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8 Christopher R. Pitoun (SBN 290235)
9 301 N. Lake Ave., Suite 920
10 Pasadena, CA 91101
11 Tel.: 213-330-7150
12 Fax: 213-330-7512
13 Email: christopherp@hbsslaw.com

14 *Attorneys for Plaintiffs*

15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

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

20 JOYCE SUTEDJA, MEHRNAZ
21 MOHAMMADI, JANE DOE M.G.,
22 JANE DOE R.B., JANE DOE K.Y., and
23 JANE DOE M.D., individually and on
24 behalf of all others similarly situated,

25 Plaintiffs,

26 v.

27 UNIVERSITY OF SOUTHERN
28 CALIFORNIA, BOARD OF
TRUSTEES OF THE UNIVERSITY OF
SOUTHERN CALIFORNIA, and
GEORGE TYNDALL, M.D.,

Defendants.

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]

DECLARATION OF BETSAYDA ACEITUNO IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

1 DECLARATION OF BETSAYDA ACEITUNO IN SUPPORT OF MOTION FOR
2 PRELIMINARY APPROVAL OF CLASS SETTLEMENT

3 I Betsayda Aceituno declare under penalty of perjury under the laws of the
4 United States that the following is true and correct.

- 5
- 6 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed Class
7 Representative in the above-entitled action. This Declaration, which is based
8 on my personal knowledge of the facts stated herein, is submitted in support
9 of the Motion for Preliminary Approval of Class Action Settlement.
- 10 2. I attended the University of Southern California (“USC”) from 2013 to 2015.
- 11 3. During my time at USC, I was treated for womens health related issues by
12 Dr. George Tyndall at USC’s student health center.
- 13 4. I had approximately three appointments with Dr. Tyndall. During these
14 appointments, Dr. Tyndall made me extremely uncomfortable by making
15 inappropriate comments, performing pelvic exams without a chaperone
16 present, and making inappropriate sexual comments about my appearance
17 while performing pelvic exams.
- 18 5. When I learned from media reports that Dr. Tyndall had violated, abused,
19 and mistreated female patients at USC for more than 25 years, I was
20 horrified and decided to contact a lawyer.
- 21 6. I contracted Hagens Berman to ask about pursuing a claim against USC.
22 After speaking with a lawyer there about all of my legal options—which
23 included filing an individual lawsuit—I made the decision to join the class
24 action as a class representative.
- 25 7. I chose to act class representative because I thought that it was the best
26 option for pursuing my claim against USC. I also wanted to help hold USC
27 accountable for its failure to ensure that its female students receive quality
28

1 womens healthcare from a safe provider, and I wanted to see to it that people
2 who have suffered from the same experience receive compensation for their
3 injuries.

- 4 8. It was not an easy decision to act as a class representative. Participation
5 required me to relive a traumatic experience, file a description of my
6 experience on the public docket, and open myself up to potential discovery.
7 However, I found the strength to come forward because I wanted to prevent
8 this type of misconduct from happening again.
- 9 9. In October, 2018 class counsel contacted me to explain the terms of the
10 settlement. I fully understand the terms and conditions of the settlement.
- 11 10. I also understand that as a class member I have a right to opt out of the
12 settlement class and/or object to the class settlement in court.
- 13 11. I support the settlement as a fair and adequate outcome for the class.
- 14 12. Class counsel has shown me the following definition of the settlement class,
15 which they propose should be used in the Class Notice notifying class
16 members about this case, the certification of the class in this case, the scope
17 of that class, the claims in the case, and what class members must do in order
18 to be included or excluded from the class.
- 19 13. For purposes of this settlement, the Class is defined as all women who had
20 womens-health-related treatment conducted by George Tyndall, M.D. at the
21 University of Southern California.
- 22 14. This definition clearly communicates which persons are in the Class and
23 which are not. From this description, people would understand who is
24 included in the Class without further description or detail.
- 25 15. I support the class settlement because it not only fairly compensates the
26 Class, but it affords women a choice about the level of participation they are
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1 willing and able to undertake in order to submit their claims. This choice will
2 minimize the emotional and logistical impact on class members.

3 16. I understand that as part of the settlement, USC has agreed to implement
4 policies aimed at bolstering oversight of the student healthcare center to
5 prevent future misconduct. I strongly support those efforts.

6 17. Ultimately, accepting the class settlement will allow me to move on from
7 this traumatic experience knowing that I have helped right an injustice, USC
8 has been held accountable, and I have helped to prevent universities,
9 healthcare providers, and other institutions from tolerating sexual abuse in
10 the future.

11 Dated: February 9, 2019

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14 Signed:



15 Name:

16 Betsayda Aceituno
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DECLARATION OF JANE DOE 4
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF
CLASS SETTLEMENT

1 DECLARATION OF JANE DOE 4 IN SUPPORT OF MOTION FOR
2 PRELIMINARY APPROVAL OF CLASS SETTLEMENT

3 I Jane Doe 4 declare under penalty of perjury under the laws of the United
4 States that the following is true and correct.

