

1 JEROME J. SCHLICHTER (SBN 054513)  
 jschlichter@uselaws.com  
 2 MICHAEL A. WOLFF (admitted *pro hac vice*)  
 mwolff@uselaws.com  
 3 JOEL D. ROHLF (admitted *pro hac vice*)  
 jrohlf@uselaws.com  
 4 SCHLICHTER BOGARD & DENTON, LLP  
 100 South Fourth Street, Suite 1200  
 St. Louis, MO 63102  
 5 Telephone: (314) 621-6115  
 Facsimile: (314) 621-5934  
 6 *Class Counsel for Plaintiffs*

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 8 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
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10 ALLEN MUNRO *et al.*,  
 11 *Plaintiffs,*  
 12 v.  
 13 UNIVERSITY OF SOUTHERN  
 CALIFORNIA, *et al.*,  
 14 *Defendants.*

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

**DECLARATION OF SARAH  
 WOHLGEMUTH**

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

Hon. Virginia A. Phillips

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1 I, Sarah Wohlgemuth, declare as follows:

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

3 2. I was employed by the University of Southern California from 2012-2019  
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  
7 Technical Grant Writer at the University of Southern California and accepted the  
8 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 3 hours and prepared for that deposition for  
16 approximately 2.5 hours. Additionally, I was prepared to testify at trial, if  
17 necessary. I estimate that I spent 45 hours over the six years plus this case has been  
18 pending in these activities.

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

20 Executed: Jun 29, 2023

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22 Sarah Wohlgemuth (Jun 29, 2023 20:47 CDT)  
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Sarah Wohlgemuth

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