

Exhibit D

COURT AUTHORIZED NOTICE OF CLASS ACTION AND
PROPOSED SETTLEMENT

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

Manhattan University Settlement
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391



Postal Service: Please do not mark barcode

XXX—«ClaimID» «MailRec»

«First1» «Last1»
«C/O»
«Addr1» «Addr2»
«City», «St» «Zip» «Country»

By Order of the Court Dated: September
4, 2025

MANHATTAN UNIVERSITY SETTLEMENT

A Settlement has been reached in a class action lawsuit between Defendant Manhattan University ("Defendant" or "Manhattan") and a certain individual who has alleged that she, and the Settlement Class Members, are entitled to partial refunds of tuition and fees for the Spring 2020 Semester because Manhattan transitioned to remote instruction in March 2020 amid the COVID-19 pandemic. The case is Czigany Beck, *et al.* v. Manhattan College, Case No. 1:20-cv-03229-LLS, in the United States District Court for the Southern District of New York (the "Action"). The proposed Settlement is not an admission of wrongdoing by Manhattan and Manhattan denies all allegations of wrongdoing and disclaims all liability with regard to all claims in the Action.

Am I a Class Member? Manhattan's records reflect you may be a Class Member. You are a member of the Settlement Class if you were a Manhattan College undergraduate student enrolled during the Spring 2020 semester for whom any amount of tuition and fees were paid from any source other than a scholarship/grant from Manhattan (e.g., your own funds, funding from a parent or other family member, loan, or non-Manhattan scholarship/grant) to Manhattan for the Spring 2020 Semester, and your tuition or fees have not been refunded in their entirety, and you are not excluded from the Settlement Class.

What Can I Get? If approved by the Court, a Settlement Fund of \$742,940 has been established to pay all claims to the Settlement Class, together with notice and administration expenses, approved Attorneys' Fees and Costs, and Service Award. What remains of the \$742,940 will be divided equally among the approximately 3,000 Settlement Class Members.

How Do I Get a Payment? Settlement Class Members will not need to take any action to receive their shares of the Cash Benefit payment. Settlement Class Members will automatically receive their shares by check mailed to the Settlement Class Member's last known mailing address. Alternatively, if they prefer to receive their share by Venmo or PayPal, or update their mailing address for 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 information.

What are My Other Options?

You may exclude yourself from the Class by sending a letter to the Settlement Administrator **no later than November 17, 2025**.

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 Action. 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 November 17, 2025**. Specific instructions about how to object to, or exclude yourself from, the Settlement are available at www.ManhattanUniversityfundlawsuit.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 outs will not be allowed.

Who Represents Me? The Court has appointed Poulin | Willey | Anastopoulos, LLC to represent the 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, as well as any requests for an award of Attorneys' Fees (not to exceed 33% of the total Settlement Fund or \$247,399), Costs and expenses not to exceed \$75,000, and Service Award for the Named Plaintiff (not to exceed \$10,000) that may be sought by Class Counsel. The Court will hold the Final Approval Hearing on **January 15, 2026 at 3:30 pm ET**, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312. 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.ManhattanUniversityfundlawsuit.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, Election Form, a copy of the Settlement Agreement and other documents, or to update your address go to www.ManhattanUniversityfundlawsuit.com, contact the Settlement Administrator at **(833) 630-8407** or at Manhattan University Settlement, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391, or call Class Counsel at **1-843-614-8888**.

Manhattan University Settlement c/o Kroll Settlement
Administration LLC
P.O. Box 225391
New York, NY 10150-5391

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