

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

*4/4/18
Motion filed.
Should Nugent*

CHRISTOPHER META, On Behalf Of Himself)	CASE NO. 4:14-CV-0832
And All Others Similarly Situated)	
)	JUDGE DONALD C. NUGENT
Plaintiff)	
)	<u>PLAINTIFF'S UNOPPOSED</u>
vs.)	<u>MOTION FOR PRELIMINARY</u>
)	<u>APPROVAL OF CLASS ACTION</u>
TARGET CORPORATION, et al.)	<u>SETTLEMENT</u>
)	
Defendants)	
)	

Plaintiff hereby respectfully moves the Court, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for an order:

- (1) Of preliminary approval of the settlement of this class action as set forth in the class action settlement agreement dated March 28, 2018, attached as Exhibit 1 to the accompanying Memorandum of Points and Authorities;
- (2) Of conditional certification, for settlement purposes only, of a settlement class defined as “all persons residing in the United States who purchased Up & Up flushable toddler wipes from April 18, 2010 through the discontinuation of the ‘Buckeye’ product formulation on October 31, 2014, specifically excluding purchasers of Nice-Pak’s ‘Sigma’ formulation and subsequent product formulations of Up & Up flushable toddler wipes.”;
- (3) Directing the dissemination of notice in the form and manner set forth in the settlement agreement; and
- (4) Setting a date for a final approval hearing.

A copy of the [Proposed] Order for Preliminary Approval is attached to the Settlement Agreement as Exhibit C.