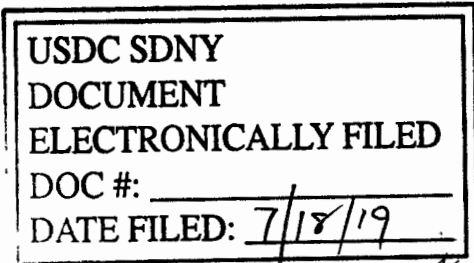


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CARNELLA TIMES and ERVING SMITH, :
on behalf of themselves and all others :
similarly situated, and :
THE FORTUNE SOCIETY, INC., :
Plaintiffs, :
-against- :
TARGET CORPORATION, :
Defendant. :

CIVIL ACTION NO.
18-02993-DCF



PROPOSED ORDER APPROVING ADDENDUM TO SETTLEMENT AGREEMENT AND RELEASE, REVISED NOTICE OF CLASS ACTION SETTLEMENT AND CLAIM FORM, AND SCHEDULE FOR NOTICE DISTRIBUTION AND FINAL APPROVAL

Having reviewed the parties' July 11, 2019 Joint Status Report ("Joint Status Report") for approval of: (1) Addendum to Settlement Agreement and Release; (2) revised Notice of Class Action Settlement and Claim Form; and (3) schedule for Notice distribution and Final Approval, the Court now FINDS, CONCLUDES, and ORDERS as follows:

I. APPROVAL OF ADDENDUM TO SETTLEMENT AGREEMENT AND RELEASE

On May 14, 2018, the Court granted Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Class, Appointment of Class Counsel, and Approval of Plaintiffs' Proposed Notice of Settlement ("Preliminary Approval Order"). ECF No. 24. The Court has reviewed the parties' Addendum to Settlement Agreement and Release ("Settlement Addendum"), attached as Exhibit C to the Joint Status Report, which describes the parties' agreement that qualified Group A Filers who do not benefit from priority hiring/interviewing within 12 months from the date of final approval

shall have the opportunity to participate in the settlement as Group B Filers. The Court

ORDERS:

1. The Settlement Addendum is hereby APPROVED. Final approval and entry of the Settlement Agreement and Settlement Addendum is subject to a final hearing of any objections of members of the class to the proposed Settlement Agreement.

II. APPROVAL OF REVISED NOTICES AND CLAIM FORMS

In its May 14, 2018 Preliminary Approval Order, the Court approved the form of Notice of Class Action Settlement and Claim Form and the manner for distribution. ECF No. 24 at 4-7. The parties have submitted for this Court's approval a revised Notice of Class Action Settlement and Claim Form for Group A Filers attached as Exhibit A to the Joint Status Report and a revised Notice of Class Action Settlement and Claim Form for Group B Filers attached as Exhibit B to the Joint Status Report (collectively, "revised Notices and Claim Forms"). The Court FINDS and CONCLUDES as follows:

1. The revised Notices and Claim Forms are the best notice practicable under the circumstances and allows Settlement Class Members a full and fair opportunity to consider the proposed settlement.

2. The revised Notices and Claim Forms provide separate notices and claims forms for Class Members who are eligible to be either Group A or Group B Filers and Class Members who are eligible only as Group B Filers. The revised Notices and Claim Forms will provide specific information regarding the date, time, and place of the final approval hearing and how to object to or exclude oneself from the settlement. This information is adequate to put Class Members on notice of the proposed settlement and is well within the requirements of Rule 23(c)(2)(B).

3. The revised Notices and Claim Forms fairly, plainly, accurately, and reasonably inform Settlement Class Members of: (1) appropriate information about the nature of this litigation, the Settlement Class, the identity of Class Counsel, and the essential terms of the Settlement Agreement, including programmatic, class member, and organizational relief; (2) appropriate information about Class Counsel's forthcoming application for attorneys' fees, the proposed Service Awards to the Class Representatives and other payments that will be deducted from the Settlement Fund; (3) appropriate information about how to participate in the settlement; (4) appropriate information about this Court's procedures for final approval of the Settlement Agreement, and about Settlement Class Members' right to appear through counsel if they desire; (5) appropriate information about how to challenge or opt out of the settlement, if they wish to do so; and (6) appropriate instructions as to how to obtain additional information regarding this litigation or the Settlement Agreement.

4. Accordingly, the Court hereby ORDERS the form of the revised Notices and Claim Forms is approved. Non-material changes may be made as the parties deem appropriate.

III. SCHEDULE FOR NOTICE DISTRIBUTION AND FINAL APPROVAL

The parties have also submitted a revised schedule for the distribution of revised Notices and Claim Forms and final approval of the Settlement Agreement. The Court approves the schedule as follows:

Event	Deadline
Defendant to Deliver Class List to Settlement Administrator ¹	July 17, 2019
Initial Mailing and Emailing of Notices and Claim Forms	July 31, 2019
Mailing and Emailing of Reminder Postcard	August 30, 2019
End of Notice Period	September 30, 2019
Filing of Final Approval Motion	October 9, 2019
Final Approval Hearing	October 24, 2019

It is so ORDERED this 18th day of July, 2019.



United States Magistrate Judge

DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

¹ This deadline assumes the parties are able to resolve any remaining disputes regarding class membership by July 12, 2019.