

United States District Court for the Northern District of Illinois

Quiroz, et al. v. Northwestern University, Case No. 1:20-cv-04798 (N.D. Ill.)

**IF YOU PAID TUITION TO NORTHWESTERN UNIVERSITY FOR THE SPRING 2020,
SUMMER 2020, AND/OR FALL 2020 QUARTERS, YOU MAY BE ELIGIBLE FOR COMPENSATION
FROM A CLASS ACTION SETTLEMENT.**

A court authorized this notice. This is not a solicitation from a lawyer.

Your legal rights are affected whether you act or not. Please read this notice carefully.

A settlement has been reached in the above-entitled action. If the Court gives final approval of the settlement, Northwestern University (“Northwestern”) will provide the benefits in the settlement, and you may be entitled to a portion of the Net Settlement Fund. The purpose of this Notice is to inform you of the settlement so that you may decide what steps to take in relation to it.

BASIC INFORMATION

1. Why did I get this Notice?

You received this Notice because a settlement has been reached in the action entitled *Quiroz, et al. v. Northwestern University*, Case No. 1:20-cv-04798 (N.D. Ill.). You may be a member of the class of students on whose behalf this Action was filed; thus, you may be eligible for the relief detailed below.

This Notice explains the nature of the Action, the general terms of the proposed settlement, and your legal rights and obligations. To obtain more information about the settlement, including information about how you can see a copy of the Agreement, see Section 19 below.

2. What is a class action?

In a class action, one or more people called a “Class Representative” (in this case, Nancy Quiroz, Surya Veeravalli, and Daniel Greenwald) sue on behalf of people who have similar claims. For purposes of this proposed settlement, one court will resolve the issues for all Class Members. Since Northwestern was the entity sued in this Action, it is called the Defendant.

3. What is the lawsuit about?

Plaintiffs Nancy Quiroz, Surya Veeravalli, and Daniel Greenwald (“Plaintiffs”) commenced a putative class action in the United States District Court for the Northern District of Illinois alleging breach of contract and unjust enrichment claims related to Northwestern’s transition of in-person instruction and other educational services to a virtual environment during a portion of the Spring 2020, Summer 2020, and/or Fall 2020 quarters or terms due to the COVID-19 pandemic and related state and local public health mandates and orders. Northwestern denies Plaintiffs’ allegations and that it has done anything wrong. No court has decided which side is right. To learn more about what has happened in this litigation to date, please see Section 19.

4. Why is there a settlement?

Both sides agreed to the settlement to avoid ongoing litigation costs and going to trial. As a result, the Class Members will receive relief now rather than years from now, if at all.

5. How do I know if I am part of the settlement?

You are a member of the Class if you fit the following description:

you were a full-time student enrolled in degree-conferring programs at Northwestern University campuses in the United States for Spring 2020, Summer 2020, and/or Fall 2020 quarters or terms, and whose tuition was not fully funded by Northwestern in any of the respective quarters or terms (Spring 2020, Summer 2020, or Fall 2020) in which you were thereby enrolled.

Questions? Call 1-877-780-7564 or visit www.NorthwesternTuitionRefund.com.

You are not a Class Member if you are related or married to the District Judge or Magistrate Judge presiding over this Action, the judge's law clerk, a current or former trustee, officer, director, agent, attorney, or employee at Northwestern, or you opt out of the settlement.

6. What if I am still not sure if I am included?

If you are still not sure whether you are included in the Settlement Class, you can visit the website www.NorthwesternTuitionRefund.com, call toll-free 1-877-780-7564, or write to Northwestern University Covid Tuition Settlement, c/o Epiq Class Action & Claims Solutions, Inc., P.O. Box 4339, Portland, OR 97208-4339, for more information.

THE PROPOSED SETTLEMENT

7. What relief does the the settlement provide?

The Settlement provides for a Gross Settlement Fund of \$4,000,000.00, which will be used to pay Costs and Fees with the Net Settlement Fund distributed to Class members.

Class Members who enrolled in the Spring 2020 quarter or term at any of Northwestern's campuses in the United States are eligible for an equal pro rata distribution out of an allotment of 75% of the Net Settlement Fund. This equal pro rata amount for Spring term claims is approximately \$153. (These figures are approximate as they will depend upon the exact amounts ultimately approved by the Court for Fees and Costs in this case).

Class Members who enrolled in the Summer 2020 quarter at any of Northwestern's campuses in the United States are eligible for an equal pro rata distribution out of an allotment of 7% of the Net Settlement Fund. This equal pro rata amount for Summer term claims is approximately \$61.

Class Members who enrolled in the Fall 2020 quarter or term at any of Northwestern's campuses in the United States are eligible for an equal pro rata distribution out of an allotment of 18% of the Net Settlement Fund. This equal pro rata amount for Fall term claims is approximately \$35.