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- 6 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed Class
7 Representative in the above-entitled action. This Declaration, which is based
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9 of the Motion for Preliminary Approval of Class Action Settlement.
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- 11 3. During my time at USC, I was treated for womens health related issues by
12 Dr. George Tyndall at USC’s student health center.
- 13 4. I had one appointment with Dr. Tyndall. During this appointment, Dr.
14 Tyndall violated and harmed me by performing a pelvic exam even though I
15 was under 21 and it was not required to treat my yeast infection, digitally
16 penetrating me, and inviting me to view my vaginal swab under a
17 microscope.
- 18 5. When I learned from media reports that Dr. Tyndall had violated, abused,
19 and mistreated female patients at USC for more than 25 years, I felt
20 disappointed and let down by USC and decided to contact a lawyer.
- 21 6. I contacted Hagens Berman to ask about pursuing a claim against USC.
22 After speaking with a lawyer there about all of my legal options—which
23 included filing an individual lawsuit—I made the decision to join the class
24 action as a class representative.
- 25 7. I chose to act class representative because I thought that it was the best
26 option for pursuing my claim against USC. I also wanted to help hold USC
27 accountable for its failure to ensure that its female students receive quality
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1 womens healthcare from a safe provider, and I wanted to see to it that people
2 who have suffered from the same experience receive compensation for their
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25 15. I support the class settlement because it not only fairly compensates the
26 Class, but it affords women a choice about the level of participation they are

willing and able to undertake in order to submit their claims. This choice will minimize the emotional and logistical impact on class members.

16. I understand that as part of the settlement, USC has agreed to implement policies aimed at bolstering oversight of the student healthcare center to prevent future misconduct. I strongly support those efforts.

17. Ultimately, accepting the class settlement will allow me to move on from this traumatic experience knowing that I have helped right an injustice, USC has been held accountable, and I have helped to prevent universities, healthcare providers, and other institutions from tolerating sexual abuse in the future.

Dated: February 10, 2019

Signed: JANE DOE 4

Name: Jane Doe 4

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DECLARATION OF JANE DOE C.N. IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

1 DECLARATION OF JANE DOE C.N. IN SUPPORT OF MOTION FOR
2 PRELIMINARY APPROVAL OF CLASS SETTLEMENT

3 I Jane Doe C.N. declare under penalty of perjury under the laws of the United
4 States that the following is true and correct.

- 5
- 6 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed Class
7 Representative in the above-entitled action. This Declaration, which is based
8 on my personal knowledge of the facts stated herein, is submitted in support
9 of the Motion for Preliminary Approval of Class Action Settlement.
- 10 2. I attended the University of Southern California (“USC”) from 2010-2013.
- 11 3. During my time at USC, I was treated for womens health related issues by
12 Dr. George Tyndall at USC’s student health center.
- 13 4. I had one appointment with Dr. Tyndall. During this appointment, Dr.
14 Tyndall violated and harmed me by performing an improper and unnecessary
15 pelvic exam, making inappropriate comments during the examination,
16 performing a pelvic exam without a chaperone present, and remaining in the
17 examination room while I undressed.
- 18 5. When I learned from media reports that Dr. Tyndall had violated, abused,
19 and mistreated female patients at USC for more than 25 years, I felt upset
20 and betrayed and decided to contact a lawyer.
- 21 6. I contacted Hagens Berman to ask about pursuing a claim against USC.
22 After speaking with a lawyer there about all of my legal options—which
23 included filing an individual lawsuit—I made the decision to join the class
24 action as a class representative.
- 25 7. I chose to act class representative because I thought that it was the best
26 option for pursuing my claim against USC. I also wanted to help hold USC
27 accountable for its failure to ensure that its female students receive quality
28

1 womens healthcare from a safe provider, and I wanted to see to it that people
2 who have suffered from the same experience receive compensation for their
3 injuries.

4 8. It was not an easy decision to act as a class representative. Participation
5 required me to relive a traumatic experience, file a description of my
6 experience on the public docket, and open myself up to potential discovery.
7 However, I found the strength to come forward because I wanted to prevent
8 this type of misconduct from happening again.

9 9. In October, 2018 class counsel contacted me to explain the terms of the
10 settlement. I fully understand the terms and conditions of the settlement.

11 10. I also understand that as a class member I have a right to opt out of the
12 settlement class and/or object to the class settlement in court.

13 11. I support the settlement as a fair and adequate outcome for the class.

14 12. Class counsel has shown me the following definition of the settlement class,
15 which they propose should be used in the Class Notice notifying class
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18 to be included or excluded from the class.

19 13. For purposes of this settlement, the Class is defined as all women who had
20 womens-health-related treatment conducted by George Tyndall, M.D. at the
21 University of Southern California.

22 14. This definition clearly communicates which persons are in the Class and
23 which are not. From this description, people would understand who is
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25 15. I support the class settlement because it not only fairly compensates the
26 Class, but it affords women a choice about the level of participation they are
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16. I understand that as part of the settlement, USC has agreed to implement policies aimed at bolstering oversight of the student healthcare center to prevent future misconduct. I strongly support those efforts.

17. Ultimately, accepting the class settlement will allow me to move on from this traumatic experience knowing that I have helped right an injustice, USC has been held accountable, and I have helped to prevent universities, healthcare providers, and other institutions from tolerating sexual abuse in the future.

Dated: February 11, 2019

Signed: Jane Doe C.N.
Name: Jane Doe C.N.

1 Steve W. Berman (*pro hac vice*)
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14 *Attorneys for Plaintiffs*

15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT
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20 JOYCE SUTEDJA, MEHRNAZ
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DECLARATION OF JANE DOE
A.D. IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL
OF CLASS SETTLEMENT

1 DECLARATION OF JANE DOE A.D. IN SUPPORT OF MOTION FOR
2 PRELIMINARY APPROVAL OF CLASS SETTLEMENT

3 I Jane Doe A.D. declare under penalty of perjury under the laws of the United
4 States that the following is true and correct.

