UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

NOTICE OF CLASS ACTION SETTLEMENT

This Notice is being provided by Order of the U.S. District Court.
It is not a solicitation from a lawyer. You are not being sued.

PLEASE READ THIS NOTICE CAREFULLY.

YOUR RIGHTS MAY BE AFFECTED BY A CLASS ACTION SETTLEMENT.

A proposed settlement has been reached in a class action lawsuit brought by University of California researchers against the U.S. Environmental Protection Agency ("EPA") concerning the termination of research grants awarded by EPA. The case, *Thakur, et al. v. Trump, et al.*, was filed in the Northern District of California as Case No. 25-cv-4737. The Court has preliminarily approved the settlement and ordered that this Notice be provided to you.

Under the terms of this settlement, EPA cannot terminate certain previously awarded research grants staffed by University of California researchers, except where a grantee fails to comply with original or agreed-upon modified award terms. If you are receiving this notice, you have been identified as a researcher working on a covered grant. **This is not a monetary settlement. There is no claims process and no money to claim.**

Because this is a Rule 23(b)(2) class settlement, there is no right to opt out. However, you have the right to comment on, or object to, the settlement.

You do not need to do anything to receive the benefits of this settlement. The relief is self-executing. If you wish to comment on, or object to, the settlement, see the "Your Rights" section of this Notice.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	You will automatically receive the benefits of the settlement. The settlement prevents EPA from terminating certain covered research grants, except where a grantee fails to comply with original or agreed-upon modified award terms. No action is required.
COMMENT ON OR OBJECT TO THE SETTLEMENT	If you wish to comment on, or object to, the settlement, you may file a written comment or objection with the Court by **November 20, 2026.** The Court may excuse the written requirement upon a showing of good cause. You may also attend the Fairness Hearing, either in person or by Zoom, but you are not required to attend. See "Your Rights" below.

ATTEND THE FAIRNESS HEARING	The Court will hold a Fairness Hearing on **December 10, 2026, at 10:00 a.m.** at Courtroom 4, 450 Golden Gate Avenue, 17th Floor, San Francisco, CA 94102, to decide whether the settlement is fair and reasonable. Any Class Member may attend the hearing, either in person or by Zoom, but no Class Member is required to attend.

THESE RIGHTS AND OPTIONS AND THE DEADLINES TO EXERCISE THEM ARE EXPLAINED IN THIS NOTICE.

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BASIC INFORMATION ABOUT THE LAWSUIT

1. Why did I get this Notice?

This Notice is to inform you about a proposed class action settlement in the case of *Thakur, et al. v. Trump, et al.*, Case No. 3:25-cv-4737, pending in the United States District Court for the Northern District of California.

You received this Notice because you may be a member of the Settlement Class—a group of University of California researchers whose EPA research grants were allegedly improperly terminated following certain Executive Orders issued in early 2025.

This Notice explains the lawsuit, the proposed settlement, and your rights. Please read it carefully. If you have questions, please visit: https://ucresearchergrantterminations.com/EPA-Settlement.

2. What should I do after reading this Notice?

You do not need to take any action to benefit from this settlement, *unless you seek a no-cost extension for your grant.* The covered grants were previously reinstated as a result of a preliminary injunction issued June 23, 2025. Under the terms of the settlement,

EPA has agreed not to terminate covered research grants, except where a grantee fails to comply with original or agreed-upon modified award terms. EPA also agreed to allow an up to 12-month (or up to 8 months if a grant received an extension before termination) no-cost extension pursuant to 2 C.F.R. § 200.308(g) and (h). To request an extension, refer to those regulations.

If you wish to comment on, or object to, the settlement, you must follow the procedures described in the "Your Rights" section below.

3. What is this Notice NOT about?

This is NOT a notice of a monetary settlement. There is no money to claim, no claims process, and no claim form to submit. The settlement agreement only affects EPA's ability to terminate covered grants.

4. What is the lawsuit about?

In early 2025, EPA and other federal agencies terminated more than a thousand previously awarded research grants on which University of California researchers were working. In June 2025, Plaintiffs filed a lawsuit against EPA and the other agencies challenging the terminations.

Plaintiffs claim that the terminations were carried out pursuant to Executive Orders targeting disfavored viewpoints, including those expressing "diversity, equity, and inclusion" ("DEI") principles, or terminated pursuant to ideologically driven "cost-cutting" measures. Plaintiffs allege that the researchers received form termination notices with no notice or consideration of their rights, which caused severe harm to researchers. Plaintiffs claim that these mass grant terminations violated the Constitution and other laws. In particular, Plaintiffs allege violations of the Administrative Procedure Act, the Separation of Powers, the First Amendment, the Fifth Amendment, and the Impoundment Control Act.

