

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

**IN RE USC STUDENT HEALTH
CENTER LITIGATION**

No. 2:18-cv-04258-SVW

[consolidated with No. 2:18-cv-04940- SVW-GJS, No. 2:18-cv-05010-SVW-GJS, No. 2:18-cv-05125-SVW-GJS, and No. 2:18-cv-06115-SVW-GJS]

ADDENDUM TO AMENDED SETTLEMENT AGREEMENT

Pursuant to paragraph 10.14 of the Amended Settlement Agreement (the “Settlement Agreement”) in *In re USC Student Health Center Litigation*, United States District Court for the Central District of California, Case No. 2:18-cv-04258-SVW, this Addendum is entered into by the Parties to the Settlement.

1. All terms in this Addendum have the same meanings as in the Settlement Agreement.
2. Section 4.4 of the Settlement Agreement is hereby revised to provide as follows:

Within 10 days after Preliminary Approval, Defendants will deposit an advance of the Settlement Amount of \$5 million applicable towards costs of notice and administration in the Escrow Account pursuant to instructions to be delivered by Class Counsel. **Within 10 days of the Effective Date, Defendants will deposit \$50 million into the Escrow Account, applicable towards costs of administration, including costs associated with the Special Master’s Team and Panel, as well as any and all Tier 1 Claim Awards. The balance of the Settlement Amount shall be payable into the Escrow Account within 10 days after the Special Master submits her proposed Claim Awards to the Court.**

3. Defendants will further deposit into the Escrow Account, within 10 days after the Special Master submits to the Court her report reflecting proposed Claim Awards under the Settlement, an amount reflecting the interest that would have been earned on the remaining \$160 million of

the Settlement Fund had it been held in the Escrow Account from 10 days after the Effective Date of the Settlement Agreement until the date of actual deposit. The amount of such interest shall be determined by the Escrow Agent, based on returns comparable to the interest actually accrued on other funds deposited in the Escrow Account. Escrow Agent shall, on a monthly basis, report to the Parties the amount of interest accrued on the Escrow Deposit (1) over that month, and (2) to date. For the avoidance of doubt, the amount of such interest shall be calculated using the rate of compensation, including all changes thereto, paid by Escrow Agent on amounts held in the Escrow Account during such period of time.


4. Sections 6.4(a)(i)-(ii) of the Settlement Agreement are hereby revised to provide as follows:

(i) **Beginning not later than 10 days after** the Effective Date, each Settlement Class Member who can be identified through USC's existing health center records (which cover the period from July 14, 1997, through June 21, 2016), will be mailed a Tier 1 Claim Award (in the form of a check for \$2,500), representing an initial amount for damages for all claims advanced by the Settlement Class or that could have been advanced.


(ii) **Beginning not later than 10 days after** the Effective Date, each Settlement Class Member who has completed online or returned by mail a qualifying Statement of Settlement Class Membership signed under penalty of perjury will be mailed a Tier 1 Claim Award (in the form of a check for \$2,500), representing an initial amount for damages for all claims advanced by the Settlement Class or that could have been advanced....

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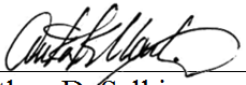
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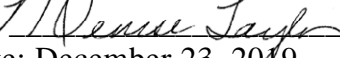
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