- 5
- 6 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed Class
7 Representative in the above-entitled action. This Declaration, which is based
8 on my personal knowledge of the facts stated herein, is submitted in support
9 of the Motion for Preliminary Approval of Class Action Settlement.
- 10 2. I attended the University of Southern California (“USC”) from 2005 to 2010.
- 11 3. During my time at USC, I was treated for womens health related issues by
12 Dr. George Tyndall at USC’s student health center.
- 13 4. I had one appointment with Dr. Tyndall. During this appointment, Dr.
14 Tyndall violated and harmed me by performing an unnecessary pelvic exam,
15 making inappropriate sexual comments during the pelvic exam, and
16 providing incorrect/false information in my medical record.
- 17 5. When I learned from media reports that Dr. Tyndall had violated, abused,
18 and mistreated female patients at USC for more than 25 years, I felt upset
19 and betrayed and decided to contact a lawyer.
- 20 6. I contacted Hagens Berman to ask about pursuing a claim against USC.
21 After speaking with a lawyer there about all of my legal options—which
22 included filing an individual lawsuit—I made the decision to join the class
23 action as a class representative.
- 24 7. I chose to act class representative because I thought that it was the best
25 option for pursuing my claim against USC. I also wanted to help hold USC
26 accountable for its failure to ensure that its female students receive quality
27 womens healthcare from a safe provider, and I wanted to see to it that people
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1 who have suffered from the same experience receive compensation for their
2 injuries.

3 8. It was not an easy decision to act as a class representative. Participation
4 required me to relive a traumatic experience, file a description of my
5 experience on the public docket, and open myself up to potential discovery.
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7 this type of misconduct from happening again.

8 9. In October, 2018 class counsel contacted me to explain the terms of the
9 settlement. I fully understand the terms and conditions of the settlement.

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11 settlement class and/or object to the class settlement in court.

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13 12. Class counsel has shown me the following definition of the settlement class,
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15 members about this case, the certification of the class in this case, the scope
16 of that class, the claims in the case, and what class members must do in order
17 to be included or excluded from the class.

18 13. For purposes of this settlement, the Class is defined as all women who had
19 womens-health-related treatment conducted by George Tyndall, M.D. at the
20 University of Southern California.

21 14. This definition clearly communicates which persons are in the Class and
22 which are not. From this description, people would understand who is
23 included in the Class without further description or detail.

24 15. I support the class settlement because it not only fairly compensates the
25 Class, but it affords women a choice about the level of participation they are
26 willing and able to undertake in order to submit their claims. This choice will
27 minimize the emotional and logistical impact on class members.
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16. I understand that as part of the settlement, USC has agreed to implement policies aimed at bolstering oversight of the student healthcare center to prevent future misconduct. I strongly support those efforts.

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Dated: February 10, 2019

Signed: Jane Doe A. D.
Name: Jane Doe A. D.

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DECLARATION OF JANE DOE F.M. IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

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12 Dr. George Tyndall at USC’s student health center.
- 13 4. I had one appointment with Dr. Tyndall. During this appointment, Dr.
14 Tyndall violated me by performing an unnecessary and inappropriate pelvic
15 exam, improper digital penetration, performing an improper breast
16 examination, making inappropriate comments during the breast and pelvic
17 examinations, and failing to properly drape private areas of my body during
18 the breast and pelvic examinations.
- 19 5. When I learned from media reports that Dr. Tyndall had violated, abused,
20 and mistreated female patients at USC for more than 25 years, I was
21 incredibly upset and decided to contact a lawyer.
- 22 6. I contracted Hagens Berman to ask about pursuing a claim against USC.
23 After speaking with a lawyer there about all of my legal options—which
24 included filing an individual lawsuit—I made the decision to join the class
25 action as a class representative.
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27 option for pursuing my claim against USC. I also wanted to help hold USC
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1 accountable for its failure to ensure that its female students receive quality
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10 the future.

11 Dated: February 9, 2018

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14 Signed:



15
16 Name: JANE DOE F.M.
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5 Tel.: 206.623.7292
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7 Email: steve@hbsslaw.com

8 Christopher R. Pitoun (SBN 290235)
9 301 N. Lake Ave., Suite 920
10 Pasadena, CA 91101
11 Tel.: 213-330-7150
12 Fax: 213-330-7512
13 Email: christopherp@hbsslaw.com

14 *Attorneys for Plaintiffs*

15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

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

20 JOYCE SUTEDJA, MEHRNAZ
21 MOHAMMADI, JANE DOE M.G.,
22 JANE DOE R.B., JANE DOE K.Y., and
23 JANE DOE M.D., individually and on
24 behalf of all others similarly situated,

25 Plaintiffs,

26 v.

27 UNIVERSITY OF SOUTHERN
28 CALIFORNIA, BOARD OF
TRUSTEES OF THE UNIVERSITY OF
SOUTHERN CALIFORNIA, and
GEORGE TYNDALL, M.D.,

Defendants.

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]

DECLARATION OF MEHRNAZ MOHAMMADI IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

1 DECLARATION OF MEHRNAZ MOHAMMADI IN SUPPORT OF MOTION FOR
2 PRELIMINARY APPROVAL OF CLASS SETTLEMENT

3 I Mehrnaz Mohammadi declare under penalty of perjury under the laws of the
4 United States that the following is true and correct.