Class Members who enrolled in more than one of the relevant quarters or terms at any of Northwestern's campuses in the United States are eligible to receive a distribution, as set forth above, for each quarter or term that they were enrolled. For example, if a Class Member was enrolled in both Spring 2020 and Fall 2020 terms, then they will receive both \$153 for their Spring term claim and \$35 for their Fall term claim, for a combined total of approximately \$188.

YOUR RIGHTS AND OPTIONS

If you are a Class Member, you must decide how you wish to handle the settlement and exercise your options as detailed below, including meeting any associated deadline.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
DO NOTHING	<p>Receive the benefits in the Settlement.</p> <p>If you do nothing and the Court approves the settlement, you will receive a portion of the Net Settlement Fund.</p> <p>If you would like to receive your portion of the Net Settlement Fund through digital means such as Venmo or Paypal instead of a physical check, or to update your address for a physical check, then you must submit the Election Form by mail or via the settlement website at www.NorthWesternTuitionRefund.com.</p>	
ASK TO BE EXCLUDED	<p>Get out of this settlement and get no money.</p> <p>If you ask to be excluded from the settlement, you are not eligible to share in the benefits of the settlement. Instead, you will keep any rights to sue Northwestern separately over the legal claims in this Action.</p>	<p>Deadline: March 30, 2026</p>

Questions? Call 1-877-780-7564 or visit www.NorthwesternTuitionRefund.com.

OBJECT	Challenge the settlement. You may file a written objection telling the Court why you object to (i.e., don't like) the settlement and think it should not be approved. Submitting an objection does not exclude you from the settlement.	Deadline: March 30, 2026
GO TO THE FINAL APPROVAL HEARING	Go to Court. The Court will hold a "Final Approval Hearing" to consider the fairness of the settlement, the request for attorneys' fees and costs of the lawyers who brought the Action, and the Plaintiffs' requests for a Service Award for bringing the Action. You may, but are not required to, speak at the Final Approval Hearing about any objection you filed to the settlement. If you intend to speak at the Final Approval Hearing, you must also submit a "Notice of Intention to Appear" indicating your intent to do so.	Date and Time: May 19, 2026 at 10:00 a.m.

These rights and options – **and the deadlines to exercise them** – are explained in more detail below. The Court has preliminarily approved the settlement and must decide whether to give final approval of the settlement. The relief provided to the Settlement Class will be provided only if the Court gives final approval to the settlement and, if there are any appeals, after the appeals are resolved in favor of the settlement. ***Please be patient.***

8. What happens if I do nothing at all?

If you do nothing and the Court approves the proposed settlement, you will be releasing your claims against Northwestern. This generally means that you will not be able to file a lawsuit, continue prosecuting a lawsuit, or be part of any other lawsuit against Northwestern regarding the claims in the Action. The Agreement, available online at the following Settlement Website: www.NorthwesternTuitionRefund.com, contains the full terms of the release.

9. What happens if I exclude myself?

If you exclude yourself from the settlement, you will be excluded from the Settlement Class, you will not receive any relief from the settlement, you will not be bound by the judgment entered in the Action, and you will not be precluded from prosecuting any timely, individual claim against Northwestern based on the conduct alleged in the Action.

10. How do I request to be excluded?

To exclude yourself, you must mail, via First-Class United States Mail, postage prepaid, a written, signed statement stating you wish to opt out ("Opt-out Statement") to the Settlement Claims Administrator. In order to be valid, the Opt-out Statement must include your name, address, and telephone number, and a statement indicating your intention to opt out. To be effective, an Opt-out Statement must be postmarked by United States Postal Service on or before the Notice Response Deadline.

The last day of the Notice Response Deadline is **March 30, 2026**. The mailing address of the Settlement Claims Administrator is **Northwestern University Covid Tuition Settlement, c/o Epiq Class Action & Claims Solutions, Inc., P.O. Box 4339, Portland, OR 97208-4339**.

11. How do I tell the Court that I disagree with the settlement?

To object to the settlement, you must submit the objection no later than the last day of the Notice Response Deadline. The objection must be mailed to the Settlement Claims Administrator. An objection statement must be mailed to the Settlement Claims Administrator via First-Class Mail, postage pre-paid, and postmarked by the United States Postal Service on or before the Notice Response Deadline. The statement must include:

1. the objector's name, address, and telephone number;
2. an explanation of the basis upon which the objector claims to be a Settlement Class Member;
3. all grounds for the objection, including all citations to legal authority and evidence supporting the objection;

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4. the name and contact information of any and all attorneys representing, advising, or in any way assisting the objector in connection with the preparation or submission of the objection or who may profit from the pursuit of the objection;
5. a statement indicating whether the objector intends to appear at the Final Approval Hearing (either personally or through counsel who files an appearance with the Court in accordance with the Local Rules);
6. copies of any papers, briefs, declarations, affidavits, or other documents upon which the objection is based;
7. a detailed list of any other objections submitted by the Class Member, or his/her counsel, to any class actions submitted in any state or federal court in the United States in the previous five years (or affirmatively stating that no such prior objection has been made); and
8. the objector's signature, in addition to the signature of the objector's attorney (if any) – an attorney's signature alone shall not be deemed sufficient to satisfy this requirement.

