

SUPERIOR COURT FOR THE STATE OF CALIFORNIA, COUNTY OF ALAMEDA

If you are in any of the three subclass definitions below, you are eligible to participate in a class action settlement:

- 1. Enrolled Students Subclass:** All persons enrolled at Mills on March 17, 2021, and who re-enrolled at Mills for the fall 2021 semester, excluding students who graduated with a degree from Mills in 2021 or 2022 or who were designated as No Degree students in Mills' records.
- 2. Prospective Students Subclass:** All persons who were admitted to Mills in spring 2021, and who enrolled at Mills for the fall 2021 semester, excluding students who graduated with a degree from Mills in 2021 or 2022 or who were designated as No Degree students in Mills' records.
- 3. Mediation Disclosure Subclass:** All persons enrolled at Mills on March 17, 2021 or who were admitted to Mills in spring 2021, and who enrolled at Mills for the fall 2021 semester who consented to the disclosure of the facts of their claims and circumstances for purposes of mediation.

A California Court authorized this notice. This is not a solicitation.

- A proposed settlement has been reached in a class action lawsuit involving Mills College ("Mills") and Northeastern University ("Northeastern"). In the lawsuit, Plaintiffs are current or former students who allege that Mills made misleading statements to its current and incoming students prior to and after announcing its intent to merge with Northeastern. Mills and Northeastern deny all wrongdoing.
- If the settlement is approved by the Court, you may be eligible to participate if you are included in one of the three categories above for Enrolled Students Subclass, Prospective Students Subclass, or Mediation Disclosure Students Subclass.
- For those who qualify, the settlement will provide benefits and no claim form will be required to receive a payment. Further information can be found under the heading Settlement Benefits.
- Your legal rights are affected whether you act or do not act. **READ THIS NOTICE CAREFULLY.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

DO NOTHING AND RECEIVE A PAYMENT	Class Members who do not opt-out of participation in this settlement will receive an allocation from the settlement. Your minimum allocation is \$ <<Award Rounded>> . You do not need to submit a form. You give up rights to sue
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	<p>Mills College and Northeastern University about the legal claims in this case.</p> <p>Note: If you are moving to a new location or want your check mailed to a different location than where this notice was mailed, you <i>must</i> contact the Settlement Administrator and provide your desired address.</p>
<p>YOU MAY EXCLUDE YOURSELF FROM PARTICIPATION IN THIS SETTLEMENT</p>	<p>Class Members who timely opt-out will receive no payment from the Settlement.</p> <p>Opting out of participation is the only option that allows you to retain your rights and not give up claims you may have against Mills and Northeastern relating to the legal claims in this case.</p>
<p>OBJECT TO THE SETTLEMENT</p>	<p>You may write to the Court about why you think the settlement is unfair, inadequate, or unreasonable. Alternatively, you may object orally at the fairness hearing without submitting a written objection first.</p>

- These rights and options—and *the deadlines to exercise them*—are explained in this notice. The deadlines may be moved, canceled or otherwise modified, so please check the settlement website at www.MCSettlement.com regularly for updates and further details.
- The Court overseeing this case still has to rule whether to approve the settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved.

BASIC INFORMATION

1. Why is there a notice?

You have a right to know about a proposed settlement of a class action lawsuit and your options before the Court decides whether to approve the settlement.

The Court overseeing this case is the Superior Court for the State of California, County of Alameda, the Honorable Brad Seligman, Judge Presiding (the “Court”). The case is *Willa Cordrey, et al., individually and on behalf of the putative class, and on behalf of the general public, v. Mills College, Northeastern University, and DOES 1-50*, Superior Court of the State of California, County of Alameda, case number 22CV011159.

The individuals who sued (Willa Cordrey, Jenny Varner, Clara MacKenzie, Joya Saxena, and Savannah McCoy) are the Plaintiffs. The entities they sued (Mills College and Northeastern University) are the Defendants.

2. What is this lawsuit about?

The lawsuit alleges that Mills College made misleading statements to its current and incoming students prior to and after announcing its intent to merge with Northeastern University.

Mills College and Northeastern University deny all wrongdoing and deny any liability to Plaintiffs and to other current and former students. For a copy of Plaintiffs' First Amended Complaint, please visit the settlement website, www.MCSettlement.com .

