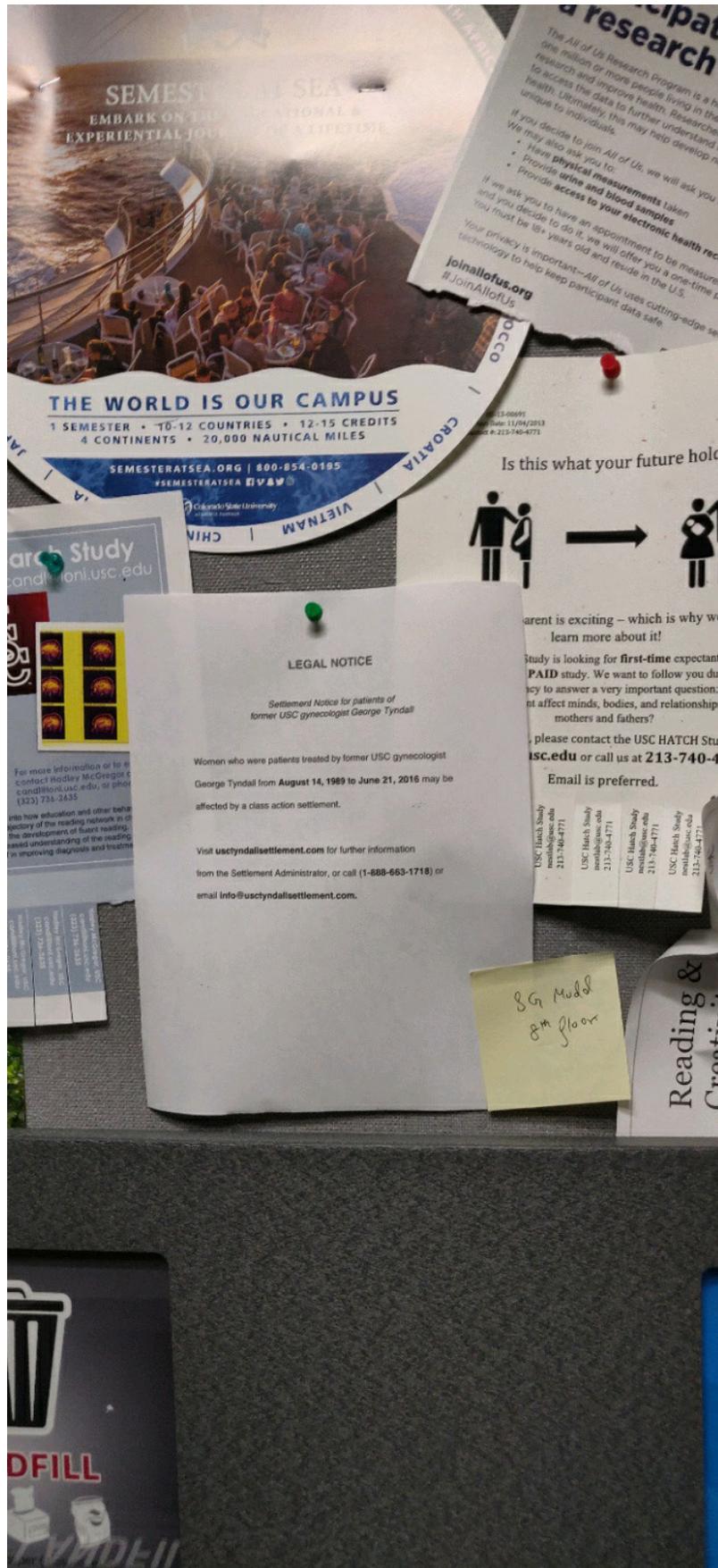
~~news release~~  
by 148

**DORNSIFE**

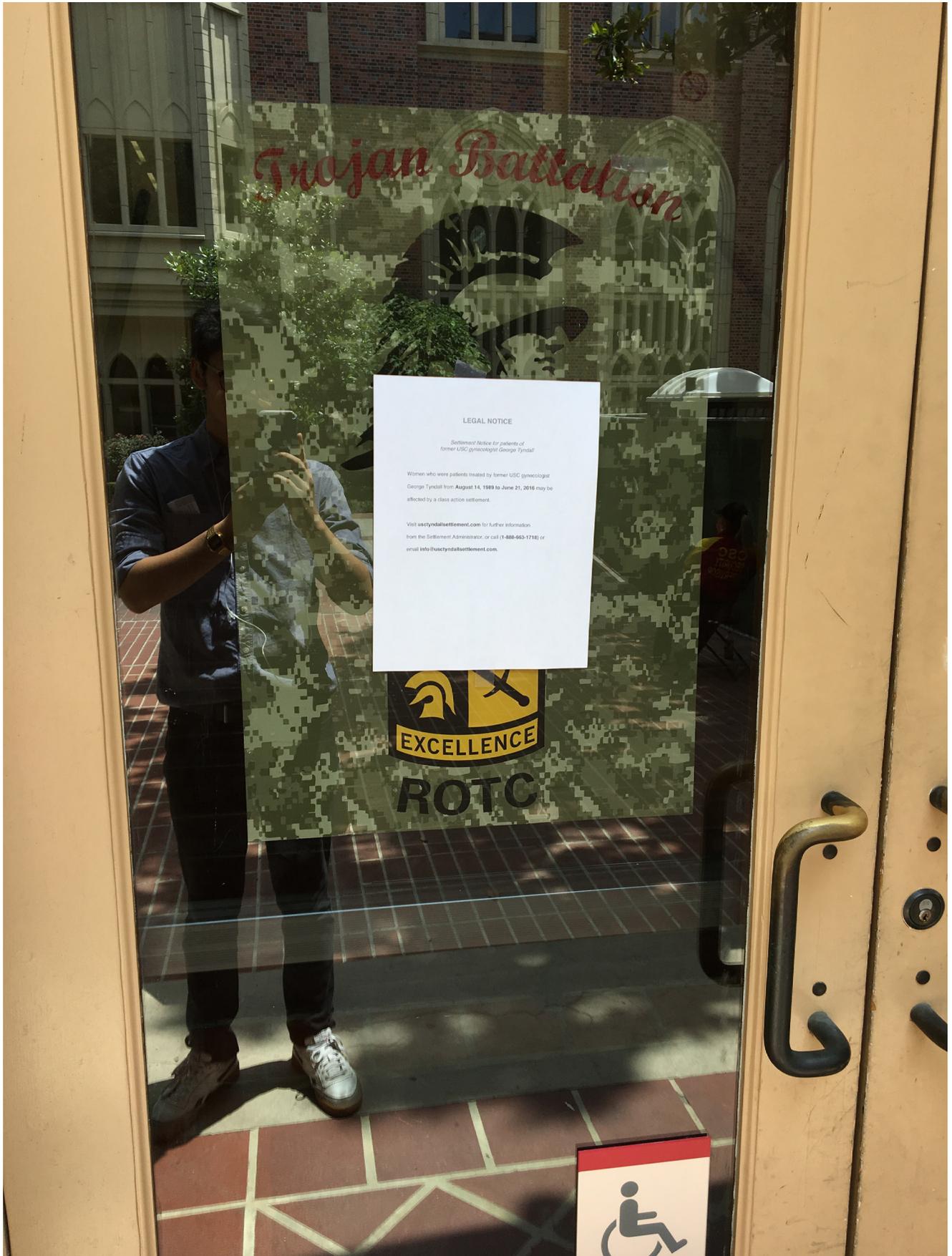
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**DORNSIFE**  
MHP



**DORNSIFE**  
PED



**DORNSIFE**

**RRI**

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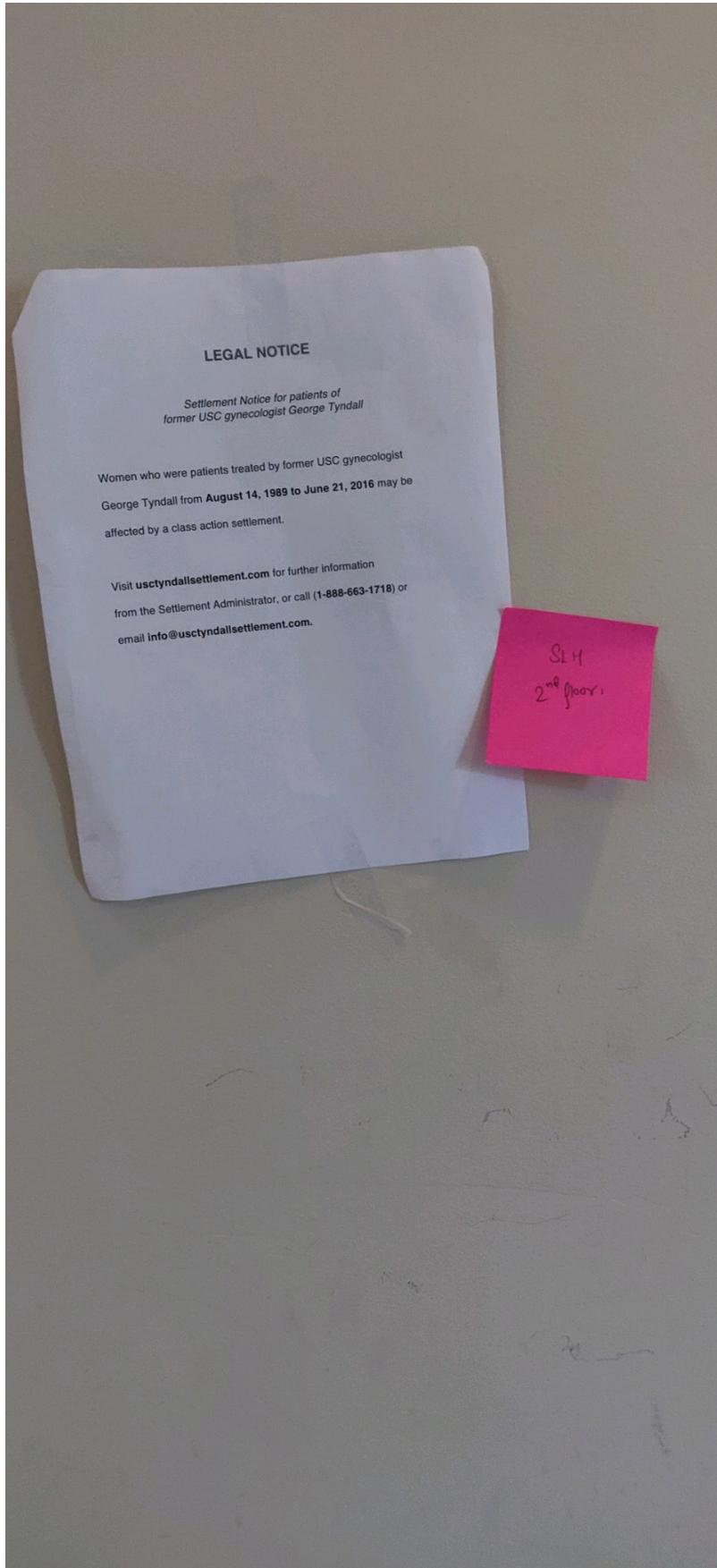
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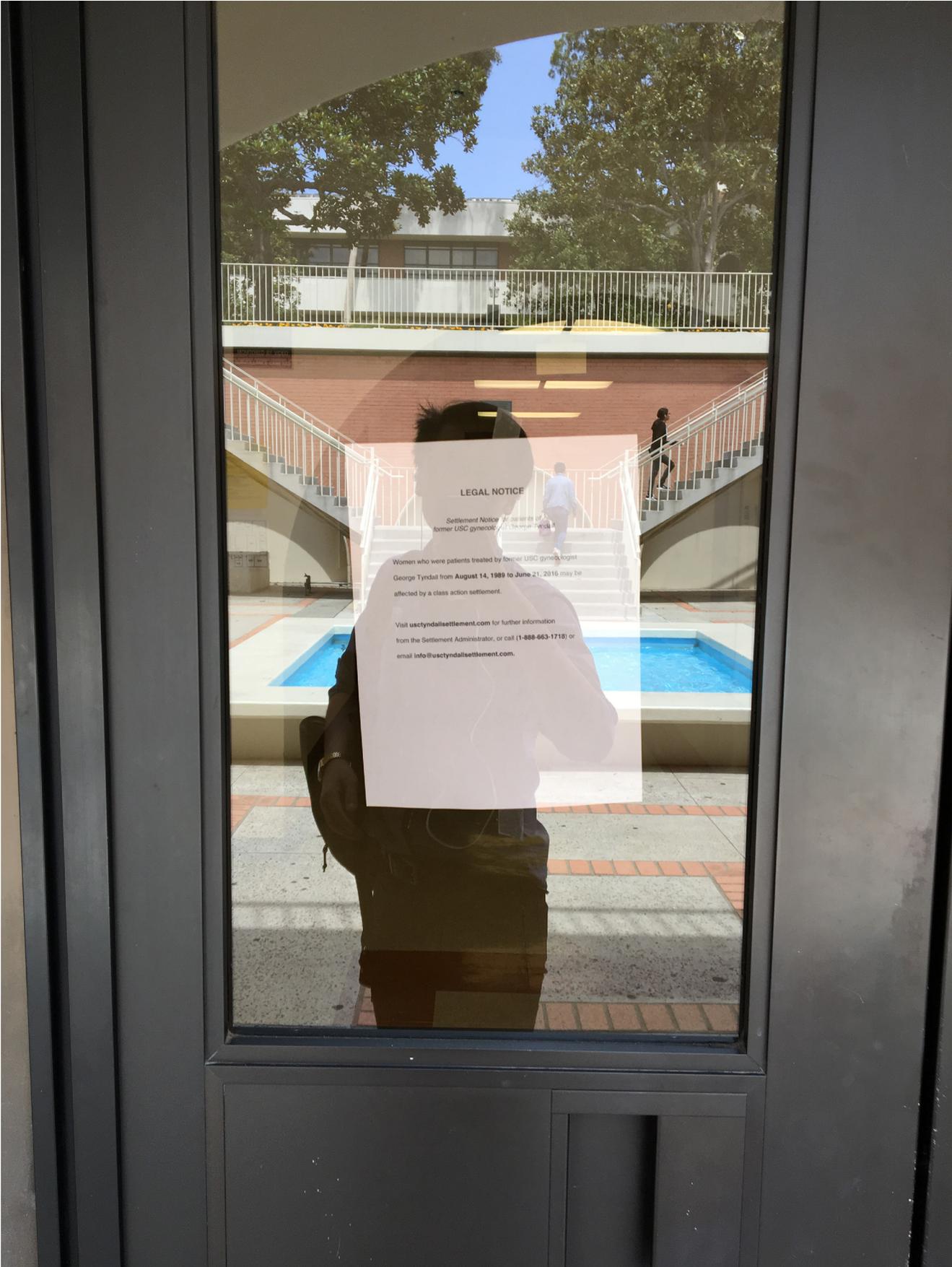
Irani FL 2  
Bulletin  
white board

