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## **STATEMENT OF GLORIA ALLRED**

On May 22, 2018, we filed our first lawsuit against U.S.C. and Dr. George Tyndall because of the very serious allegations made by female students that for many years U.S.C. knew of inappropriate conduct by him but failed to take appropriate measures to protect innocent students who were under his care. In fact, when I held a press conference to announce the filing of our first lawsuit, I stated that we had a declaration from a “Jane Doe” that she had notified U.S.C. in 1991 of Dr. Tyndall’s inappropriate conduct.

My firm, Allred, Maroko & Goldberg, and our co-counsel Carpenter, Zuckerman and Rowley represent 72 of those female victims.

When we filed our complaint, I promised that “we will not stop until the truth is known and we win justice for the U.S.C. women whose rights were violated.” That day has come.

Today, we announce an “herstoric” settlement -- \$842,400,000.00, which we believe to be the highest single sexual abuse and sex harassment settlement against a university in civil litigation history. This is a global settlement for all 702 women whom Dr. Tyndall sexually abused at U.S.C., and who decided to opt out of the federal class action settlement against U.S.C.

Our 72 clients are victims no more.

We congratulate our clients for deciding to opt out of the federal class action settlement approved more than 2 years ago and instead making the decision to continue to litigate the case against U.S.C. with us.

The survivors in the federal class action settlement who endured the most severe form of sexual abuse will receive on average \$96,000. On the other hand, in this global settlement which the Court approved this afternoon, the survivors who declined to accept the class action settlement and continued to litigate will

receive an average of \$1.2 million dollars. Our clients obviously made the right choice.

Our clients and the other survivors of Dr. Tyndall's morally despicable and wrongful conduct have persevered. They have persevered in order to hold U.S.C. accountable for not protecting them and for not having taken action against Dr. Tyndall decades ago when the young women first began to complain about him.

Today our clients and other victims received a long overdue "apology" from Rick Caruso, Chair of the U.S.C. Board of Trustees. He sent a letter to the U.S.C. community in which he stated on behalf of the Board of Trustees, "No settlement could ever adequately address the deep pain and sense of personal violation that these innocent victims must have experienced. The behavior that was discovered shocks the conscience of the university to its core. It compromises the very foundation of honor and integrity upon which this institution was built and betrays the trust that our students have long expected from us. Our institution fell short by not doing everything it could to protect those who matter to us most – our students. For years, the victims of George Tyndall suffered in silence. I am sorry for the pain this caused the very people we were obligated to protect."

We agree with Rick Caruso's sentiment and we appreciate U.S.C.'s acknowledgement of the pain and personal violation that our clients have suffered.

We congratulate our 72 clients for staying strong. They endured further litigation and the risk that they might have to testify at trial. They made many sacrifices in order to continue with this case, and they trusted us to continue to fight for them to obtain the best possible result for them.

Today justice has prevailed because of their courage and the exceptional legal work and advocacy of all of the lawyers in this case.

Today's settlement is a legal reckoning and one major step forward in vindicating the rights and protections for women. Women stood united. They refused to be silenced and to suffer injustice. Instead, they became empowered. They decided to fight back against a powerful institution, and they have won.

ATTORNEY GLORIA ALLRED  
REPRESENTING 72 CLIENTS WITH CARPENTER ZUCKERMAN & ROWLEY  
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