3. Why is this a class action?

In a class action, one or more people, called "class representative(s)," sue on behalf of people they contend have similar claims. All these people are grouped into one or more proposed "class" or "classes" or "subclass" and are referred to as "class members." An Enrolled Students Subclass, a Prospective Students Subclass, and a Mediation Disclosure Subclass have been preliminarily approved by the Court in relation to the Class Settlement Agreement. Willa Cordrey, Jenny Varner, Clara MacKenzie, Joya Saxena, and Savannah McCoy are the Class Representatives in this case. The Court oversees this class action.

4. Why is there a Settlement?

After evaluating Plaintiffs' claims, Defendants' defenses, the respective chances of success, and participating in mediations, the parties determined that a mutually-agreeable resolution is in everyone's best interest. The Class Representatives and their attorneys believe the settlement and the benefits it provides is best for everyone who is affected given the risks and costs of further litigation. The Defendants are not admitting they did anything wrong and they likewise want to avoid further litigation costs. The Court has not decided the case in favor of the Plaintiffs or the Defendants. For a full copy of the settlement agreement, please visit the settlement website, www.MCSettlement.com .

WHO IS IN THE SETTLEMENT?

5. How do I know if I am in the settlement?

The settlement class includes three subclasses of current and former students of Mills College who do not timely opt-out of participation in this settlement. The specific subclasses are outlined below.

The Enrolled Students Subclass consists of:

"All persons enrolled at Mills on March 17, 2021, and who re-enrolled at Mills for the fall 2021 semester, excluding students who graduated with a degree from Mills in 2021 or 2022 or who were designated as No Degree students in Mills' records."

It is estimated there are 206 Enrolled Students Class Members.

The Prospective Students Subclass consists of:

“All persons who were admitted to Mills College in spring 2021, and who enrolled at Mills College for the fall 2021 semester, excluding students who graduated with a degree from Mills College in 2021 or 2022 or who were designated as No Degree students in Mills’ records.”

It is estimated there are 197 Prospective Students Class Members.

The Mediation Disclosure Subclass consists of:

“All persons enrolled at Mills on March 17, 2021 or who were admitted to Mills in spring 2021, and who enrolled at Mills for the fall 2021 semester who consented to the disclosure of the facts of their claims and circumstances for purposes of mediation.”

It is estimated there are 99 Mediation Disclosure Students Class Members.

6. What if I am still not sure if I am included in the settlement?

If you are not sure whether you are a Settlement Class Member, or have any other questions about the settlement agreement, you should visit the settlement website, www.MCSettlement.com, or call the toll-free number, 1-833-419-0980.

SETTLEMENT BENEFITS

7. What monetary payments does the settlement provide?

The Settlement Fund is one million two hundred fifty thousand dollars (\$1,250,000.00). From that amount, Class Counsel is requesting (1) an award of up to five hundred sixty two thousand five hundred dollars (\$562,500.00) in attorneys’ fees plus up to twenty-five thousand dollars (\$25,000.00) in costs, and (2) an award of up to seven thousand five hundred dollars (\$7,500.00) in enhancement awards to each of the Class Representatives. Defendants are separately paying for the costs of Settlement Administration, not to exceed one hundred fifty thousand dollars (\$150,000.00). The costs of Settlement Administration will not come out of the Settlement Fund. If the Court approves all of the fees, costs, and enhancement awards currently requested, it is estimated that you will receive a minimum settlement allocation of <<Award Rounded>>. Class Counsel reserves the right to file a fee petition with the Court to ask for the stated amount in attorneys’ fees and costs. If the Court awards different amounts in attorneys’ fees and costs, the payments currently allocated to Class Members may change. Each Class Member will be mailed a settlement check to the last known address Mills and/or Northeastern has on file or to an updated address. If you are in the Mediation Disclosure Subclass, awards are to be allocated based on an objective formula that accounts for Class Members’ financial harm, risks, and

participation in the litigation. The award formula accounts for five categories of harm suffered (education terminated, unusable Mills credits, delayed graduation, educational promises unfulfilled, and increased costs). Mediation Disclosure Subclass members are eligible for an award allocation that is a uniform percentage (23%) of their distinct harm suffered as calculated at mediation. All Enrolled Students Subclass members and Prospective Students Subclass members who do not fall into the Mediation Disclosure Subclass will be allocated \$750 each, which accounts for difference in participation and investment in the litigation from members of these groups.