**DORNSIFE**

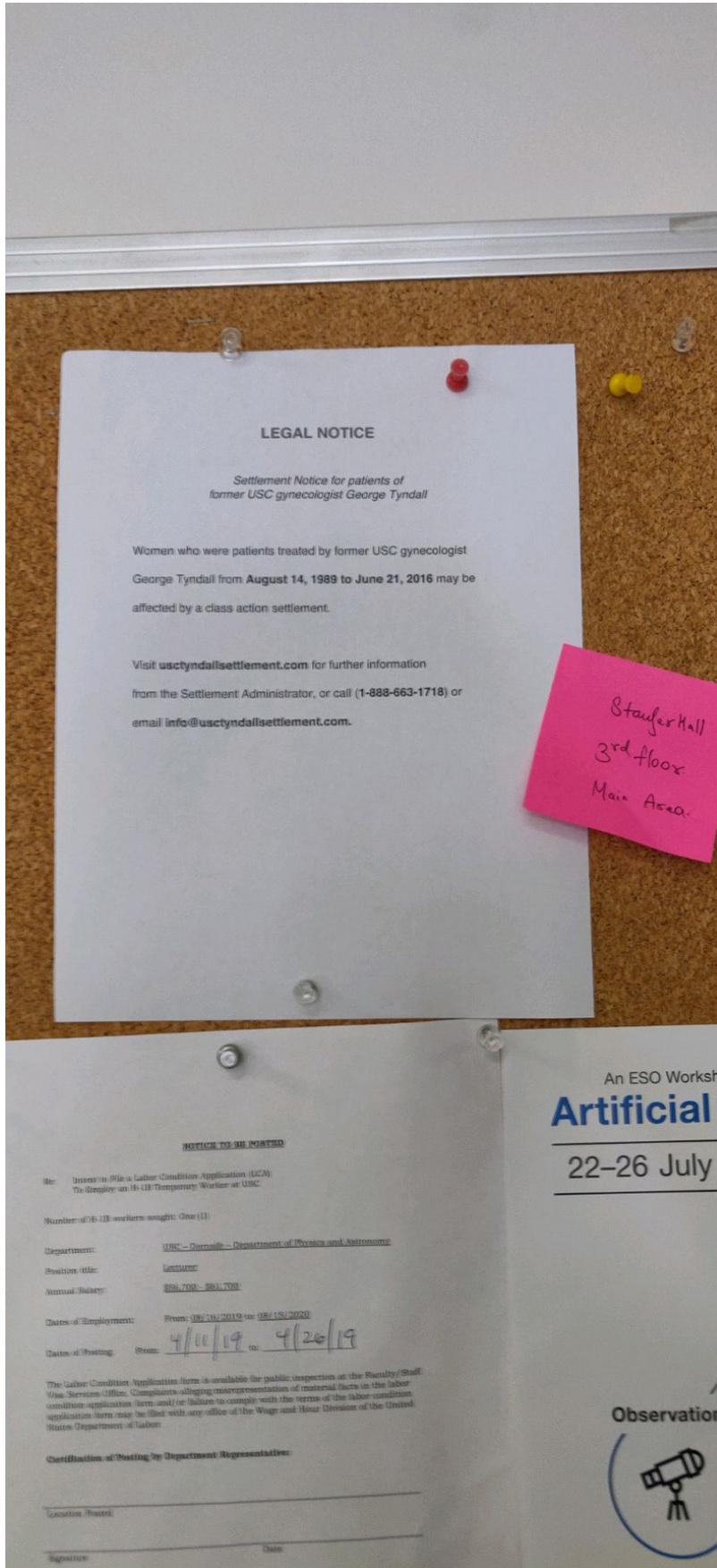
**SLH**



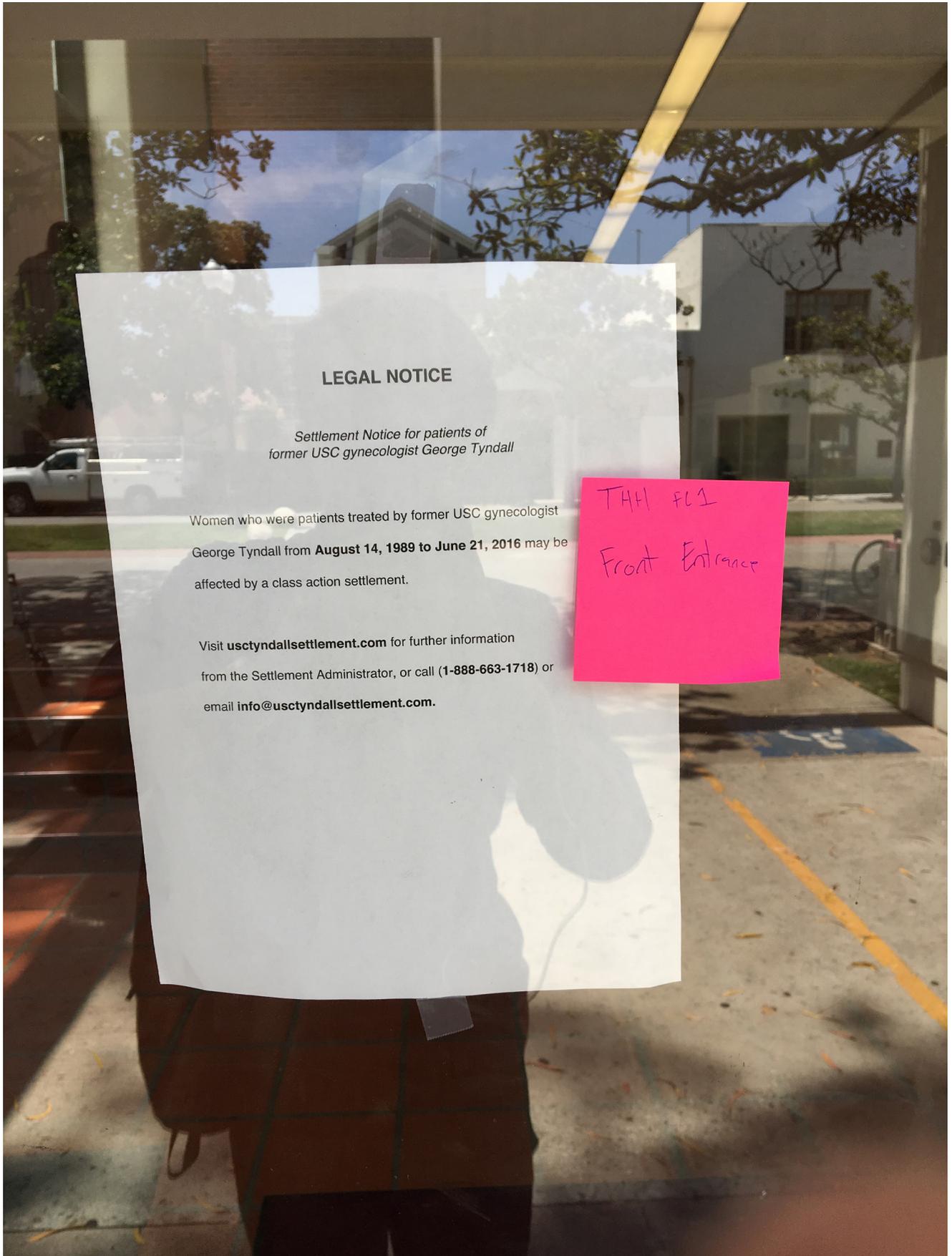
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SOS



**DORNSIFE**  
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**DORNSIFE**  
THH



**LEGAL NOTICE**

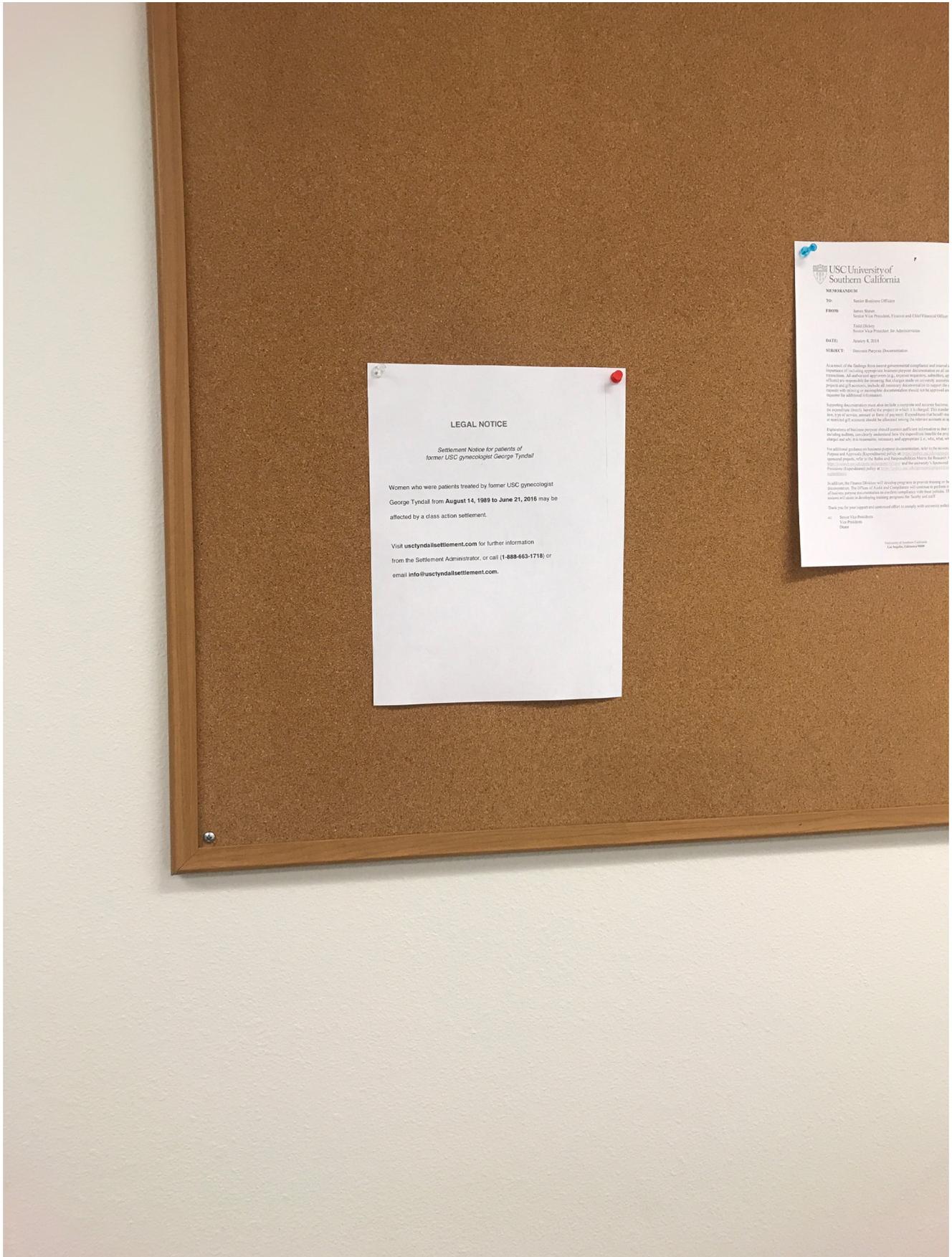
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THH FC1  
Front Entrance

**DORNSIFE**  
TRF



**LEGAL NOTICE**

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**USC University of Southern California**

**MEMORANDUM**

To: Senior Business Officers

FROM: James Rosen, Senior Vice President, Finance and Chief Financial Officer  
Todd Chikley, Senior Vice President for Administration

DATE: January 8, 2018

SUBJECT: Disaster Preparedness Documentation

As a result of the findings from recent governmental compliance and internal a review of our disaster preparedness documentation, we have identified several areas for improvement. Additional improvements (e.g., content updates, administrative updates) are being implemented and will be completed by the end of the year. The following are the key areas for improvement and the actions being taken to address them.

Improvement actions must also include a review of our disaster preparedness documentation to ensure that the content is current and accurate. The review will include a review of all disaster preparedness documentation, including all policies, procedures, and forms. The review will also include a review of all disaster preparedness training materials. The review will be completed by the end of the year.

Improvements of disaster preparedness documentation will include the following: updates to all disaster preparedness documentation, including all policies, procedures, and forms; updates to all disaster preparedness training materials; and updates to all disaster preparedness testing procedures. The review will be completed by the end of the year.

In addition, the Finance Office will develop a program to ensure ongoing compliance. The Office of Audit and Compliance will continue to perform its function to ensure compliance with these policies. It is important that all employees understand their responsibilities and comply with these policies. Thank you for your support and continued effort to comply with university policies.

cc: James Rosen, Senior Vice President  
Todd Chikley, Senior Vice President

University of Southern California  
Los Angeles, California 90089

# DORNSIFE

## URC

**LEGAL NOTICE**

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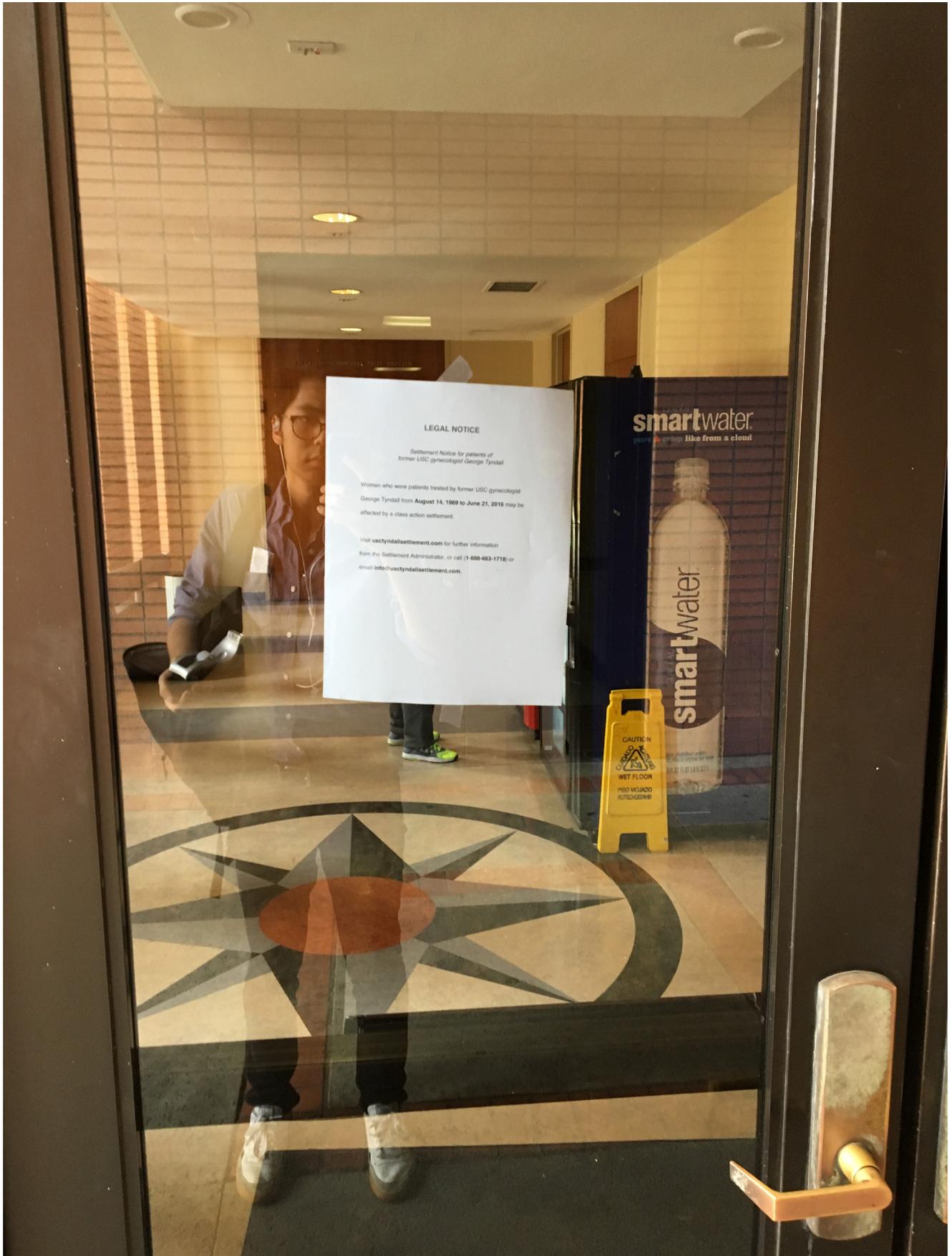
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Religious Center

