

**CLASS ACTION SETTLEMENT NOTICE**  
***Ralston v. University of Southern California, et al.***  
**Case No. 22STCV18066**

You have been identified as someone who completed a University of Southern California (“USC”) Graduate Certificate Program, did not otherwise have a degree from USC, and whose membership in the USC Alumni Association was revoked and/or not provided on or after January 1, 2000

**\*\*\*PLEASE PROVIDE YOUR EMAIL ADDRESS TO FACILITATE ONE OF THE BENEFITS OF THE PROPOSED SETTLEMENT\*\*\***

*This class action settlement may affect your rights.*  
**PLEASE READ THIS NOTICE CAREFULLY.**

A California Superior Court authorized this notice. This is not an advertisement.

**SUMMARY:** Brian Ralston (“Plaintiff”), a graduate of a Graduate Certificate (“GRCT”) program at USC, brought this lawsuit against USC and the USC Alumni Association (“USCAA”) (collectively referred to as “Defendants”), claiming that Defendants improperly revoked his membership in the USCAA, as well as the membership of other GRCT program graduates. Plaintiff sought damages, restitution, and injunctive relief in the form of reinstatement of membership in the USCAA for himself and the Class, with all accompanying alumni benefits. Defendants dispute Plaintiff’s claims and deny all liability to Plaintiff and the Class. The Court has not determined whether Defendants are liable on any of Plaintiff’s claims, but Plaintiff and Defendants have, after extensive negotiations, decided to resolve their dispute and agree that this Settlement is fair, adequate, reasonable, and in the best interests of Plaintiff, the Class, and Defendants, who recognize the value of maintaining a positive relationship with their alumni.

As explained in greater detail below and in the attached documents, the proposed Settlement resolves the claims that were or could have been raised in this lawsuit, stipulates to certification of the Class and appointment of Class Counsel, and provides for: (1) reinstatement of membership in the USCAA to all Class Members; and (2) issuance of a \$50.00 electronic coupon (“e-coupon”) to the USC Bookstore redeemable online at [www.USCBookstore.com](http://www.USCBookstore.com) (or, if requested, a printed coupon redeemable at on-campus USC bookstores) for all Class Members who do not opt out of the Settlement. (Settlement Class Members do not have to submit claims to obtain these Settlement benefits; however, Settlement Class Members must have a valid email address on file to receive an e-coupon; otherwise, a physical coupon will be sent to their last known mailing address, as described below.) Defendants will also ensure that USC/USCAA's advertising relating to the GRCT Programs accurately describes the benefits available to GRCT graduates.

**\*\*\*Please provide your updated email address to the Settlement Administrator by email at: [info@USCGraduateCertificateSettlement.com](mailto:info@USCGraduateCertificateSettlement.com) to facilitate distribution of an electronic \$50.00 USC Bookstore Coupon.\*\*\***

**WHO IS INCLUDED?** The Settlement Class is defined as all 1,822 individuals who completed a USC GRCT Program, did not otherwise have a degree from USC, and whose USCAA membership was revoked and/or not provided to him/her/them from January 1, 2000 to November 9, 2023, who do not exclude themselves from the Settlement Class.

