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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALLEN MUNRO *et al.*,
Plaintiffs,
v.
UNIVERSITY OF SOUTHERN
CALIFORNIA, *et al.*,
Defendants.

Case No. 2:16-cv-06191-VAP-E

DECLARATION OF COREY CLARK

DATE: August 14, 2023
TIME: 2:00 p.m.
Courtroom 6A

Hon. Virginia A. Phillips

1 I, Corey Clark, declare as follows:

2 1. I am a named Plaintiff and Class Representative in this case.

3 2. I have been employed by the University of Southern California since 2012
4 and I participate in the University of Southern California Defined Contribution Plan
5 and the University of Southern California Tax-Deferred Annuity Plan.

6 3. When this case was filed, on August 17, 2016, I held the position of Distance
7 Education Operations Supervisor at the University of Southern California and
8 accepted the risk of retaliation from USC or its officers.

9 4. I have been an active participant throughout this litigation and have dedicated
10 significant time to the prosecution of this lawsuit. My attorneys sent me the case
11 documents which I reviewed, and they also discussed with me the status of the case
12 and issues regarding the case throughout these six years of litigation. I also
13 searched my own documents in preparing responses for Rule 26 disclosures and
14 responses to 19 interrogatories and 30 requests for production of documents. I
15 gave my deposition in this case over 4 hours and prepared for that deposition for
16 approximately 2 hours. Additionally, I was prepared to testify at trial and prepared
17 for that testimony with my attorneys for approximately two hours. I estimate that I
18 spent at least 36-40 hours over the six years plus this case has been pending in these
19 activities.

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

21 Executed: Jun 29, 2023

22 Corey London Clark
23 Corey London Clark (Jun 29, 2023 19:17 PDT)
24 Corey Clark

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