5. What happened in the litigation?

On June 23, 2025, the Court granted Plaintiffs' motion for a preliminary injunction and provisionally certified two classes: (1) the "Form Termination Class" (researchers whose grants were terminated through a form notice without individualized explanation); and (2) the "Equity Termination Class" (researchers whose grants were terminated pursuant to the Executive Orders targeting DEI programs).

Following the injunction, EPA and the other federal agencies reinstated all previously terminated grants subject to the Court's order.

On May 25, 2026, the United States Court of Appeals for the Ninth Circuit affirmed the preliminary injunction as to the Equity Termination Class but reversed as to the Form Termination Class on jurisdictional grounds. *See Thakur v. Trump*, 176 F.4th 1187 (9th Cir. 2026). On August 18, 2026, the government asked the Supreme Court to review the Ninth Circuit's decision. The Supreme Court has yet to weigh in on the request.

Despite the Ninth Circuit's partial reversal and the pending appeal to the Supreme Court, the EPA has agreed to resolve claims for members of both classes through this settlement, because EPA understands its grant terminations to fall into both classes. The other federal defendants continue to litigate the case.

6. Who is the settling Defendant?

This is a settlement with the EPA only. Claims against other defendants in this case continue. This Notice relates solely to the settlement between the Settlement Class and the EPA.

7. Why is the lawsuit continuing if there is a settlement?

Only the Settling Defendant listed above in Question 6 has agreed to settle the lawsuit.

8. What is a class action, and who is involved?

In class actions, one or more people called the "class representatives" sue on behalf of themselves and other people with similar claims in the specific class action. All of these people together are the "class" or "class members." In a class action, one court may resolve the issues for all class members.

Here, three University of California researchers whose EPA grants were terminated—Plaintiffs Neeta Thakur, Ken Alex, and Nell Green Nylen—brought the case against EPA and served as class representatives throughout the litigation. They represented the interests of all University of California researchers working on EPA grants that were allegedly improperly terminated.

9. Does the EPA admit any wrongdoing?

No. The EPA denies any liability and wrongdoing. The settlement is a compromise to avoid the risks, costs, and delays of continued litigation.

DETERMINING IF YOU ARE A MEMBER OF THE CLASS

10. How do I know if I am a Settlement Class member?

The Court has certified the following Settlement Class for purposes of this settlement:

> All University of California researchers, including faculty, staff, academic appointees, and employees across the University of California system who are named as principal researchers, investigators, or project leaders on the grant applications for previously awarded research grants by the EPA that are (1) terminated pursuant to Executive Orders 14151 or 14173, from and after January 20, 2025, or (2) terminated by means of a form termination notice that does not provide a grant-specific explanation for the termination that states the reason for the change to the original award decision and considers the reliance interests at stake, from and after January 20, 2025, as defined by the Court's Preliminary

Injunction Order provisionally certifying the Equity Termination Class and Form Termination Class. *See ECF No. 184 (citing ECF No. 54).*

In plain language: If you are a UC researcher who was named as a principal investigator, researcher, or project leader on an EPA grant that was terminated in 2025 under either of the two categories above, you are a Settlement Class member.

11. How do I know if my research grant is covered by the settlement?

Under the terms of the settlement, EPA and Class Counsel engaged in a collaborative process to identify all affected research grants. This resulted in the "Covered Grants" list, which you can find on the case website at https://ucresearchergrantterminations.com/EPA-Settlement. Because you are receiving this notice, Class Counsel believe you are affiliated with a Covered Grant.

12. What type of class is this?

This is a Rule 23(b)(2) class, certified for purposes of injunctive and declaratory relief. Unlike a Rule 23(b)(3) class (which typically involves monetary damages), a (b)(2) class is used when the defendant has acted on grounds that apply generally to the class, and court-ordered relief (such as an injunction) is appropriate for the class as a whole.

Because this is a (b)(2) class, there is no right to opt out of the settlement. All Class Members are bound by the settlement upon Final Approval. However, you do have the right to comment on, or object to, the settlement (see "Your Rights" below).

More details about the settlement are provided in the Settlement Agreement, available at https://ucresearchergrantterminations.com/EPA-Settlement.

SETTLEMENT INFORMATION

13. What does the settlement provide?

The settlement protects certain EPA research grants awarded to University of California researchers from termination. Specifically:

a. Protection of Covered Grants

EPA agrees not to terminate, indefinitely suspend, or disallow costs for the Covered Grants identified in the settlement. EPA may only terminate a Covered Grant if the grantee fails to comply with original or agreed-upon modified award terms, and only through: (i) an individualized letter providing a grant-specific explanation for the termination, and (ii) reasoning consistent with the standards articulated in the Court's preliminary injunction order.

b. No-Cost Extensions

Covered Grants are eligible for a 12-month no-cost extension under 2 C.F.R. §§ 200.308(g) and (h). Grants that already received a no-cost extension before their termination are eligible for an 8-month no-cost extension.

