

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Galban v. Institute for the International Education of Students. Case No. 1:22-cv-4917

PLEASE READ THIS NOTICE CAREFULLY.

IF YOU WERE ENROLLED IN THE SPRING 2020 STUDY ABROAD PROGRAM IN AUSTRIA PRESENTED BY THE INSTITUTE FOR THE INTERNATIONAL EDUCATION OF STUDENTS (“IES Abroad”), YOU MAY BE ENTITLED TO PAYMENT FROM A CLASS ACTION SETTLEMENT. THIS NOTICE EXPLAINS YOUR RIGHTS AND OPTIONS AND THE DEADLINES TO EXERCISE THEM.

*The United States District Court for the Northern District of Illinois authorized this Notice.
You are not being sued. This is not a solicitation from a lawyer.*

- A Settlement has been reached in a class action lawsuit between Defendant Institute for the International Education of Students (“Defendant” or “IES”) and a student, Kristen Galban, who was enrolled in the IES Spring 2020 Study Abroad Program in Vienna, Austria (“Plaintiff”) when the Program was cut short and transitioned to remote learning due to the COVID-19 pandemic. The case is *Galban et al. v. Institute for the International Education of Students*, Case No. 1:22-cv-4917 and it is pending in the United States District Court for the Northern District of Illinois (the “Lawsuit”). IES denies that it had any such contractual obligation and denies Plaintiff’s allegations.
- You are included in this lawsuit if you were a student enrolled in IES Abroad’s Spring 2020 program in Vienna, Austria, and who directly paid IES Abroad for tuition and housing costs in connection with that Program.
- Read this Notice carefully. Your legal rights will be affected by your actions.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT	
DO NOTHING	Settlement Class Members who do nothing will automatically receive a \$250 payment by check to the student’s last known mailing address as reflected in IES’s records once the Settlement is finally approved by the Court. In exchange, you will give up any rights you may have to sue IES about the issues in this case.
CHANGE YOUR PAYMENT OPTION	Settlement Class Members may visit: <i>AustriaStudyAbroadSettlement.com</i> to receive more information about the settlement or to provide an updated address for sending payment.
EXCLUDE YOURSELF	You will not receive any payment from the Settlement, but you will retain any rights you have to sue IES about the issues in this case.
OBJECT	Write to the Court explaining why you do not like the Settlement. You would remain a part of the Settlement Class and be bound by the Court’s decisions regarding the Settlement, even if the Court disagrees with you.

QUESTIONS? VISIT AustriaStudyAbroadSettlement.com

DO NOT CONTACT THE JUDGE OR THE COURT WITH ANY QUESTIONS.

These rights and options—and the deadlines to exercise them—are explained in this Notice below.

The Court presiding over this case still has to decide whether to approve the Settlement. The monetary relief made available by this Settlement will be provided only if the Court approves the Settlement and after any issues with the Settlement are resolved. Please be patient.

BASIC INFORMATION

Why was this Notice issued?

A Court authorized this Notice because, as a Class Member, you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options and rights before the Court decides whether to give final approval to the Settlement. This Notice explains the Lawsuit, the Settlement, and your legal rights.

What is this Lawsuit about?

In this lawsuit, Plaintiff claims that IES's decision to transition its Study Abroad Program to remote learning from home in response to the COVID-19 pandemic for the Spring 2020 Semester amounted to a breach of its contractual obligations to provide the in-person educational services and international experiences promised as part of that Program, including room and board, meals, and field trips that were paid for but not experienced. Plaintiff also asserted that IES was unjustly enriched by retaining these payments. IES denies that it breached any such contractual obligations because it retained the legal right to change its program at any time and therefore denies Plaintiff's allegations.

The District Court agreed with IES and dismissed the case based on language in the IES contract that provided authority for IES to change the program. Plaintiff appealed that decision to the Seventh Circuit Court of Appeals. Before the Court of Appeals ruled on the appeal, the Parties agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

What is a class action?

In a class action, one or more people called class representatives sue on behalf of a group or a "class" of people who they allege have similar claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the Class.

Why is there a Settlement?

Although a final decision has not been made on who will win this case, both sides agreed to a Settlement to avoid the uncertainties and expenses associated with ongoing litigation. And, Settlement Class Members will receive compensation sooner rather than, if at all, after the completion of the appeal and any future trial.

WHO'S INCLUDED IN THE SETTLEMENT?

You are included if you were a student enrolled in Spring 2020 IES Study Abroad Program for Vienna, Austria, and directly paid IES for your tuition and housing costs for that Program. You were identified by the business records of IES as being enrolled in this Program and a Class Member.

THE SETTLEMENT BENEFITS

What does the Settlement provide?

A Settlement Fund has been created from which each Settlement Class Member who does not opt out will automatically receive a \$250.00 Settlement Payment.

When will I get my payment?

Payments will be distributed after the Court grants Final Approval to the Settlement. The Parties cannot accurately predict when (or whether) the Court will grant Final Approval to the Settlement, or whether there may be appeals from that order that take additional time to resolve, so please be patient.

The Settlement Administrator will send payments to eligible Class Members between 30 and 60 days after final approval. The payments will be made via check. All checks will expire and become void 180 days after they are issued.

THE LAWYERS AND THE PERSON REPRESENTING YOU

Do I have a lawyer in the case?

The Court has appointed Varnell & Warwick, P.A. to be the attorneys representing the Settlement Class. They are called “Class Counsel.” They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged attorney fees for Class Counsel. If you want to be represented by your own lawyer in this case, you may hire one at your expense. Class Counsel is asking the Court to approve payment to them in the amount of \$30,000.00. This amount will not reduce the Settlement Payments being made to you.

