

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Target has agreed to a proposed settlement of a class action lawsuit called *Christopher Meta v. Target Corp, et al.* Case No. 4:14-CV-0832 in the U.S. District Court ND Ohio, relating to a product you may have purchased. The lawsuit claims that certain Up & Up flushable toddler wipes were not flushable. Target denies these claims, and the court has not decided who is right or who is wrong. Instead the parties have agreed to settle this case to resolve the matter.

Target customers who purchased Up & Up flushable toddler wipes during the class period may submit a claim and may receive benefits from the settlement.

Who's Included?

You are a member of the Settlement class if you reside in the United States and bought Up & Up Flushable Toddler Wipes at any Target Store nationwide from April 18, 2010 through October 31, 2014. The wipes involved in this settlement were under the "Buckeye" product line, which was discontinued on October 31, 2014.

What does the Settlement provide?

Eligible Class Members who file a valid claim **with a proof of purchase** may be eligible to receive gift cards or coupons for Up & Up Wipes packs, based on the amount purchased. Eligible Class Members who file a valid claim **without** a proof of purchase may be eligible to receive a gift card or coupon for a capped amount based on amounts purchased. The cap for the gift cards is no more than 20 units at \$1.35 per unit (up to \$27). The cap for coupons is 20. If you have proof of purchase for more than 20 units you may receive 20 coupons for the first 20 purchases and a gift card in the amount of \$1.35 for each additional purchase. Please visit the web site [link] for complete details.

What are my rights?

File a claim. This is the only way to receive a gift card or coupon. You must file a claim form, online or by mail, no later than September 7, 2018. **Do Nothing.** You will not receive a payment and you will be bound by the decisions of the Court. **Opt Out.** You may opt-out of the settlement. You will not receive settlement benefits, but you will retain your right to sue regarding these claims. You must opt out by July 9, 2018. **Object.** If you do not agree with the terms of the Settlement, you may file an objection with the Court. You must file an Objection by July 9, 2018.

The Court will hold a final hearing on August 7, 2018 at 9:00 a.m., at the United States District Court for the Northern District of Ohio, Carl B. Stokes U.S. Court House, 801 West Superior Avenue, Cleveland, Ohio 44113, to consider whether to approve the settlement and a request for attorneys' fees, costs, and expenses to be paid by the settlement.

The motion for the fees, costs, and expenses will be posted on the settlement website after they are filed. You may attend this hearing, but you do not have to.

This is only a summary. For more information, or to file a claim, visit the settlement website, www.upandupwipesettlement.com, or call the Settlement Administrator at 1-888-878-1989.