

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PITTSBURGH DIVISION

BLAIR DOUGLASS, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

MELNOR INC.,

Defendant.

Case No. 2:25-cv-00670-WSH

EXHIBIT 2
NOTICE PLAN

1. **Within twenty-one (21) days of this Order**, Defendant shall, at its expense:

(a) Add dates to the placeholders in the Long-Form Notice accompanying the Agreement as Agreement Exhibit 1.

(b) Ensure the Settlement Website is live and may be accessed over the internet. Defendant shall further ensure the Settlement Website tracks the number of visitors to the Settlement Website, and the Settlement Website remains published for at least sixty (60) days after the date the Court grants final approval of the Agreement.

(c) Cause the Long-Form Notice to be published on, and make the following documents filed in this Lawsuit available for download on, the Settlement Website: the class action complaint, motion for preliminary approval of class action settlement and supporting documents, and the Court's orders concerning preliminary approval as well as any supporting memorandum. Defendant shall ensure the Settlement Website and the documents identified in this Subsection shall be fully accessible by individuals who use screen reader auxiliary aids.

(d) Display a link to the Settlement Website at the beginning of the Website. Defendant shall ensure this link directs individuals who are Blind and/or who have a Visual Disability to the Settlement Website, and shall have the option to make this link invisible to customers who are not Blind and who do not have a Visual Disability, provided that this link is otherwise Accessible. The link shall include alternative text which reads “Click to view our ADA class action settlement notice.” Defendant shall further ensure this link remains published for at least 180 days after the date the Court grants final approval of the Settlement Agreement.

(e) Cause a post in the form set forth below to be published on the following social media accounts: <https://www.facebook.com/>, <https://www.instagram.com/>, and <https://twitter.com/>. Defendant shall ensure these posts are fully accessible to individuals who use Appropriate Auxiliary Aids and Services. Defendant shall further ensure these posts remain published during the Agreement Term.

Visit <https://www.MelnorADAsettlement.com> to learn more about Melnor’s agreement to make its online store accessible to individuals who are Blind and/or who have a Visual Disability. Have questions? Contact East End Trial Group at <https://eastendtrialgroup.com>.

(f) Publish a blog post on the Website in the form of the Long-Form Notice accompanying the Agreement as Agreement Exhibit 1. Defendant shall ensure this post is fully accessible to individuals who use Appropriate Auxiliary Aids and Services. Defendant shall maintain the blog post on its Website during the Agreement Term.

(g) Cause an email in the form set forth below to be sent to each subscriber of Defendant’s email newsletter. The email’s subject line shall read: “Our agreement to make Melnor’s website accessible”. Defendant shall ensure this email is fully accessible to individuals who use Appropriate Auxiliary Aids and Services.

A proposed settlement has been reached that would resolve the class action lawsuit *Douglass v. Melnor Inc.*, Case No. 2:25-cv-00670-WSH (W.D. Pa.). The lawsuit alleges that Melnor violated the Americans with Disabilities Act, 42 U.S.C. §§ 12101, et seq., by failing to take the necessary steps to ensure its website and mobile apps does not discriminate against individuals who are Blind and/or who have a Visual Disability. Under the settlement, Melnor agrees to make its website and any new website or mobile app it develops or acquires accessible to individuals who are Blind and/or who have a Visual Disability. For a more complete summary of the terms of the proposed settlement, please visit <https://www.MelnorADAsettlement.com>. Have questions? Contact East End Trial Group at <https://eastendtrialgroup.com>.

2. Defendant shall ensure the documents identified in the previous paragraphs shall be fully accessible by individuals who use Appropriate Auxiliary Aids and Services.

3. **No less than five (5) days before the fairness hearing**, Defendant shall file a declaration that all of the obligations of Paragraphs 7 and 8, *supra*, have been discharged, along with the number of visitors to the Settlement Website.

4. **Within twenty-eight (28) days of this Order**, Class Counsel shall, at its expense, request that at least the following organizations publish notice in the form set forth below in their respective electronic newsletters and social media accounts such that the notice is sent out within sixty (60) days of Preliminary Approval: ACHIEVA, American Action Fund for Blind Children and Adults, American Council of the Blind, American Foundation for the Blind, Blinded American Veterans Foundation, Blinded Veterans Association, Foundation Fighting Blindness, Pennsylvania Association for the Blind, Disability Law Center, Disability Rights Education and Defense Fund, and National Federation of the Blind.

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the terms of the proposed settlement, please visit <https://www.MelnorADAsettlement.com>. Have questions? Contact East End Trial Group at <https://eastendtrialgroup.com>.

5. **Within sixty (60) days of this Order**, Defendant or Defendant's counsel shall file a declaration evidencing Defendant's compliance with this order.

6. **Within sixty (60) days of this Order**, Class Counsel shall file a declaration evidencing its compliance with this order.

7. **Within ninety (90) days of this Order**, any Settlement Class Member may object to the Agreement by filing written objections with the Clerk of the Court ("Objection Deadline"). Only such objecting Settlement Class Members shall have the right, and only if they expressly seek it in their objection, to present objections orally at the final approval hearing.

8. **Within one hundred (100) days of this Order**, the parties shall respond to any timely-filed objections.

9. **Within one hundred (100) days of this Order**, Plaintiff shall move for final approval and for reasonable attorneys' fees and costs.

10. A final approval hearing shall be held before this Court on _____, 2025 at _____ ET in the United States District Court for the Western District of Pennsylvania, located at Joseph F. Weis Jr. U.S. Courthouse, 700 Grant Street, Courtroom 3B, Pittsburgh, PA 15219, to determine whether the Agreement shall be granted final approval, and to address any related matters.

11. The final approval hearing may, from time to time and without further notice to the Settlement Class Members (except those who have filed timely objections or entered appearances), be continued or adjourned by order of the Court.