AU Settlement Settlement Administrator P.O. Box 2587 Portland, OR 97208-2587

COURT-AUTHORIZED NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

AU'S RECORDS INDICATE YOU WERE A PERSON WHO PAID, OR ON WHOSE BEHALF WAS PAID, TUITION OR FEES TO AU FOR THE SPRING 2020 SEMESTER AND MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.

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A class Settlement has been reached between Defendant American Univ. (AU) and students who allege they are entitled to <u>partial</u> refunds of tuition and fees for the Spring 2020 Semester. The case is *Qureshi v. AU*, No. 1:20-cv-01141-CRC, in the US District Court for the Dist. of Columbia. The proposed Settlement is not an admission of wrongdoing by AU; AU denies all allegations of wrongdoing and disclaims all liability with regard to all claims in the lawsuit.

Am I a Class Member? AU's records reflect you may be a Class Member as an AU undergraduate student during the Spring 2020 Semester for whom any amount of tuition and fees were paid from a source other than a scholarship or grant from AU (e.g., your or family funds, loan, or external scholarship or grant) for the Spring 2020 Semester, your tuition/fees have not been fully refunded, and you are not excluded from the Settlement Class.

What Can I Get? A Settlement Fund of \$5,439,000 has been established to pay all claims, notice and administration expenses, approved attorneys' fees and costs, and service awards if approved by the Court. What remains of the fund will be divided equally among approximately 7,000 Settlement Class Members.

<u>How Do I Get a Payment?</u> Settlement Class Members will automatically receive their shares by check mailed to their last known mailing address. Other options are available at AURefundSettlement.com.

What Are My Options? You may exclude yourself from the Class by sending a letter to the Settlement Administrator by April 1, 2024. If you exclude yourself, you will not get a payment but will keep any rights you may have to sue AU. If you do not exclude yourself, you may object to the Settlement by filing a written objection with the Court by April 1, 2024. Instructions are available at AURefundSettlement.com. If you do nothing, you will be bound by the Court's orders and judgments.

Who Represents Me? The Court appointed Leeds Brown Law, PC; Poulin Willey Anastopoulo, LLC; and Bursor & Fisher, PA, to represent the class (Class Counsel). You will not be charged for these lawyers. You may hire your own lawyer at your expense.

When Will the Court Consider the Proposed Settlement? At 2 p.m. May 7, 2024, the Court will consider the fairness of the Settlement, whether to finalize the certification of the Class, any objections or exceed arguments to the Settlement, and requests for an award of attorneys' fees (not to exceed 33% of the fund), expenses not to exceed \$200,000, and Plaintiffs' service awards (not to exceed \$7,500 each). The Court will hold the hearing at the US District Court, Dist. Of Columbia, 333 Constitution Ave. NW, Washington, DC 20001.

How Can I Get More Information? The detailed Notice, Election Form, Settlement Agreement, and other documents are available at AURefundSettlement.com. Call the Settlement Administrator at 1-888-497-4133 or Class Counsel at 1-803-222-2222 with questions.