- 5
- 6 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed Class
7 Representative in the above-entitled action. This Declaration, which is based
8 on my personal knowledge of the facts stated herein, is submitted in support
9 of the Motion for Preliminary Approval of Class Action Settlement.
 - 10 2. I attended the University of Southern California (“USC”) from 2014 to 2017.
 - 11 3. During my time at USC, I was treated for womens health related issues by
12 Dr. George Tyndall at USC’s student health center.
 - 13 4. I had one appointment with Dr. Tyndall. During this appointment, Dr.
14 Tyndall made me extremely uncomfortable by making inappropriate sexual
15 comments while performing a pelvic exam, and making inappropriate and
16 unprofessional comments in his office after the exam was finished.
 - 17 5. When I learned from media reports that Dr. Tyndall had violated, abused,
18 and mistreated female patients at USC for more than 25 years, I was very
19 upset and decided to contact a lawyer.
 - 20 6. I contacted Hagens Berman to ask about pursuing a claim against USC.
21 After speaking with a lawyer there about all of my legal options—which
22 included filing an individual lawsuit—I made the decision to join the class
23 action as a class representative.
 - 24 7. I chose to act class representative because I thought that it was the best
25 option for pursuing my claim against USC. I also wanted to help hold USC
26 accountable for its failure to ensure that its female students receive quality
27 womens healthcare from a safe provider, and I wanted to see to it that people
28

1 who have suffered from the same experience receive compensation for their
2 injuries.

3 8. It was not an easy decision to act as a class representative. Participation
4 required me to relive a traumatic experience, file a description of my
5 experience on the public docket, and open myself up to potential discovery.
6 However, I found the strength to come forward because I wanted to prevent
7 this type of misconduct from happening again.

8 9. In October, 2018 class counsel contacted me to explain the terms of the
9 settlement. I fully understand the terms and conditions of the settlement.

10 10. I also understand that as a class member I have a right to opt out of the
11 settlement class and/or object to the class settlement in court.

12 11. I support the settlement as a fair and adequate outcome for the class.

13 12. Class counsel has shown me the following definition of the settlement class,
14 which they propose should be used in the Class Notice notifying class
15 members about this case, the certification of the class in this case, the scope
16 of that class, the claims in the case, and what class members must do in order
17 to be included or excluded from the class.

18 13. For purposes of this settlement, the Class is defined as all women who had
19 womens-health-related treatment conducted by George Tyndall, M.D. at the
20 University of Southern California.

21 14. This definition clearly communicates which persons are in the Class and
22 which are not. From this description, people would understand who is
23 included in the Class without further description or detail.

24 15. I support the class settlement because it not only fairly compensates the
25 Class, but it affords women a choice about the level of participation they are
26 willing and able to undertake in order to submit their claims. This choice will
27 minimize the emotional and logistical impact on class members.
28

1 16. I understand that as part of the settlement, USC has agreed to implement
2 policies aimed at bolstering oversight of the student healthcare center to
3 prevent future misconduct. I strongly support those efforts.

4 17. Ultimately, accepting the class settlement will allow me to move on from
5 this traumatic experience knowing that I have helped right an injustice, USC
6 has been held accountable, and I have helped to prevent universities,
7 healthcare providers, and other institutions from tolerating sexual abuse in
8 the future.

9
10 Dated: February 9, 2019

11
12 Signed:



13 Name:

Mehraz Mohammadi

1 Steve W. Berman (*pro hac vice*)
2 HAGENS BERMAN SOBOL SHAPIRO LLP
3 1301 Second Avenue, Suite 2000
4 Seattle, WA 98101
5 Tel.: 206.623.7292
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14 *Attorneys for Plaintiffs*

15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

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

20 JOYCE SUTEDJA, MEHRNAZ
21 MOHAMMADI, JANE DOE M.G.,
22 JANE DOE R.B., JANE DOE K.Y., and
23 JANE DOE M.D., individually and on
24 behalf of all others similarly situated,

25 Plaintiffs,

26 v.

27 UNIVERSITY OF SOUTHERN
28 CALIFORNIA, BOARD OF
TRUSTEES OF THE UNIVERSITY OF
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GEORGE TYNDALL, M.D.,

Defendants.

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]

DECLARATION OF JANE DOE
A.N. IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL
OF CLASS SETTLEMENT

1 DECLARATION OF JANE DOE F.M. IN SUPPORT OF MOTION FOR
2 PRELIMINARY APPROVAL OF CLASS SETTLEMENT

3 I Jane Doe A.N. declare under penalty of perjury under the laws of the United
4 States that the following is true and correct.

- 5
- 6 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed Class
7 Representative in the above-entitled action. This Declaration, which is based
8 on my personal knowledge of the facts stated herein, is submitted in support
9 of the Motion for Preliminary Approval of Class Action Settlement.
- 10 2. I attended the University of Southern California (“USC”) from 2012 to 2016.
- 11 3. During my time at USC, I was treated for womens health related issues by
12 Dr. George Tyndall at USC’s student health center.
- 13 4. I had one appointment with Dr. Tyndall. During this appointment, Dr.
14 Tyndall violated and harmed me by making inappropriate comments about
15 my appearance, improper digital penetration without gloves, inappropriate
16 comments during digital penetration, recommending birth control without
17 explanation, and failing to conduct proper testing and properly treat my
18 heavy periods.
- 19 5. When I learned from media reports that Dr. Tyndall had violated, abused,
20 and mistreated female patients at USC for more than 25 years, I felt
21 distressed and betrayed and decided to contact a lawyer.
- 22 6. I contacted Hagens Berman to ask about pursuing a claim against USC.
23 After speaking with a lawyer there about all of my legal options—which
24 included filing an individual lawsuit—I made the decision to join the class
25 action as a class representative.
- 26 7. I chose to act class representative because I thought that it was the best
27 option for pursuing my claim against USC. I also wanted to help hold USC
28

1 accountable for its failure to ensure that its female students receive quality
2 womens healthcare from a safe provider, and I wanted to see to it that people
3 who have suffered from the same experience receive compensation for their
4 injuries.