**WHAT CAN I GET?** Under the proposed Settlement, Defendants have agreed to: (1) reinstate and/or instate membership in the USCAA/Alumni Status to all of the 1,822 Class Members, and (2) issue a \$50.00 bookstore coupon to the USC Bookstore (redeemable online or at USC bookstores) to all Class Members who do not opt out of the Settlement (the “Bookstore Coupon”). Class Members’ reinstated and/or instated membership in the USCAA will include such benefits that he/she/they enjoyed or would have enjoyed during the Settlement Class Period as a graduate of a USC GRCT Program, will be subject to all rules of membership as set forth in all current and future bylaws, and will subject Class Members to the same standards of membership as every other member of the USCAA. Settlement Class Members with a valid email address on file with Defendants (or who submit a valid email address to the Settlement Administrator in the manner described below) will receive an e-coupon that is redeemable online at [www.USCBookstore.com](http://www.USCBookstore.com), unless they send a written request for a printed coupon within sixty (60) days from the date of delivery of this notice in the manner detailed below. E-coupons will be sent to Settlement Class Members via email to the last known email address Defendants have on file, and no action is required by Settlement Class Members to receive an e-coupon in this manner. The Bookstore Coupon (whether a printed coupon or e-coupon) is limited to one coupon per Settlement Class Member; has no cash value; cannot be used for textbooks or course materials; cannot be combined with any other coupons, discounts, offers, or promotions; IS VALID FOR ONE-TIME USE ONLY; is void if altered, copied, or transferred; and is not redeemable for gift card purchase.

**DO I HAVE TO SUBMIT A CLAIM?** No. You do not have to submit a claim to receive the benefits of the Settlement, namely: (i) membership in the USCAA, and (ii) the Bookstore Coupon. Membership in the USCAA will automatically be reinstated to all Class Members by February 20, 2024. Further, as detailed above, an electronic version of the \$50.00 Bookstore Coupon (or “e-coupon”), redeemable at [www.USCBookstore.com](http://www.USCBookstore.com) will be emailed to all Class Members with a valid email address on file who (i) do not opt out of the Settlement, and (ii) do not request a printed coupon at the mailing address on file by May 6, 2024. However, **a valid email address must be on file with the Settlement Administrator to receive an electronic bookstore coupon (“e-coupon”), and you are receiving this notice because we were unable to contact you via email.**

- **To Receive an E-Coupon.** Settlement Class Members receiving this notice via U.S. Mail who do not opt out of the Settlement and who want to receive an e-coupon redeemable at [www.USCBookstore.com](http://www.USCBookstore.com), must email a request to **the Settlement Administrator info@USCGraduateCertificateSettlement.com**, that includes: (i) the case name (*Ralston v. University of Southern California, et al.*, Los Angeles Superior Court, Case No. 22STCV18066), (ii) the Settlement Class Member’s name, and (iii) the Settlement Class Member’s updated email address.
- **To Receive a Printed Coupon at a Different Address.** Settlement Class Members receiving this notice via U.S. Mail who do not opt out of the Settlement and who want to receive a printed coupon mailed to a different address than where this notice was sent must

mail a written request to the Settlement Administrator (**Ralston v USC c/o Settlement Administrator, P.O. BOX 23369, Jacksonville, FL 32241**), that includes: (i) the case name (*Ralston v. University of Southern California, et al.*, Los Angeles Superior Court, Case No. 22STCV18066), (ii) the Settlement Class Member's name, and (iii) the Settlement Class Member's updated mailing address.

- **To Receive a Printed Coupon at Last Known Mailing Address.** Settlement Class Members receiving this notice via U.S. Mail who do not opt out of the Settlement and who want to receive a printed coupon mailed to the same address where this notice was sent do not need to do anything. A printed copy of the Bookstore Coupon will be mailed via U.S. Mail to their last known address.

### **YOUR OTHER OPTIONS:**

*Exclusion from the Settlement Class:* If you want to keep the right to sue or continue to sue Defendants about the legal issues in this litigation on your own, you will need to exclude yourself from or "opt out" of the Settlement Class. To exclude yourself, you must mail or email a signed, written request for exclusion to the Settlement Administrator by **April 3, 2024**, saying that you want to be excluded from the settlement class in the matter entitled *Ralston v. University of Southern California, et al.*, Los Angeles Superior Court, Case No. 22STCV18066.