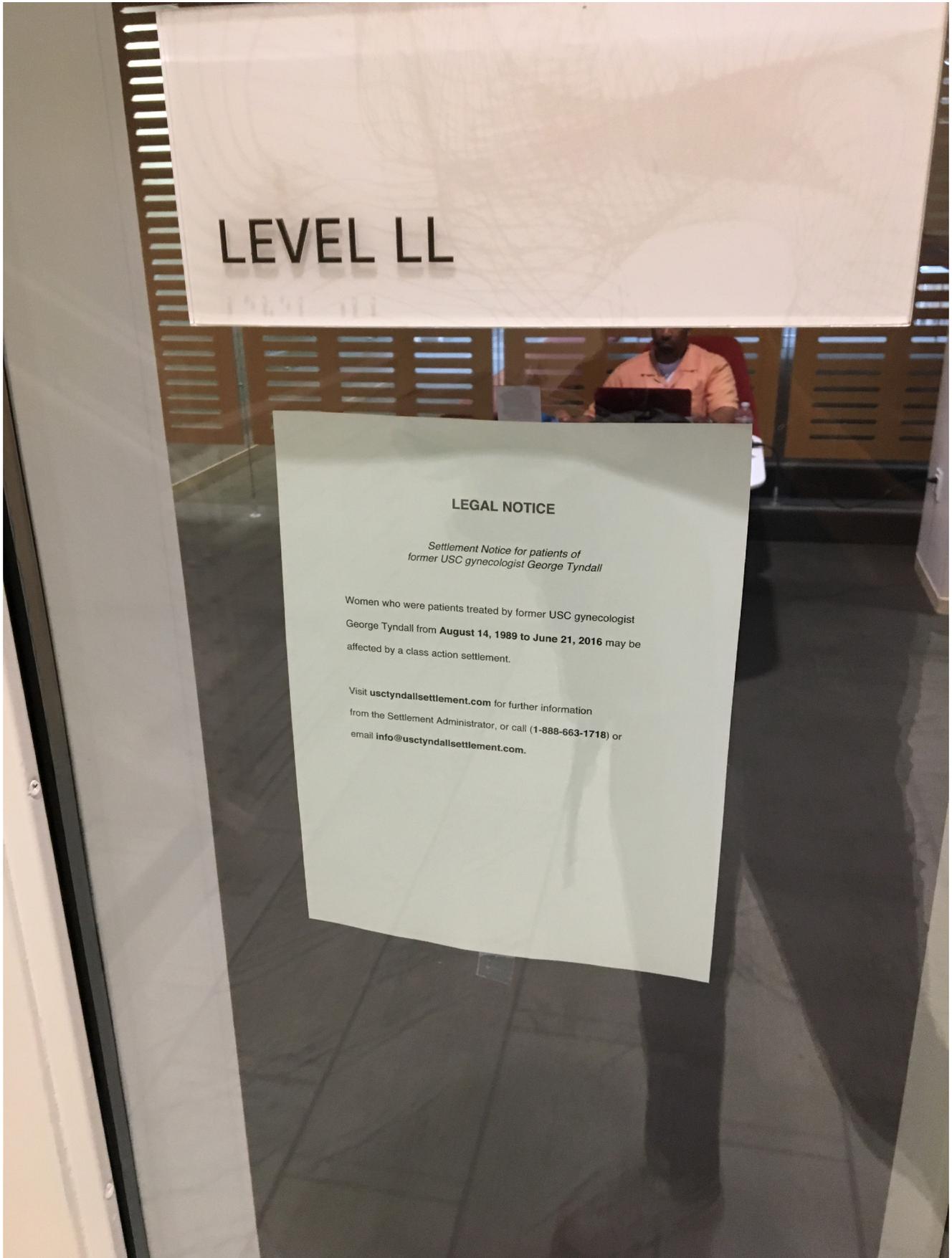
Bulletin Board

**DORNSIFE**  
VKC

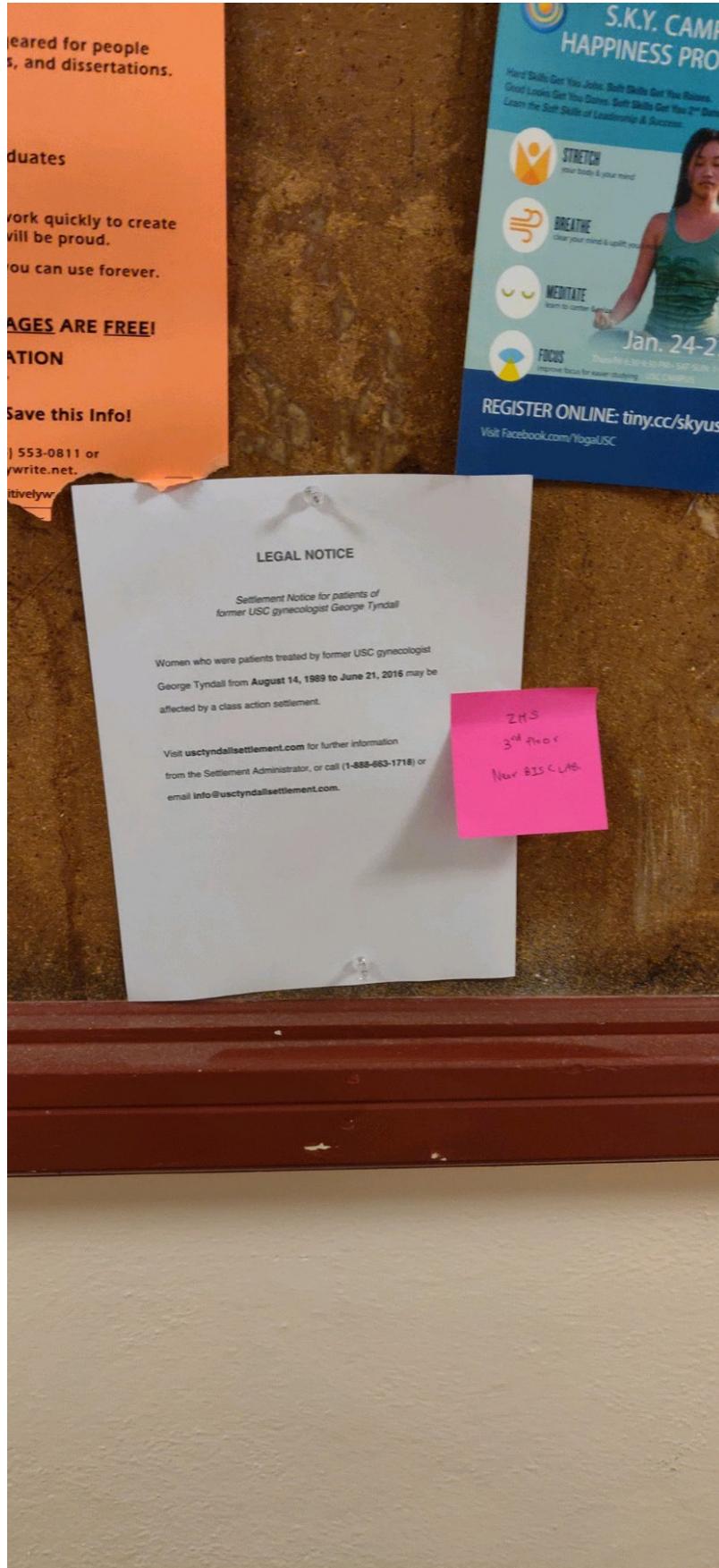


# DORNSIFE

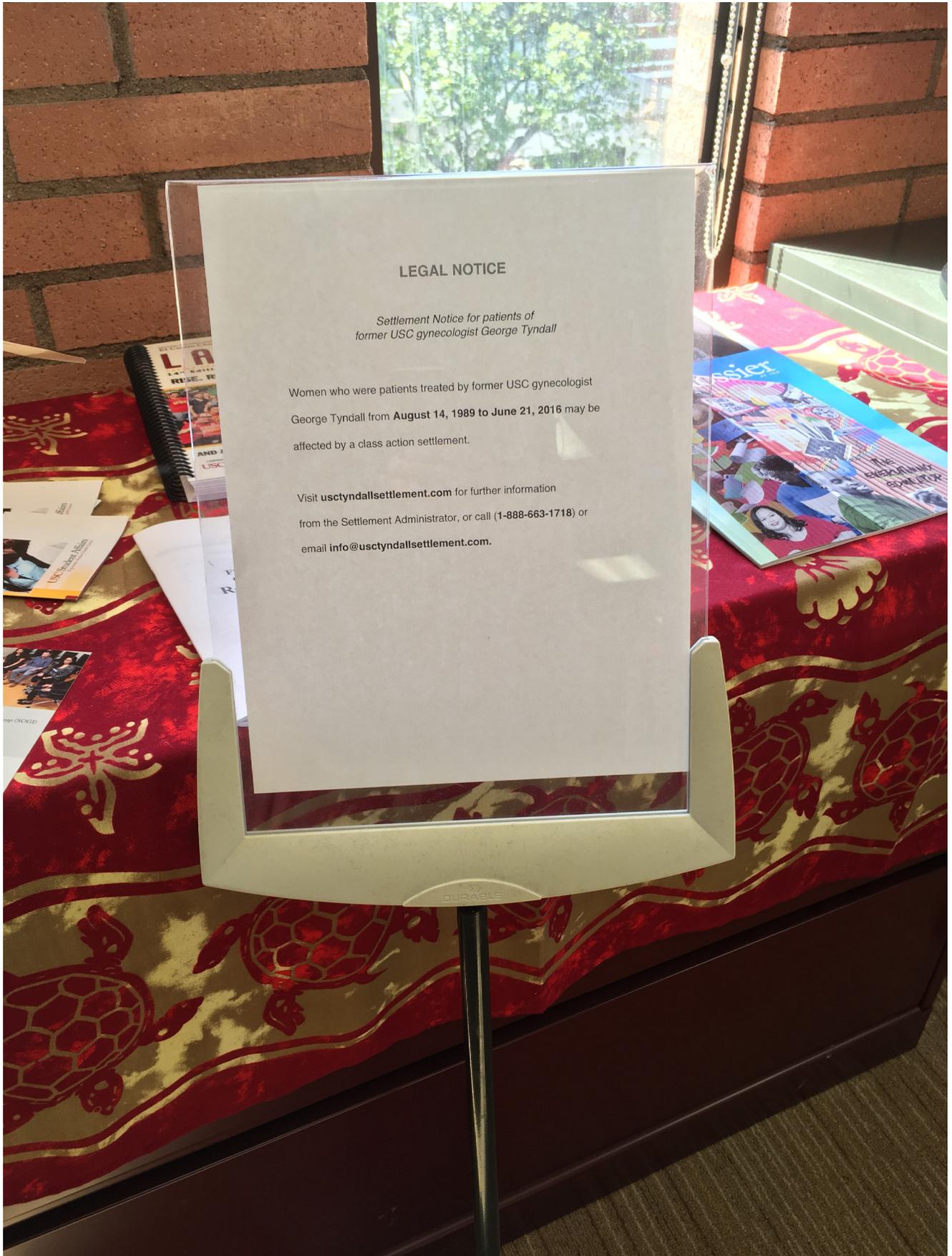
## VDP



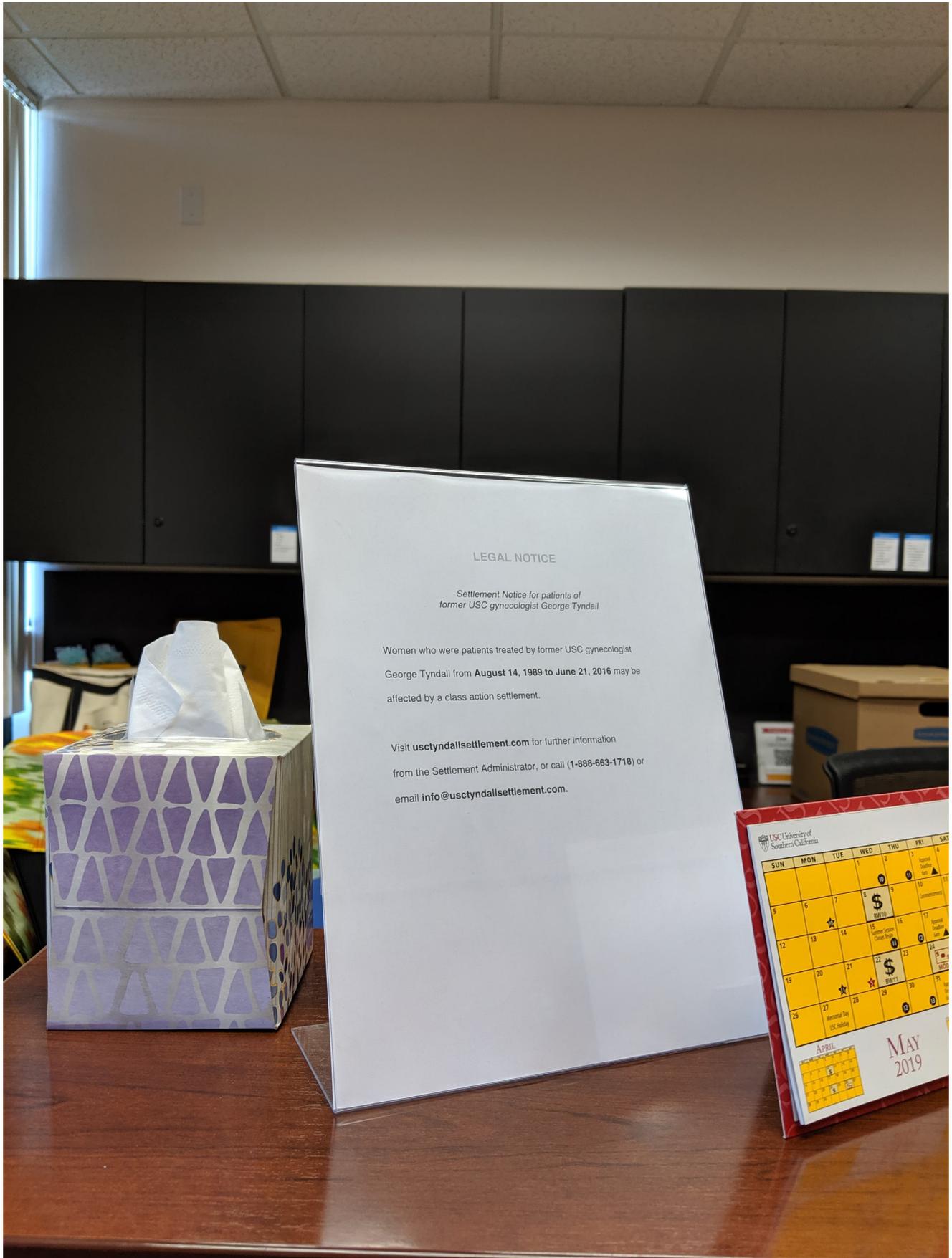
**DORNSIFE**  
ZHS



# EDUCATION



# ENGINEERING



LEGAL NOTICE

Settlement Notice for patients of  
former USC gynecologist George Tyndall

Women who were patients treated by former USC gynecologist  
George Tyndall from **August 14, 1989 to June 21, 2016** may be  
affected by a class action settlement.

