

LEGAL NOTICE

If you were a practical nursing student at Stone Academy during the period between November 1, 2021 and February 14, 2023, and were unable to graduate due to Stone Academy's closure,

YOU COULD GET A PAYMENT FROM A PROPOSED CLASS ACTION SETTLEMENT.

The Connecticut Superior Court, Complex Litigation Docket, Judicial District of Waterbury (the "Court") has given preliminary approval for settlement of a class action lawsuit against Stone Academy (the "Defendants"). The lawsuit is known as *Ridenhour, et al. v. Career Training Specialists, LLC d/b/a Stone Academy, et al.* Docket No. (X10) UWY-CV-23-6070643-S (the "Lawsuit"). The Proposed Settlement, if finally approved by the Court, will provide for payments to Settlement Class Members, as discussed below. This Notice summarizes your rights and options in connection with the Proposed Settlement. A document with additional information is available at <https://www.stoneacademyclassaction.com> or upon request by calling (800) 836-7204.

Are you a Settlement Class Member?

You are a Settlement Class Member if (1) you were enrolled in any of the practical nursing day or night programs offered by Stone Academy between November 1, 2021 and February 14, 2023; and (2) you were unable to graduate as a result of Stone Academy's closure.

What is the Case About?

The Lawsuit claims that between November 1, 2021 and February 14, 2023, Stone Academy violated the Connecticut Unfair Trade Practices Act ("CUTPA"), breached contractual or quasi-contractual agreements, breached the covenant of good faith and fair dealing, and were unjustly enriched when the school and its owners failed to adequately educate its students and shuttered its doors without advanced notice to students.

The Lawsuit seeks money damages relating to the delay this closure and has had on students' careers and earning potentials. Stone Academy denies the allegations and maintains it did not breach any duty or cause any injury to the Class Members. The Parties have agreed to a settlement, subject to approval of the Court, to avoid further litigation.

What are the Terms of the Settlement?

Under the terms of the Proposed Settlement, the Defendants will pay a total settlement amount of \$5,000,001.00 (Five Million and One Dollars). After reductions for attorneys' fees and expenses associated with pursuing this matter (the sum of which will be determined by the Court), as well as any Class Representative Service Awards (also determined by the Court), the remaining amount will be distributed in equitable shares to all Settlement Class Members who qualify for payment. Pursuant to the Proposed Settlement, all Settlement Class Members will receive a monetary payment without offering additional proof (with the exception of the Claim Form noted below, where applicable) and without additional fact-finding proceedings.

Who Represents You?

The Court has appointed the law firm of Hurwitz, Sagarin, Slossberg & Knuff, LLC, as “Class Counsel.” You do not have to pay any fees or expenses to Class Counsel. As part of the Proposed Settlement, attorneys’ fees and expenses will be approved by the Court and paid from the total settlement amount noted above. You do not have to pay any attorneys’ fees or expenses out of your pocket. You may hire your own attorney, if you wish; however, you will be responsible for that attorney’s fees and expenses.

What Further Proceedings Are Scheduled?

The Court has not yet decided whether to give Final Approval of the Proposed Settlement. The Court will hold a Fairness Hearing at 10:00 am on February 26, 2025 at the Connecticut Superior Court, Judicial District of Waterbury, 400 Grand Street, Waterbury, Connecticut. At this hearing, the Court will consider: (1) whether the Proposed Settlement is fair, reasonable and adequate, and if it should be approved; (2) the amount of attorneys’ fees and expenses to award Class Counsel; and, (3) any awards to the Class Representatives for their services. The Court will also consider any objections to the Proposed Settlement.

Settlement Class Members who have followed certain procedures, as outlined in the Proposed Order attached as Exhibit A to the Motion for Preliminary Approval of the Settlement, may appear and be heard by the Court at the Fairness Hearing. After the hearing, the Court will decide whether to approve the Proposed Settlement.

What Are Your Legal Rights?

