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ORIGINAL FILED
Superior Court of California
County of Los Angeles

AUG 12 2015

Sherri R. Carter, Executive Officer/Clerk
By N. DiGiambattista, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

BRYCE DIXON, an individual,

Petitioner,

v.

KEGAN ALLEE, Ph.D., in her official
capacity as Title IX Investigator, for the
University of Southern California;
AINSLEY CARRY, Ed.D., in his official
capacity as Vice Provost for Student
Affairs, for the University of Southern
California,

Respondents.

Case No. BS157112

[Proposed]

ORDER GRANTING STAY OF
THE SANCTION OF EXPULSION

Date: August 12, 2015

Time: 8:30 a.m.

Dept: 82

Having considered the papers submitted in support of and opposition to
Petitioner's request for stay, and the argument in support of and in opposition to the
stay, and finding good cause therefore;

IT IS HEREBY ORDERED that the sanction of expulsion, imposed as set
forth in the letter of Respondent Ainsley Carry, dated May 12, 2015, attached
hereto, is stayed.

Date: 8-12-15

Robert H. O'Brien

Hon. Robert H. O'Brien
Judge of the Superior Court



USC University of Southern California

AINSLEY CARRY
Vice Provost
Student Affairs

May 12, 2015

Bryce Dixon
brycedix@usc.edu

Dear Bryce Dixon,

This letter is your written notification of the decision resulting from your appeal of the Title IX Investigator's decision in Cases 201400985 and 201401403.

I have reviewed the Summary Administrative Review for these cases, your appeal, the Complainant's response to your appeal, and the recommendation of the Student Behavior Appeals Panel. I agree with the finding of no violation in Case 201401403. In Case 201400985, for the reasons cited by the Panel, I accept the decisions of the Title IX Investigator and the Student Behavior Appeals Panel that you are responsible for violating sections 11.36B, 11.41, 11.53A, 11.53B, and 11.53D of the Student Conduct Code for the events that occurred on October 23-24, 2014. Likewise, I do not find you responsible for violating section 11.53C, for the reasons cited by the Panel.

After a thorough review of the case file, for the reasons cited by the Panel, I approve the sanction of expulsion imposed by the Title IX Investigator and agreed to by the Student Behavior Appeals Panel. Your expulsion is effective immediately.

This decision is final and binding on all parties involved, and there is no further avenue of appeal.

Sincerely,

Ainsley Carry
Vice Provost for Student Affairs

Enclosure: Student Behavior Appeals Panel Recommendation

CC: Roopali Malhotra, Senior Advisor to the Vice Provost for Student Affairs
Jody Shipper, Executive Director, Equity and Diversity, Title IX Coordinator, 504
Coordinator

PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES } ss.

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 888 West Sixth Street 4th Floor, Los Angeles CA 90017.

On August 12, 2015 I served the foregoing document, described as [Proposed] ORDER GRANTING STAY OF THE SANCTION OF EXPULSION on all interested parties listed below by transmitting to all interested parties a true copy thereof as follows:

Kelly Bendell
University of Southern California
3551 Trousdale Parkway, ADM 352
Los Angeles, CA 90089-5013
Telephone: (213) 740-7922
Facsimile: (213) 740-3249
E-mail: kbendell@usc.edu
ATTORNEYS FOR RESPONDENTS

Karen Pazzani
Young Zinn & Bate LLP
888 S. Figueroa St., 15th Floor
Los Angeles, CA 90017
Telephone: (213) 362-1860
Facsimile: (213) 362-1861
E-mail: kpazzani@yzblaw.com
ATTORNEYS FOR RESPONDENTS

- ☒ **BY FACSIMILE TRANSMISSION** from FAX No. (213) 624-1942 to the fax numbers set forth above.
☒ The facsimile machine I used complied with Rule 2003(3) and no error was reported by the machine.
Pursuant to Rule 2005(i), I caused the machine to print a transmission record of the transmission, a copy of which is attached to this declaration.
- ☒ **BY MAIL** as follows:
By placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as set forth above. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.
- ☒ **BY ELECTRONIC TRANSMISSION** - I transmitted a PDF version of the document(s) by electronic mail to the party(s) identified on the service list using the e-mail address(es) indicated.
- ☐ **BY PERSONAL SERVICE** as follows: I delivered a copy of the document(s) by hand to the addressee or I cause such envelope to be delivered by a process server employed by
- ☐ **FEDERAL** - I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.
- ☒ **STATE** - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 12, 2015 at Los Angeles, California.

EMMA AYALA/YESENIA ALVARADO