

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

PLEASE READ THIS NOTICE CAREFULLY. If you were enrolled as a student at Thomas Jefferson University (“TJU” or “University”) during the Spring 2020 semester, were registered for at least one in-person class during the Spring 2020 semester, and your payment obligation was satisfied, you may be eligible to receive a payment as part of a proposed settlement of *Vincent v. Thomas Jefferson University*, Civil Action No. 5:24-cv-1561 (E.D. Pa.) (the “Action”).

In this Action, Plaintiff alleged TJU breached a contract or was unjustly enriched when it transitioned to remote learning in response to the COVID-19 pandemic. TJU denies all allegations of wrongdoing and there has been no finding of liability in any court. However, considering the interest of both TJU and its students in prompt resolution of the matter, TJU and Plaintiff have agreed that TJU will pay \$875,000.00 into a Settlement Fund to resolve the Action.

**Am I a Class Member?** If you were a student enrolled at TJU during the Spring 2020 semester, and your payment obligation of tuition and/or fees to attend at least one in-person class was satisfied, then you are part of the proposed settlement class (a “Settlement Class Member”). **If you are a Settlement Class Member, you do not have to do anything to participate in and receive the benefits of the proposed Settlement.**

**How Do I Get a Payment?** Your payment will be sent automatically by First-Class U.S. Mail to your last known mailing address on file with the University Registrar. Settlement Class Members will also have the option to visit the Settlement Website at [www.TJUCovidSettlement.com](http://www.TJUCovidSettlement.com) to choose one or more of the following selections: (a) provide an updated address for sending a check; or (b) elect to receive the Settlement Benefit by Venmo or PayPal instead of a paper check. These actions must be taken no later than forty-five (45) days after the Effective Date, as defined in the proposed Settlement. That date will also be posted on the Settlement Website when it is known, but it will be sometime after the Final Approval Hearing currently scheduled for **September 26, 2025**.

By participating in the proposed Settlement, you release your right to bring any claim covered by the proposed Settlement, including bringing any claim related to TJU’s transition to remote learning, or joining any other action against TJU related to TJU’s transition to remote learning.

**What Are My Other Options?** If you do not want to participate in this proposed Settlement—meaning you do not want to receive the Settlement Benefit, and you do not want to be bound by any judgment entered in this case—you may exclude yourself by mailing a signed opt-out request to the Settlement Administrator, which must be postmarked no later than **August 16, 2025**. If you instead want to object to this proposed Settlement because you think it is not fair, adequate, or reasonable, you may submit an objection, which must be postmarked no later than **August 16, 2025**. Please follow the detailed instructions outlined in the Long-Form Notice and

the Settlement Agreement, which can both be found at [www.TJUCovidSettlement.com](http://www.TJUCovidSettlement.com), to properly opt out from, or object to, the proposed Settlement.

**What Happens Next?** The Court has preliminarily approved the proposed Settlement, but the distribution of payments will occur only if the Court grants final approval of the proposed Settlement. The Final Approval Hearing in this case is scheduled for **September 26, 2025**. At that hearing, the Court will consider whether to grant final approval of the proposed Settlement, and whether to approve payment from the Settlement Fund of: (1) award to the Settlement Class Representative for his service in this litigation; and (2) Class Counsels' requested attorneys' fees, which will not exceed thirty-three and one-third percent of the Settlement Fund and will be posted on the Settlement Website after **August 1, 2025**, and reimbursement for litigation costs.

**You are encouraged to review the Long-Form Notice.** To review the Long-Form Notice, review other important documents, including the Settlement Agreement, and obtain more information about the proposed Settlement, please visit [www.TJUCovidSettlement.com](http://www.TJUCovidSettlement.com).

**If you have any questions, you can contact Class Counsel: Nicholas A. Colella at Lynch Carpenter, LLP, (412) 322-9243 or Anthony M. Alesandro at Leeds Brown Law, P.C., (516) 873-9550.**

**You can also contact the Settlement Administrator by calling toll-free (866) 830-1298, or by emailing [info@TJUCovidSettlement.com](mailto:info@TJUCovidSettlement.com).**