

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

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

Plaintiff,

v.

MONDELÉZ GLOBAL LLC,

Defendant.

Civil Action No. 2:22-cv-00875-WSH

**NOTICE PLAN**

1. As soon as practicable, but no later than twenty-one (21) days after the Court's entry of a Preliminary Approval order, Mondelēz Global LLC shall, at its expense:

(a) Cause the Long-Form Notice accompanying the Agreement as Agreement Exhibit B to be published on, and make the following documents filed in the Lawsuit available for download on, the Settlement Website, located at <https://www.mondelezADAsettlement.com>:<sup>1</sup>

- i. the class action complaint;
- ii. Plaintiff's preliminary approval motion and supporting documents;

and

iii. the Court's orders granting preliminary approval and any supporting memorandum.

(b) Request that the following organizations publish notice in the form of Section 1(c) in their respective electronic newsletters so the notice is sent out within sixty (60)

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<sup>1</sup> The Settlement Website and the documents identified in Section 1(a) shall be fully accessible by individuals who screen reader auxiliary aids.

days of Preliminary Approval. Mondelēz Global LLC shall copy Class Counsel on each request at the addresses provided in Section 38.1 of the Agreement.

- (1) Achieva,
- (2) American Council of the Blind,
- (3) American Foundation for the Blind,
- (4) Blinded American Veterans Foundation,
- (5) Blinded Veterans Association,
- (6) Foundation Fighting Blindness,
- (7) Guide Dogs for the Blind,
- (8) National Association of Blind Merchants,
- (9) National Council on Disability, and
- (10) National Federation of the Blind.

(c) “A proposed settlement has been reached that would resolve the class action lawsuit *Douglass v. Mondelēz Global LLC*, No. 2:22-cv-00875-WSH (W.D. Pa.). The lawsuit alleges that Mondelēz Global LLC violated the Americans with Disabilities Act, 42 U.S.C. §§ 12101, et seq. by failing to take the necessary steps to ensure its websites do not discriminate against blind or visually disabled consumers who use screen reader auxiliary aids to access digital content. Mondelēz Global LLC denies the allegations in the lawsuit that it has violated the ADA and denies any allegation or implication that it discriminates against blind or visually disabled consumers or any individual or group of individuals. Under the settlement, Mondelēz Global LLC agrees to take additional steps to make its websites, mobile apps, and any new website or mobile app it develops or acquires accessible to screen reader users. For a more complete summary of the terms of the proposed settlement, please visit: <https://www.mondelezADAsettlement.com>.”

2. As soon as practicable, but no later than seven (7) days after they are filed, Mondelēz Global LLC shall make any motion for attorneys’ fees and costs, and supporting documentation, as well as any order granting or denying any motion for attorneys’ fees and costs, available for download on the Settlement Website.