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13 *Attorneys for Defendants University of Southern California,*  
 14 *Board of Trustees of the University of Southern California*

15 **UNITED STATES DISTRICT COURT**  
 16 **CENTRAL DISTRICT OF CALIFORNIA**

17 *IN RE USC STUDENT HEALTH*  
 18 *CENTER LITIGATION*

No. 2:18-cv-04258-SVW-GJS]

[consolidated with 2:18-cv-04940-SVW-GJS, 2:18-cv-05010-SVW-GJS, 2:18-cv-05125-SVW-GJS, and 2:18-cv-06115-SVW-GJS]

21 **JOINT NOTICE REGARDING**  
 22 **CLASS ACTION SETTLEMENT**

23 Hon. Stephen V. Wilson  
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1 At the January 6, 2020 hearing on Plaintiffs’ Motion for Final Approval of  
2 Class Action Settlement (Dkts. 155, 163), the Court directed the parties to (i) make  
3 certain revisions to the settlement in accordance with the Court’s instructions at the  
4 hearing, and (ii) to provide the Court with a mutually-agreed list of candidates for  
5 the Special Master’s panel. Dkt. 166.

6 The parties have met and conferred, and hereby submit (i) a revised settlement  
7 agreement (the “Second Amended Settlement Agreement”), as well as (ii) proposed  
8 candidates for the Special Master’s panel. Class counsel joins in this submission.

9 **I. THE REVISED SETTLEMENT AGREEMENT**

10 The Second Amended Settlement Agreement contains the following  
11 modifications. *See* Ex. 1. *First*, as directed by the Court, the procedures for the  
12 Special Master’s panel have been revised to strike the appeals portion of the claims  
13 award process. *Second*, the Settlement now reflects that the parties, rather than the  
14 Special Master, jointly select the members of the Special Master’s panel. *Finally*,  
15 the amended Settlement sets forth the revised escrow procedures for the Settlement  
16 Fund that were reflected in the proposed addendum to the Settlement Agreement  
17 previously submitted as Dkt. 163-1.

18 **II. THE PARTIES’ PROPOSED CANDIDATES FOR THE SPECIAL**  
19 **MASTER’S PANEL**

20 Section 2.32 of the Second Amended Settlement Agreement provides that the  
21 Special Master’s Panel “shall consist of the Special Master appointed by the Court,  
22 along with a forensic psychologist/psychiatrist and an OB/GYN selected by the  
23 Parties.” Ex. 1. The parties have agreed to the appointment of the following two  
24 individuals:

- 25 **1. Dr. Annie Steinberg, M.D.** is a forensic psychiatrist with experience  
26 in this precise role. Dr. Steinberg assisted the special master in the  
27  
28

1            *Johns Hopkins* settlement involving the conduct of Dr. Nikita Levy,<sup>1</sup>  
2            and—together with the special master—trained all of the interviewers  
3            in those proceedings. Dr. Steinberg is well-versed in all aspects of this  
4            panel position, including drafting interview scripts, running trainings,  
5            and reviewing medical records for claims purposes. Dr. Steinberg is a  
6            child & adolescent psychiatry specialist in Narberth, PA and has been  
7            practicing for 31 years, currently practicing at City of Philadelphia  
8            Department of Behavioral Health and Intellectual Disability Services.  
9            She received her M.D. degree from Boston University School of  
10            Medicine.

11            **2. Dr. Susan Dwyer Ernst, M.D.** is an Assistant Professor of Obstetrics  
12            and Gynecology at the University of Michigan Medical School and  
13            Chief of Gynecology at the University Health Service. She specializes  
14            in reproductive healthcare for adolescents and women with disabilities,  
15            adolescent gynecology, and college health. Dr. Ernst has been faculty  
16            on the Pediatric Ethics Committee at the University of Michigan for 8  
17            years. Her current research projects include the evaluation of patient  
18            satisfaction with sexual assault services on campus and in the  
19            emergency department, along with utilization of post assault services  
20            on campus. Dr. Ernst received her M.D. degree and completed her  
21            residence in obstetrics and gynecology at the University of Michigan  
22            Medical School.

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27            <sup>1</sup> See *Jane Doe NO. 1, et al., v. Johns Hopkins Hospital, et al.*, Case No. 24-C-  
28            13-001041 (Cir. Ct. Baltimore).

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**CONCLUSION**

The proposed settlement offers class members prompt and meaningful relief, and addresses the concerns of the Court articulated at the January 6, 2020 hearing. The parties respectfully request that the Court grant final approval of the Second Amended Settlement Agreement, and appoint Drs. Steinberg and Ernst to the panel of the Special Master overseeing proposed claims awards for this settlement.

DATED: January 13, 2020

By: /s/ Shon Morgan

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