If the Proposed Settlement is approved, you are a Settlement Class Member as defined in this Notice, and IF you received an audited transcript from the Connecticut Office of Higher Education, you do not need to do anything in order to receive the benefits set forth above. **If you fall into this category you do not need to submit a Claim Form.**

If, however, you did NOT receive an audited transcript from the Connecticut Office of Higher Education, but fall within the Class definition above, you MUST submit the Claim Form, which is available at <https://www.stoneacademyclassaction.com>. Your Claim Form MUST be postmarked on or before February 19, 2025.

Additional information regarding the Claim Form is available at <https://www.stoneacademyclassaction.com>, by calling (800) 836-7204, or by reviewing the “Long-Form Notice” at <https://www.stoneacademyclassaction.com>, which contains additional information about the Lawsuit and the Settlement.

If you are receiving this Notice on behalf of a deceased or incapacitated individual, you must provide the Settlement Administrator with documentation evidencing your legal authority to act on behalf of that individual or estate, no later than February 19, 2025. Additional information is available at <https://www.stoneacademyclassaction.com> or by calling (800) 836-7204.

Release: If the Proposed Settlement is approved, all Settlement Class Members will release all claims related to this Action. No Settlement Class Member will be able to sue any of the Defendants for the released claims. More detailed language regarding the release is available at <https://www.stoneacademyclassaction.com>.

Your Right to Object: If you are a member of the Settlement Class, you may object to any aspect of the Proposed Settlement, including (1) final certification of the Settlement Class; (2) the fairness, reasonableness, or adequacy of the Proposed Settlement; (3) the adequacy of the representation by the Class Representatives or by Class Counsel; or (4) the requested awards of attorneys' fees and costs and/or the requested service awards of \$5,000 each for the Class Representatives.

Information regarding the amounts requested for attorneys' fees and costs will be available at <https://www.stoneacademyclassaction.com> by February 3, 2025. If you object, your objection must be in writing, sent to the Clerk of the Complex Litigation Docket, Judicial District of Waterbury, 400 Grand Street, Waterbury, CT 06702, as well as the Settlement Administrator, Stone Academy Class Action Settlement c/o Atticus Administration, LLC, PO Box 64053, St. Paul, MN 55164, and MUST be postmarked on or before **February 19, 2025**. If you object and the Court approves the Settlement, you will be bound by the Court's decision and the release described above, and will retain the right to receive a payment under the terms of the Settlement.

Your Right to Opt-Out: If you do not want to be bound by the Settlement in this case and do not want a payment from the Proposed Settlement, but instead want to keep any right you may have to sue the Defendants about the legal issues in this case, then you must exclude yourself from the Class. To exclude yourself from the Class, you must submit an Opt-Out Election Form to the address indicated on the form. Be sure to include your name, address, telephone number and your signature. Your Opt-Out Election Form must be postmarked on or before February 19, 2025. The Opt-Out Election Form is available at <https://www.stoneacademyclassaction.com>. You can also request an Opt-Out Election Form by calling (800) 836-7204. You cannot exclude yourself by telephone or by email. If you ask to be excluded, you will not get any recovery from the Proposed Settlement. You will not be legally bound by anything that happens in the lawsuit, and you may be able to sue the Defendants in the future about the legal issues in this case, but you will be subject to any legal defenses that the Defendants may assert. If you opt-out of the Settlement, you may not file an objection to the Settlement.

HOW CAN YOU GET MORE INFORMATION?

If you have questions or want a full, detailed notice or other documents about this Lawsuit and your rights, you can visit <https://www.stoneacademyclassaction.com> or call toll-free (800) 836-7204. You may also contact Class Counsel at (203) 877-8000. You can also download copies of the Proposed Settlement and other documents related to the Proposed Settlement on the Connecticut Judicial Branch website (www.jud.ct.gov) by searching for the docket for this Lawsuit. Please do not contact the Court or Stone Academy or its attorneys regarding this Notice.