

**Your claim must  
be submitted  
online or  
postmarked by:  
DECEMBER 27,  
2025**

**FINANCIAL AID ANTITRUST SETTLEMENT**  
*Henry, et al. v. Brown University, et al.*  
United States District Court Northern District of Illinois Eastern  
Division  
Case No. 1:22-cv-00125

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**If you are a member of the Settlement Class and have not previously submitted a claim form for other settlements in this case, you must submit a valid and timely claim to get money from the Settlement Fund. This is the only way to get money from the Settlements.**

**If you have previously submitted a claim form in this case, you need not submit another one and will automatically be considered for all additional settlements for which you are eligible.**

**SUBMISSION DEADLINE:**

**ONLINE OR POSTMARKED BY DECEMBER 27, 2025**

**PROOF OF CLAIM**

On June 26, 2025 and July 30, 2025, respectively, the Court in this case granted final approval of settlements between Plaintiffs Andrew Corzo, Sia Henry, Alexander Leo-Guerra, Michael Maerlender, Brandon Piyevesky, Benjamin Shumate, Brittany Tatiana Weaver, and Cameron Williams (“Plaintiffs”) and the Settlement Class (defined below), on the one hand, and Defendants California Institute of Technology (“Caltech”) and the Johns Hopkins University (“Johns Hopkins”) (together “Settling Defendants”), on the other. The settlement agreements are referred to herein as the “Settlements.” The Settlements are on behalf of a class of certain current and former students at seventeen universities (“Defendants” or “Defendant Universities”). The seventeen Defendants are the Settling Defendants plus the following schools: Brown University (“Brown”), The Trustees of Columbia University in the City of New York (“Columbia”), Cornell University (“Cornell”), Trustees of Dartmouth College (“Dartmouth”), Duke University (“Duke”), Emory University (“Emory”), Georgetown University (“Georgetown”), Massachusetts Institute of Technology (“MIT”), Northwestern University (“Northwestern”), University of Chicago (“Chicago”), University of Notre Dame du Lac (“Notre Dame”), the Trustees of the University of Pennsylvania (“Penn”), William Marsh Rice University (“Rice”), Vanderbilt University (“Vanderbilt”), and Yale University (“Yale”).

**The Settlement Class is defined as:**

- a. All persons who have during the Class Period (a) enrolled in one or more of Defendants’ full-time undergraduate programs, (b) received at least some need-based financial aid from one or more Defendants, **and** (c) whose tuition, fees, room, or board to attend one or more Defendants’ full-time undergraduate programs was not fully covered by the combination of any types of financial aid or merit aid (not including loans) in any undergraduate year.<sup>1</sup> The Class Period is defined as follows:
  - i. For Chicago, Columbia, Cornell, Duke, Georgetown, MIT, Northwestern, Notre Dame, Penn, Rice, Vanderbilt, Yale—from Fall Term 2003 through February 28, 2024.
  - ii. For Brown, Dartmouth, Emory—from Fall Term 2004 through February 28, 2024.
  - iii. For Caltech—from Fall Term 2019 through February 28, 2024.
  - iv. For Johns Hopkins—from Fall Term 2021 through February 28, 2024.
- b. **Excluded from the Class are:**
  - i. Any Officers<sup>2</sup> and/or Trustees of Defendants, or any current or former employees holding any of the following positions: Assistant or Associate Vice Presidents or Vice Provosts, Executive Directors, or Directors of Defendants’ Financial Aid and Admissions offices, or any Deans or Vice Deans, or any employees in Defendants’ in-house legal offices;

<sup>1</sup> For the avoidance of doubt, the Class does not include those for whom the total cost of attendance, including tuition, fees, room, and board for each undergraduate academic year, was covered by any form of financial aid or merit aid (not including loans) from one or more Defendants.

<sup>2</sup> For the avoidance of doubt, the Columbia University “Officers” excluded from the Class are members of the Senior Administration of Columbia University, and do not include exempt employees of Columbia University who are referred to as officers.

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- ii. any person who was not a U.S. citizen or permanent resident at the time such person attended a full-time undergraduate program and received at least some financial aid from one or more Defendants; and
- iii. the Judge presiding over this action, his or her law clerks, spouse, and any person within the third degree of relationship living in the Judge's household and the spouse of such a person.

Plaintiffs allege an antitrust conspiracy involving all seventeen Defendants. Defendants deny the allegations and assert multiple defenses. The Court has not decided who is correct. Plaintiffs have resolved their claims with the Settling Defendants for aggregate cash payments totaling \$35,250,000 (the "Settlement Fund"), and certain other relief. The case continues against the non-settling Defendants. The Court appointed Angeion Group, LLC ("Angeion") as the Claims Administrator. If Angeion was provided your contact information from one or more of the Defendant(s), Angeion would have previously emailed or mailed a notice to you indicating how you could access the long-form notice of the Settlements ("Settlement Notice"). The Settlement Notice is available at [www.FinancialAidAntitrustSettlement.com](http://www.FinancialAidAntitrustSettlement.com) (the "Settlement Website"). The Settlement Notice summarizes both the litigation and the terms of the Settlements. The purpose of this Proof of Claim or "Claim Form" is to ensure that members of the Settlement Class can participate in the distribution of the \$35.25 million Settlement Fund, less attorneys' fees, expenses, administration costs, service awards approved by the Court, and any taxes owed ("Net Settlement Fund").