5 8. It was not an easy decision to act as a class representative. Participation
6 required me to relive a traumatic experience, file a description of my
7 experience on the public docket, and open myself up to potential discovery.
8 However, I found the strength to come forward because I wanted to prevent
9 this type of misconduct from happening again.

10 9. In October, 2018 class counsel contacted me to explain the terms of the
11 settlement. I fully understand the terms and conditions of the settlement.

12 10. I also understand that as a class member I have a right to opt out of the
13 settlement class and/or object to the class settlement in court.

14 11. I support the settlement as a fair and adequate outcome for the class.

15 12. Class counsel has shown me the following definition of the settlement class,
16 which they propose should be used in the Class Notice notifying class
17 members about this case, the certification of the class in this case, the scope
18 of that class, the claims in the case, and what class members must do in order
19 to be included or excluded from the class.

20 13. For purposes of this settlement, the Class is defined as all women who had
21 womens-health-related treatment conducted by George Tyndall, M.D. at the
22 University of Southern California.

23 14. This definition clearly communicates which persons are in the Class and
24 which are not. From this description, people would understand who is
25 included in the Class without further description or detail.

26 15. I support the class settlement because it not only fairly compensates the
27 Class, but it affords women a choice about the level of participation they are
28

1 willing and able to undertake in order to submit their claims. This choice will
2 minimize the emotional and logistical impact on class members.

3 16. I understand that as part of the settlement, USC has agreed to implement
4 policies aimed at bolstering oversight of the student healthcare center to
5 prevent future misconduct. I strongly support those efforts.

6 17. Ultimately, accepting the class settlement will allow me to move on from
7 this traumatic experience knowing that I have helped right an injustice, USC
8 has been held accountable, and I have helped to prevent universities,
9 healthcare providers, and other institutions from tolerating sexual abuse in
10 the future.

11 Dated: February 8, 2019

12
13
14
15 Signed:



16 Name:

Jane Doe A.N.

1 Steve W. Berman (*pro hac vice*)
2 HAGENS BERMAN SOBOL SHAPIRO LLP
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14 *Attorneys for Plaintiffs*

15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

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

20 JOYCE SUTEDJA, MEHRNAZ
21 MOHAMMADI, JANE DOE M.G.,
22 JANE DOE R.B., JANE DOE K.Y., and
23 JANE DOE M.D., individually and on
24 behalf of all others similarly situated,

25 Plaintiffs,

26 v.

27 UNIVERSITY OF SOUTHERN
28 CALIFORNIA, BOARD OF
TRUSTEES OF THE UNIVERSITY OF
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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]

DECLARATION OF JANE DOE
H.R. IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL
OF CLASS SETTLEMENT

1 DECLARATION OF JANE DOE H.R. IN SUPPORT OF MOTION FOR
2 PRELIMINARY APPROVAL OF CLASS SETTLEMENT

3 I Jane Doe H.R. declare under penalty of perjury under the laws of the United
4 States that the following is true and correct.

- 5
- 6 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed Class
7 Representative in the above-entitled action. This Declaration, which is based
8 on my personal knowledge of the facts stated herein, is submitted in support
9 of the Motion for Preliminary Approval of Class Action Settlement.
- 10 2. I attended the University of Southern California (“USC”) from 2010-2012.
- 11 3. During my time at USC, I was treated for womens health related issues by
12 Dr. George Tyndall at USC’s student health center.
- 13 4. I had one appointment with Dr. Tyndall. During this appointment, Dr.
14 Tyndall caused harm to me by making inappropriate and embarrassing
15 comments, performing a pelvic exam without a chaperone present, and
16 failing to conduct proper testing to determine why I was experiencing heavy
17 periods and passing large blood clots.
- 18 5. When I learned from media reports that Dr. Tyndall had violated, abused,
19 and mistreated female patients at USC for more than 25 years, I decided to
20 contact a lawyer.
- 21 6. I contacted Hagens Berman to ask about pursuing a claim against USC.
22 After speaking with a lawyer there about all of my legal options—which
23 included filing an individual lawsuit—I made the decision to join the class
24 action as a class representative.
- 25 7. I chose to act class representative because I thought that it was the best
26 option for pursuing my claim against USC. I also wanted to help hold USC
27 accountable for its failure to ensure that its female students receive quality
28

1 womens healthcare from a safe provider, and I wanted to see to it that people
2 who have suffered from the same experience receive compensation for their
3 injuries.

