

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JULIA JIN-WOLFSON, *on behalf of herself
and all others similarly situated,*

Plaintiff,

v.

LAFAYETTE COLLEGE,

Defendant.

Case No. 5:23-cv-04005-JMG

**PLAINTIFF'S UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE THAT, upon the Declaration of Nicholas A. Colella, sworn to on July 21, 2025, and the accompanying exhibits and memorandum of law, and upon all prior proceedings, pleadings, and filings in the above-captioned action, Named Plaintiff Julia Jin-Wolfson will move this Court on July 31, 2025, at 9:30 A.M. in the United District Court of the Eastern District of Pennsylvania, Edward N. Cahn U.S. Courthouse and Federal Building, Courtroom 4B, 504 W. Hamilton St., Allentown, PA 18101, before the Honorable John M. Gallagher of the United States District Court for the Eastern District of Pennsylvania, for an Order under Federal Rule of Civil Procedure 23:

(1) Finally certifying, for purposes of the Settlement only, the following Settlement Class:

All Lafayette College students whose payment obligation of tuition and/or fees was satisfied for the Spring 2020 semester, and who were enrolled in at least one in-person on-campus class as of March 16, 2020.

Excluded from the Settlement Class are all Lafayette College students who received scholarships, grants, or credits that equaled or exceeded their total payment obligations to Lafayette for the Spring 2020 semester, or who were otherwise not obligated to make contributions, payments or third-party arrangements towards tuition or fees for the Spring 2020 semester.

(2) finally approving the Settlement under Rule 23(e)(2) as fair, reasonable, and adequate; (3) confirming that the Class Notice plan approved by the Court in its March 24, 2025, Preliminary Approval Order has been fully and sufficiently executed; (4) finally appointing Named Plaintiff Julia Jin-Wolfson as Settlement Class Representative; (5) finally appointing Nicholas A. Colella of Lynch Carpenter, LLP and Michael A. Tompkins and Anthony M. Alesandro of Leeds Brown Law, P.C. to act on behalf of the Settlement Class and the Settlement Class Representative with respect to the Settlement; (6) entering the proposed final judgment; and (7) granting such other and further relief as may be just and appropriate.

Dated: July 21, 2025

Respectfully submitted,

/s/ Nicholas A. Colella
Nicholas A. Colella (PA ID No. 332699)
LYNCH CARPENTER, LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
Phone: (412) 322-9243
NickC@lcllp.com

Michael Tompkins, Esq.*
Anthony Alesandro, Esq.*
LEEDS BROWN LAW, P.C.
1 Old Country Road, Suite 347
Carle Place, NY 11514
Phone : (516) 873-9550
mtompkins@leedsbrownlaw.com
aalesandro@leedsbrownlaw.com

**Pro Hac Vice*

*Attorneys for Named Plaintiff and
the Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that, on July 21, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system.

/s/ Nicholas A. Colella

Nicholas A. Colella