If, after the first distribution has occurred, uncashed settlement payments exceed \$10,000, then a second distribution will be made *pro rata*, based on Class Members' initial allocation amounts, of the remaining funds to those who have cashed the first settlement payments. If less than \$10,000 remains after the first distribution, then the remainder will be distributed to the agreed upon *cy pres* beneficiary, the Impact Fund.

8. What am I giving up to stay in the class?

Unless you timely exclude yourself from the settlement, you cannot sue Mills College, Northeastern University, or other Released Parties, continue to sue, or be part of any other lawsuit against Mills College, Northeastern University, or other Released Parties about the claims and issues in this case. The release is described more fully in the Settlement Agreement and describes the legal claims you give up if you stay in the settlement class. The settlement agreement is available at the settlement website, www.MCSettlement.com.

HOW TO GET A PAYMENT

9. How can I get a payment? What if I need to change the address the payment is sent to?

You do not have to fill out a form to receive a payment if you are member of the Class. To receive a payment from the settlement, Mills College, Northeastern University, or Class Counsel must have your current address on file. The Settlement Administrator will mail a check to the Class Members at that address.

If you have moved, are moving to a new location, or want your check mailed to a different location than where this notice was mailed, you must contact the Settlement Administrator and provide your desired address. You can email, mail, or call the Settlement Administrator. The contact information is listed on www.MCSettlement.com and located below.

10. When will I get my payment?

Payments will be mailed after the Court grants final approval of the settlement and after any and all appeals are resolved and/or the time for appeal has expired. If the Court approves the settlement after a hearing on March 12, 2024 at 3:00 p.m., there may be

appeals which may delay or reject the settlement approval. The final approval hearing may be moved by order of the Court without additional notice, so be sure to check the settlement website at www.MCSettlement.com if you are considering attending the hearing.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep the right to sue on your own about the legal issues in this case, then you must take steps to get out. This is called excluding yourself or opting out of the settlement class.

11. How do I get out of the settlement?

To exclude yourself from the settlement, you must complete and timely mail to the Settlement Administrator an unequivocal written request that includes the following:

- Your name and address;
- The name of the case: *Willa Cordrey et al. v. Mills College, et al.*, Superior Court of the State of California, County of Alameda, case number 22CV011159.
- A statement that you want to be excluded from this settlement; and
- Your signature.

You must mail your “opt-out” request, postmarked no later than **January 22, 2024** to:

Cordrey v. Mills College Settlement Administrator
c/o Settlement Services, Inc.
Post Office Box 10269
Tallahassee, FL 32302-2269
Email: claims@ssiclaims.com
Phone: (833) 419-0980
Website: www.MCSettlement.com

If you do not include the required information or do not submit your request for exclusion on time, you will remain a Settlement Class Member and will be bound by the settlement’s release of claims.

12. If I exclude myself, can I still get a payment?

No.

OBJECTING TO THE SETTLEMENT

13. How can I tell the Court if I do not like the settlement?

A Settlement Class Member may object to the Agreement either on their own, or through an attorney hired at their expense. Any objection may be in writing, signed by the Settlement Class Member (and attorney, if individually represented), and sent to the Settlement Administrator. The Settlement Administrator will send all objections to Class Counsel and Defense Counsel. Class Counsel will then file such written objections with the Court and no later than **February 16, 2024**. Any written objection shall contain a caption or title that identifies it as “Objection to Class Settlement *Willa Cordrey et al. v. Mills College, et al.*, Superior Court of the State of California, County of Alameda, case number 22CV011159.” Alternatively, Settlement Class Members may object orally to the Agreement at the fairness hearing without needing to submit a written objection or a notice of intent to appear. Information about the fairness hearing may be found on the settlement website www.MCSettlement.com.

Any written objection must contain information sufficient to identify and contact the objecting Settlement Class Member (or their individually-hired attorney, if any) as well as a clear and concise statement of the settlement class member’s objection, the facts supporting the objection, and the legal grounds on which the objection is based.

