

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

PLEASE READ THIS NOTICE CAREFULLY. If you were enrolled at Temple University Of The Commonwealth System of Higher Education (“Temple”) as an undergraduate, graduate, or professional student, in at least one in-person, on-campus class during the Spring 2020 Semester, remained enrolled after March 16, 2020, and paid your tuition and/or University Services Fee obligations from any source for that semester, you may be eligible to receive a payment as part of a proposed settlement of *Ryan v. Temple University*, Civil Action No. 20-cv-2164 (E.D. Pa.) (the “Action”).

In this Action, Plaintiffs alleged Temple breached a contract when it transitioned to remote learning in the Spring 2020 Semester in response to Governmental shutdown orders issued because of the COVID-19 pandemic. Plaintiffs also alleged that Temple’s transition to remote learning gave rise to a claim for unjust enrichment. Plaintiffs sought a refund of a portion of their tuition and University Services Fee for the Spring 2020 Semester. Temple has agreed to pay \$6,900,000 into a Settlement Fund to resolve the Action. Temple denies all allegations of wrongdoing in the Action and has agreed to a settlement to avoid the expense, uncertainty, and burden of continued litigation.

Am I a Class Member? If you were enrolled as a Temple undergraduate, graduate, or professional student during the Spring 2020 Semester, paid your tuition and/or University Services Fee obligations from any source for the Spring 2020 Semester, and remained enrolled after March 16, 2020, then you may be 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 Cash Award portion of the proposed Settlement.**

How Do I Get a Payment? Your Cash Award will be sent automatically by First-Class U.S. Mail to your last known mailing address on file with the Temple Registrar. You will also have the option to visit the Settlement website at www.TempleCovidSettlement.com to choose one or more of the following selections: (a) provide an updated address for sending a check; (b) elect to receive the Cash Award by Venmo or PayPal instead of a paper check; (c) elect to apply the Cash Award to your Temple account; or (d) elect to donate the Cash Award to Temple’s General Scholarship Fund. These actions must be taken no later than forty-five (45) days after the Notice Date, or **December 27, 2024**.

Additionally, Settlement Class Members will have forty-five (45) days after the Notice Date, or **December 27, 2024**, to select one of the Non-Cash Benefits: (i) one non-transferable Temple University home football season ticket (seat location to be determined at Temple’s discretion) for the two consecutive seasons after the Settlement is finally approved by the Court and is no longer subject to appeal (the “Effective Date”); (ii) one non-transferable Alumni Recreation Access pass, which will be issued to Settlement Class Members who elect this option in a reasonable amount of time after the Effective Date, and which will last

for approximately two consecutive years; or (iii) one non-transferable course offered through Temple's Office of Non-Credit and Continuing Education, which must be redeemed within one year of the Effective Date. The course number must start with ONCE. Online, self-paced courses offered in partnership with LERN/UGotClass, ed2go, and ETC are excluded from this Non-Cash Benefit. Your selection must be made no later than **December 27, 2024**.

If you remain in the Settlement Class, you release your right to bring any claim covered by the proposed Settlement, including bringing any claim related to Temple's transition to remote learning during 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 benefits, 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 **January 13, 2025**. If you want to object to this proposed Settlement or the request for attorneys' fees by Class Counsel, you may file an objection by **January 13, 2025**. Please follow the detailed instructions outlined in the Long-Form Notice and the Settlement Agreement, which can both be found at www.TempleCovidSettlement.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 Cash Awards and Non-Cash Benefits will occur only if the Court grants final approval of the proposed Settlement. The Final Approval Hearing in this case is scheduled for **February 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) awards to the Settlement Class Representatives of \$5,000 apiece for their service in this litigation; and (2) Class Counsel's request for attorneys' fees, which will not exceed \$2,300,000 (equaling thirty-three and one-third percent of the Settlement Fund), and litigation expenses, which will not exceed \$250,000. The fee petition will be posted on the Settlement website after **December 30, 2024**.

You are encouraged to review the Long-Form Notice. To review the Long-Form Notice, review other important court documents, including the Settlement Agreement, and obtain more information about the proposed Settlement, please visit www.TempleCovidSettlement.com.

If you have any questions, you can contact Class Counsel: Nicholas A. Colella at Lynch Carpenter, LLP, (412) 322-9243; or Paul J. Doolittle at Poulin | Willey | Anastopoulos, LLC, (843) 614-8888.

You can also contact the Settlement Administrator by calling toll-free 1-877-252-4685, or by emailing info@TempleCovidSettlement.com.