

Shaffer et al. v. The George Washington University et al.
Settlement Administrator
P.O. Box 2178
Portland, OR 97208-2178

GW SETTLEMENT

A settlement has been reached in a class action lawsuit between George Washington University (“Defendant” or “GW”) and certain individuals who allege that they and the Settlement Class Members are entitled to partial refunds of tuition and fees for the Spring 2020 Semester because GW transitioned to remote instruction in March 2020 amid the COVID-19 pandemic in accordance with District of Columbia legal mandates. The case is *Shaffer et al. v. The George Washington University et al.*, Case No. 1:20-cv-01145-RJL, in the United States District Court for the District of Columbia (the “Lawsuit”). The proposed settlement is not an admission of wrongdoing by GW, and GW denies all allegations of wrongdoing and disclaims all liability with regard to all claims in the Lawsuit.

Am I a Class Member? According to GW’s records, you may be a Settlement Class Member. You are a member of the Settlement Class if you are a Student or a Payor who paid or incurred tuition and/or fees to any Released Party in connection with the Spring 2020 Semester and whose tuition and/or fees have not been refunded in their entirety, and who is not excluded from the Settlement Class.

What Can I Get? If approved by the Court, a Settlement Fund of \$5,400,000 has been established to pay all claims to the Settlement Class, together with notice and administration expenses, approved attorneys’ fees and costs, and service awards. What remains of the \$5,400,000 will be divided equally among the approximately 18,000 Students in the Settlement Class.

How Do I Get a Payment? Students in the Settlement Class will not need take any action to receive their shares of the payment. Students in the Settlement Class will automatically receive their shares by check mailed to the Student’s last known mailing address. Alternatively, if they prefer to receive their share by Venmo or PayPal, or need to update their mailing address for the mailing of a check, they may visit the settlement website to complete an Election Form to provide their Venmo or PayPal information or update their mailing address. Any award will presumptively be paid to the Students in the Settlement Class. However, a Student and a Payor who made payments of tuition and fees on that Student’s behalf for the Spring 2020 Semester may agree and communicate to the Settlement Administrator via a jointly filed Non-Student Payor Payment Claim Form that the Cash Award for that Student should be paid to the Payor. In that instance, the Student will not receive a Cash Award.

What Are My Other Options? You may exclude yourself from the Settlement Class by sending a letter to the Settlement Administrator no later than **March 11, 2024**. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue the Defendant over the legal issues in the Lawsuit. If you do not exclude yourself, you may object to the settlement if you choose to do so. You and/or your lawyer have the right to appear before the Court and/or object to the proposed settlement. Your written objection must be filed with the Court no later than **March 11, 2024**. Specific instructions about how to object to, or exclude yourself from, the settlement are available at www.GWSettlement.com. If you do nothing and the Court approves the settlement, you will be bound by all of the Court’s orders and judgments. In addition, your claims relating to causes of action asserted in this case or which could have been brought in this case based upon the facts alleged regarding the Spring 2020 Semester will be released. “Mass” or “class” objections or opt opts will not be allowed.

Who Represents Me? The Court has appointed Hagens Berman Sobol Shapiro LLP to represent the Settlement Class. These attorneys are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

When Will the Court Consider the Proposed Settlement? The Court has already granted Preliminary Approval of the settlement. A final hearing on the settlement, called a final approval or fairness hearing, will be held to determine the fairness of the settlement. At the Final Approval Hearing, the Court will also consider whether to make final the certification of the Settlement Class for settlement purposes, hear any proper objections and arguments to the settlement, and hear any requests for an award of attorneys' fees and expenses (not to exceed 33% of the total Settlement Fund) and Service Awards for the Plaintiffs (not to exceed \$10,000 each) that may be sought by Class Counsel. The Court will hold the Final Approval Hearing on **April 2, 2024, at 3:00 p.m. ET** at the United States District Court for the District of Columbia, 333 Constitution Ave. N.W., Washington D.C. 20001. The date and time of the Final Approval Hearing are subject to change by Court Order, and the hearing may be conducted remotely. Any changes, including instructions for how Settlement Class Members may attend the hearing if it is conducted virtually or by telephonic means, will be posted at the settlement website, www.GWSettlement.com, and on the Court's docket on PACER at <http://ecf.dcd.uscourts.gov>.

How Do I Get More Information? For more information, including a more detailed Notice, Claim Form, a copy of the Settlement Agreement, and other documents, go to www.GWSettlement.com, contact the Settlement Administrator at 1-888-302-6048, or write to the Settlement Administrator at *Shaffer et al. v. The George Washington University et al.*, c/o Settlement Administrator, P.O. Box 2178, Portland, OR 97208-2178, or call Class Counsel at 1-708-628-4949.