

NOTICE OF CLASS ACTION SETTLEMENT

Keeven v. Webster University., Case No. 21SL-CC05384 (Cir. Court of St. Louis County)

1. Introduction

A state court preliminarily approved a class action settlement between plaintiff and defendant Webster University (“Webster”), in the above-referenced lawsuit (the “Lawsuit”). The Court approved this Notice to inform individuals included in the settlement of their rights. As described in more detail below, you may do one of the following:

PARTICIPATE (NO ACTION REQUIRED)	You will receive a settlement payment. You will remain in the Class and be subject to the Settlement Agreement.
EXCLUDE YOURSELF	You will not receive a settlement payment. You will not remain in the Class and will not be subject to the Settlement Agreement.
OBJECT	You will remain a part of the Class and will receive any settlement payment that is approved by the Court if your objection is overruled.

Before any money is paid, the Court will decide whether to grant final approval of the settlement.

2. What Is The Lawsuit About?

The Lawsuit is against Webster University and asserts violations of Missouri law in connection with Webster’s alleged failure to provide full-time in-person students with appropriate reimbursements for student fees in connection with Webster’s campus closures during the 2020 Spring Semester due to the COVID-19 pandemic. Plaintiff alleges that after the transition to online-only instruction away from campus during the 2020 Spring Semester, in-person students did not receive benefits associated with the student fees that they paid. She also alleges that certain Webster students with Meal Plans were not appropriately reimbursed in regard to the money they had remaining on their Meal Plans. Webster denies any violation of the law. The Court did not decide whether Webster violated the law.

3. Who Is In The Settlement Class?

The Settlement Class consists of individuals who have been identified as full-time in-person students of Webster in Missouri who were charged a Student Activity Fee, a Housing Activity Fee, and/or a Parking Fee, in addition to Webster’s Missouri students who, as of March 27, 2020, had a balance on a Meal Plan that exceeded \$1,029. Our records indicate you were a student at Webster University during the 2020 Spring Semester and a member of the Settlement Class entitled to a settlement payment. You do not need to file a claim or take any action to receive a settlement payment.

4. What Does The Settlement Provide?

The settlement provides, among other things, for a total payment of \$250,000 that Webster has agreed to pay to settle the claims in the Lawsuit. The Settlement provides for a separate Fee Class Fund and Meal Plan Class Fund. The Fee Class Fund is in the amount of \$168,500 and will be used to pay Fee Class Member’s payments in regard to the Student Activity Fee, Housing Activity Fee, and/or Parking Fee, as provided for in the Settlement Agreement. The amount of the awards that Fee Class Members will receive are proportional to which of these fees that they paid. The Meal Plan Class Fund is in the amount of \$81,500 and will be used to pay Meal Plan Class Member’s awards as described in the Settlement Agreement. The amount Meal Plan Class Members will receive is in proportion to the percentage that his or her final Meal Plan balance represented out of the total Meal Plan final balance of all the Meal Plan Class Members. Subject to Court approval, the Fee Class Fund and Meal Plan Class Fund will be reduced to cover litigation costs, Settlement Administrator’s costs, and a Service Award to Class Representative Caroline Keeven, and by an award of up to one third of the total amount of each respective settlement fund for Settlement Class Counsel’s attorney fees. Following these reductions, the remaining amounts will be the Net Fee Class Fund and Net Meal Plan Class Fund, which will be distributed to the Fee Class and Meal Plan Class members as referenced above.

The exact amount of money each Fee Class and Meal Plan Class member will receive will not be known until a later date. Please consult your tax advisor regarding the tax consequences and obligations related to the payment.

5. What Are My Options?

You have the choice of participating in the settlement (**by doing nothing**), **excluding yourself** from the settlement, or **objecting** to the settlement. Please review a list of your options below.

- a. **Participate (no action required).** To participate in the settlement, you do not need to take any action. If you have received this Notice and do nothing, you will automatically receive money from the settlement if it is approved by the Court and be bound by all orders and judgments of the Court.
- b. **Exclude yourself from the settlement.** You may exclude yourself from the settlement by mailing or emailing the Settlement Administrator (contact information below) on or before **January 16, 2025**. If you do this, you will NOT receive a settlement payment and will not be bound by the settlement. You must include your name, address, telephone number, and a clear statement that you wish to be excluded, and your (or your authorized representative's) actual or digital signature. A request to exclude cannot be made on behalf of a group of persons.
- c. **Object to the settlement.** You may object to the settlement on or before **January 16, 2025**. If you want to object to the settlement, as further set forth in the Settlement Agreement, you must file the objection with the St. Louis County Circuit Clerk, 105 South Central Avenue, Clayton, MO, and serve a copy on Class Counsel and Defense Counsel. The objection must include your full name, address, telephone number, and the grounds for the objection. An objection cannot be made on behalf of a group of persons. If you exclude yourself from the settlement, you cannot file an objection.

Each choice has risks and consequences. Unless you exclude yourself, you are staying in the Settlement Class and agreeing to release Webster as set forth in the Settlement Agreement if the Court approves the settlement. This means that you can't sue, continue to sue, or be part of any other lawsuit against Webster about the legal issues related to this case. It also means that all of the Court's orders will apply to you and legally bind you.

6. Who Are The Attorneys For The Class And How Will They Be Paid?

The Court has appointed the following Settlement Class Counsel to represent the Settlement Class in this settlement:

GOLDENBERG HELLER & ANTOGNOLI, P.C.
Kevin P. Green; Daniel S. Levy; Richard S. Cornfeld
2227 South State Route 157, Edwardsville, Illinois 62025

Settlement Class Counsel will request up to one-third of the total settlement amount as attorney fees, plus reimbursement of litigation costs and payment of a Service Award to Plaintiff and Settlement Administrator's costs. The request for such amounts (the "Fee Petition") will be added to the Settlement Website after it is filed and is subject to Court approval.

7. When Is The Final Approval Hearing?

The Court will hold a hearing in this case, on a date to be determined, to consider whether to finally approve (1) the settlement; and (2) the Fee Petition. You may appear at the final approval hearing, but you are not required to do so.

8. Who Is The Settlement Administrator And Are There More Details About The Settlement?

This Notice summarizes the proposed settlement. More details can be found in the Settlement Agreement and other documents that can be found on the Settlement Website: www.WebsterUniversityrefundsettlement.com. If you have questions about this Notice that are not answered by the website, you may also contact the Settlement Administrator at:

Webster University Refund Settlement c/o Atticus Administration
PO Box 64053, St. Paul, MN 55164
1-800-690-8960
WebsterUniversityrefundsettlement@atticusadmin.com

*****NO INQUIRIES SHOULD BE DIRECTED TO THE CLERK OF THE COURT OR TO THE JUDGE*****