

Subject: NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Notice ID: <<Notice ID>>

PLEASE READ THIS NOTICE CAREFULLY. If you were a student enrolled at the University of Scranton (“Scranton” or “University”) during the Spring 2020 semester, have paid or were credited with having paid Tuition and/or Fees for the semester, and were registered for at least one in-person class for the semester, you may be eligible to receive a payment as part of a proposed settlement of *Nouri v. University of Scranton*, Civil Action No. 3:23-cv-01362 (M.D. Pa.) (the “Action”).

In this Action, Plaintiff alleged Scranton breached a contract when it transitioned to remote learning in response to the COVID-19 pandemic. Plaintiff also alleged that Scranton’s shift to remote learning gave rise to a claim of unjust enrichment. Plaintiff sought a refund of a portion of the tuition and mandatory fees for the Spring 2020 semester. Scranton denies all allegations of wrongdoing, and there has been no finding of liability in any court. However, considering the interest of both Scranton and its students in prompt resolution of the matter, Scranton and Plaintiff have agreed that Scranton will pay \$1,000,000 into a Settlement Fund to resolve the Action, and will provide the option to receive two free tickets for admission to Scranton’s Reunion Weekend to each Settlement Class Member for two separate reunions.

Am I a Class Member? If you were a student enrolled at the University of Scranton during the Spring 2020 semester, have paid or were credited with having paid any Tuition and/or Fees for the semester, and were registered for at least one in-person class for the semester, 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.scrantoncovidsettlement.com to: (a) provide an updated address for sending a check; (b) elect to receive the Settlement Benefit by Venmo or PayPal instead of a paper check; or (c) select the Non-Cash Benefit. This action 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 **January 17, 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 Scranton’s transition to remote learning in the Spring 2020 semester, or joining any other action against Scranton related to Scranton’s transition to remote learning in the Spring 2020 semester.

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 or Non-Cash 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 **December 16, 2024**. Be aware that the statute of limitations may impact your ability to file a claim. 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 also must be postmarked no later than **December 16, 2024**. Please follow the detailed instructions outlined in the Long-Form Notice and the Settlement Agreement, which can both be found at www.scrantoncovidsettlement.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 **January 17, 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) an award to the Settlement Class Representative for his service in this litigation; and (2) Class Counsel's 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 **December 2, 2024**, 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.scrantoncovidsettlement.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) 905-8103, or by emailing info@scrantoncovidsettlement.com.

Scranton Covid Settlement
c/o A.B. Data, Ltd.
P.O. Box 173136
Milwaukee, WI 53217