The Claims Administrator, Angeion, in conjunction with Plaintiffs' economic expert retained to assist with the allocation process, EconOne, will determine the payment amount for each Settlement Class member who submits a Claim Form (or previously submitted a claim form from earlier settlements in this case) (a "Claimant"). Each Claimant's pro rata share of the Net Settlement Fund will be computed based on the formula set forth in the Fourth Tranche Allocation Plan (posted on the Important Documents page of the Settlement Website), and the process will be consistent with the Allocation Plan Process (posted on the Important Documents page of the Settlement Website). In short, each Claimant's share will be determined based on (1) the average "Net Price"—the price of tuition, fees, room, and board minus all need-based and other forms of aid (excluding loans)—charged by the Defendant University (or Defendant Universities) the Claimant attended in each of the years (or fractions of years) the Claimant attended during the Class Period; (2) the number of years (or fractions thereof) the Claimant attended a Defendant University (or Universities) during the Class Period; and (3) the total number of Claimants who submit timely and valid Claim Forms.

**Each Claimant must provide proof that he or she is a member of the Settlement Class in order to receive a payment from the Net Settlement Fund.**

**PART 1: CLAIMANT IDENTIFICATION**

**Notice/Claim ID # (If you  
received the Settlement  
Notice via mail or email,  
please enter your  
Notice/Claim ID. If you did  
not receive a Notice, leave  
blank):**

**First Name:**

**Last Name:**

**Street 1:**

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**Street 2:**

**City:**

**State:**

**Zip Code:**

**Country:**

**Phone Number:**

**Email Address:**

**Confirm Email Address:**

☐ **Check this box if you had a different First Name or Last Name while attending a Defendant University.**

Previous First Name: \_\_\_\_\_

Previous Last Name: \_\_\_\_\_

**PART 2: SETTLEMENT CLASS MEMBERSHIP**

2A: Check which Defendant University or Universities you attended at any point during the Class Period for that Defendant or those Defendants. For reference, the Class Period for each Defendant University is defined below (check all that apply):

- i. For Chicago, Columbia, Cornell, Duke, Georgetown, MIT, Northwestern, Notre Dame, Penn, Rice, Vanderbilt, Yale—from Fall Term 2003 through February 28, 2024.
- ii. For Brown, Dartmouth, Emory—from Fall Term 2004 through February 28, 2024.
- iii. For Caltech—from Fall Term 2019 through February 28, 2024.
- iv. For Johns Hopkins—from Fall Term 2021 through February 28, 2024.

- ☐ Brown University
- ☐ California Institute of Technology
- ☐ University of Chicago
- ☐ Columbia University
- ☐ Cornell University
- ☐ Dartmouth College
- ☐ Duke University
- ☐ Emory University
- ☐ Georgetown University

- ☐ Johns Hopkins University
- ☐ Massachusetts Institute of Technology
- ☐ Northwestern University
- ☐ University of Notre Dame
- ☐ University of Pennsylvania
- ☐ Rice University
- ☐ Vanderbilt University
- ☐ Yale University

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2B: For any point during the Class Period, did you receive need-based grants or scholarships from any of the Defendant University(ies) you attended?

- ☐ Yes
- ☐ No
- ☐ Other (explain)

2C: When you received need-based grants or scholarships from a Defendant University or Universities, were all of your costs for tuition, fees, room, and board covered by grants and/or scholarships?

- ☐ Yes, for all of the terms I attended the Defendant University(ies)
- ☐ Yes, for some (but not all) of the terms I attended Defendant University(ies)
- ☐ No
- ☐ Other (explain)

2D: For all of the terms in which you attended a Defendant University, received need-based grants or scholarships, and your grants and/or scholarships did not cover the total cost of tuition, fees, room, and board, were you a U.S. citizen or permanent resident?

- ☐ Yes, for all of the terms I attended the Defendant University(ies)
- ☐ Yes, for some (but not all) of the terms I attended Defendant University(ies)
- ☐ No
- ☐ Other (explain)

2E: If you were a U.S. citizen or permanent resident for all or some of the terms in which you received need-based grants and/or scholarships, and your grants and/or scholarships did not cover the total cost of tuition, fees, room, and board, please state which term(s) in which **all of the following** apply: (1) you were a U.S. citizen or permanent resident, (2) you were receiving need-based financial aid, ***and*** (3) where your scholarships and grants did not cover the total cost of tuition, fees, room, and board. For example, Cornell – Fall Semester 2020, Spring Semester, 2021; Dartmouth – Fall Quarter 2021, Spring Quarter 2022.

