

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

PLEASE READ THIS NOTICE CAREFULLY. If you were enrolled as a student at Lebanon Valley College (“LVC” or “College”) 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 *Alumni v. Lebanon Valley College*, Civil Action No. 1:23-cv-01424 (M.D. Pa.) (the “Action”).

In this Action, Plaintiff alleged LVC breached a contract or was unjustly enriched when it transitioned to remote learning in response to the COVID-19 pandemic. LVC denies all allegations of wrongdoing and there has been no finding of liability in any court. However, considering the interest of both LVC and its students in prompt resolution of the matter, LVC and Plaintiff have agreed that LVC will pay \$575,000.00 into a Settlement Fund to resolve the Action.

Am I a Class Member? If you were a student enrolled at LVC 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 LVC Registrar. Class Members will also have the option to visit the Settlement Website at www.LebVSettlement.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 some time after the Final Approval Hearing currently scheduled for October 8, 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 LVC’s transition to remote learning, or joining any other action against LVC related to LVC’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 29, 2024. 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 29, 2024. Please follow the detailed instructions outlined in the Long Form Notice and the Settlement Agreement, which can both be found at www.LebVSettlement.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 8, 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) 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 15, 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.LebVSettlement.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) 806-2442, or by emailing LVCSettlement@noticeadministrator.com.