

1 LAURENCE W. PARADIS (California Bar No. 122336)
2 ROGER N. HELLER (California Bar No. 215348)
3 DISABILITY RIGHTS ADVOCATES
4 2001 Center Street, Third Floor
5 Berkeley, California 94704
6 Telephone: (510) 665-8644
7 Facsimile: (510) 665-8511
8 TTY: (510) 665-8716

9 JOSHUA KONECKY (California Bar No. 182897)
10 RACHEL E. BRILL (California Bar No. 233294)
11 SCHNEIDER & WALLACE
12 180 Montgomery Street, Suite 2000
13 San Francisco, CA 94104
14 Telephone: (415) 421-7100
15 Fax: (415) 421-7105
16 TTY: (415) 421-1655

17 DANIEL F. GOLDSTEIN (*pro hac vice*)
18 BROWN, GOLDSTEIN & LEVY, LLP
19 120 E. Baltimore St., Suite 1700
20 Baltimore, MD 21202
21 Telephone: (410) 962-1030
22 Fax: (410) 385-0869

PETER BLANCK (*pro hac vice*)
900 S. Crouse Avenue
Syracuse, NY 13244-2130
Telephone: (315) 443-9703
Fax: (315) 443-9725

23 Class Counsel

24 **UNITED STATES DISTRICT COURT**
25 **NORTHERN DISTRICT OF CALIFORNIA**

26 NATIONAL FEDERATION OF THE BLIND
27 and the NATIONAL FEDERATION OF THE
28 BLIND OF CALIFORNIA, on behalf of their
members; and BRUCE F. SEXTON, JIM
MARKS, and MELISSA WILLIAMSON, on
behalf of themselves and all others similarly
situated

Plaintiffs,

v.

TARGET CORPORATION AND DOES ONE-
TEN,

Defendants.

Case No. C-06-01802 MHP

CLASS ACTION

**[Proposed] ORDER APPROVING FORM
OF NOTICE AND NOTICE
DISTRIBUTION PLAN**

Date: None Set

Time: None Set

Judge: Hon. Marilyn Hall Patel

1 By letter dated and filed December 21, 2007:

- 2 • Plaintiffs submitted a proposed form of notice to the class. The parties have agreed
3 on this form of notice.
- 4 • Plaintiffs indicated that they have retained RG2 Claims Administration, LLP as
5 third-party notice administrator. Defendant has agreed to this selection.
- 6 • Plaintiffs submitted a proposed distribution list for the notice and described their
7 plan for distribution.

8 This Court having reviewed and considered the above, and good cause appearing, hereby
9 ORDERS the following:

- 10 1. The form of notice attached as Exhibit A to Plaintiffs' December 21, 2007 letter,
11 which the parties agreed to, is approved.
- 12 2. The Court approves of RG2 Claims Administration, LLP as third-party notice
13 administrator.
- 14 3. The third-party notice administrator shall maintain a record of all class members
15 who opt out, and provide a report to the Court and parties of such within 30 days of
16 the conclusion of the opt-out period.
- 17 4. The Court approves of Plaintiffs' proposed distribution list, attached as Exhibit B to
18 Plaintiffs' December 21, 2007 letter, and distribution plan, including:
- 19 a. Plaintiffs shall have until February ¹⁵, 2008 to have the case website,
20 www.NFBtargetlawsuit.com, up and running.
- 21 b. The third-party notice administrator shall insert in the notice a date certain
22 for the opt-out deadline of 70 days from when notice is mailed/emailed.

23
24 IT IS SO ORDERED.

25
26 Dated: January 24, 2008

27 HONORABLE MA
United States District

