

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

PLEASE READ THIS NOTICE CAREFULLY. If you were an undergraduate student enrolled in any program at Saint Joseph's University ("SJU" or "University") after March 19, 2020, and were assessed tuition by SJU for the Spring 2020 semester, you may be eligible to receive a payment as part of a proposed settlement of *Cantave v. Saint Joseph's University*, Civil Action No. 2:23-cv-03181 (E.D. Pa.) (the "Action").

In this Action, Plaintiff alleged SJU breached a contract when it transitioned to remote learning in response to the COVID-19 pandemic. Plaintiff also alleged that SJU's shift to remote learning gave rise to a claim of unjust enrichment. Plaintiff sought a refund of a portion of the tuition for the Spring 2020 semester. SJU denies all allegations of wrongdoing, and there has been no finding of liability in any court. However, considering the interest of both SJU and its students in prompt resolution of the matter, SJU and Plaintiff have agreed that SJU will pay \$1,153,880 into a Settlement Fund to resolve the Action.

Am I a Class Member? If you were an undergraduate student enrolled at SJU after March 19, 2020; were assessed tuition for the Spring 2020 semester; and were enrolled for the Spring 2020 semester in at least one class that was meeting in person and on campus at the beginning of the Spring 2020 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. Class Members will also have the option to visit the Settlement Website at www.SJUSettlement.com to choose one or more of the following selections: (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) elect to have the Settlement Benefit applied to your SJU student account. 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 some time after the Final Approval Hearing, currently scheduled for October 15, 2024.

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 SJU's transition to remote learning in the Spring 2020 semester, or joining any other action against SJU related to SJU'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, 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 September 9, 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 September 9, 2024. Please follow the detailed instructions outlined in the Long Form Notice and the Settlement Agreement, which can both be found at www.SJUSettlement.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 October 15, 2024. 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 her 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 August 26, 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.SJUSettlement.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 833-806-3773, or by emailing SJUSettlement@noticeadministrator.com.

Electronic Settlement Payment Election

If you would like to receive your Settlement Payment electronically (via PayPal or Venmo), please visit <https://cantavestjosephs.claims-administrator.com> to submit your payment election by 45 days after the Effective Date, as defined in the Settlement.

If you do not submit a payment election by 45 days after the Effective Date, as defined in the Settlement, you will receive your settlement payment as a check by mail instead.