

EXHIBIT 5

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Interim Class Counsel and Plaintiffs' Executive Committee

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

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]

**STATEMENT OF USC STUDENT
LEADERS IN SUPPORT OF
PROPOSED SETTLEMENT**

1 1. We are current students or recent graduates at the University of Southern
2 California and have served as active campus leaders in various groups as set out
3 below.

4 2. We are particularly concerned with the issues of sexual assault and abuse,
5 as well as gender-based violence on USC's campus.

6 3. When we learned about Dr. Tyndall's serial abuse of USC students, we
7 were horrified. What was even worse was learning that USC knew about Dr. Tyndall's
8 misconduct, and could have stopped it, but did nothing about it until the story came
9 out and USC felt pressure from the public.

10 4. Even then, we hoped that after news of the USC scandal became publicly
11 known, USC would make meaningful changes on campus to protect its students and
12 make sure that nothing like what Dr. Tyndall did could ever happen again. But the
13 steps USC has taken on its own are halfhearted and inadequate. Protecting USC
14 students and taking a stand against sexual assault and abuse requires real, systemic
15 change—not lip service and half measures.

16 5. Recently, we learned of the proposed class action settlement on behalf of
17 survivors of Dr. Tyndall's abuse. We understand that the proposed settlement includes
18 a financial component to pay Class members, but also equitable relief, to make USC
19 change its ways.

20 6. We have reviewed the Equitable Relief Provisions of the proposed
21 Settlement Agreement, as well as the final report of the Equitable Relief Committee.

22 7. The reforms set out in the Report are important steps toward changing the
23 way things are done at USC, and ensuring that the University invests in real protection
24 for its students that empowers them to feel safe on their own campus.

25 8. While financial compensation for survivors is important, these kinds of
26 reforms are an essential part of making survivors whole. USC allowed Dr. Tyndall to
27 abuse its students, and these reforms are an important signal from USC that it
28

1 recognizes the problems of the past and is sincere about making meaningful changes
2 for the future.

3
4 Sincerely,

5 /s/ Shany Ebadi

6 Shany Ebadi
7 USC Class of 2019
8 Chief Diversity Officer, USC
9 Undergraduate Student Government

10 /s/ Jessica O'Connor

11 Jessica O'Connor
12 USC Class of 2020
13 Vice President of External Affairs,
14 Trojan Advocates for Political Progress
(TAPP)

15 /s/ Joy Shin

16 Joy Shin
17 USC Class of 2019
18 Executive Director, USC Asian Pacific
19 American Student Assembly

20 /s/ Katherine Thanos

21 Katherine Thanos
22 USC Class of 2020