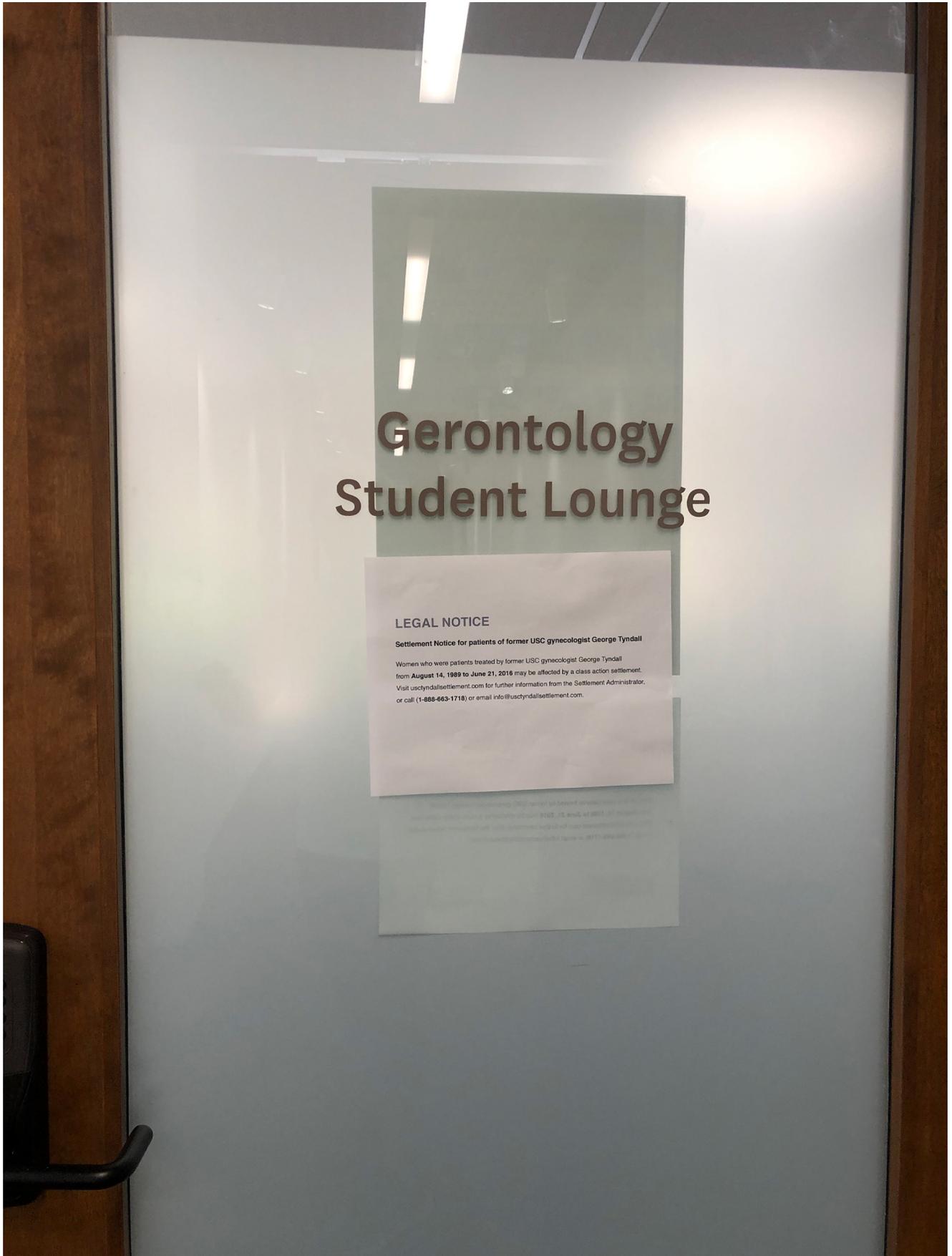
Visit [usctyndallsettlement.com](http://usctyndallsettlement.com) for further information  
from the Settlement Administrator, or call (1-888-663-1718) or  
email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

USC University of Southern California

SUN	MON	TUE	WED	THU	FRI	SAT
			1	2	3	4
			5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

APRIL MAY 2019

# GERONTOLOGY



**LAW  
OFFICES**

AT-A-GLANCE® MONTH: *July*

Sunday	Monday	Tuesday	Wednesday	Thursday
	1	2	3	4 <i>Independence Day</i>
7	8	9	10	11 <i>USC H</i>
	15 <i>SLE Orientation</i> <i>12pm Welcome Lunch</i> <i>T&amp;G</i>	16 <i>* Wellness Info Session</i> <i>12:15-1:20pm Rm3</i>	17 <i>LLM Prep WS</i> <i>Rm3 12:15-1:20pm</i>	18
	22 <i>* TitleXI Info Session</i> <i>12:15pm-1:20pm Rm3</i>	23 <i>Career &amp; Bar Info Session</i> <i>Rm3 12:15-1:20pm</i>	24 <i>LLM Prep WS</i> <i>Rm3 12:15-1:20</i>	25
	29	30 <i>* Lib. &amp; Computing</i> <i>3:30-4pm</i>	31 <i>LLM Prep WS</i> <i>Rm 12:15-1:20</i>	

**HOT** \* = Mandatory Info Session for SL

**LEGAL NOTICE**

Settlement Notice for patients of former USC gynecologist George Tyndal from August 14, 1989 to June 21, 2016 may be affected by a class action settlement.

Visit [uscynofda.settlement.com](http://uscynofda.settlement.com) for further information from the Settlement Administrator, or call (1-888-663-1718) or email [info@uscynofda.settlement.com](mailto:info@uscynofda.settlement.com).

**Motivational Quote for the Week:**

**21+ year-old USC students who drink alcohol wanted as participants for a research study**

screening includes phone interview and online questionnaires; study includes drinking during four occasions in the laboratory while wearing transdermal alcohol sensors and other devices

You will receive up to \$520 for participation in this research study

If you are a 21+ year-old USC student (graduate or undergraduate) who drinks alcohol,

contact Dr. Luczak's laboratory in the Department of Psychology for more information by emailing from your USC email account to [Luczaklab@usc.edu](mailto:Luczaklab@usc.edu)

*Success is not final, failure is not fatal: it is the courage to continue that counts.*

*-Winston Churchill*

**Be well. Do well.**

USC COLLEGE GRADUATE & INTERNATIONAL PROGRAMS

**ASK FOR HELP**

- Counseling and Mental Health Services: [studenthealth.usc.edu](http://studenthealth.usc.edu)
- Office of Health Promotion: [studenthealth.usc.edu/health-promotion](http://studenthealth.usc.edu/health-promotion)
- The Nurses at College: [theonestatcollege.com](http://theonestatcollege.com)
- USC Occupational Therapy - Liberate Realign Program: [liberate.usc.edu](http://liberate.usc.edu)
- USC Psychology Services Center: [psychology.usc.edu](http://psychology.usc.edu)
- The Trojan Food Pantry: [trojanfoodpantry.usc.edu](http://trojanfoodpantry.usc.edu)

**OUTDOOR ACTIVITIES**

- USC Recreation: [usc.usc.edu/recreation](http://usc.usc.edu/recreation)
- USC Urban Garden: [usc.usc.edu/urban-garden](http://usc.usc.edu/urban-garden)

**SPIRITUAL GUIDANCE**

Office of Religious Life: [usc.usc.edu/religious-life](http://usc.usc.edu/religious-life)

**MINDFULNESS**

Health USC: [health.usc.edu](http://health.usc.edu)

