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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 DION  
 DICKMAN, PH.D.**

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

Hon. Virginia A. Phillips

1 I, Dion Dickman, Ph.D., 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 Assistant  
7 Professor of Biological Science, Neurobiology at the University of Southern  
8 California, had not yet been granted tenure, and accepted the risk of retaliation from  
9 USC or its officers.

10 4. I have been an active participant throughout this litigation and have dedicated  
11 significant time to the prosecution of this lawsuit. My attorneys sent me the case  
12 documents which I reviewed, and they also discussed with me the status of the case  
13 and issues regarding the case throughout these six years of litigation. I also  
14 searched my own documents in preparing responses for Rule 26 disclosures and  
15 responses to 19 interrogatories and 30 requests for production of documents. I  
16 gave my deposition in this case over 3.5 hours and prepared for that deposition for  
17 approximately 2 hours. Additionally, I was prepared to testify at trial and prepared  
18 for that testimony with my attorneys for approximately two hours. I estimate that I  
19 spent at least 60 hours over the six years plus this case has been pending in these  
20 activities.

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

22 Executed: Jun 29, 2023

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Dion Dickman (Jun 29, 2023 18:57 PDT)  
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Dion Dickman, Ph.D.