Who is representing the Class?

The Court has appointed Plaintiff Kristen Galban to act as Class Representative on behalf of the Class. Plaintiff Galban has brought this case, hired Class Counsel and litigated the case on behalf of the Class. She has participated in the investigation of the case, discovery, and attended multiple day-long mediations sessions where she represented the Class in settlement negotiations. To compensate her for her time and efforts on behalf of the Settlement Class, the parties have negotiated the payment of a \$8,200.00 Service Award to Plaintiff Galban, subject to Court approval.

OTHER OPTIONS?

1. Exclude yourself (“opt out” of the Settlement).

You may exclude yourself from the Settlement. If you do so, you will not receive any Settlement Payment. You will not release any claims you may have against IES, and you will be free to pursue whatever legal rights you may have by pursuing your own lawsuit against IES at your own risk and expense, if you choose to do so.

To exclude yourself from the Settlement, you must mail a timely written request to the Settlement Administrator at Galban v IES c/o Settlement Administrator, PO Box 23309, Jacksonville, FL 32241, postmarked by May 4, 2026. Your request to be excluded from the Settlement must: (a) include a simple statement requesting exclusion from the Settlement Class; (b) be personally signed by you; (c) include the case name (*Galban v. Institute for the International Education of Students*, Case No. 1:22-cv-4917); and (d) include your name, address, and either a telephone number or email address.

You cannot ask to be excluded by phone or on the Settlement Website. You may opt out of the Settlement Class only on your own behalf; one may not purport to opt others out of the Settlement Class on a class or representative basis.

2. Object to the Settlement.

If you are a Settlement Class Member (and do not exclude yourself from the Settlement Class), you can object to any part of the Settlement. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views. To object, you must mail your written objection(s) to the Clerk of Court with a postmark no later than May 4, 2026. Your written objections must: (a) state that you are a Settlement Class Member in *Galban v. Institute for the International Education of Students*, Case 1:22-cv-4917); (b) include your name, address, email, and/or telephone number; (d) be personally signed by you; (e) contain a statement detailing all objections and provides the specific reasons for all objections, including any legal arguments and evidentiary support (including copies of any documents relied upon); and (f) include a statement of whether you intend to appear at the Final Approval Hearing, with or without counsel.

You must also mail or deliver copies of your written objection(s) to Class Counsel and Defendant's Counsel listed below, at the same time that you mail your written objection(s) to the Court:

Clerk of Court	Class Counsel	Defendant's Counsel
Clerk of Court Everett McKinley Dirksen United States Courthouse 219 South Dearborn Street Chicago, IL 60604	Brian W. Warwick Varnell & Warwick, P.A. 400 N Ashley Drive, Suite 1900 Tampa, FL 33602 T: 352-753-8600	Mark W. Wallin Barnes & Thornburg LLP One North Wacker Drive Suite 4400 Chicago, IL 60606 312-357-1313 Benjamin Spencer Perry 409 Calhoun St Mishawaka, IN 46545 574-339-5834 <i>Attorney for Institute for the International Education of Students</i>

IF YOU DO NOT TIMELY AND VALIDLY MAKE YOUR OBJECTION(S), YOU WILL BE DEEMED TO HAVE WAIVED ALL OBJECTIONS AND WILL NOT BE ENTITLED TO SPEAK AT THE FINAL APPROVAL HEARING.

WHEN WILL THE COURT RULE ON THE SETTLEMENT?

The Court has already granted Preliminary Approval of the Settlement. A final hearing on the Settlement will be held to determine the fairness of the Settlement. The Court will hold a Final Approval Hearing on June 24, 2026 at 11:00am in person at the United States District Court for the Northern District of Illinois, Eastern Division, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The courtroom will be assigned fourteen (14) days before the scheduled Final Approval Hearing so please check the website after June 10, 2026 for this information. The date and time of the Final Approval Hearing are subject to change by the Court, 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 online at AustriaStudyAbroadSettlement.com. If the Settlement is given Final Approval, the Settlement's terms will take effect and the Lawsuit will be dismissed with prejudice.

If the Court does not grant Final Approval of the Settlement, if Final Approval is reversed on appeal, or if the

DO NOT CONTACT THE JUDGE OR THE COURT WITH ANY QUESTIONS.

Settlement does not become final for some other reason, Plaintiff, IES, and Class Members will be placed back in the same position in the litigation as they were before the execution of the Settlement, and the Settlement will have no legal effect, and no class will be certified (conditionally or otherwise).

WHERE CAN I GET ADDITIONAL INFORMATION?

This Notice is only a summary of the terms of the proposed Settlement. More details are in the Settlement Agreement which, along with other documents in the case, can be obtained at *AustriaStudyAbroadSettlement.com*. If you have any questions, you can also contact the Settlement Administrator or Class Counsel at the contact information set forth below.

Settlement Administrator	Class Counsel
Galban v IES c/o Settlement Administrator PO Box 23309 Jacksonville, FL 32241 Email: info@AustriaStudyAbroadSettlement.com	Brian W. Warwick VARNELL & WARWICK, P.A. 400 N Ashley Drive, Suite 1900 Tampa, FL 33602 Email: Notice@VandWLaw.com T: 352-753-8600

Please do not contact the Judge or the Clerk of the Court or IES about this case except as instructed in this Notice. They cannot give you advice on your options.