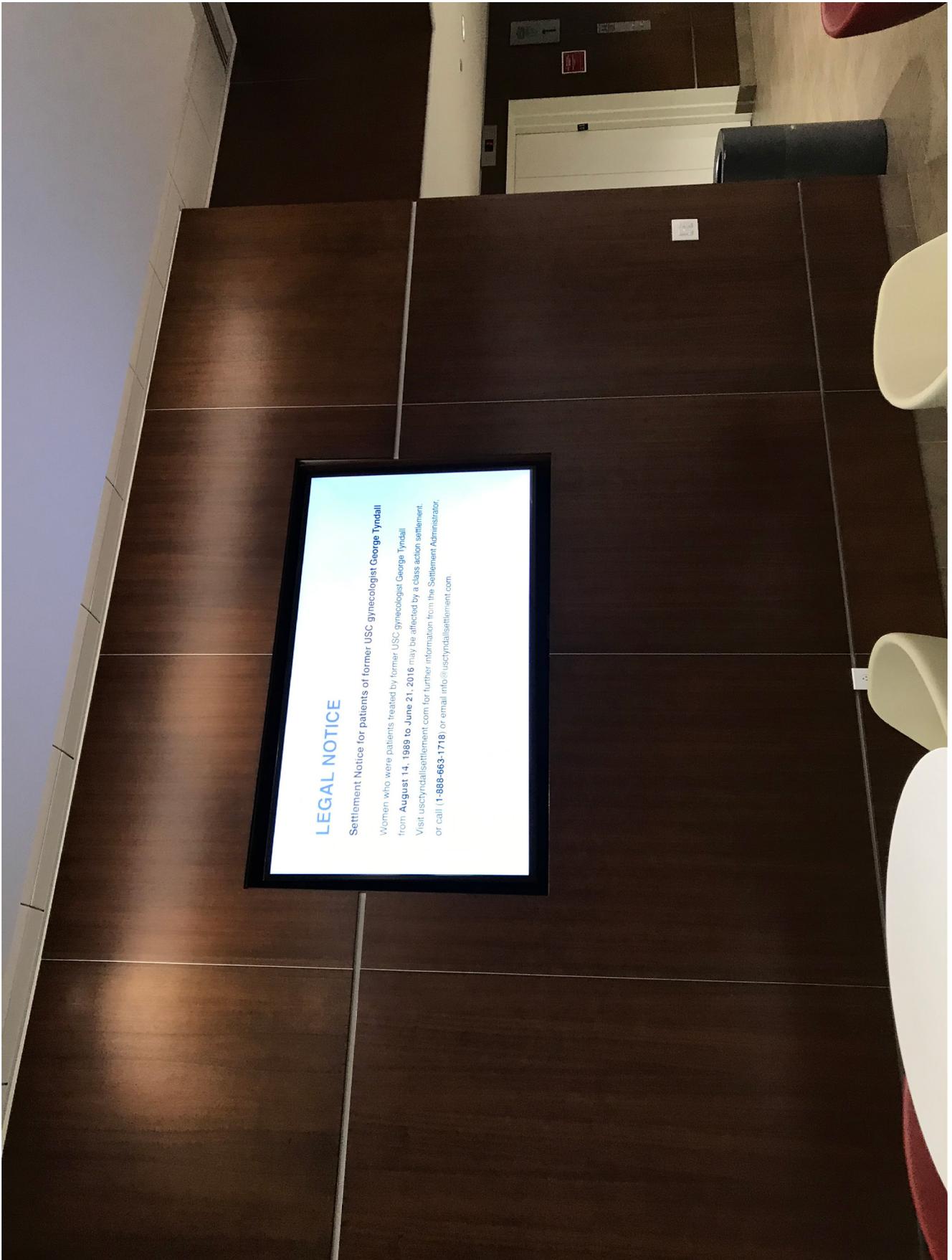
**LAW**  
**PUBLIC AREAS**



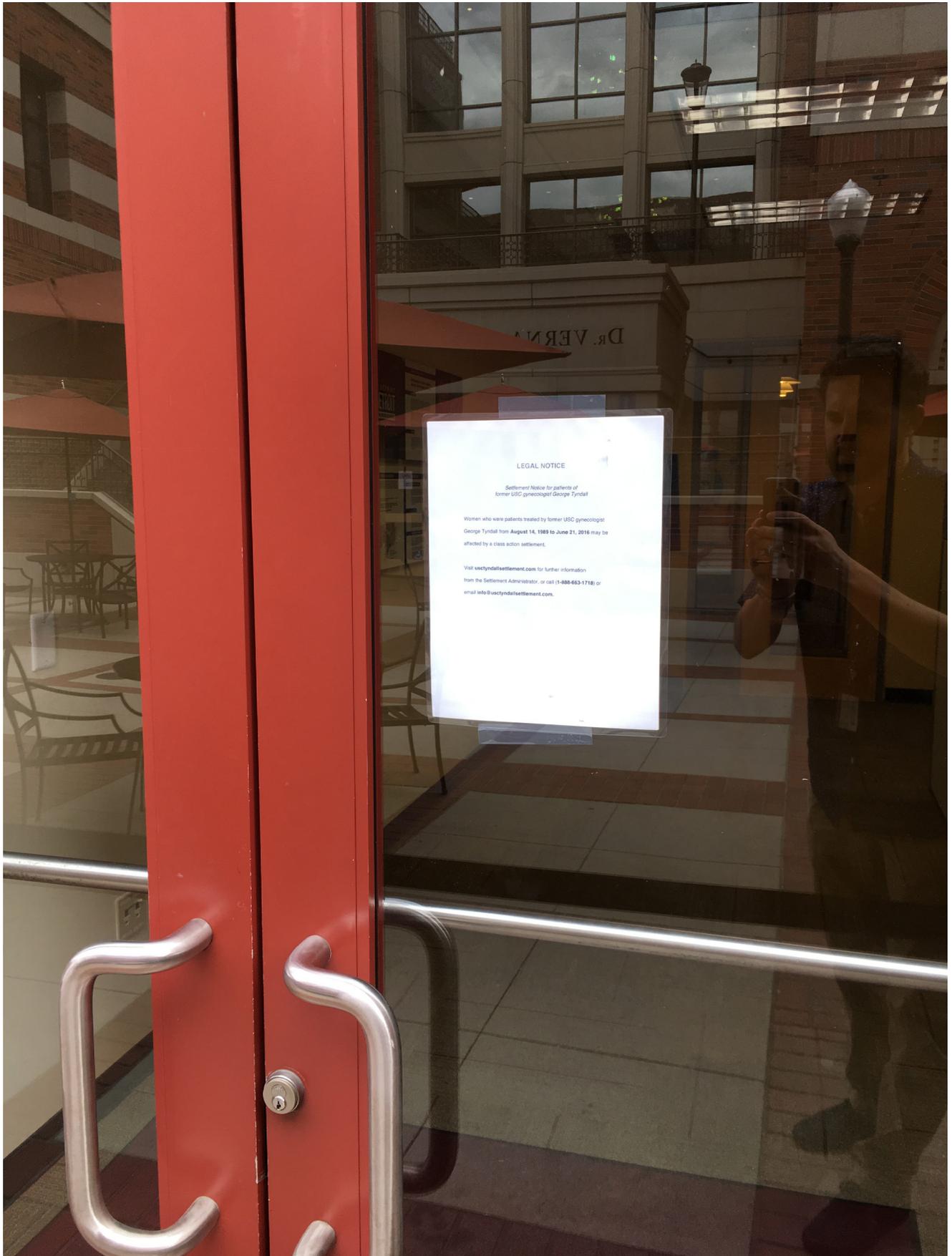
# MEDICINE



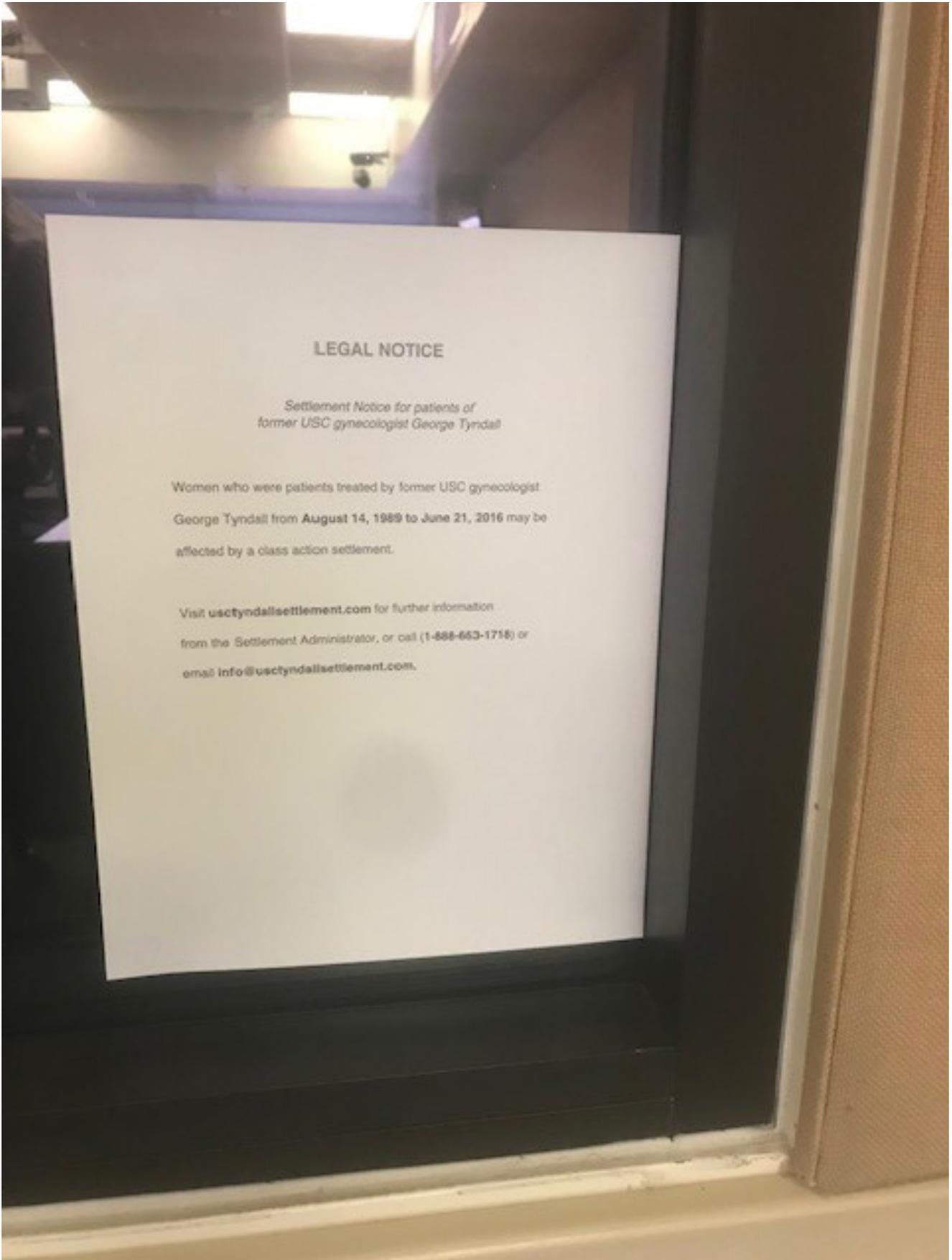
# PHARMACY



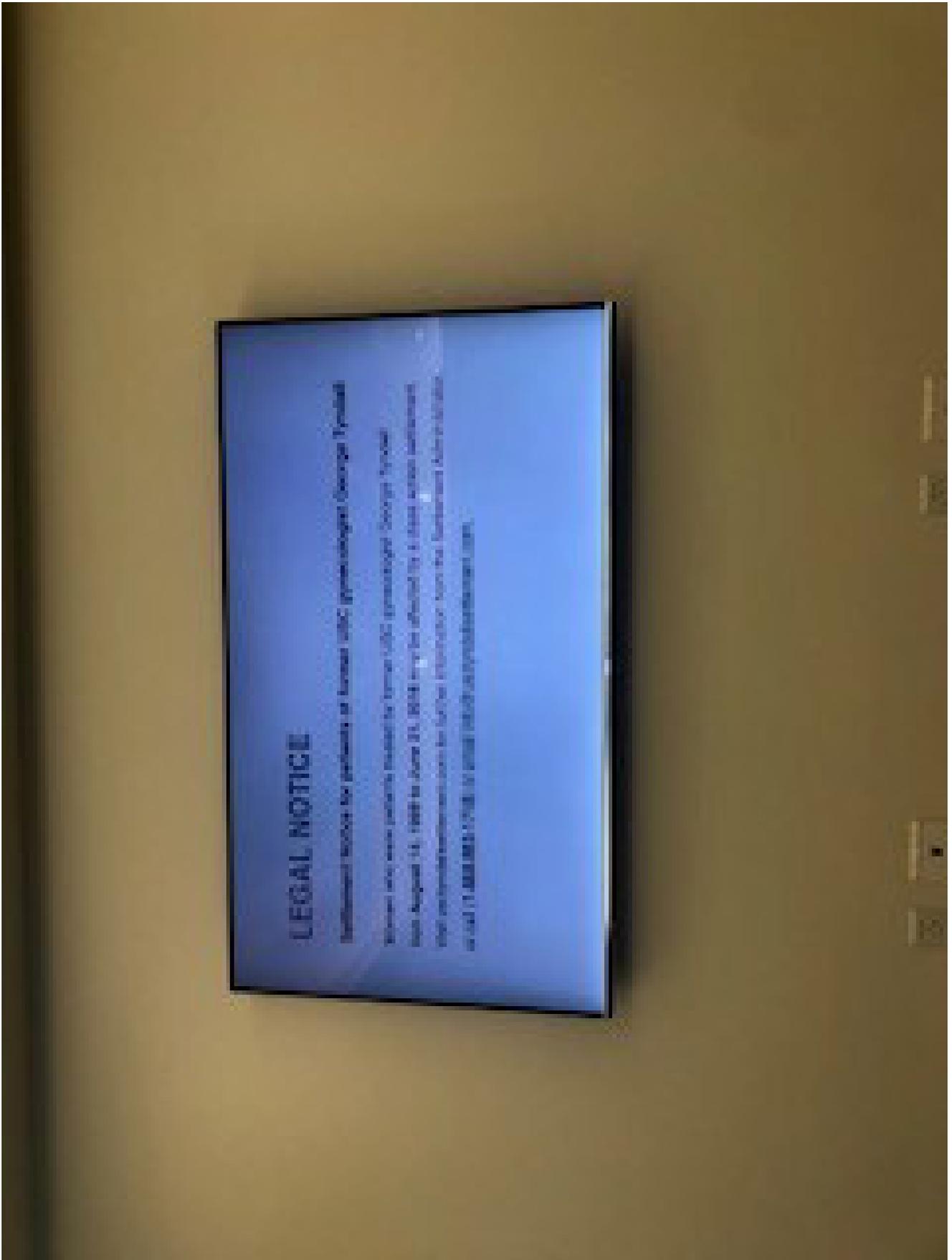
# PUBLIC POLICY



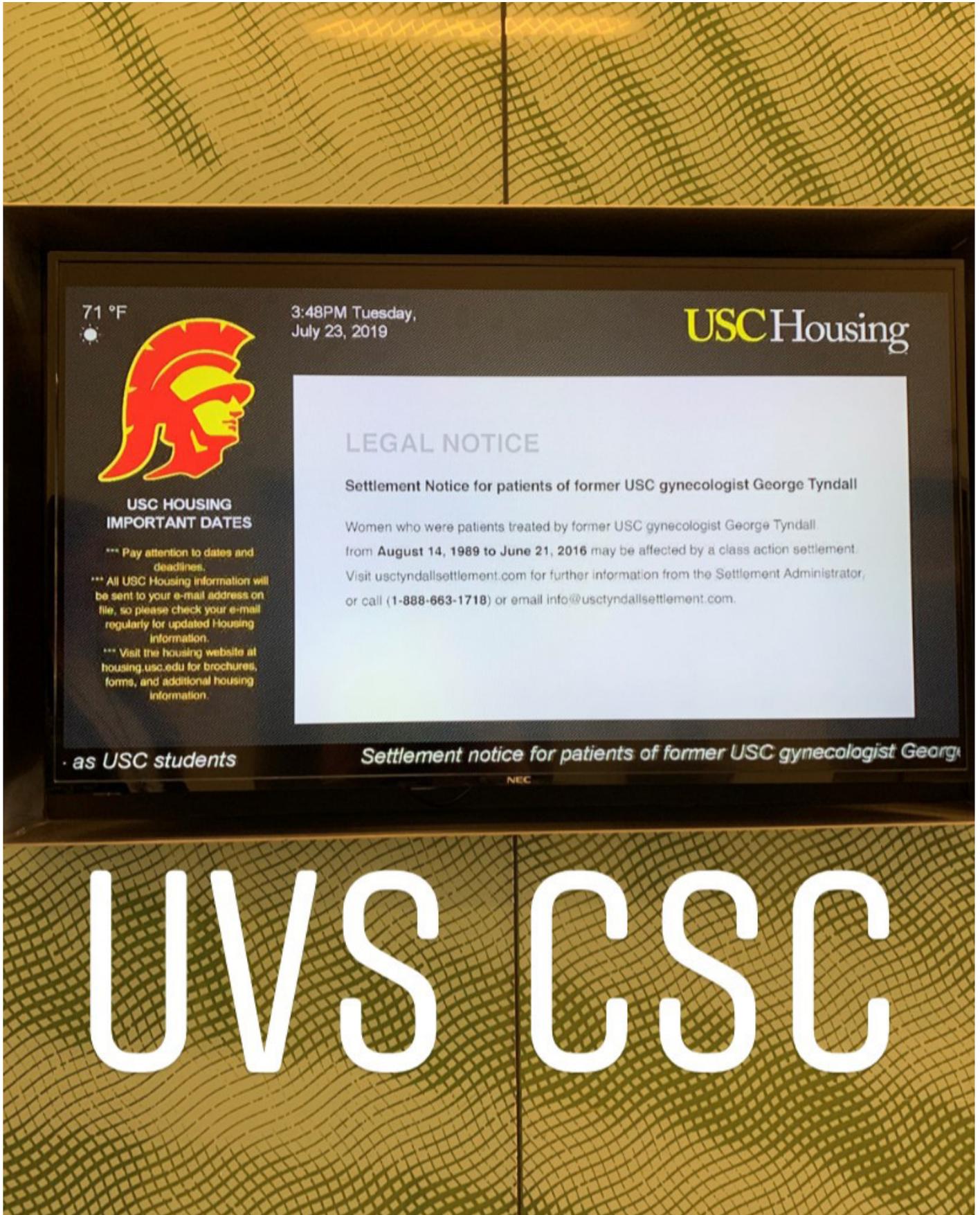
# SOCIAL WORK



**TV SCREEN  
TYNDALL PHOTOS  
HOSPITALITY**



**TV SCREEN  
TYNDALL PHOTOS  
HOUSING**



71 °F



**USC HOUSING  
IMPORTANT DATES**

- \*\*\* Pay attention to dates and deadlines.
- \*\*\* All USC Housing information will be sent to your e-mail address on file, so please check your e-mail regularly for updated Housing information.
- \*\*\* Visit the housing website at [housing.usc.edu](http://housing.usc.edu) for brochures, forms, and additional housing information.

3:48PM Tuesday,  
July 23, 2019

**USC**Housing

**LEGAL NOTICE**

**Settlement Notice for patients of former USC gynecologist George Tyndall**

Women who were patients treated by former USC gynecologist George Tyndall from **August 14, 1989 to June 21, 2016** may be affected by a class action settlement. Visit [usctyndallsettlement.com](http://usctyndallsettlement.com) for further information from the Settlement Administrator, or call **(1-888-663-1718)** or email [info@usctyndallsettlement.com](mailto:info@usctyndallsettlement.com).

as USC students

Settlement notice for patients of former USC gynecologist George Tyndall

NEC

UWS CSC

# **EXHIBIT M**

# Women who were seen for treatment by Dr. George M. Tyndall at the University of Southern California Student Health Center, you may be eligible for benefits from a class action settlement

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NEWS PROVIDED BY  
**JND Legal Administration** →  
Jul 12, 2019, 09:12 ET

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SEATTLE, July 12, 2019 /PRNewswire/ -- JND Legal Administration

A Settlement has been reached in a class action lawsuit, *In re USC Student Health Center Litigation (No. 2:18-cv-04258-SVW)*, involving Dr. George M. Tyndall, a gynecologist at the University of Southern California ("USC") Student Health Center from August 14, 1989 to June 21, 2016. Current and former USC female students sued alleging that Dr. Tyndall assaulted, abused, sexually harassed, committed medical malpractice related to a Woman's Health Issue, or otherwise acted inappropriately towards female patients while he was a gynecologist at the USC Student Health Center, and that USC and its Board of Trustees failed to respond appropriately to Dr. Tyndall's conduct. Dr. Tyndall and USC each deny the allegations against them but the Parties have agreed to the Settlement to avoid the costs and risks of a lengthy trial and appeals process. This proposed Settlement not only brings meaningful relief to this class of USC graduates and students but stands as a testament both to the strength of these women, coming forward to tell their truth, and to the ability of class actions to create real positive impact for those who have suffered.

Case 2:18-cv-04258-SJW-SJS Document 168-4 Filed 12/23/19 Page 84 of 112 Page ID #:5553

The Settlement will provide a \$25,000,000 Settlement Fund to pay claims to women who were seen for treatment by Dr. Tyndall at the USC Student Health Center during the period from August 14, 1989 to June 21, 2016 (a) for Women's Health Issues, or (b) whose treatment by Dr. George M. Tyndall included an examination by him of her breast or genital areas, or (c) whose treatment included the taking of photographs or videotapes of her unclothed or partially clothed body. "Women's Health Issues" includes, but is not limited to, any issue relating to breast, vaginal, urinary tract, bowel, gynecological, or sexual health, including contraception and fertility. A list of Women's Health Issues is available at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). Confirmed Settlement Class Members will receive a check for \$2,500 ("Tier 1 Claim Award"), subject to *Pro Rata* Increase. Settlement Class Members also have the option to submit a Claim Form describing the experience, impact, and/or damages suffered. If a Claim Form is determined eligible under the terms of the Settlement, the Settlement Class Member could receive an additional Claim Award of \$7,500 up to \$20,000 ("Tier 2 Claim Award"), or provide an interview along with a Claim Form and be eligible for a Claim Award of \$7,500 up to \$250,000 ("Tier 3 Claim Award"). Tier 2 and Tier 3 Claim Awards are subject to *Pro Rata* Adjustment. Additional information including a Statement of Settlement Class Membership Form and Claim Form are available at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). The deadline to submit a Statement of Settlement Class Membership Form and/or Claim Form is **November 8, 2019**.

Class Members also have other options. If former patients do not want to be legally bound by the Settlement, they must exclude themselves by **November 7, 2019**. If a former patient excludes herself, she cannot receive benefits from the Settlement Class. If a former patient does not request exclusion, she may object to the Settlement by **October 9, 2019**. The detailed Settlement Notice is available at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com) and explains how Class Members may request exclusion or object. The Court will hold a Fairness Hearing on **January 6, 2020** at 1:30 p.m. (Pacific) to decide whether to approve the Settlement. Class Members may ask to appear or speak at the hearing at their own expense, but are not required to do so. Additional information is available at [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com).

To learn more about the Settlement, and review related Court documents, visit [www.USCTyndallSettlement.com](http://www.USCTyndallSettlement.com). You may also contact the Settlement Administrator by email at [info@USCTyndallSettlement.com](mailto:info@USCTyndallSettlement.com), by phone toll-free at 1-888-663-1718 (USA and Canada), +1-

Case 2:18-cv-04258-SW-G-16 Document 163-4 Filed 10/03/19 Page 85 of 113 Page ID #:5554  
800-953-0227 (Mexico), 800-666-6400 (International), 1-800-074-2826 (China Mobile South), 1-800-0714-2807 (China Mobile North), or by mail at USC Student Health Center Settlement, P.O. Box 91233, Seattle, WA 98111-9333.

