

NOTICE OF SETTLEMENT

Sadler v. Target Corporation
Civ. No. 1:23-cv-00030-CPO-SAK
United States District Court, District of New Jersey

YOU ARE COVERED BY THE SETTLEMENT OF THIS CLASS/COLLECTIVE ACTION LAWSUIT.

THE UNITED STATES DISTRICT COURT HAS AUTHORIZED THIS SETTLEMENT NOTICE, WHICH SUMMARIZES THE TERMS OF THE SETTLEMENT AND EXPLAINS YOUR RIGHTS UNDER THE SETTLEMENT.

PLEASE CAREFULLY READ THIS DOCUMENT.

WHAT IS THIS LAWSUIT ABOUT?

Plaintiff alleges Progression Team Members who have been employed by Target at its New Jersey distribution centers at any time since August 6, 2019, were not paid for all time worked, including pre- and post-shift time spent walking at the distribution centers. Target denies all of Plaintiff's material allegations. After good-faith negotiations, in which both sides recognized the substantial risk of an uncertain outcome and delay, the Parties agreed to settle the Action.

WHO REPRESENTS THE SETTLEMENT CLASS?

Plaintiff and other Settlement Class Members who do not exclude themselves from the Settlement are represented by Class Counsel Charles J. Kocher, Tyler J. Burrell, and Gaetano J. DiPersia of McOmber McOmber & Luber, P.C., 50 Lake Center Dr., Suite 400, Marlton, NJ 08053; Phone: 1-888-840-4265.

HOW DO THE LAWYERS AND PLAINTIFF GET PAID?

Class Counsel has worked on the lawsuit without yet receiving any payments for their time or out-of-pocket expenses. Under the Settlement, Class Counsel will ask the Court for attorneys' fees and expenses, which will not exceed one-third of the Global Settlement Fund of \$4,600,000.00 (i.e., \$1,533,333.33, plus expenses). The Court has not yet approved these requested fees and expenses. Just like you, Plaintiff will receive a pro rata Settlement Award. In addition, Plaintiff may ask the Court to award her an additional Service Award, not to exceed \$10,000, in recognition of the work and services she contributed to the case. If approved by the Court, this Service Award will be made from the Global Settlement Fund.

WHAT DOES THE SETTLEMENT PROVIDE?

The Court will decide whether the Settlement is fair, reasonable, and adequate. If the Court approves the Settlement, \$4,600,000.00 will be distributed to Plaintiff, Settlement Class Members, Class Counsel, and the Settlement Administrator. For tax purposes, Settlement Awards paid to each Settlement Class Member shall be treated as (a) one-third [1/3] for taxable wage income under an IRS Form W-2, with all required and authorized deductions, including income taxes, withheld from such payments, and (b) two-thirds [2/3] for taxable non-wage income under an IRS Form 1099, with nothing withheld from such payments. In addition to the Global Settlement Fund, Target shall pay for employer-side payroll taxes. Any overestimated payroll taxes, as determined by the Settlement Administrator, shall belong to Target. The Settlement Class Members will be responsible for any tax liability arising from the allocation of the Global Settlement Fund.

Your individual payment amount was determined on a pro rata basis using Target's pay records. If Target's pay records for you were available when notice was sent, your estimated pro rata share of the Settlement was printed on your notice.

If you have questions about your payment amount, please contact the Settlement Administrator.

If this Settlement Notice is addressed to you, you are covered by the Settlement, and ***you do not need to do anything to receive a Settlement Award***. The award will not be made unless, and until, the Court approves the Settlement.

If you do not exclude yourself from the Settlement, you will release and forever discharge Target and other Releasees of any and all Released Claims (as defined in the Settlement Agreement), known or unknown, arising from, of or in any way relating to, the facts or claims alleged in the lawsuit.

HOW DO I EXCLUDE MYSELF FROM THE SETTLEMENT?

If you do not want to participate in the Settlement, you must complete and timely submit a request for exclusion. The request for exclusion must be completed, dated, signed by you, and sent to the Settlement Administrator at Sadler v Target, Settlement Administrator, PO Box 2715, Portland, OR 97208-2715 by **February 13, 2026**. An incomplete or unsigned opt-out form will be deemed invalid. If you timely submit a completed request for exclusion, you will retain the right, if any, to pursue, at your own expense, a claim against Target for unpaid wages and you will not receive a Settlement Award. If you do not timely submit a completed request for exclusion, you will be bound by all terms and conditions of the Settlement, and, if the Court approves the Settlement, you will receive a Settlement Award.

HOW CAN I OBJECT TO THE SETTLEMENT?

If you believe the Settlement is unfair or should not be approved by the Court, and you do not exclude yourself from the Settlement, you can object. To object to the Settlement, you must send to the Settlement Administrator a written objection. The objection must set forth (1) your full name, address, telephone number, and the last four digits of your SSN; (2) the basis for your objection; and (3) a reference to Civil Action No. 1:23-cv-00030-CPO-SAK. Settlement Class Members who fail to make objections in the manner specified above may be deemed to have waived any objections and shall, subject to any order issued by the Court, be foreclosed from making any objection (whether by appeal or otherwise) to the Agreement. To be valid, your objection *must be postmarked on or before February 13, 2026* and must be mailed to: Sadler v Target, Settlement Administrator, PO Box 2715, Portland, OR 97208-2715.

WHEN AND WHERE WILL THE COURT APPROVE THE SETTLEMENT?

The Court will hold a hearing to decide whether to approve the Settlement. Although you are welcome to attend the hearing, you are not required or expected to attend. The hearing will take place on **February 24, 2026 at 10:00 a.m.** in Courtroom 5A of the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101. At the hearing, the Court will consider whether the Settlement is fair and should be approved. The Court will also consider any written objections to the Settlement and will hear from any Settlement Class Members or their legal representatives. If you have not excluded yourself from the Settlement and want to speak at the hearing, you must send a letter stating your desire to appear in person, or through counsel, at the hearing to the Court and to Class Counsel by **December 26, 2025**. Such notice of your intention to appear must include your full name, address, telephone number, and signature.

HOW DO I OBTAIN MORE INFORMATION?

This Settlement Notice summarizes the most important aspects of the proposed Settlement. You can obtain further information by going to ***NJDistributionCenterSettlement.com***, by calling the Class Counsel, or by contacting the Settlement Administrator at Sadler v Target, Settlement Administrator, PO Box 2715, Portland, OR 97208-2715.

FOR INFORMATION REGARDING THIS SETTLEMENT, DO NOT TELEPHONE THE COURT OR DEFENDANT'S COUNSEL.

Dated: December 15, 2025

Approved: Christine P. O'Hearn
United States District Judge