

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

WILLIAM DOYLE, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

FRANKLIN & MARSHALL COLLEGE,

Defendant.

Case No. 5:24-cv-01024-JLS

**PLAINTIFF'S UNOPPOSED MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

**PLEASE TAKE NOTICE THAT**, upon the Declaration of Nicholas A. Colella, sworn to on August 11, 2025, and the accompanying exhibits and memorandum of law, and upon all prior proceedings, pleadings, and filings in the above-captioned action, Named Plaintiff William Doyle will move this Court on August 21, 2025, at 10:00 A.M. in the United District Court of the Eastern District of Pennsylvania, The Gateway Building, Courtroom 1, 201 Penn Street, Reading, PA 19601, before the Honorable Jeffrey L. Schmehl of the United States District Court for the Eastern District of Pennsylvania, for an Order under Federal Rules of Civil Procedure 23:

(1) Finally certifying, for purposes of the Settlement only, the following Settlement Class:

All students who satisfied their payment obligations to Franklin & Marshall College for Spring 2020 for tuition and/or Mandatory Fees (including any Health Services Fee and/or Student Activity Fee) and who were enrolled in at least one in-person, on-campus class.

Excluded from the Settlement Class is: (i) all students who had their tuition and fee obligations completely funded by Franklin & Marshall College for the Spring 2020 semester; (ii) Defendant, Defendant's officers, directors, agents, trustees, parents, children, corporations, trustees, representatives, employees, principals, servants, partners, joint venturers, and/or entities controlled by Defendant; and/or (iii) Defendant's heirs, successors, assigns, or other persons or entities related to or affiliated with Defendant and/or Defendant's officers.

(2) Confirming that the notice plan approved by the Court in its April 7, 2025, Preliminary Approval Order has been fully and sufficiently executed; (3) finally appointing Plaintiff William Doyle as Settlement Class Representative; (4) finally appointing Nicholas A. Colella of Lynch Carpenter, LLP and Michael A. Tompkins and Anthony M. Alesandro of Leeds Brown Law, P.C. to act on behalf of the Settlement Class and the Settlement Class Representative with respect to the Settlement; (5) entering the proposed final judgement; and (6) granting such other and further relief as may be just and appropriate.

Dated: August 11, 2025

Respectfully submitted,

/s/ Nicholas A. Colella  
Nicholas A. Colella (PA ID No. 332699)  
**LYNCH CARPENTER, LLP**  
1133 Penn Avenue, 5th Floor  
Pittsburgh, PA 15222  
Phone: (412) 322-9243  
NickC@lcllp.com

Michael Tompkins, Esq.\*  
Anthony Alesandro, Esq.\*  
**LEEDS BROWN LAW, P.C.**  
1 Old Country Road, Suite 347  
Carle Place, NY 11514  
516.873.9550  
mtompkins@leedsbrownlaw.com  
aaesandro@leedsbrownlaw.com

*\*Pro Hac Vice*

*Attorneys for Plaintiff and the Settlement  
Class*

**CERTIFICATE OF SERVICE**

I hereby certify that, on August 11, 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