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10 Including Professional Corporations
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17 Attorneys for Defendants UNIVERSITY OF SOUTHERN
CALIFORNIA AND UNIVERSITY OF SOUTHERN
18 CALIFORNIA ALUMNI ASSOCIATION

19 SUPERIOR COURT OF THE STATE OF CALIFORNIA
20 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

21 BRIAN RALSTON, individually and on
22 behalf of all others situated,

23 Plaintiff,

24 v.

25 UNIVERSITY OF SOUTHERN
CALIFORNIA, a California Corporation;
26 and UNIVERSITY OF SOUTHERN
CALIFORNIA ALUMNI
27 ASSOCIATION, form of entity unknown

28 Defendants.

Case No. 22STCV18066

**STIPULATION AND [PROPOSED]
ORDER EXTENDING SETTLEMENT
TIMETABLE**

Assigned to Hon. Carolyn B. Kuhl,
Department: SSCDept12

Initial Status Conference Date: December
9, 2022

Complaint Filed: June 1, 2022

FILED
Superior Court of California
County of Los Angeles

12/08/2023

David W. Slayton, Executive Officer / Clerk of Court

By: L. MGreené Deputy

1 Plaintiff Brian Ralston, individually and on behalf of all others situated (“Plaintiff”)
2 and Defendants University of Southern California and Defendant California Alumni
3 Association (“Defendants,” and, collectively, the “Parties”) together submit, through their
4 undersigned counsel of record, the following Stipulation and Proposed Order.

5 WHEREAS, on November 9, 2023, the Court issued its Order Granting Plaintiff’s
6 Preliminary Approval of Class Action Settlement and Approval of Class Notice (the
7 “Order”);

8 WHEREAS, the Court’s Order includes a detailed timetable dictating when certain
9 actions are to be taken by the Parties prior to final approval, including but not limited to,
10 when Defendants were required to provide Plaintiff’s counsel and the settlement
11 administrator with the class list (November 23, 2023), when the settlement administrator
12 would send notice to the class (December 11, 2023), etc.;

13 WHEREAS, after sending the class list to Plaintiff and the settlement administrator
14 on November 22, 2023, the Parties discovered some discrepancies in the list and
15 determined that certain inquiries and/or corrections in the methodology Defendants used to
16 compile the class list may be needed before the Parties would be confident in the final
17 class list;

18 WHEREAS, the Parties agreed on the type of inquiries to be made (i.e., to various
19 colleges associated with Defendants) and on the format of an updated class list to be
20 provided to Plaintiff, which will now also include the year the graduate certificate was
21 obtained as well as the school it was obtained from, and agreed it would take 45 days to
22 complete those inquiries and updates; and

23 WHEREAS, the Parties therefore seek an extension of the Court’s settlement
24 timetable, whereby all dates are extended, as proposed in the chart below:

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Event	Timing	Original Date	Extended Date
a. Dissemination of notice to the Class:	Within fourteen (14) days of entry of the Preliminary Approval Order, Defense Counsel shall provide to the	November 23, 2023	January 19, 2024 (updated class list)

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Event	Timing	Original Date	Extended Date
	<p>Settlement Administrator the last known email and mailing addresses for the Class.</p> <p>Within thirty (30) days of entry of the Preliminary Approval Order, the Settlement Administrator will disseminate Email Notice to Class Members via email in a form substantially similar to that set forth in Exhibit A to the Agreement (or U.S. Mail Notice in a form substantially similar to that set forth in Exhibit B to the Agreement, to any Class Members for whom Defendants do not have an email address).</p> <p>Within fourteen (14) days thereafter, the Settlement Administrator will disseminate U.S. Mail Notice to any Class Members for whom the Email Notice was returned as undeliverable.</p>	<p>December 11, 2023</p> <p>December 22, 2023</p>	<p>February 6, 2024</p> <p>February 16, 2024</p>
<p>b. Deadline to reinstate/instate membership in the USCAA to all 1,631 Class Members</p>	<p>Forty-five (45) days after entry of the Preliminary Approval Order</p>	<p>December 26, 2023</p>	<p>February 20, 2024</p>
<p>c. Deadline for Class Counsel to file application for attorneys' fees and expenses</p>	<p>Fourteen (14) days before the deadline to serve objections or to request exclusion from Settlement Class</p>	<p>(inadvertently not included in prior schedule)</p>	<p>March 20, 2024</p>

Event	Timing	Original Date	Extended Date
d. Deadline to request exclusion from Settlement Class:	Ninety (90) days after entry of the Preliminary Approval Order	February 7, 2024	April 3, 2024
e. Deadline to serve objections:	Ninety (90) days after entry of the Preliminary Approval Order	February 7, 2024	April 3, 2024
f. Deadline for Class Members to request a printed Bookstore Coupon	Sixty (60) days from the date of delivery of Email or Mail Notice	February 9, 2024	April 5, 2024
g. Deadline for the parties to respond to any objections	One hundred and four (104) days after entry of the Preliminary Approval Order	February 21, 2024	April 17, 2024
h. Deadline to email the Bookstore Coupon to each Settlement Class Member	One Hundred and Twenty (120) days after entry of the Preliminary Approval Order	March 8, 2024	May 6, 2024
i. Deadline for serving and filing Motion for Final Approval of Settlement, Attorneys' Fees and Expenses, and Incentive Awards	One hundred and twenty (150) days after entry of the Preliminary Approval Order	April 8, 2024	June 6, 2024
j. Final Approval Hearing on Settlement:	One Hundred and Eighty (180) days after entry of Preliminary Approval Order	May 14, 2024 at 10:30 a.m.	July 16, 2024 at 10:30 a.m.
k. Deadline to pay Class Counsel the Fee and Expense Award	Thirty (30) days after the Court's Final Approval Order (and receipt of all necessary payment and routing information – including receipt of signed, valid, current W-9 Forms (revised as of October 2018) from both Class Counsel and Plaintiff)	June 13, 2024	August 15, 2024