*Objection to the Settlement:* If you do not exclude yourself from the Settlement Class, you may object to the Settlement (or some part of it). By objecting, you are asking the Court not to approve the Settlement in its current form. If you are a Settlement Class Member and submit a timely objection, the Court will consider your views. Settlement Class Members who object to the Settlement will still receive reinstatement of USCAA membership and may still receive the \$50.00 Bookstore Coupon. However, Class Members cannot both object to the Settlement and exclude themselves from the Settlement Class. To object to the Settlement, submit a written objection to the Settlement Administrator by **April 3, 2024** via mail or email explaining why you do not like the Settlement.

Be sure to include your name, address, email address, and telephone number, and write to the Settlement Administrator pursuant to the relevant instructions above by email at [info@uscgraduatecertificatesettlement.com](mailto:info@uscgraduatecertificatesettlement.com) or by first class mail at: Ralston v USC, c/o Settlement Administrator, P.O. BOX 23369, Jacksonville, FL 32241.

**DO I HAVE AN ATTORNEY?** The Court appointed the law firms Singian Law and Stuart Alban Law to serve as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

**PAYMENTS TO CLASS REPRESENTATIVE AND CLASS COUNSEL:** In conjunction with this Settlement, Class Counsel will ask the Court to order Defendants to pay: (1) a \$2,500 service award to the Class Representative, and (2) reasonable attorneys' fees and expenses incurred in litigating this case, up to \$165,000, to Class Counsel. Any service award provided to the Class Representative, as well as fees and expenses awarded to Class Counsel, will not impact the Settlement benefits to Settlement Class Members described above.

**THE COURT'S FINAL APPROVAL HEARING:** The Court has scheduled a Final Approval Hearing to decide whether to approve the Settlement and Class Counsel's requested fees and expenses. The hearing will be held at 10:30 a.m. on July 16, 2024, in Department 12 of the Superior Court of the State of California, County of Los Angeles, Central District, Spring Street Courthouse, 312 North Spring Street, Los Angeles, California 90012. If there are objections to the Settlement or to Class Counsel's fees and expenses, the judge will consider them. You may attend, and you may ask to speak, but you do not have to. If you send an objection, you do not have to come to Court to talk about it. As long as your written objection was received on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not required. The Final Approval Hearing may be moved to a different time or date, in which case you will receive an email providing notice of the same. Finally, you may seek to intervene in the action, but you are not required to intervene to make an objection.

**WHEN WILL THE SETTLEMENT BE EFFECTIVE?** The Settlement will become effective only after it has been finally approved by the Court and any appeals have been resolved in favor of the Settlement. The appeals process can take time, perhaps more than a year. Please be patient. If your email address changes before you receive the Bookstore Coupon, please provide your updated email address to the Settlement Administrator by email at [info@uscgraduatecertificatesettlement.com](mailto:info@uscgraduatecertificatesettlement.com).

**WHAT HAPPENS IF I DO NOTHING?** If you do nothing, you will not have the right to pursue another case against Defendants about the claims that were raised in this litigation. Your USC Alumni Association membership will be reinstated by February 20, 2024 and you will be sent a printed version of the \$50.00 Bookstore Coupon via U.S. Mail by May 6, 2024.

**THIS IS ONLY A SUMMARY.** This Notice summarizes the proposed Settlement. For more details, you may write to Class Counsel by email at [lizelle@singianlaw.com](mailto:lizelle@singianlaw.com) or by first class mail at: Lizelle S. Brandt, Singian Law, 1055 E. Colorado Blvd., Ste. 500, Pasadena, CA 91106.

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*Si necesita esta noticia en español, favor de contactar los abogados de la Clase en cuestión.*

**PLEASE DO NOT CALL OR WRITE THE JUDGE OR CLERK OF THE COURT.  
DIRECT ALL INQUIRIES TO CLASS COUNSEL OR AN ATTORNEY OF YOUR OWN  
CHOOSING.**

**For more information, including to update your email address for receiving the Bookstore Coupon, please visit [www.uscgraduatecertificatesettlement.com](http://www.uscgraduatecertificatesettlement.com).**