- 4 8. It was not an easy decision to act as a class representative. Participation
5 required me to relive a traumatic experience, file a description of my
6 experience on the public docket, and open myself up to potential discovery.
7 However, I found the strength to come forward because I wanted to prevent
8 this type of misconduct from happening again.
- 9 9. In October, 2018 class counsel contacted me to explain the terms of the
10 settlement. I fully understand the terms and conditions of the settlement.
- 11 10. I also understand that as a class member I have a right to opt out of the
12 settlement class and/or object to the class settlement in court.
- 13 11. I support the settlement as a fair and adequate outcome for the class.
- 14 12. Class counsel has shown me the following definition of the settlement class,
15 which they propose should be used in the Class Notice notifying class
16 members about this case, the certification of the class in this case, the scope
17 of that class, the claims in the case, and what class members must do in order
18 to be included or excluded from the class.
- 19 13. For purposes of this settlement, the Class is defined as all women who had
20 womens-health-related treatment conducted by George Tyndall, M.D. at the
21 University of Southern California.
- 22 14. This definition clearly communicates which persons are in the Class and
23 which are not. From this description, people would understand who is
24 included in the Class without further description or detail.
- 25 15. I support the class settlement because it not only fairly compensates the
26 Class, but it affords women a choice about the level of participation they are
27
28

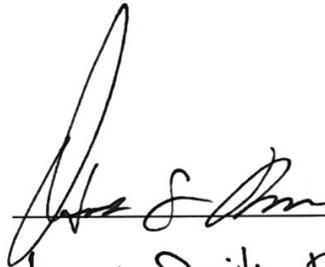
1 willing and able to undertake in order to submit their claims. This choice will
2 minimize the emotional and logistical impact on class members.

3 16. I understand that as part of the settlement, USC has agreed to implement
4 policies aimed at bolstering oversight of the student healthcare center to
5 prevent future misconduct. I strongly support those efforts.

6 17. Ultimately, accepting the class settlement will allow me to move on from
7 this traumatic experience knowing that I have helped right an injustice, USC
8 has been held accountable, and I have helped to prevent universities,
9 healthcare providers, and other institutions from tolerating sexual abuse in
10 the future.

11 Dated: February 9, 2019

12 Signed:



13 _____
14 Name: Hannah Smith Rangel
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 _____
23 _____
24 _____
25 _____
26 _____
27 _____

1 Steve W. Berman (*pro hac vice*)
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14 *Attorneys for Plaintiffs*

15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

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

20 JOYCE SUTEDJA, MEHRNAZ
21 MOHAMMADI, JANE DOE M.G.,
22 JANE DOE R.B., JANE DOE K.Y., and
23 JANE DOE M.D., individually and on
24 behalf of all others similarly situated,

25 Plaintiffs,

26 v.

27 UNIVERSITY OF SOUTHERN
28 CALIFORNIA, BOARD OF
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No. 2:18-cv-04258-SVW-GJS

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DECLARATION OF JANE DOE M.V. IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

1 DECLARATION OF JANE DOE M.V. IN SUPPORT OF MOTION FOR
2 PRELIMINARY APPROVAL OF CLASS SETTLEMENT

3 I Jane Doe M.V. declare under penalty of perjury under the laws of the United
4 States that the following is true and correct.

- 5
- 6 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed Class
7 Representative in the above-entitled action. This Declaration, which is based
8 on my personal knowledge of the facts stated herein, is submitted in support
9 of the Motion for Preliminary Approval of Class Action Settlement.
 - 10 2. I attended the University of Southern California (“USC”) from 1996 to 2000.
 - 11 3. During my time at USC, I was treated for womens health related issues by
12 Dr. George Tyndall at USC’s student health center.
 - 13 4. I had one appointment with Dr. Tyndall. During this appointment, Dr.
14 Tyndall violated and harmed me by performing an unnecessary and pelvic
15 exam without a chaperone present, performing a pelvic exam without
16 wearing gloves, making inappropriate sexual comments during the pelvic
17 exam, failing to perform proper testing to determine if I had a urinary tract
18 infection, recommending treatment for a hemorrhoid that was not medically
19 necessary, and prescribing birth control without discussing potential side
20 effects and other options.
 - 21 5. When I learned from media reports that Dr. Tyndall had violated, abused,
22 and mistreated female patients at USC for more than 25 years, I felt upset
23 and betrayed and decided to contact a lawyer.
 - 24 6. I contacted Hagens Berman to ask about pursuing a claim against USC.
25 After speaking with a lawyer there about all of my legal options—which
26 included filing an individual lawsuit—I made the decision to join the class
27 action as a class representative.
- 28

- 1 7. I chose to act class representative because I thought that it was the best
2 option for pursuing my claim against USC. I also wanted to help hold USC
3 accountable for its failure to ensure that its female students receive quality
4 womens healthcare from a safe provider, and I wanted to see to it that people
5 who have suffered from the same experience receive compensation for their
6 injuries.
- 7 8. It was not an easy decision to act as a class representative. Participation
8 required me to relive a traumatic experience, file a description of my
9 experience on the public docket, and open myself up to potential discovery.
10 However, I found the strength to come forward because I wanted to prevent
11 this type of misconduct from happening again.
- 12 9. In October, 2018 class counsel contacted me to explain the terms of the
13 settlement. I fully understand the terms and conditions of the settlement.
- 14 10. I also understand that as a class member I have a right to opt out of the
15 settlement class and/or object to the class settlement in court.
- 16 11. I support the settlement as a fair and adequate outcome for the class.
- 17 12. Class counsel has shown me the following definition of the settlement class,
18 which they propose should be used in the Class Notice notifying class
19 members about this case, the certification of the class in this case, the scope
20 of that class, the claims in the case, and what class members must do in order
21 to be included or excluded from the class.
- 22 13. For purposes of this settlement, the Class is defined as all women who had
23 womens-health-related treatment conducted by George Tyndall, M.D. at the
24 University of Southern California.
- 25 14. This definition clearly communicates which persons are in the Class and
26 which are not. From this description, people would understand who is
27 included in the Class without further description or detail.

1 15. I support the class settlement because it not only fairly compensates the
2 Class, but it affords women a choice about the level of participation they are
3 willing and able to undertake in order to submit their claims. This choice will
4 minimize the emotional and logistical impact on class members.