Event	Timing	Original Date	Extended Date
1. Deadline to ensure that USC/USCAA’s advertising relating to the GRCT Programs accurately describes the benefits available to GRCT graduates	Sixty (60) days after the Final Approval Order	July 14, 2024	September 16, 2024

IT IS SO STIPULATED

Dated: December 5, 2023

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By

/s/ Moe Keshavarzi

MOE KESHAVARZI
MARK G. RACKERS

Attorneys for Defendants
UNIVERSITY OF SOUTHERN CALIFORNIA
AND UNIVERSITY OF SOUTHERN CALIFORNIA ALUMNI ASSOCIATION

Dated: December 5, 2023

SINGIAN LAW

By

/s/ Lizelle S. Brandt

LIZELLE S. BRANDT
ANDREW J. KUBIK

Attorneys for Plaintiff

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Dated: December 5, 2023

STUART ALBAN LAW

By /s/ Courtney Stuart-Alban

COURTNEY STUART-ALBAN

JUAN PABLO ALBAN

Attorneys for Plaintiff

SIGNATURE ATTESTATION

I attest that the concurrence of filing this document with the e-signatures above has been obtained from the signatories on this document.

Dated: December 5, 2023

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Mark G. Rackers

MARK G. RACKERS

Attorneys for Defendants

[PROPOSED ORDER]

Pursuant to the foregoing stipulation, and for good cause appearing, the Court extends the settlement timetable in the following manner:

<u>Event</u>	<u>Timing</u>	<u>Original Date</u>	<u>Extended Date</u>
a. Dissemination of notice to the Class:	Within fourteen (14) days of entry of the Preliminary Approval Order, Defense Counsel shall provide to the Settlement Administrator the last known email and mailing addresses for the Class.	November 23, 2023	January 19, 2024 (updated class list)
	Within thirty (30) days of entry of the Preliminary Approval Order, the Settlement Administrator will disseminate Email Notice to Class Members via email in a form substantially similar to that set forth in Exhibit A to the Agreement (or U.S. Mail Notice in a form substantially similar to that set forth in Exhibit B to the Agreement, to any Class Members for whom Defendants do not have an email address).	December 11, 2023	February 6, 2024
	Within fourteen (14) days thereafter, the Settlement Administrator will disseminate U.S. Mail Notice to any Class Members for whom the Email Notice was returned as undeliverable.	December 22, 2023	February 16, 2024
b. Deadline to reinstate/instate membership in the USCAA to all 1,631 Class Members	Forty-five (45) days after entry of the Preliminary Approval Order	December 26, 2023	February 20, 2024
c. Deadline for Class Counsel to file application for attorneys'	Fourteen (14) days before the deadline to serve objections or to request	(inadvertently not included in prior schedule)	March 20, 2024

Event	Timing	Original Date	Extended Date
fees and expenses d. Deadline to request exclusion from Settlement Class:	exclusion from Settlement Class Ninety (90) days after entry of the Preliminary Approval Order	February 7, 2024	April 3, 2024
e. Deadline to serve objections:	Ninety (90) days after entry of the Preliminary Approval Order	February 7, 2024	April 3, 2024
f. Deadline for Class Members to request a printed Bookstore Coupon	Sixty (60) days from the date of delivery of Email or Mail Notice	February 9, 2024	April 5, 2024
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k. Deadline to pay Class Counsel the Fee and Expense Award	Thirty (30) days after the Court's Final Approval Order (and receipt of all necessary payment and routing information – including receipt of signed, valid, current W-9 Forms (revised as of	June 13, 2024	August 15, 2024

Event	Timing	Original Date	Extended Date
	October 2018) from both Class Counsel and Plaintiff)		
1. Deadline to ensure that USC/USCAA's advertising relating to the GRCT Programs accurately describes the benefits available to GRCT graduates	Sixty (60) days after the Final Approval Order	July 14, 2024	September 16, 2024

IT IS SO ORDERED.

DATED: 12/08/2023



HON. CAROLYN B. KUHL
JUDGE OF THE SUPERIOR COURT

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Diego, State of California. My business address is 501 West Broadway, 19th Floor, San Diego, CA 92101-3598.

On December 5, 2023, I served true copies of the following document(s) described as on the interested parties in this action as follows:

STIPULATION AND [PROPOSED] ORDER EXTENDING SETTLEMENT TIMETABLE.

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address *apatrick@sheppardmullin.com* to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 5, 2023, at San Diego, California.

/s/ Amy S. Patrick

Amy S. Patrick

SERVICE LIST

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