SOURCE JND Legal Administration

**EXHIBIT N**

# USC Student Health Center Monitoring Report

Dec 8, 2018 - Nov 5, 2019

USC Student Health Center Case

## Summary

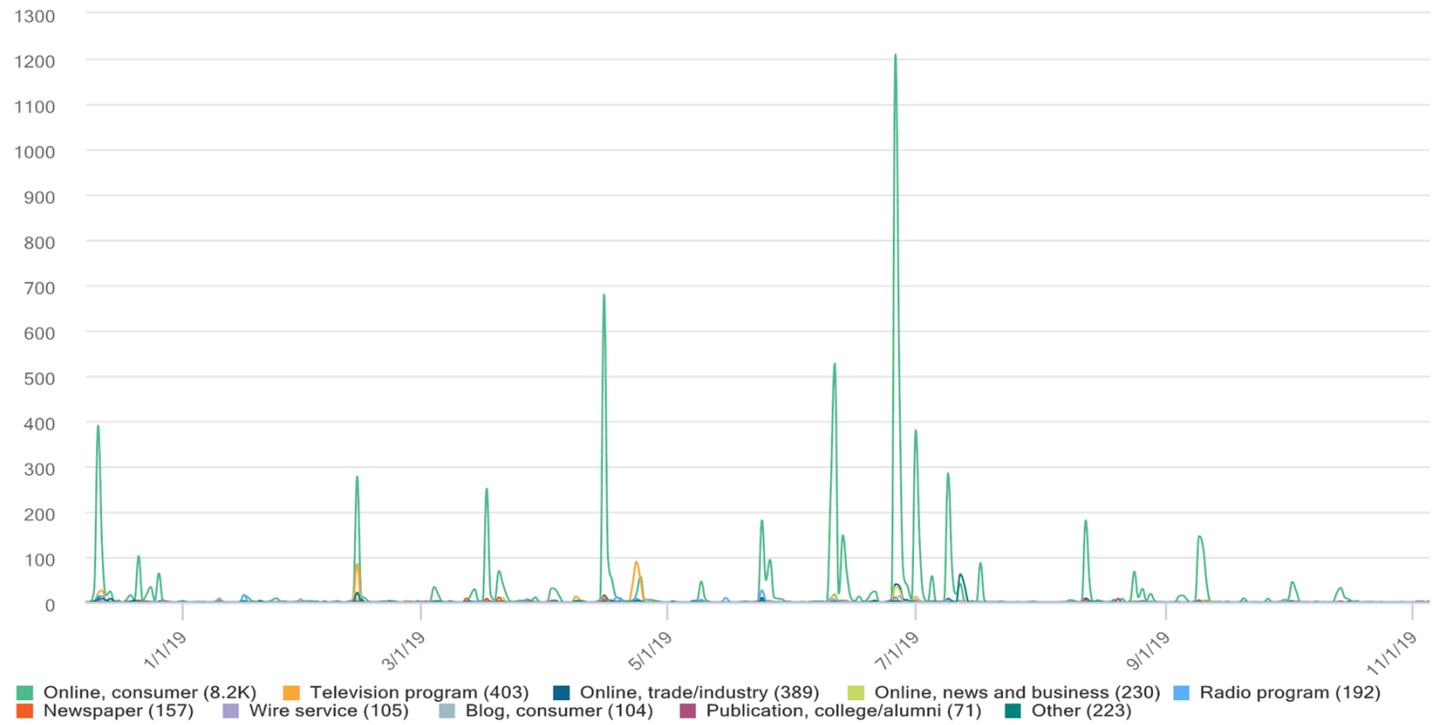
Total Mentions: 10.1K

Total Reach: 20.1B

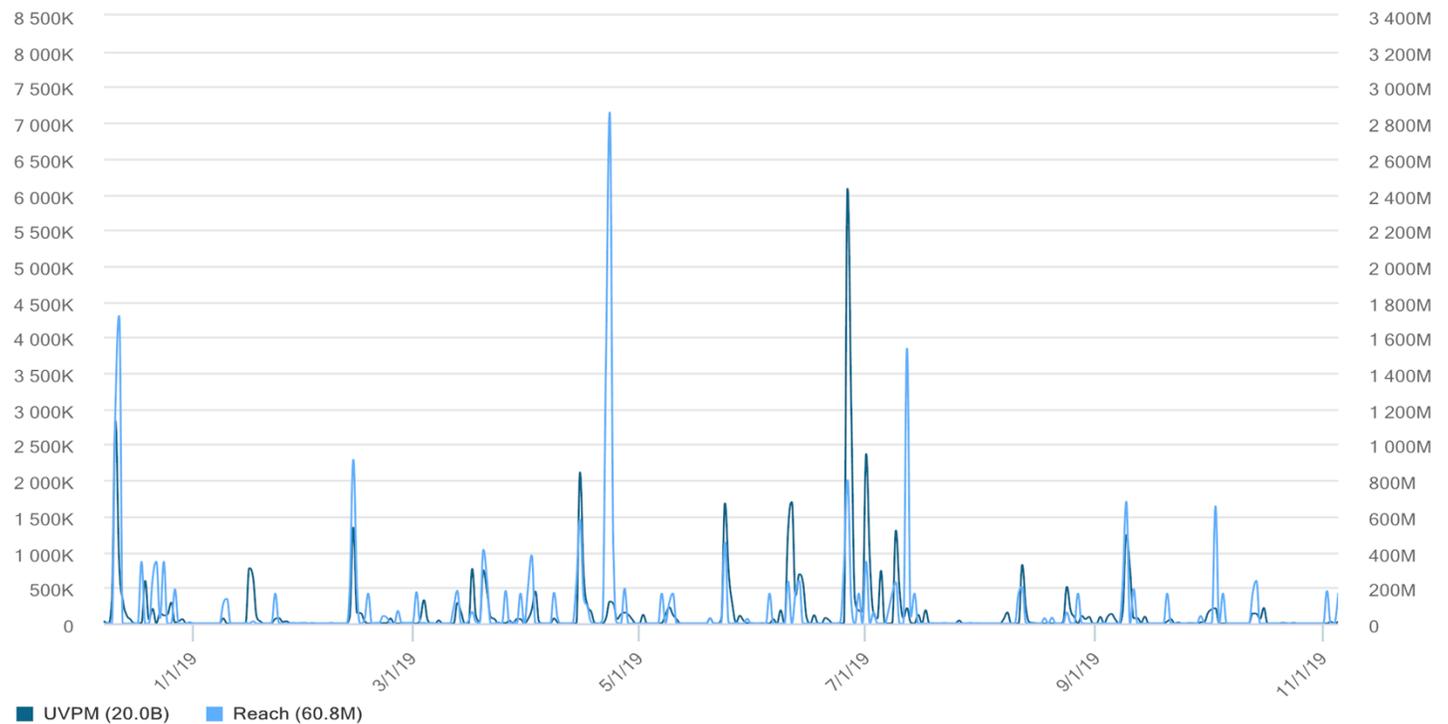
Total Publicity Value: \$21.2M

# Mentions

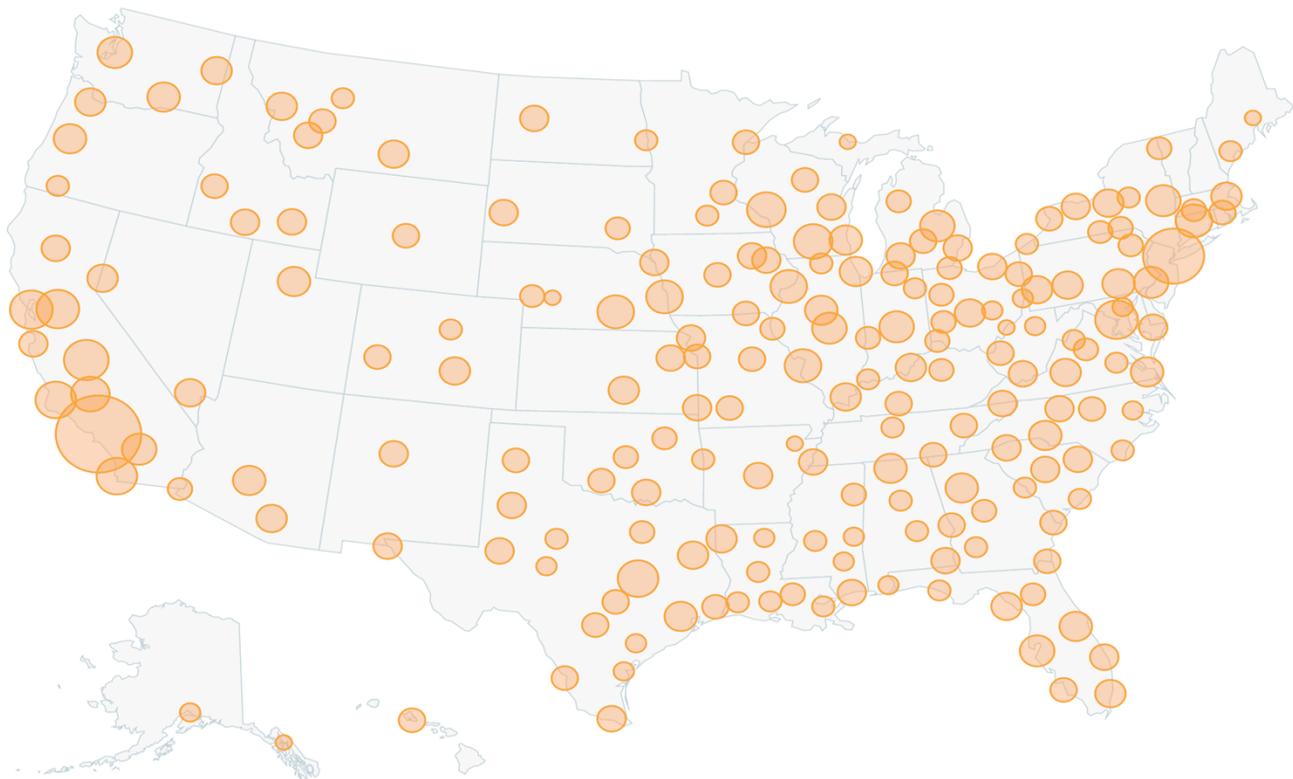
Trend of Coverage by Media Type



Reach

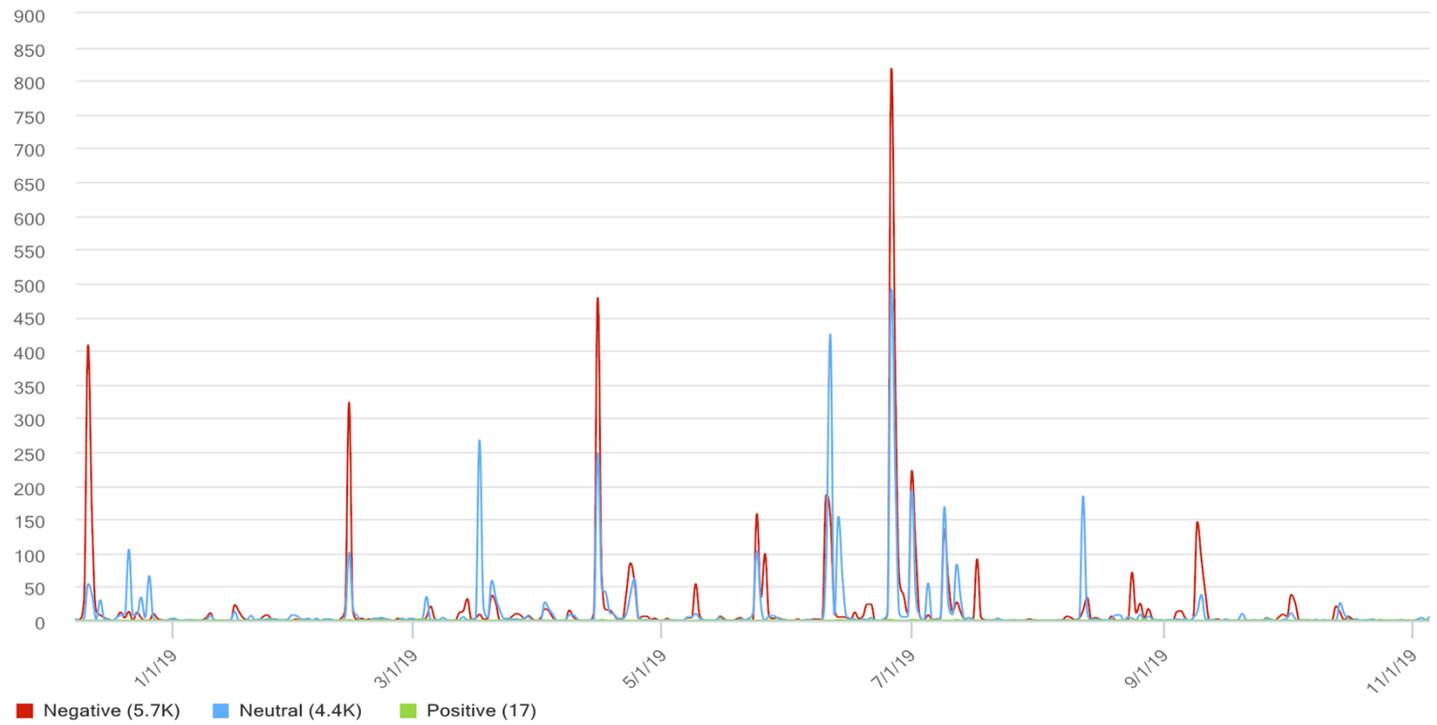


Mentions by DMA

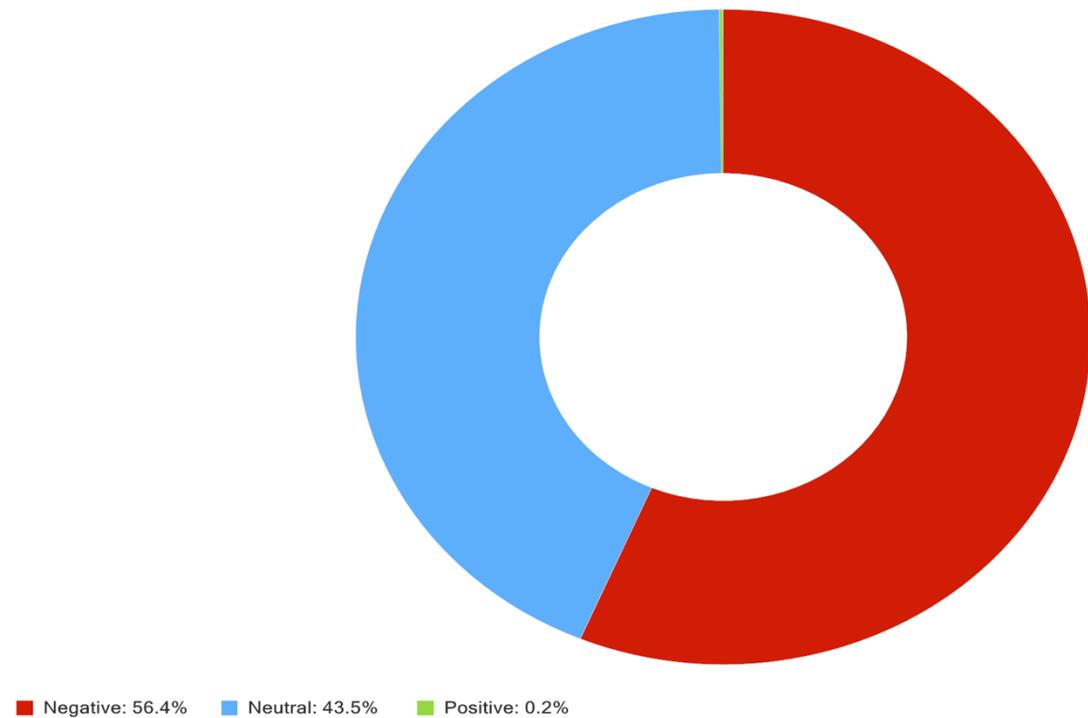


# Sentiment

Sentiment Over Time

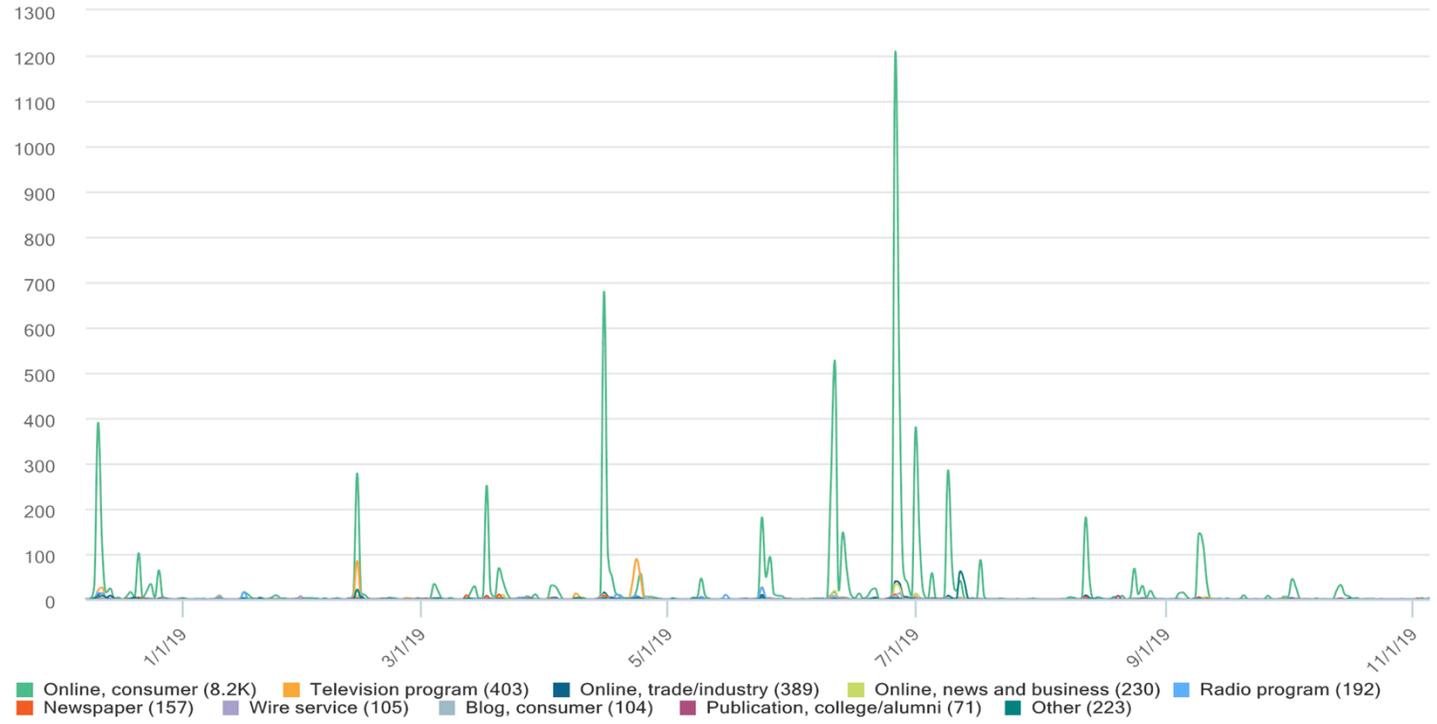


Share of Sentiment

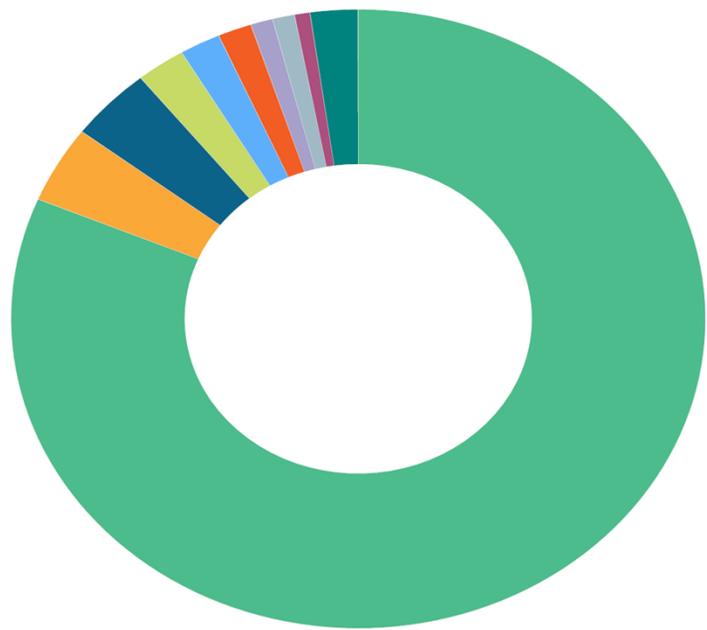


# Coverage by Media Type

Trend of Coverage by Media Type

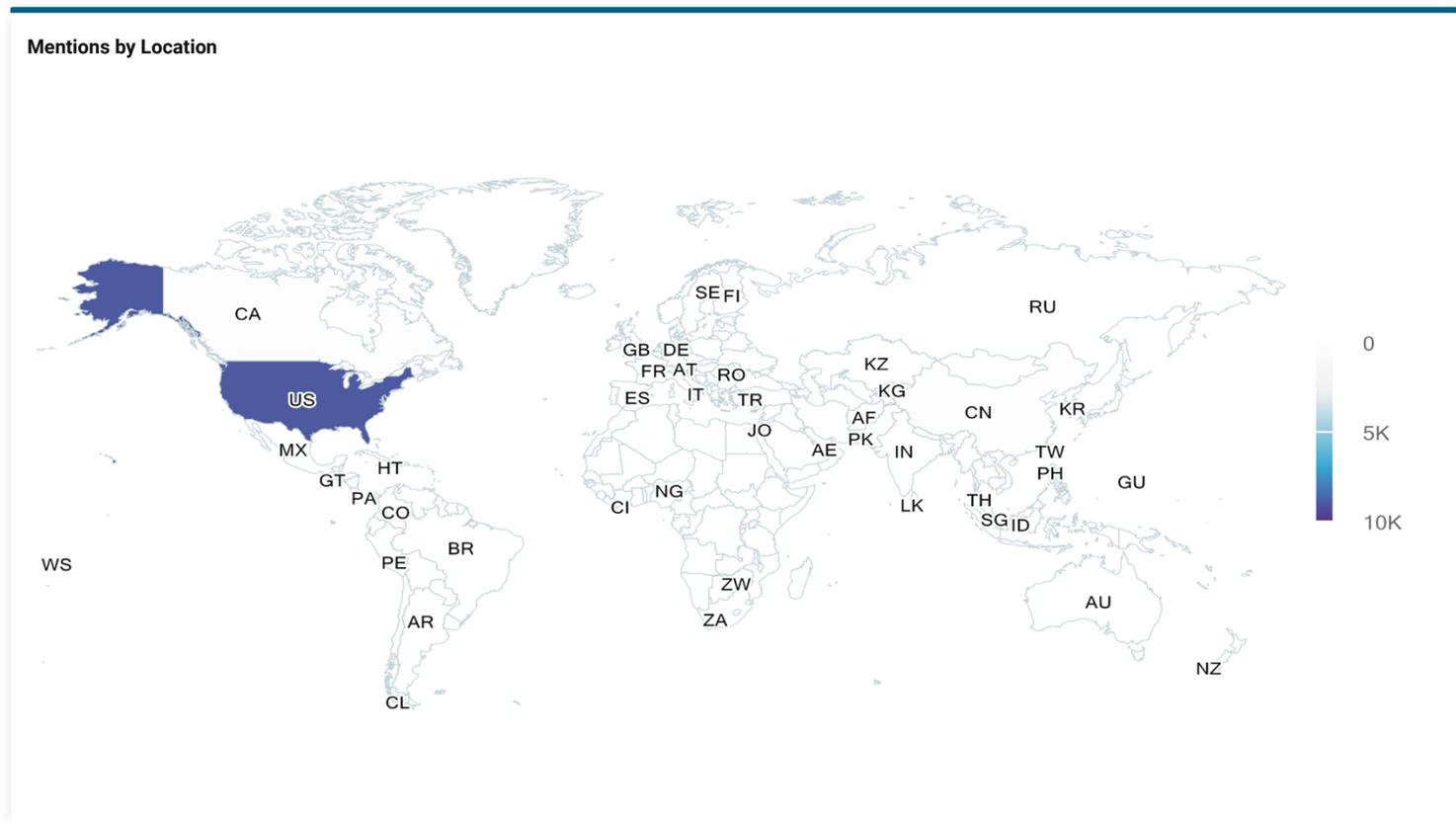


Share of Coverage by Media Type



# Coverage Map

Mentions by Location



## Prominent Terms and Top Outlets

### Top Outlets

OUTLET	NUMBER OF CLIPS	REACH	PUBLICITY VALUE
Los Angeles Times Online	124	2,971,243,240	\$3,416,929.73
Daily Trojan - Online	120	6,874,551	\$1,581.14
Patch	78	2,705,149,684	\$622,184.43
Porterville Recorder Online	76	3,847,899	\$1,770.04
Daily Forty-Niner, California State	67	670,000	\$36,345.60
Bakersfield Californian Online	65	17,490,163	\$8,045.48
Janesville Gazette Online	58	9,459,889	\$2,175.78
KCBS-TV Online	48	1,335,333,072	\$307,126.61
Los Angeles Times	47	19,761,252	\$1,496,030.90
MyHeadlinez Online	46	453,775	\$104.37
Walla Walla Union-Bulletin Online	42	2,592,900	\$1,192.73
Medical Health News	42	431,066	\$99.15
Herald-Mail Online	42	6,574,722	\$3,024.37
The Register Guard Projects	40	105,316	\$24.22
Eagle Online	39	7,371,825	\$3,391.04
Killeen Daily Herald Online	39	6,132,838	\$1,410.55
Dailynews.sina.com	38	558,296	\$128.41

### Top Articles

HEADLINES	OUTLET	REACH
George Tyndall: Ex-USC doctor arrested over	BBC News Online	56,000,000
The Washington Post wins 3 Pulitzer Prizes;	Washington Post Online, The	43,842,778
Washington Post wins Pulitzer Prizes for	Washington Post Online, The	43,842,778
The Latest: St. Louis columnist wins Pulitzer for	Washington Post Online, The	43,842,778
The Washington Post wins 3 Pulitzer Prizes;	Washington Post Online, The	43,842,778
Washington Post wins Pulitzer Prizes for	Washington Post Online, The	43,842,778
Ex-USC gynecologist pleads not guilty to sexual	Reuters Online	43,784,479
Former USC gynecologist pleads not guilty to	Reuters Online	43,784,479
Ex-USC gynecologist arrested in Los Angeles on	Reuters Online	43,784,479
Ex-USC gynecologist arrested in Los Angeles	Reuters Online	43,784,479
Ex-USC gynecologist arrested in Los Angeles	Reuters Online	43,784,479
Ex-USC gynecologist arrested in Los Angeles on	Reuters Online	43,784,479
Ex-USC gynecologist arrested in Los Angeles on	Reuters Online	43,784,479
Ex-USC gynecologist arrested in Los Angeles on	Reuters Online	43,784,479
Ex-USC gynecologist arrested in Los Angeles on	Reuters Online	43,784,479
USC Just Named a New President. Here's What	TIME Online	43,457,536
A Former USC Gynecologist Has Been Charged	TIME Online	43,457,536

## USC - Sample of News Coverage

7

	News Outlet	Date of Coverage	News Headline	Outlet DMA
1	KCBS-TV Online	7/1/2019	Former USC Gynecologist Dr. George Tyndall To Be Arraigned On Charges Of Sexually Assaulting 16 Women	Los Angeles, CA
2	MSN News	7/1/2019	USC Gynecologist Denies Sexually Abusing Patients	National
3	Quad-City Times Online	7/9/2019	Former USC gynecologist's bail lowered in sex assaults case	Davenport-Rock Island-Moline, IA
4	CNN International Online	7/11/2019	Former USC gynecologist allegedly made sex videos of young women ...	National
5	KNBC-TV	7/12/2019	NBC4 Today in LA	Los Angeles, CA
6	KBAK-TV	7/12/2019	Eyewitness News Mornings at 5 on KBAK	Bakersfield, CA
7	Arizona Republic Online	7/12/2019	Women who were seen for treatment by Dr. George M. Tyndall at the University of Southern California Student Health Center, you may be eligible for benefits from a class action settlement	Phoenix, AZ
8	Inyo Register - Online	7/12/2019	Women who were seen for treatment by Dr. George M. Tyndall at the University of Southern California Student Health Center, you may be eligible for benefits from a class action settlement	Los Angeles, CA
9	Los Angeles Times	7/14/2019	Money bail is absurd and unfair	Los Angeles, CA
