

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

GIANNA SPARACINO, *on behalf of herself and  
all others similarly situated,*

Plaintiff,

v.

WIDENER UNIVERSITY,

Defendant.

Case No. 2:24-cv-01001-MKC

**PLAINTIFF'S UNOPPOSED MOTION TO PRELIMINARILY APPROVE CLASS  
ACTION SETTLEMENT, CERTIFY THE CLASS,  
APPOINT CLASS COUNSEL, APPROVE PROPOSED  
CLASS NOTICE, AND SCHEDULE A FINAL APPROVAL HEARING**

PLEASE TAKE NOTICE THAT, upon the Declarations of Nicholas A. Colella and Anthony M. Alesandro and the accompanying exhibits and memorandum of law, and upon all prior proceedings, pleadings, and filings in the above-captioned action, Named Plaintiff Gianna Sparacino moves for an Order under Federal Rule of Civil Procedure 23:

(1) Preliminarily approving the proposed Settlement on behalf of the Settlement Class Members according to the terms of the Stipulation of Settlement;

(2) Provisionally certifying, for purposes of the Settlement only, the following Settlement Class:

All Widener University 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 during the Spring 2020 semester.

Excluded from the Potential Settlement Class are all Widener students who received scholarships, grants, or credits that equaled or exceeded their total payment obligations to Widener 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.

- (3) Preliminarily appointing Named Plaintiff Gianna Sparacino as Settlement Class Representative;
- (4) Preliminarily appointing Nicholas A. Colella of Lynch Carpenter, LLP, and Michael A. Tompkins and Anthony M. Alesandro of Leeds Brown Law, P.C. as Class Counsel to act on behalf of the Settlement Class and the Settlement Class Representative with respect to the Settlement;
- (5) Approving the Parties' proposed settlement procedure, including approving the Parties' selection of RG/2 Claims Administration LLC as Settlement Administrator and approving the Parties' proposed schedule;
- (6) Entering the proposed Order Preliminarily Approving the Proposed Settlement and Provisionally Certifying the Proposed Settlement Class, attached as Exhibit A to the Stipulation of Settlement, which is attached as Exhibit 1 to the Declaration of Nicholas A. Colella; and
- (7) Granting such other and further relief as may be just and appropriate.

Dated: November 17, 2025

Respectfully submitted,

/s/ Nicholas A. Colella  
Nicholas A. Colella (PA 332699)  
**LYNCH CARPENTER, LLP**  
1133 Penn Avenue, 5th Floor  
Pittsburgh, PA 15222  
Phone: (412) 322-9243  
NickC@lcllp.com

Michael A. Tompkins, Esq.  
Anthony M. Alesandro, Esq.  
**LEEDS BROWN LAW, P.C.**  
One Old Country Road, Suite 347  
Carle Place, New York 11514  
Tel: (516) 873-9550  
mtompkins@leedsbrownlaw.com  
aalesandro@leedsbrownlaw.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 17, 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