

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*

7
 8 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA
 9

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 REBECCA A. SNYDER

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

Hon. Virginia A. Phillips

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 I, Rebecca A. Snyder, 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 2003-2018
4 and I participated in the University of Southern California Defined Contribution
5 Plan 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 Manager
7 USC Bookstore, Direct Marketing 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 3.5 hours and prepared for that deposition for
16 approximately 3 hours. Additionally, I was prepared to testify at trial, if necessary,
17 but suffered significant anxiety and sleepless nights in anticipation of trial. I
18 estimate that I spent 25-35 hours over the six years plus this case has been pending
19 in these activities.

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

21 Executed: Jun 29, 2023

22 *R-Snyder*
23 Rebecca Snyder (Jun 29, 2023 18:49 PDT)
24 Rebecca A. Snyder

25
26
27
28