**(Please include all years and terms in which *all of the above* apply.) You may attach additional pages to your Claim Form if you require additional space.**

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University	Year	Academic Term

2F: Are you an officer or trustee at a Defendant University? For the avoidance of doubt, the Columbia University “Officers” excluded from the Class are members of the Senior Administration of Columbia University, and do not include exempt employees of Columbia University who are referred to as officers.

- ☐ Yes
- ☐ No

2G: Are you, or were you ever, an employee holding any of the following titles at a Defendant University: Assistant or Associate Vice Presidents or Vice Provosts, Executive Directors, or Directors of Defendants’ Financial Aid and Admissions offices, or any Deans or Vice Deans, or any employees in Defendants’ in-house legal offices?

- ☐ Yes
- ☐ No

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2H: Are you a law clerk or the spouse of a law clerk to the Judge presiding over this lawsuit, Judge Matthew F. Kennelly?

- ☐ Yes  
☐ No

2I: Are you a relative or spouse of a relative of Judge Matthew F. Kennelly within the third degree of relationship and residing in the same household of the Judge?

- ☐ Yes  
☐ No

**PART 3: VERIFICATION**

You must include **one or more** forms of proof of Settlement Class Membership supporting that you attended one or more Defendant Universities during the Class Period:

Examples of acceptable proof of Settlement Class Membership may include: (1) a transcript showing your attendance at a Defendant University during the Class Period; (2) a diploma showing your graduation from a Defendant University during the Class Period; (3) a copy of a student ID with a date indicating it was issued during the Class Period; (4) receipts or statements showing payment of tuition, room, board, and/or fees to a Defendant University during the Class Period; or (5) your financial aid award letter from a Defendant University issued during the Class Period that shows the amount of aid awarded and any remaining balance or out-of-pocket responsibility for tuition, fees, or other charge.

For reference, the Class Period for each Defendant University is defined below (check all that apply):

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- iii. For Caltech—from Fall Term 2019 through February 28, 2024.
- iv. For Johns Hopkins—from Fall Term 2021 through February 28, 2024.

The Claims Administrator may request additional documentation from any Settlement Class Member to confirm membership.

**PART 4: PAYMENT SELECTION**

Please select **one** of the following payment options, which will be used should you be eligible to receive a settlement payment:

☐ **PayPal** - Enter your PayPal email address: \_\_\_\_\_

☐ **Venmo** - Enter the mobile number associated with your Venmo account: \_\_\_\_ - \_\_\_\_ - \_\_\_\_

☐ **Zelle** - Enter the mobile number or email address associated with your Zelle account:

Mobile Number: \_\_\_\_ - \_\_\_\_ - \_\_\_\_ or Email Address: \_\_\_\_\_

☐ **Virtual Prepaid Card** - Enter your email address: \_\_\_\_\_

☐ **Physical Check** - Payment will be mailed to the address provided above.

**PART 5: ATTESTATION UNDER PENALTY OF PERJURY**

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By signing below, you are further verifying under penalty of perjury that the information provided in this proof of claim is accurate and complete.

By signing, you submit to the jurisdiction of the Court with respect to your claim and you acknowledge that you shall be deemed to have, by the June 27, 2025 and July 30, 2025, respectively, Orders Granting Final Judgment and Order of Dismissal, Approving Settlements with Defendants Caltech and Johns Hopkins, and Granting Settlement Class Counsel's Motion for Service Awards for the Class Representatives, Reimbursement of Expenses, and Attorneys' Fees ("Final Approval and Judgment Orders") fully, finally, and forever waived, released, relinquished, and discharged all Released Claims against the Released Parties, as defined in Paragraph 19 of the Final Approval and Judgment Orders, and in the Settlement Agreements, all of which are posted on the Settlement Website, shall be forever enjoined from prosecuting in any forum any Released Claims against any of the Releasees, and agree and covenant not to sue any of the Releasees on the basis of any Released Claims.

**YOU MUST SUBMIT THIS CLAIM FORM BY DECEMBER 27, 2025.**

I declare, under penalty of perjury, under the laws of the United States of America that the foregoing information provided by the undersigned is true and correct and that this proof of claim was executed as follows:

\_\_\_\_\_  
(Signature)

At: \_\_\_\_\_  
(City) (State/Country)

Date: \_\_\_\_\_

**PLEASE DIRECT ANY QUESTIONS ABOUT THIS CLAIM FORM TO THE CLAIMS ADMINISTRATOR BY  
DOING ONE OF THE FOLLOWING:**

- Emailing: [Info@FinancialAidAntitrustSettlement.com](mailto:Info@FinancialAidAntitrustSettlement.com)
- Calling the toll-free number, 1-833-585-3338
- Writing to: Financial Aid Antitrust Settlement, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103

**ACCURATE PROCESSING OF CLAIMS MAY TAKE SIGNIFICANT TIME.**

**THANK YOU IN ADVANCE FOR YOUR PATIENCE.**