

EXHIBIT A



United States District Court

Graham et al. v. Vassar College

Case No. 23-CV-7692 (S.D.N.Y.)

Class Action Notice

Authorized by the U.S. District Court

Are you a woman who was a Full Professor at Vassar College any time between May 14, 2015 and [date]?

There is a \$5 million settlement of a lawsuit.

You may be entitled to money.

To be part of this settlement, you should:

Read this notice.

Respond by [date].

Important things to know:

- If you take no action, you will still be bound by the settlement, and your rights will be affected.
- You can learn more at: [website].

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About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a lawsuit brought as a class action, *Graham et al. v. Vassar College*, on behalf of women Full Professors at Vassar College. **You received this notice because you may be a member of the group of people affected, called the "class."** This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights you have, and helps you make an informed decision about what action to take.

How do I know if I am part of this settlement?

If you are a woman who was employed by Vassar as a Full Professor at any time between May 14, 2015 through [date], you are part of this settlement.

What do I do next?

Read this notice to understand the settlement. Then, decide if you want to:

Options	More information about each option
Do Nothing	Get a payment. You will be bound by the settlement.
Opt Out	Get no payment. You will not be bound by the settlement.
Object	Tell the Court why you do not like the settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: [date]
Settlement approval hearing: [date]

Learning About the Lawsuit

What is this lawsuit about?

In August of 2023, a lawsuit was filed as a class action against Vassar. The lawsuit was brought on behalf of women who were employed by Vassar as Full Professors, and alleged gender-based discrimination in pay and promotion decisions at the college.

Vassar denies that it engaged in gender-based discrimination in pay and promotion decisions.

Where can I learn more?

You can get a complete copy of the key documents in this lawsuit by visiting: [\[website\]](#).

Why is there a settlement in this lawsuit?

In July of 2026, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The Court has not decided this case in favor of either side.

What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and bring about changes to the practices that allegedly caused harm.

What happens next in this lawsuit?

The Court will hold a fairness hearing to decide whether to approve the settlement. The hearing will be held at:

Where: Charles L. Briant Jr. Federal Courthouse
300 Quarropas Street, White Plains, NY 10601

When: [\[time\]](#) on [\[date\]](#).

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class,

the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You do not have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to [\[website\]](#).

Learning About the Settlement

What does the settlement provide?

Vassar has agreed to pay \$5 million into a settlement fund. This money will be divided among the class members as follows: each participating class member will be assigned a proportional share of the fund after Court-approved costs and fees are deducted, based on: (1) the duration of her employment at Vassar, relative to other participating class members; and (2) her time in the Settlement Class Period, adjusted for (if any) part-time status and/or leaves of absence, relative to other participating class members. In other words, your settlement share will be proportional to $(\text{Your Time at Vassar} \div \text{All Class Members' Time at Vassar})$ and $(\text{Your Time in Class} \div \text{All Class Members' Time in Class})$.

The fund will also be used to pay for costs and fees approved by the Court, including attorneys' fees (not to exceed 33 percent of the settlement fund) and the cost of administering this settlement (expected to be approximately \$6,750.00). If there is money left over after the claims process is completed, it will be donated to Legal Momentum (an organization selected by Plaintiffs) and HERS: Women in Higher Education Leadership (an organization selected by Vassar).

In exchange for your settlement share, and in depositing or signing your settlement check, you are releasing claims as set forth in the Settlement Agreement. A full description of the claims and persons who will be released if this settlement is approved can be found at [\[website\]](#). The Class Representatives have signed a separate general release in exchange for receiving their settlement share.

Vassar has also agreed that for three years following the settlement's effective date, Vassar will take the following measures related to compensation, performance evaluation, and promotion decisions for Full Professors:

- (1) conducting annual pay audits by a third-party consultant, and making appropriate pay adjustments based on the audit results, if warranted;
- (2) making available to Vassar's Faculty Compensation Committee ("FCC") the methods used by the third-party consultant, a summary of the results of the third-party audits, and the status of any pay adjustments made based on the results of the audits;
- (3) making available to Full Professors the methods and criteria used to determine Full Professor compensation, performance evaluations, and promotions;
- (4) making available to Full Professors any new or revised policies affecting compensation, performance evaluation, or promotion, including complaint procedures;
- (4) maintaining records relating to: implementation of the settlement; compensation, performance evaluation, and promotion decisions; the annual pay audits; and complaints of gender discrimination or retaliation; and
- (5) providing Plaintiffs' counsel in this case with annual reports regarding revised policies and procedures and a summary of the results of the annual pay audits.

How much will my payment be?

Your estimated share of the settlement will be no less than \$[amount].

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following individuals and lawyers:

Kelly M. Dermody
Michelle A. Lamy
Connie C. Cheng
Lieff Cabraser Heimann & Bernstein, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Telephone: (415) 956-1000

Catherine Bendor
Equal Rights Advocates
150 Sutter Street, PO Box #87
San Francisco, CA 94104
Telephone: (771) 210-4499

These are the lawyers who negotiated this settlement on behalf of the class.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs for the class will be paid from the settlement fund. **You will not have to pay the lawyers directly.**

As is customary for this type of case, the lawyers for the Plaintiffs have not yet been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this settlement, that the Court approve a payment of up to 33 percent of the settlement fund in attorneys' fees plus the reimbursement of out-of-pocket expenses not to exceed \$200,000.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

The lawyers for the class will also ask the Court to approve a payment of \$75,000 to each Class Representative for the time and effort they contributed to the case. If approved by the Court, this will be paid from the settlement fund.