10	Bustle	7/26/2019	A USC Gynecologist Abused Me 25 Years Ago & My Fight For Justice Goes Beyond His Trial	New York, NY
11	Mercury News, The	8/12/2019	Sex misconduct complaints against California doctors up 62% since 2017	San Francisco-Oakland-San Jose, CA
12	Daily Forty-Niner, CSU - Long Beach	8/20/2019	Turning the page: Carol Folt promises a student-driven presidency	Los Angeles, CA
13	Daily Trojan - Online	8/21/2019	A time of crisis: Reflecting on three years of turmoil at USC	Los Angeles, CA
14	WMGT-TV Online	8/23/2019	Some lawmakers want consent forms for pelvic exam	Macon, GA
15	KCBS-TV Online	8/24/2019	Embattled Former USC Gynecologist George Tyndall Makes Bail	Los Angeles, CA

## USC - Sample of News Coverage

8

	News Outlet	Date of Coverage	News Headline	Outlet DMA
16	Washington Times Online	8/24/2019	Former USC gynecologist released on bail in sex assault case	Washington, DC
17	Daily Freeman-Journal	8/26/2019	Doctors Fight Legislation Prompted By Sex Abuse Scandals	Des Moines-Ames, IA
18	KNTV-TV Online	8/26/2019	Former USC Gynecologist Released on Bail in Sex Assault Case	San Francisco-Oakland-San Jose, CA
19	World News, The	8/28/2019	Amid scandals, USC continues reputation reboot with new provost appointment	National
20	Bellingham Herald Online	9/4/2019	California Senate OKs giving USC victims more time to sue	Seattle-Tacoma, WA
21	KUSI-TV Online	9/4/2019	California Senate OKs giving USC victims more time to sue	San Diego, CA
22	Modesto Bee Online	9/6/2019	This bill seeks to protect women from sexual assault, but it has a major flaw	Sacramento-Stockton-Modesto, CA
23	KTLA-TV Online	9/9/2019	Former USC Gynecologist Accused of Sexually Abusing Patients Surrenders His Medical License	Los Angeles, CA
24	Sierra Madre Patch	9/9/2019	Disgraced USC Gynecologist George Tyndall Surrenders His License	Los Angeles, CA
25	KTVN-TV Online	9/9/2019	Ex-USC doctor charged with sex abuse surrenders license	Reno, NV
26	KXJZ-FM Online	9/10/2019	Ex-USC Doctor Accused Of Sexually Abusing Hundreds Of Women Surrenders Medical License	Sacramento-Stockton-Modesto, CA
27	Coastline Pilot Online	9/20/2019	USC President Carol Folt will be inaugurated today. Her daunting task: Fix the university	Los Angeles, CA
28	Walla Walla Union-Bulletin Online	9/20/2019	Fix a university battered by scandal	Yakima-Pasco-Richland-Kennewick, WA
29	NowThis	9/26/2019	Survivor Stories: Survivors of Dr. George Tyndall Speak Out	New York, NY
30	ArcaMax	10/2/2019	Reports of rape and fondling at USC surged in 2018 due to allegations against George Tyndall, officials say	Norfolk-Portsmouth-Newport News, VA

## USC - Sample of News Coverage

9

	News Outlet	Date of Coverage	News Headline	Outlet DMA
31	U.S. News & World Report	10/2/2019	New California Law Gives USC Victims More Time to Sue	National
32	Daily Journal Online	10/2/2019	New California law gives USC victims more time to sue	San Francisco-Oakland-San Jose, CA
33	HuffPost	10/3/2019	New California Law Allows More Lawsuits Against USC Gynecologist To Go Forward	National
34	KABC-TV Online	10/3/2019	USC annual security report shows spike in sexual assault claims; university blames increase on Tyndall allegations	Los Angeles, CA
35	E-News	10/6/2019	USC gynecologist charged with abuse sold photos and videos of girls he met in hotel rooms while abroad, prosecutor says	National
36	Modesto Bee Online	10/13/2019	California grants more time for filing child sexual abuse allegations under new law	Sacramento-Stockton-Modesto, CA
37	USC Annenberg Media	10/22/2019	How USC fired one dean, hired another, and kept itself mired in controversy	Los Angeles, CA
38	Los Angeles Times	11/5/2019	USC WILL REFORM BOARD IN WAKE OF SCANDALS	Los Angeles, CA

### Los Angeles Times

CALIFORNIA



## Former USC gynecologist George Tyndall charged with 29 felonies in sex abuse case



George Tyndall, left, worked at USC's Engemann Student Health Center, which opened in 2013, as well as the clinic's previous incarnation. (USC; Irfan Khan / Los Angeles Times)

By RICHARD WINTON, HARRIET RYAN JUNE 26, 2019 | 9:37 AM

[George Tyndall](#), the gynecologist accused of sexual misconduct toward hundreds of USC students, was arrested Wednesday and charged with committing more than two dozen felonies at the campus clinic where he [practiced for decades](#).

