

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

DAVE MCCORMICK, T'LANI ROBINSON,
DENNIS MAGANA, SCOTT SWINDELL,
DAVID TOROSYAN, and ROBBY BROWN,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

ADTALEM GLOBAL EDUCATION, INC.,
formerly known as DEVRY EDUCATION
GROUP, INC., a Delaware corporation, DEVRY
UNIVERSITY, INC., a Delaware corporation,

Defendants.

Case No.: 2018-CH-04872

Hon. Michael T. Mullen

JOINT STATUS REPORT

Following the status hearing on June 22, 2023, the Parties and non-Party Kroll Settlement Administration LLC (“KSA”) submit the following joint status report to update the Court on their progress toward ensuring that accurate settlement payments are sent to the Settlement Class as soon as possible:

1. Since the status hearing, BrownGreer PLC (“BrownGreer”) has completed its review of the latest issue it identified wherein certain Settlement Class Members were inaccurately designated as being ineligible for graduate payments despite earning a degree and not obtaining a job within their field of study within six months. This review included reviewing paper claim form submissions and other information that Kroll originally gathered and input into the recalculation spreadsheet that it provided to BrownGreer and the Parties. As part of this effort, BrownGreer conferred with Kroll’s data team to ensure that BrownGreer could complete its review of these materials.

2. Upon the completion of this review, BrownGreer identified nearly 550 Settlement Class Members who should have been eligible to receive a total of \$442,500 in graduate payments. Incorporating these updated determinations and graduate payment amounts, BrownGreer recalculated the settlement payments for the entire Settlement Class and prepared an updated reconciliation table identifying where all disbursements and amounts related to the Settlement are to be distributed. For example, in addition to payments to Settlement Class Members, this reconciliation table addresses the disposition of the residual funds from Reliance Payment money that Kroll provided, as well as offsets owed to Defendants.

3. Class Counsel shared the proposed final reconciliation table and recalculated spreadsheet with Kroll (including its data team) and Defendants on June 29, 2023 to provide them an opportunity to ask any final questions about the methodology used in the latest steps in the audit. Given the limited additional steps that BrownGreer took in addressing these latest items, the Parties do not anticipate this process taking significant time. Kroll confirmed receipt and that it was reviewing on an expedited basis.

4. Given that the recalculated settlement payments have been presumptively finalized and circulated for final review and comment, the Parties and Kroll expect that any last questions can be addressed and resolved prior to the status hearing scheduled for July 6, 2023. Thus, by the time the Parties and Kroll are next before the Court, settlement payment data should be sent to the printer so that Settlement Class Members' checks can be cut and mailed. Contemporaneously, BrownGreer will issue any necessary wire payments to Kroll and Defendants.

5. BrownGreer has requested a date by which the printer will be done printing and

mailing the checks, understanding the Fourth of July may affect their operations.¹ As soon as a firm mailing date is identified, it will be posted on the Settlement Website so that Settlement Class Members are aware of when the settlement payments should be in the mail. Class Counsel will also be prepared address the mailing date with the Court at the July 6, 2023 status hearing.

6. To the extent that anything materially changes in this timetable such that data cannot be shared with the printer as contemplated, the Parties and Kroll will promptly alert the Court and post an update to the Settlement Website to alert the Settlement Class.

Respectfully submitted,

DAVE MCCORMICK, T'LANI ROBINSON, DENNIS MAGANA, SCOTT SWINDELL, DAVID TOROSYAN, and ROBBY BROWN,
individually and on behalf of the Settlement Class,

Dated: June 29, 2023

By: /s/ Michael W. Ovca
Settlement Class Counsel

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¹ Consistent with the Court's instructions at the last status hearing not to send out the checks that were already printed, but in the incorrect amounts, BrownGreer requested that the printer destroy the checks.

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**ADTALEM GLOBAL EDUCATION,
INC.**, formerly known as **DEVRY
EDUCATION GROUP, INC.**, a Delaware
corporation, **DEVRY UNIVERSITY,
INC.**, a Delaware corporation,

Dated: June 29, 2023

By: /s/ William Andrichik (with permission)
One of Defendants' Counsel

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**KROLL SETTLEMENT
ADMINISTRATION LLC,**

Dated: June 29, 2023

By: /s/ Scott M. Ahmad (with permission)
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CERTIFICATE OF SERVICE

I, Michael W. Ovca, an attorney, hereby certify that on June 29, 2023, at Chicago, Illinois, I filed the foregoing document by electronic means with the Clerk of the Circuit Court of Cook County, and that I served same upon counsel of record using the Odyssey File & Serve Electronic Filing System.

/s/ Michael W. Ovca

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