

1 DECLARATION OF JANE DOE

2
3 I, Jane Doe, do hereby affirm:

4 1. I am over the age of 21 years and am a resident of the County of Los Angeles, State
5 of California. The following is true of my own personal knowledge. If called, I could and would
6 competently testify thereto.

7 2. I was a student at the University of Southern California ("USC") from 1988 until
8 1992, when I graduated.

9 3. In or about 1991, I went to see a gynecologist at USC, Dr. Tyndall for a pap smear.
10 I was told to undress from the waist down, given a paper type cover for the upper half of my body,
11 and told to lie down. I did so, putting my feet on the stirrups at the end of the examination table.

12 4. Dr. Tyndall walked into the examining room alone. He began to perform the
13 examination, but then turned around and pulled out a camera from behind a box on his shelf.

14 5. Dr. Tyndall began to take pictures of my genital area close up. He said it was a new
15 way to do examinations instead of a pap smear because they could see things more closely.

16 6. He then got up and started to walk backwards away from the table and began taking
17 full body pictures and of my private area away. I was trying to cover my face with the paper cover.

18 7. After I came out of the examination room, my then boyfriend was waiting for me. I
19 started crying. I told him what Dr. Tyndall had done to me. He told me I had to report it. He and
20 I went to the Medical Director of the Clinic and I told him what Dr. Tyndall had done to me.

21 8. The Medical Director then had a female nurse speak to me in case I had been too
22 embarrassed to tell him everything. I repeated the same story to her.

23 9. The Medical Director told me he went to confront Dr. Tyndall, but Dr. Tyndall
24 had denied it and denied having a camera. Because I had told the Medical Director where Dr.
25 Tyndall had retrieved the camera, the Medical Director told me that he was able to locate the
26 camera. Then the Medical Director stated Dr. Tyndall exposed the film in the camera.

27 ///

28