5 16. I understand that as part of the settlement, USC has agreed to implement
6 policies aimed at bolstering oversight of the student healthcare center to
7 prevent future misconduct. I strongly support those efforts.

8 17. Ultimately, accepting the class settlement will allow me to move on from
9 this traumatic experience knowing that I have helped right an injustice, USC
10 has been held accountable, and I have helped to prevent universities,
11 healthcare providers, and other institutions from tolerating sexual abuse in
12 the future.

13
14 Dated: February 10, 2019

15 Signed: Jane Doe, M.V.

16 Name: *Jane Doe, M.V.*

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 WESTERN DIVISION

4
5 **IN RE USC STUDENT**
6 **HEALTH CENTER**
7 **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]

8 **DECLARATION OF**
9 **JANE DOE M.S.**

10
11 I, Jane Doe M.S., under penalty of perjury, do hereby state as follows:

12 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed
13 Class Representative in the above-entitled action. This Declaration, which is based
14 on my personal knowledge of the facts stated herein, is submitted in support of the
15 Motion for Preliminary Approval of Class Action Settlement.

16 2. As Named Plaintiff, I bring this action for money damages and
17 equitable relief on behalf of myself and all similarly situated women who were
18 harmed by the abuse and misconduct of Dr. George Tyndall and USC as described
19 in the Consolidated Class Action Complaint [Dkt. 47].

20 3. In the Consolidated Class Action Complaint in this matter, I used the
21 name “Jane Doe M.S.” to protect my privacy.

22 4. In 1992, I was a graduate student at USC’s School of Cinema-
23 Television. During that time, I saw Dr. Tyndall for a womens health appointment.

24 5. In my appointment, Dr. Tyndall put iodine on my cervix and
25 photographed my vagina, claiming that it was a new method of diagnosing cervical
26 cancer. He delivered my “results”—which were negative—several weeks later.
27
28

1 6. Dr. Tyndall’s behavior made me so uncomfortable that I stopped
2 seeking womens healthcare from USC – I went to Planned Parenthood for the
3 remainder of graduate school.

4 7. When I learned from media reports that Dr. Tyndall had violated,
5 abused, and mistreated female patients at USC for more than 25 years, I was
6 incredibly upset and decided to contact a lawyer.

7 8. I contacted Hagens Berman to ask about pursuing a claim against
8 USC. After speaking with a lawyer there about all of my legal options—which
9 included filing an individual lawsuit—I made the decision to join the class action as
10 a class representative.

11 9. I chose to act class representative because I thought that it was the best
12 option for pursuing my claim against USC. I also wanted to help hold USC
13 accountable for its failure to ensure that its female students receive quality womens
14 healthcare from a safe provider, and I wanted to see to it that people who have
15 suffered from the same experience receive compensation for their injuries.

16 10. I am a part of this case to help right a wrong. It was not an easy
17 decision to act as a class representative. Participation required me to relive a
18 traumatic experience, file a description of my experience on the public docket, and
19 open myself up to potential discovery. However, I found the strength to come
20 forward because I wanted to prevent this type of misconduct from happening again.

21 11. Hopefully, this case will deter universities from employing sexual
22 predators, because for my alma mater the potentially dire consequences for their
23 female student body were not enough to fire Dr. Tyndall.

24 12. In October, 2018 class counsel contacted me to explain the terms of
25 the settlement. I fully understand the terms and conditions of the settlement.

26 13. I also understand that as a class member I have a right to opt out of the
27 settlement class and/or object to the class settlement in court.

28 14. I support the settlement as a fair and adequate outcome for the class.

1 15. I support the class settlement because it not only fairly compensates
2 the Class, but it affords women a choice about the level of participation they are
3 willing and able to undertake in order to submit their claims. This choice will
4 minimize the emotional and logistical impact on class members.

5 16. Class counsel has shown me the following definition of the settlement
6 class, which they propose should be used in the Class Notice notifying class
7 members about this case, the certification of the class in this case, the scope of that
8 class, the claims in the case, and what class members must do in order to be
9 included or excluded from the class.

10 17. For purposes of this settlement, the Class is defined as all women who
11 had womens-health-related treatment conducted by George Tyndall, M.D. at the
12 University of Southern California.

13 18. This definition clearly communicates which persons are in the Class
14 and which are not. From this description, people would understand who is included
15 in the Class without further description or detail.

16 19. Finally, I am aware of the equitable relief that USC has agreed to as
17 part of the settlement and I fully support the changes that are part of that, in
18 particular the establishment of an Office of Professionalism & Ethics, enhanced
19 executive background screens for new hires and promotions to leadership positions,
20 and – most importantly – the hiring of two new female board-certified
21 gynecologists and a female adolescent and young adult medicine specialist at the
22 student health center.

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

24 Executed this 9th day of February, 2019 at 9:00

25 AM _____.

26

27

28

Jane Doe MS

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 WESTERN DIVISION

4
5 **IN RE USC STUDENT**
6 **HEALTH CENTER**
7 **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]

8 **DECLARATION OF**
9 **JANE DOE A.R.**

10
11 I, Jane Doe A.R., under penalty of perjury, do hereby state as follows:

12 1. I am over the age of eighteen (18), and a Named Plaintiff and proposed
13 Class Representative in the above-entitled action. This Declaration, which is based
14 on my personal knowledge of the facts stated herein, is submitted in support of the
15 Motion for Preliminary Approval of Class Action Settlement.