Deciding What to Do

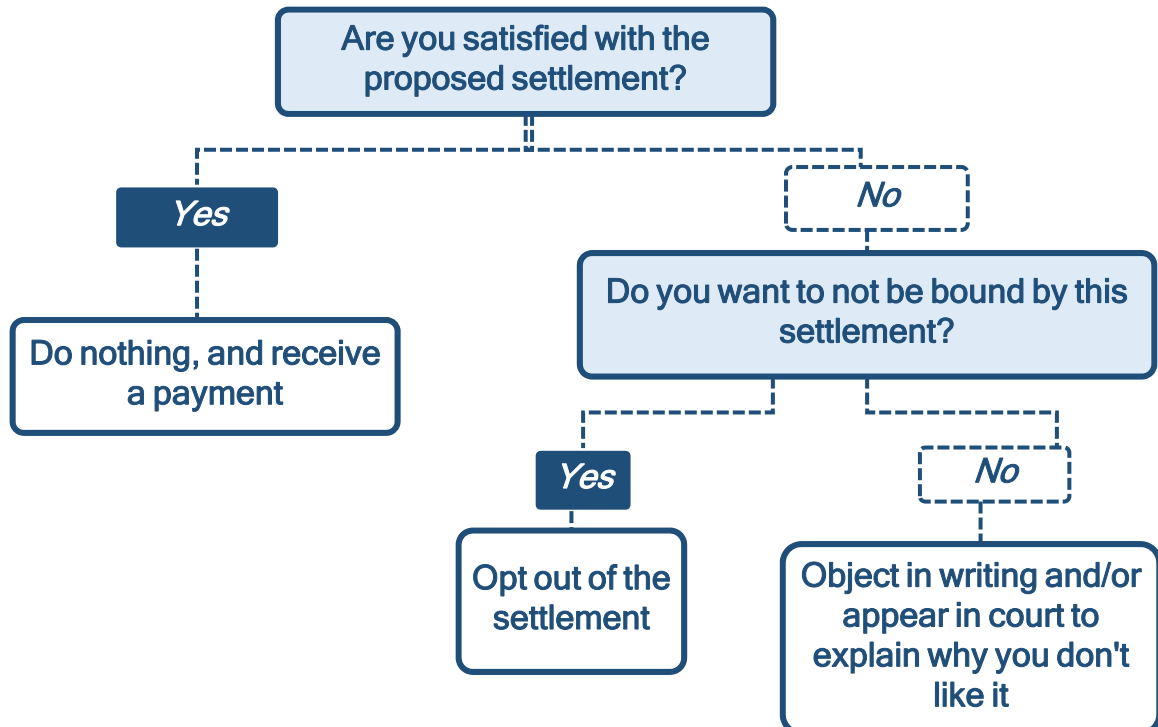
How do I weigh my options?

You have three options. You can do nothing, opt out of the settlement, or object to the settlement.

This chart shows the effects of each option:

	Do Nothing	Opt out	Object
Can I receive settlement money if I . . .	YES	NO	YES
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES
Will the class lawyers represent me if I . . .	YES	NO	NO

What is the best path for me?



Doing Nothing

What happens if I do nothing?

If you do nothing, and if the Court approves the settlement, then you will receive a share of the settlement, and will be bound by the settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against Vassar about the issues in this case. A full description of the claims and persons who will be released if this settlement is approved can be found at [\[website\]](#). The Class Representatives have signed a separate general release in exchange for receiving their settlement share.

Opting Out

What if I do not want to be part of this settlement?

You can opt out. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case. You cannot exclude yourself from the program changes called for by the proposed settlement.

How do I opt out?

To opt out of the settlement, you must submit a written, signed statement that you are opting out. Your statement must be either:

(1) Mailed to the Settlement Administrator and postmarked no later than [\[date\]](#), to the following address:

[\[Settlement Administrator\]](#)
[\[Street address\]](#)
[\[City, State, Zip Code\]](#)
[\[Phone Number\]](#)

(2) Submitted to the Settlement Administrator no later than [\[date\]](#), through the following email:

[\[email address\]](#)

Your statement must include written confirmation of your understanding that, by opting out of the settlement, you will not receive any money. Be sure to include your name, address, telephone number, and signature.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but do not want to opt out, you may object. You must give reasons why you disagree with the settlement. The Court will consider your views. The Court can only approve or deny the settlement—it cannot change the terms of the settlement. You may, but do not need to, hire your own lawyer to help you.

To object, you must submit a written, signed statement that you are objecting. Your statement must be either:

(1) Mailed to the Settlement Administrator and postmarked no later than [date], to the following address:

[Settlement Administrator]
[Street address]
[City, State, Zip Code]
[Phone Number]

(2) Submitted to the Settlement Administrator no later than [date], through the following email:

[email address]

Your statement must contain the basis for your objection. Be sure to include your name, address, telephone number, and signature.

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found at [website].

To get a copy of the settlement agreement or get answers to your questions:

- visit the case website at [website]
- access the case docket by visiting the Court's PACER system online (<https://ecf.cand.uscourts.gov/>), for a fee, or by visiting the Clerk's office of the Court (address below) between 8:30 a.m. and 5:00 p.m. PT, Monday through Friday, excluding Court holidays.

Resource	Contact Information
Settlement Website	[website]
Settlement Administrator	ILYM Group, Inc. [Street address] [City, State, Zip Code] [Phone Number]
Your Lawyers	Kelly M. Dermody Michelle A. Lamy Connie C. Cheng Lieff Cabraser Heimann & Bernstein, LLP 250 Hudson Street, 8th Floor New York, NY 10013 Telephone: (415) 956-1000 Catherine Bendor Equal Rights Advocates 150 Sutter Street, PO Box #87 San Francisco, CA 94104 Telephone: (771) 210-4499
Court (DO NOT CONTACT)	Charles L. Brieant Jr. Federal Courthouse 300 Quarropas Street White Plains, NY 10601