ADVERTISEMENT



#### LATEST CALIFORNIA >

CALIFORNIA

He wanted a pet monkey but stole a lemur instead. Then he bragged about it, FBI says  
1 hour ago

CALIFORNIA

Marines alleged to be in human smuggling ring arrested at Camp Pendleton  
2 hours ago

CALIFORNIA

Earthquake: 3.4 quake hits in Ventura

### The New York Times

CALIFORNIA TODAY

## What to Know About the Arrest of a Former U.S.C. Gynecologist



Going back as far as the 1990s, patients and medical staff had accused Dr. George Tyndall, U.S.C.'s longtime campus gynecologist, of inappropriately touching young women.  
Robyn Beck/Agence France-Presse — Getty Images

By Jill Cowan

June 27, 2019



# USC - Sample of News Articles

**Los Angeles Times**

SU  
Try it

CALIFORNIA

## USC gynecologist charged with assaulting patients posts bail, released from jail




Dr. George Tyndall, former campus gynecologist at USC. (USC)

By ESMERALDA BERMUDEZ | STAFF WRITER AUG. 24, 2019 | 12:11 PM

A former USC gynecologist charged with sexually abusing patients posted bail Friday and was released from jail.

**AP**

## California Senate OKs giving USC victims more time to sue

September 4, 2019

SACRAMENTO, Calif. (AP) — The California Senate has passed a bill aimed at giving alleged sexual assault victims at the University of Southern California more time to file lawsuits.

The Senate voted 38-0 Wednesday to approve an Assembly bill giving some who fall outside the current window an additional year to sue.

The current deadline is 10 years from the last attack or three years from the discovery of an injury.

The bill, which now goes back to the Assembly, is a response to allegations by hundreds of women that former USC gynecologist Dr. George Tyndall sexually assaulted them during examinations.

Tyndall, who worked at USC for decades, was arrested in June and is charged with molesting 16 patients. He's denied wrongdoing.

In all, more than 380 women have reported misconduct by Tyndall.

**RELATED TOPICS**

- General News
- Bills
- California
- Lawsuits
- Sexual assault

## USC - Sample of News Articles

12

Police & Fire

### Disgraced USC Gynecologist George Tyndall Surrenders His License

Former US gynecologist George Tyndall, facing dozens of charges for allegedly abusing patients, won't be practicing again in California.

By SoCal Patch, News Partner  
Sep 9, 2019 6:35 pm ET

Like 172 Share

Reply



In this July 1, 2019 file photo Dr. George Tyndall, the former University of Southern California gynecologist accused of sexual assault, listens during an arraignment at Los Angeles Superior court in Los Angeles. (AP Photo/Richard Vogel, File)

# **EXHIBIT O**

## Welcome to the USC Student Health Center Litigation Settlement Website

Please note, all Settlement claims and submissions will be kept strictly confidential by the Settlement Administrator and Panel. In particular, neither USC nor Tyndall will know the identities or claim information of any claimant. At the conclusion of the claims process, all claim submissions will be destroyed or returned to the claimant at their request.

Para consultar el aviso en español, haga clic aquí.

如需中文通知, 請點擊此處。

- A Settlement has been reached with the University of Southern California and its Board of Trustees and with Dr. George M. Tyndall, M.D. in a class action lawsuit. Plaintiffs allege in the lawsuit that Dr. Tyndall assaulted, abused, sexually harassed, committed medical malpractice, or otherwise acted inappropriately towards female patients while he was a gynecologist at the USC Student Health Center, and that USC failed to respond appropriately to Dr. Tyndall's conduct.
- The Settlement provides a \$215 million Settlement Fund for Class Members.
  - Class Members are guaranteed a minimum \$2,500 Tier 1 payment simply by virtue of being Class Members.
  - Class Members can further seek a Tier 2 payment, from \$7,500 to \$20,000 (subject to *Pro Rata Adjustment*);
  - or a Tier 3 payment, an award in a range of \$7,500 to \$250,000 (subject to *Pro Rata Adjustment*).
- Statement of Settlement Class Membership and Tier 2 and 3 Claim Forms must have been received online or postmarked by mail no later than November 8, 2019.
- The Settlement requires USC to implement institutional changes, like an independent women's health advocate on campus, stringent background checks, training, and monitoring of health center employees, and procedures at the university for preventing and reporting potential abuse or harassment, among other measures. [Click here](#) for the current status of the institutional changes.
- The deadline to object to the Settlement was October 9, 2019 and the deadline to exclude yourself from the Settlement was November 7, 2019.

### Am I a Class Member?

You are a Class Member if you were seen for treatment by Dr. Tyndall at the University of Southern California Student Health Center during the period from August 14, 1989 to June 21, 2016:

(a) for Women's Health Issues, ("Women's Health Issues" includes but is not limited to any issue relating to breast, vaginal, urinary tract, bowel, gynecological, or sexual health, including contraception and fertility. A list of Women's Health Issues is available on this website by [clicking here](#).)

or

(b) whose treatment by Dr. Tyndall included an examination by him of her breast or genital areas.

or

(c) whose treatment included the taking of photographs or videotapes of her unclothed or partially clothed body.

### Protecting Your Privacy

Your identity and all information you provide in making your claim will be kept strictly confidential in accordance with the Amended Settlement Agreement. Everyone you interact with when making your claim – either online or on the phone – is specially trained to be sensitive to the needs of survivors, and to ensure you have a safe, private, and compassionate place to tell your story.

### Class Member Award Tiers

Recognizing the traumatic nature of the conduct at the heart of this case, the Settlement was designed to compensate Class Members for the harms they endured, while allowing individuals to select an award tier and participation level based on their willingness to discuss their experiences of abuse.

#### Tier 1 (Guaranteed Minimum \$2,500 Payment)

Every Class Member will receive an initial, minimum \$2,500 payment, simply by virtue of being a Class Member, in addition to being eligible for Tier 2 or Tier 3 payments. Those who can be pre-identified through USC's existing health center records will be automatically mailed a Tier 1 payment check for \$2,500 once the Settlement is effective. Those Class Members who could not be identified through USC's records must have submitted a simple signed Statement of Settlement Class Membership Form no later than November 8, 2019 to receive their \$2,500 payment.

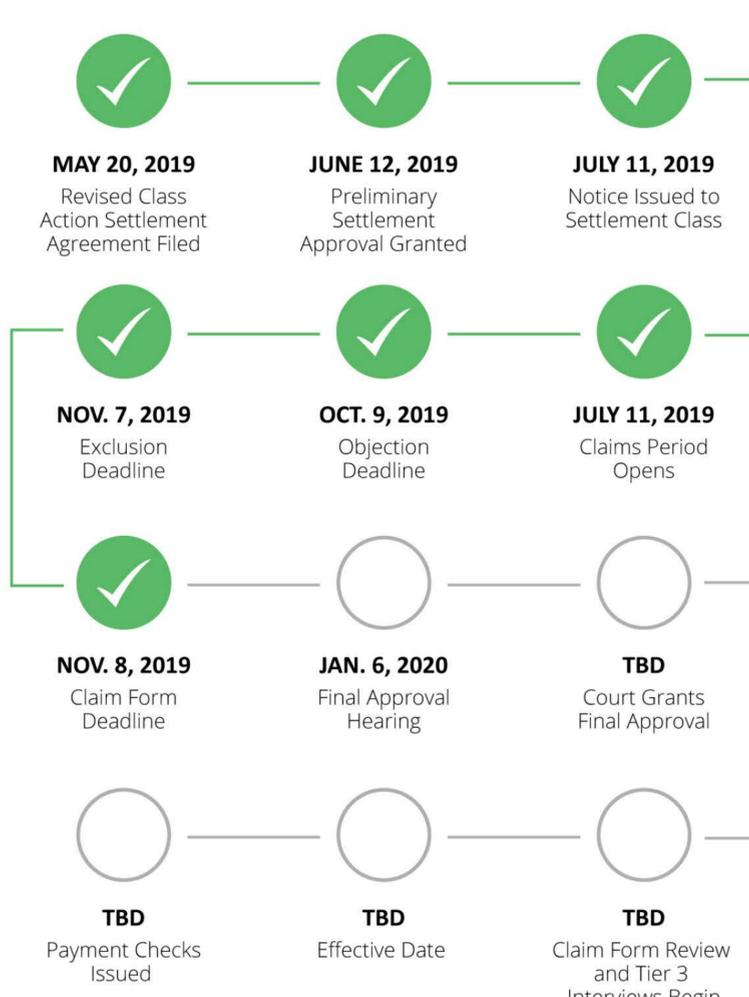
#### Tier 2 – for those who only feel comfortable sharing their story in writing.

Class Members had the option to submit a written Claim Form no later than November 8, 2019 describing their experience with Dr. Tyndall, the impact to them, and the harm they suffered. Class Members willing to provide a written account of their experiences are eligible for a Tier 2 payment, for which there is a range of \$7,500 and \$20,000, subject to *Pro Rata Adjustment*. Claim Forms will be reviewed by a three-member claims Panel, made up of a Court-appointed Special Master, an OB/GYN, and a forensic psychologist selected by the Parties in consultation with the Special Master.

#### Tier 3 – for those who feel comfortable being interviewed by specially trained, compassionate specialists, in addition to submitting a written claim.

Class Members who were willing to provide information about their experience and its impact in the form of an interview with the team for the three-member claims Panel, in addition to submitting the written Claim Form no later than November 8, 2019, are eligible for Tier 3 payments between \$7,500 and \$250,000, subject to *Pro Rata Adjustment*. Claim Forms will be reviewed by the three-member claims Panel.

## Key Dates



## Your Legal Rights and Options in this Settlement

ACTION	EXPLANATION	DUE DATE
<b>DO NOTHING</b>	If you are a pre-identified member of the Settlement Class and you did nothing, you will be included in the Settlement and will receive a \$2,500 Tier 1 payment if the Settlement becomes effective. You will also give up the right to sue the Defendants about the claims in this case.  If you are a potential member of the Settlement Class and you did nothing, you will not receive any payment and you will give up the right to sue the Defendants about the claims in this Litigation. In order to receive the guaranteed minimum \$2,500 Tier 1 payment under the Settlement, you must have completed a Statement of Settlement Class Membership Form by November 8, 2019.  See <a href="#">FAQ No. 18</a> .	
<b>SUBMIT A CLAIM FORM</b>	Class Members also had the option to submit a Tier 2 or Tier 3 claim describing their experience as a patient of Dr. Tyndall. Depending on the information they provide and whether they are willing to be interviewed, they could receive as much as \$250,000.  For more information about submitting a claim, see <a href="#">FAQ No. 7</a> .  Class Members who submit a claim give up their rights to sue the Defendants about the claims in this Litigation.	<b>November 8, 2019 (Postmarked or Received Online) (Passed)</b>
<b>EXCLUDE YOURSELF</b>	If you are a Class Member and excluded yourself, you will not be included in the Settlement. You will receive no Settlement benefits and you will keep any rights you currently have to sue the Defendants about the claims in this case. See <a href="#">FAQ No. 52</a> .	<b>November 7, 2019 (Postmarked) (Passed)</b>
<b>OBJECT</b>	If you are a Class Member who did not exclude yourself and disagreed with the Settlement, you had the option to write to the Court to explain your objection. See <a href="#">FAQ No. 50</a> .	<b>October 9, 2019 (Filed or Postmarked) (Passed)</b>
<b>GO TO A HEARING</b>	Class Members also had the option to request to speak in court about the fairness of the Settlement. See <a href="#">FAQ No. 43</a> .	<b>January 6, 2020 at 1:30 p.m.</b>  U.S. District Court Central Division of California First Street Courthouse 350 W. 1st Street Courtroom 10A, 10th Floor Los Angeles, CA 90012

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The deadline to file a Claim was **November 08, 2019** (Pacific Standard Time), and has now passed.

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# USC Student Health Center Litigation Settlement

Case No. 2:18-cv-04258-SVW-GJS

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## Important Documents

(To view/download a document, click its name.) [Get Adobe Reader](#)

### Settlement Notice and Claim Documents

-  [Settlement Notice](#)
-  [Statement of Settlement Class Membership Form](#)
-  [Statement of Settlement Class Membership Form \(Fillable Version\)](#)
-  [Tier 2 and 3 Claim Form](#)
-  [Tier 2 and 3 Claim Form \(Fillable Version\)](#)

### Court Documents

-  [Plaintiffs' Notice of and Motion for Final Approval of Class Action Settlement: Memorandum of Points and Authorities in Support](#) November 18, 2019
-  [Joint Declaration of Steve W. Berman, Elizabeth A. Kramer, and Annika K. Martin in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement](#)
-  [Declaration of Jennifer M. Keough Regarding Notice Program and Settlement Administration](#)
-  [Proposed Order Granting Final Approval of Class Action Settlement](#)
-  [Order Granting Plaintiffs' Renewed Motion for Preliminary Settlement Approval and to Direct Class Notice](#) June 12, 2019
-  [Plaintiffs' Renewed Notice of and Motion for Appointment of Special Master](#) May 17, 2019  
(refiled May 23, 2019)
-  [Plaintiffs' Notice of and Renewed Motion for Preliminary Approval of Class Action Settlement and to Direct Class Notice](#) May 17, 2019  
(refiled May 23, 2019)
-  [Amended Settlement Agreement](#)
-  [Declaration of Jennifer M. Keough in Response to Court's Order Dated April 18, 2019](#)
-  [Declaration of Annika K. Martin in Support of Plaintiffs' Renewed Motion for Preliminary of Class Action Settlement and to Direct Class Notice](#)
-  [Joint Status Conference Report for April 29, 2019 Further Status Conference](#)
-  [Statement of USC Student Leaders in Support of Proposed Settlement](#)
-  [Proposed Order Granting Plaintiffs' Renewed Motion for Preliminary Settlement Approval and to Direct Class Notice](#)
-  [Second Amended Consolidated Class Action Complaint](#) May 22, 2019
-  [Order Denying Plaintiffs' Motion for Preliminary Approval of a Class Action Settlement and Motion to Appoint Special Master](#) April 18, 2019
-  [Order on Joint Stipulation and Qualified HIPPA Protective Order](#) April 3, 2019
-  [Supplemental Declaration of Jennifer M. Keough Regarding Settlement Administration and Lien Resolution](#) March 18, 2019
-  [Plaintiffs' Notice of and Motion for Preliminary Approval of Class Action Settlement and to Direct Class Notice](#) February 12, 2019
-  [Joint Declaration of Steve W. Berman, Elizabeth A. Kramer, and Annika K. Martin in Support of Plaintiffs' Motion for Preliminary Approval](#)
-  [Settlement Agreement](#)
-  [Declaration of Jennifer M. Keough Regarding Proposed Notice Program](#)
-  [Declaration of Layn R. Phillips](#)
-  [Class Representative Declarations in Support of Motion for Preliminary Approval](#)
-  [Proposed Order Granting Plaintiffs' Motion for Preliminary Settlement Approval](#)

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## Frequently Asked Questions

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## Key Dates

<u>DATE</u>	<u>EVENT</u>
June 12, 2019	Preliminary Approval Granted
July 11, 2019	Notice Issued to Settlement Class
October 9, 2019 (filed or postmarked) <b>(Passed)</b>	Objection Deadline
November 7, 2019 (postmarked) <b>(Passed)</b>	Exclusion Deadline
November 8, 2019 (received online or postmarked by mail) <b>(Passed)</b>	Claim Form Deadline (Tiers 1, 2, and 3)
January 6, 2020 at 1:30 p.m.	Final Approval Hearing

U.S. District Court, Central District of California  
First Street Courthouse  
350 W. 1st Street, Courtroom 10A, 10th Floor  
Los Angeles, CA 90012

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## WELCOME TO THE USC STUDENT HEALTH CENTER SETTLEMENT CLAIMS PORTAL

Enter your Username and Password below to check your claim status.

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Password:

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If you previously created a username and password and you need to reset your password, [click here](#).

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Please review the **FAQs** for answers to many basic questions before contacting the Settlement Administrator.

You may contact the Settlement Administrator in the following ways:

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**By Telephone**

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**By Mail**

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[El Formulario de Reclamos para la Categoría 2 y 3](#)

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和解声明



申诉委托人表以及 **2** 级和 **3** 级申请表中

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# **EXHIBIT P**

**FILED UNDER SEAL**

# **EXHIBIT Q**

**FILED UNDER SEAL**