16 2. As Named Plaintiff, I bring this action for money damages and
17 equitable relief on behalf of myself and all similarly situated women who were
18 harmed by the abuse and misconduct of Dr. George Tyndall and USC as described
19 in the Consolidated Class Action Complaint [Dkt. 47].

20 3. In the Consolidated Class Action Complaint in this matter, I used the
21 name “Jane Doe 1LC”) to protect my privacy.¹

22 4. In August 2011, I received my B.S. degree in accounting from USC,
23 and I returned to the school in 2015 to take a variety of classes with the goal of
24 preparing to apply to medical school. While enrolled in various classes at USC, I
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28 ¹ My initials are inadvertently incorrect in the Consolidated Class Action Complaint; my actual initials are “A.R.” However, the remainder of allegations relating to my situation are accurate in the Consolidated Complaint.

1 decided to switch to the pre-med track and completed the pre-med post-bac
2 program at USC in December 2017.

3 5. I am a part of this case to help right a wrong. Dr. Tyndall was a wolf in
4 sheep's clothing and victimized me and countless young women; and by remaining
5 silent for so long, the University of Southern California disappointingly condoned
6 his behavior.

7 6. With light shed onto this case by hundreds of other patients and
8 myself, I hope that other victims will be able to speak up against sexual predators
9 like Dr. Tyndall. I felt personally preyed upon because of my ethnicity, gender, and
10 smaller stature, and that I ultimately did not have a voice to speak up. It is very
11 unfortunate that the educational institution I worked so hard to get into employed a
12 sexual predator who took advantage of not only me and my naive trust in my
13 OBGYN, but hundreds of other patients as well.

14 7. I cannot help but feel as though the degree I received from my
15 prestigious alma mater is tarnished by my experiences at the Engemann Student
16 Health Center, Dr. Tyndall, and the University of Southern California, itself.
17 Instead of pride, I feel shame and hurt. I would never want anyone else to go
18 through a similar experience, which is why I am participating in this case.
19 Educational institutions must be aware that there are ramifications for their actions,
20 or lack thereof.

21 8. Hopefully, this case will deter universities from employing sexual
22 predators, because for my alma mater the potentially dire consequences for their
23 female student body were not enough to fire Dr. Tyndall.

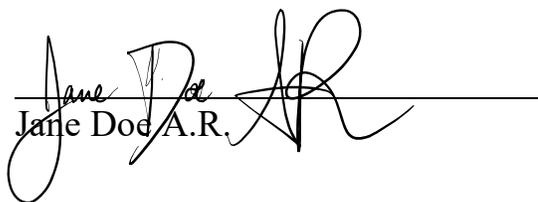
24 9. Ultimately, I am participating in this case so that I can speak up for
25 myself. Although this legal experience is very uncomfortable and brings up many
26 unwanted feelings, I am a part of this case so that I can put my past behind me,
27 regain some dignity, and move forward with my life. Painful memories are hard to
28

1 live with, especially when they are being broadcast on the media. I hope that by
2 speaking my truth, I can close the book on this chapter in my life and move on.

3 10. Finally, I am aware of the equitable relief that USC has agreed to as
4 part of the settlement and I fully support the changes that are part of that, in
5 particular the establishment of an Office of Professionalism & Ethics, enhanced
6 executive background screens for new hires and promotions to leadership positions,
7 and – most importantly – the hiring of two new female board-certified
8 gynecologists and a female adolescent and young adult medicine specialist at the
9 student health center.

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

11 Executed this 12 day of February, 2019 at Los Angeles.

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15 Jane Doe A.R.
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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]

**DECLARATION OF
SHANNON O'CONNOR**

1 I, Shannon O’Conner, under penalty of perjury, do hereby state as follows:

2 1. I am over the age of eighteen, and a named plaintiff and proposed
3 Class Representative in the above-entitled action. I submit this declaration based on
4 personal knowledge in support of the Motion for Preliminary Approval of Class
5 Action Settlement.

6 2. I authorized Girard Sharp to file a proposed class action for damages
7 for the abuse and misconduct of Dr. George Tyndall and USC as described in the
8 Consolidated Class Action Complaint [Dkt. 47]. I also want to see institutional
9 changes at USC to ensure that what happened with Tyndall never happens again.

10 3. I have been in regular contact with my attorneys at all times during this
11 litigation. I support the proposed settlement, as I believe it advances the interests of
12 all members of the class by providing an immediate and substantial recovery for all
13 women who were exposed to Tyndall and it requires USC to implement the
14 institutional changes to protect women at USC from the risk of sexual violence and
15 racial abuse.

16 4. From my perspective, one of the most important aspects of the
17 settlement is that even if class members do not want to describe their experience in
18 writing or in an interview, they can still get the \$2,500 tier one payment and so be
19 acknowledged, without identifying themselves or reliving a painful experience.
20 The settlement holds USC accountable by requiring the payment of \$215 million to
21 compensate the women treated by Tyndall and requiring USC to undertake lasting
22 institutional changes, all under the supervision of a federal district court.

23 5. I put my name on this lawsuit so that other women would not have to.
24 This settlement allows women to recover money through a process that is private
25 and where they are in control over how much information they share. For thirty
26 years I thought I was the only one who had been abused by Tyndall, but this
27 settlement recognizes and compensates all the victims of Tyndall’s abuse, while
28 respecting their privacy and their choices.

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I declare under penalty of perjury that the foregoing is true and correct.
Executed this 12th day of February, 2019 in Houston, TX.

Shannon O’Conner