Your written objection, along with any supporting material you wish to submit, must be postmarked no later than **February 2, 2024**, and must be sent to the Settlement Administrator at the following address:

Cordrey v. Mills College Settlement Administrator
c/o Settlement Services, Inc.
Post Office Box 10269
Tallahassee, FL 32302-2269
Email: claims@ssiclaims.com
Phone: (833) 419-0980
Website: www.MCSettlement.com

14. What is the difference between objecting and excluding?

Objecting is telling the Court that you don’t like something about the settlement and asking that it not be approved. You can object to the settlement only if you do not exclude yourself from the settlement. A person who files an objection or orally objects can still receive the benefit of the settlement if the objection is overruled and the settlement is approved.

Excluding yourself from the settlement is telling the Court that you don’t want to be part of the settlement. If you exclude yourself from the settlement, you have no basis to object to the settlement because it no longer affects you. Excluding yourself from the settlement means that you are not entitled to any of the benefits available under the settlement.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes. The Court has appointed the lawyers listed here as “Class Counsel,” meaning that they are appointed to represent all class members:

Bryan Schwartz and Renato Flores of Bryan Schwartz Law, P.C. and Matthew C. Helland and Jasjit Mundh of Nichols Kaster, LLP.

You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel intends to file a motion seeking attorneys’ fees and expenses to be paid from the Settlement Fund paid by Mills College and Northeastern University. Any fees and expenses awarded by the Court will be paid from the Settlement Fund. The Court will determine the amount of any fees and expenses to award.

The Court will also determine if any other things or amounts should be paid from the Settlement Fund.

THE COURT’S FAIRNESS HEARING

17. When and where will the Court decide whether to approve the settlement?

The Court will hold a fairness hearing on March 12, 2024 at 3:00 p.m., though the date and the time of the fairness hearing may be changed without further notice. Check the settlement website to confirm the date/time of the hearing if you plan to attend, at www.MCSettlement.com.

At the fairness hearing, the Court will consider whether the settlement agreement is fair, reasonable, and adequate. The Court will also consider the fee award for Class Counsel and other requests, if any, to pay funds from the Settlement Fund.

If there are objections, the Court will consider them at this time or at such other time as the Court may schedule. After the hearing, the Court will decide whether to approve the settlement.

The address of the Court is:

Superior Court for the State of California, County of Alameda
Department 23
1221 Oak Street, Oakland, CA 94612

18. Do I have to come to the hearing?

No Class Members need to attend the hearing. Class Counsel will seek to answer any questions the Court may have. You may attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time to the proper addresses, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

19. May I speak at the hearing?

Yes, you may speak at the fairness hearing and no prior notification is required. Information about the fairness hearing may be found on the settlement website www.MCSettlement.com.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

If you do nothing, you will be included in the settlement, you will receive the benefits of the settlement provided to the class of which you are a member and in return you will release any claim you have against Mills College, Northeastern University, or other Released Parties relating to the claims alleged in the suit.

If you do not exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Mills College, Northeastern University, or other Released Parties about the legal issues in this case.

GETTING MORE INFORMATION

21. How do I get more information or contact the settlement administrator?

This notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can review a complete copy of the Settlement Agreement and other information at the settlement website, www.MCSettlement.com. If you have additional questions, you can visit this settlement website. You can also write to the settlement administrator by mail or call toll-free.

MAIL: Cordrey v. Mills College Settlement Administrator
c/o Settlement Services, Inc.
Post Office Box 10269
Tallahassee, FL 32302-2269

PHONE: 1-833-491-0980

Updates will be posted at www.MCSettlement.com as information about the settlement process becomes available.

Please do not contact the Court concerning this case.

The pleadings and other records in this litigation may be examined online on the Alameda County Superior Court's website, known as "eCourt Public Portal," at <https://eportal.alameda.courts.ca.gov>.

After arriving at the website, click the "Search" tab at the top of the page, then select the Document Downloads link, enter the case number and click "Submit." Images of every document filed in the case may be viewed at a minimal charge. You may also view images of every document filed in the case free of charge by using one of the computer terminal kiosks available at each court location that has a facility for civil filings.