

EXHIBIT B

Dear XX,

We are writing to provide formal notice of a proposed class action settlement in *Thakur, et al. v. Trump, et al.*, Case No. 3:25-cv-4737, pending in the U.S. District Court for the Northern District of California.

The proposed settlement has received preliminary approval from the Court. Under the proposed settlement, the EPA has agreed not to terminate, indefinitely suspend, or disallow costs for Covered Grants, except through an individualized process based on noncompliance with original or agreed-upon modified award terms. The protection would last through the remaining period of performance, including applicable no-cost extensions, and Covered Grants would be eligible for no-cost extensions of up to 12 months (or up to 8 months if a grant received an extension before termination).

Upon Final Approval, claims against the EPA related to the subject matter of the lawsuit would be released, while claims against other defendants would continue. No action is required of class members to receive this relief, and there is no claims process or form to complete. You have the right to comment on, or object to, the settlement: you may submit a comment in support or in opposition, including an objection if you believe the settlement is unfair, and appear at the final approval hearing. To do so, submit a written comment and follow the filing and appearance instructions and deadlines on the case website, which identifies the comment deadline and the hearing date, time, and location or remote-access information.

Your grant is protected. Under the terms of the settlement, the EPA has agreed not to terminate, indefinitely suspend, or disallow costs for the Covered Grants. EPA can only take action against a Covered Grant if a grantee fails to comply with original or agreed-upon modified award terms, and only through an individualized process consistent with the Court's order. This protection lasts for the full remaining duration of your grant's period of performance, including any applicable no-cost extensions. Covered Grants are also eligible for a no-cost extension of up to 12 months, or up to 8 months if your grant already received an extension before the termination.

No action is required on your part. This is not a monetary settlement — there is no claims process and there are no forms to fill out. The relief is self-executing, meaning your grant is automatically protected without you needing to do anything. However, if you wish to request a no-cost extension, you will need to follow the applicable regulatory procedures under 2 C.F.R. § 200.308(g) and (h).

Release of claims. Upon Final Approval by the Court, all claims related to the subject matter of this lawsuit against the EPA—including any claims that could be brought in the Court of Federal Claims—will be fully released. This release applies only to claims against the EPA; claims against other defendants continue.

Your right to comment and to object. Because this is a Rule 23(b)(2) class settlement, there is no right to opt out, and all class members are bound by the settlement upon Final Approval. However, you have the right to comment on, or object to, the settlement if you believe it is unfair, inadequate, or unreasonable. You may submit a written comment to the Court and appear at the final approval hearing by following the filing and appearance instructions and deadlines on the case website. **Upon a showing of good cause, the Court may excuse the requirement that objections be made in writing.**

For more information, please visit the case website at <https://ucresearchergrantterminations.com/EPA-Settlement>, where you can find the full Settlement Agreement, the Court's Preliminary Approval Order, important dates and deadlines, and frequently asked questions. If you have any questions, please do not hesitate to contact Class Counsel directly.

Sincerely,

Class Counsel