

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NICHOLAS VINCENT II, *on behalf of
himself and all others similarly situated,*

PLAINTIFF,

v.

THOMAS JEFFERSON UNIVERSITY,

DEFENDANT.

Case No. 5:24-cv-01561-JLS

**PLAINTIFF'S UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE THAT, upon the Declaration of Nicholas A. Colella, sworn to on September 16, 2025, and the accompanying exhibits and memorandum of law, and upon all prior proceedings, pleadings, and filings in the above-captioned action, Named Plaintiff Nicholas Vincent II will move this Court on September 26, 2025, at 9:30 A.M. in the United States District Court for the Eastern District of Pennsylvania, The Gateway Building, Courtroom 5, 201 Penn Street, Reading, PA 19601, before the Honorable Jeffrey L. Schmehl of the United States District Court for the Eastern District of Pennsylvania, for an Order under Federal Rules of Civil Procedure 23:

(1) Finally certifying, for purposes of the Settlement only, the following Settlement Class:

All enrolled students at Thomas Jefferson University during the Spring 2020 semester who paid any Tuition and/or Fees, or who were credited with having paid the same and who were registered for at least one in-person class at the beginning of the Spring 2020 semester.

Excluded from the Settlement Class is any person who properly executes and files a timely optout request to be excluded from the Settlement Class.

(2) Confirming that the notice plan approved by the Court in its May 20, 2025, Preliminary Approval Order has been fully and sufficiently executed; (3) finally appointing Plaintiff Nicholas Vincent II as Settlement Class Representative; (4) finally appointing Nicholas A. Colella of Lynch Carpenter, LLP and Michael A. Tompkins and Anthony M. Alesandro of Leeds Brown Law, P.C. to act on behalf of the Settlement Class and the Settlement Class Representative with respect to the Settlement; (5) entering the proposed final judgement; and (6) granting such other and further relief as may be just and appropriate.

Dated: September 16, 2025

Respectfully submitted,

/s/ Nicholas A. Colella
Nicholas A. Colella (PA ID No. 332699)
LYNCH CARPENTER, LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
Phone: (412) 322-9243
NickC@lcllp.com

Michael Tompkins, Esq.*
Anthony Alesandro, Esq.*
LEEDS BROWN LAW, P.C.
1 Old Country Road, Suite 347
Carle Place, NY 11514
516.873.9550
mtompkins@leedsbrownlaw.com
aaesandro@leedsbrownlaw.com

**Pro Hac Vice*

Attorneys for Plaintiff and the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that, on September 16, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system.

/s/ Nicholas A. Colella

Nicholas A. Colella