The last day of the Notice Response Deadline is **March 30, 2026**. The mailing address of the Settlement Claims Administrator is **Northwestern University Covid Tuition Settlement, c/o Epiq Class Action & Claims Solutions, Inc., P.O. Box 4339, Portland, OR 97208-4339**.

12. What is the difference between excluding myself and objecting to the settlement?

Objecting is simply telling the Court that you disagree with something about the settlement. You can object only if you do not exclude yourself from the settlement.

Excluding yourself is telling the Court that you do not want to be part of the settlement. If you exclude yourself, you have no basis to object because the settlement no longer affects you.

THE LAWYERS REPRESENTING THE CLASS

13. Do I have a lawyer in this case?

Yes. The Court appointed (Eddie) Jae K. Kim and Tiffine E. Malamphy of Lynch Carpenter, LLP; Michael Tompkins of Leeds Brown Law, P.C.; James A. Francis of Francis Mailman Soumilas, P.C.; Yvette Golan of The Golan Law Firm; and Daniel A. Edelman of Edelman, Combs, Lattner & Goodwin, LLC as "Class Counsel." You do not have to pay Class Counsel. If you want to be represented by your own lawyer and have that lawyer appear in court for you in this case, you may hire one at your own expense.

14. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys' fees and costs up to \$1,390,100.85, which will be paid out of the Gross Settlement Fund. You will not be required to pay any attorneys' fees or costs.

15. May I get my own lawyer?

You are not required to hire your own lawyer because Class Counsel is working on your behalf. However, if you want your own lawyer, you can hire one at your own expense. For example, you can ask your lawyer to appear in court for you if you want someone other than Class Counsel to speak for you.

FINAL APPROVAL HEARING

16. What is the Final Approval Hearing?

The Court has preliminarily approved the settlement and will hold a hearing to decide whether to give final approval to the settlement. The purpose of the Final Approval Hearing will be for the Court to determine whether the settlement should be approved as fair, reasonable, adequate, and in the best interests of the Settlement Class; to consider the award of attorneys' fees and expenses to Class Counsel; and to consider the request for a Service Award to the Plaintiffs. At the hearing, the Court will be available to hear any objections and arguments concerning the proposed settlement. You may attend, but you do not have to do so.

Questions? Call 1-877-780-7564 or visit www.NorthwesternTuitionRefund.com.

17. When and where is the Final Approval Hearing?

On May 19, 2026 at 10:00 a.m. CT, a hearing will be held on the fairness of the proposed Settlement. The hearing will take place before the Hon. Lindsay C. Jenkins in the United States District Court for the Northern District of Illinois, located at 219 South Dearborn Street, Chicago, IL 60604. The hearing may be postponed to a different date, time, or transferred to a different location without notice. Please check www.NorthwesternTuitionRefund.com for any updates about the Settlement or Final Approval Hearing.

18. May I speak at the hearing?

You may speak at the Final Approval Hearing if: (a) you have timely submitted an objection; and (b) you have timely provided a Notice of Intent to Appear.

If you have requested exclusion from the settlement, you may not speak at the hearing.

GETTING MORE INFORMATION

19. Are more details available?

Visit the Settlement Website at www.NorthwesternTuitionRefund.com, where you will find a copy of the Agreement, the Court's Preliminary Approval Order, Class Counsel's application for attorneys' fees and costs, and the operative Complaint filed in the Action. Alternatively, you may contact the Settlement Claims Administrator at the email address: info@NorthwesternTuitionRefund.com or the U.S. postal (mailing) address: Northwestern University Covid Tuition Settlement, c/o Epiq Class Action & Claims Solutions, Inc., P.O. Box 4339, Portland, OR 97208-4339.

This description of this Action is general and does not cover all of the issues and proceedings that have occurred. In order to see the complete file, you should visit <https://ecf.ilnd.uscourts.gov/cgi-bin>ShowIndex.pl> or the Clerk's office at 219 South Dearborn Street, Chicago, IL 60604. The Clerk will tell you how to obtain the file for inspection and copying at your own expense.

20. What if my address or other information has changed?

It is your responsibility to inform the Settlement Claims Administrator of your updated information. You may do so in the following manner: at the email address info@NorthwesternTuitionRefund.com or the U.S. postal (mailing) address: Northwestern University Covid Tuition Settlement, c/o Epiq Class Action & Claims Solutions, Inc., P.O. Box 4339, Portland, OR 97208-4339.

DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT OR THE LITIGATION TO THE CLERK OF THE COURT OR THE JUDGE, EXCEPT FOR AS PROVIDED ABOVE.