14. Do I need to do anything to receive the benefits of the settlement?

No, unless you seek a no-cost extension. If you are a Class Member whose EPA grant is among the Covered Grants, the settlement automatically protects that grant from improper termination. You do not need to file a claim or take any affirmative action.

However, if you would like to request a no-cost extension for your grant, please refer to 2 C.F.R. § 200.308(g) and (h) for instructions on how to do so.

15. What claims am I releasing?

Upon Final Approval of the settlement, all Class Members will release and extinguish all claims related to the subject matter of this lawsuit against the EPA, including claims that could be brought in the United States Court of Federal Claims.

Important: This release applies only to claims against EPA. Claims against other defendants that are not based on the Covered Grants at issue in this settlement are not released and will continue to be litigated.

YOUR RIGHTS

16. How do I comment on, or object to, the settlement?

Because this is a Rule 23(b)(2) class certified for injunctive and declaratory relief, there is no right to opt out, and all Class Members are bound by the settlement if it receives Final Approval from the Court. *See Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338 (2011). However, any Class Member who wishes to comment on, or object to, the proposed settlement may do so by filing a written comment or objection with the Court. To comment on, or object to, the proposed settlement, you must file a written comment or objection with the Clerk of Court at:

Clerk of Court
United States District Court, Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102

Your comment or objection must include:

- Your full name, address, telephone number, and email address;
- The case name and number: *Thakur v. Trump*, Case No. 3:25-cv-4737;
- A statement that you are a Class Member;
- A clear and concise statement of your comment or objection and the reasons for it;

- Any supporting documents or evidence; and
- Your signature

You must submit your comment or objection to the Court postmarked or filed by **November 20, 2026**. The Court may excuse the written requirement upon a showing of good cause.

17. What is the Fairness Hearing?

A Fairness Hearing will be held on **December 10, 2026, at 10:00 a.m.** subject to change by the Court.

At the Fairness Hearing, the Court will consider whether to grant Final Approval of the settlement. Any Class Member may attend the hearing, either in person or by Zoom, but no Class Member is required to attend. A Class Member who has filed a timely written comment or objection may, but is not required to, appear at the hearing, either in person, by Zoom, or through counsel, to present the comment or objection. An objector does not need to appear in person for the Court to consider their objection. The Court may also consider the adequacy of the settlement's terms, the scope of the release, and any other matters related to the settlement's fairness.

The hearing may be continued or rescheduled without further notice. Please check https://ucresearchergrantterminations.com/EPA-Settlement for updates.

18. Do I have to attend the Fairness Hearing?

No. Attendance is voluntary. Any Class Member may attend the hearing, either in person or by Zoom, but no Class Member is required to attend. If you have filed a timely written comment or objection, you may—but are not required to—appear at the hearing, in person or by Zoom, to present it. An objector does not need to appear in person for the Court to consider their objection. If you do not comment on, or object to, the settlement, you do not need to attend.

The Zoom link may be accessed at https://cand.uscourts.gov/judges/rfl/lin-rita-f.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this case?

Yes. The Court has appointed the following attorneys as Class Counsel to represent the interests of all Class Members:

Elizabeth J. Cabraser and Kevin R. Budner
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FARELLA BRAUN + MARTEL LLP
One Bush Street, Suite 900
San Francisco, California 94104
Telephone: (415) 954-4400

20. How are the lawyers paid?

Class Counsel is not seeking fees or costs for their work on the claims against EPA.

GETTING MORE INFORMATION

21. Where do I get more information?

This Notice summarizes the proposed settlement. For the precise terms and conditions of the settlement, please refer to the Settlement Agreement, which is available at https://ucresearchergrantterminations.com/EPA-Settlement.

You may also obtain more information by:

- Visiting the case website: https://ucresearchergrantterminations.com/EPA-Settlement
- Contacting Class Counsel (listed above)
- Accessing the Court's public docket through PACER (Public Access to Court Electronic Records) at https://pacer.uscourts.gov
- Contacting Class Counsel at the addresses listed above
- Accessing court files at the Clerk's Office at 450 Golden Gate Avenue, San Francisco, California 94102, during regular business hours

22. What documents are available at the case website?

The case website at https://ucresearchergrantterminations.com/EPA-Settlement contains:

- The full Settlement Agreement
- The Motion for Preliminary Approval
- The Court's Order granting Preliminary Approval
- This Notice
- Important dates and deadlines

You can find additional information about the case, including key court orders and filings, at https://ucresearchergrantterminations.com.

23. Can I talk to someone about this Notice?

Please do not contact the Court or the Clerk's Office for information about the settlement. They cannot give you legal advice. For questions about this Notice or the settlement, please visit https://ucresearchergrantterminations.com/EPA-Settlement.