

## **EXHIBIT A**

### **Settlement Website Notice Pursuant to Section 28.1.3 (No Later than April 6, 2023)**

#### **NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION LAWSUIT**

#### **IF YOU ARE AN INDIVIDUAL WHO IS BLIND AND/OR HAS A VISUAL DISABILITY, YOUR LEGAL RIGHTS MAY BE AFFECTED. PLEASE READ THIS NOTICE AND THE INSTRUCTIONS CAREFULLY**

- This notice is to inform you about the proposed settlement that would resolve the class action lawsuit *Douglass v. P.C. Richard & Son, LLC*, Case No. 2:22-cv-399-MPK (W.D. Pa.).
- The settlement covers all individuals who are blind and/or who have a visual disability who use auxiliary aids and services who have accessed, attempted to access, been deterred from accessing, will access, will attempt to access, or will be deterred from accessing: <https://www.PCRichardADAsettlement.com>.
- The class action lawsuit alleges that P.C. Richard & Son, LLC (“P.C. Richard”) 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 applications do not discriminate against individuals who are blind and/or who have a visual disability who use auxiliary aids and services to access digital content.
- P.C. Richard denies all liability in the case and asserts that its current practices do not violate applicable federal, state, and local law.
- The settlement, which must be approved by the Court, would resolve the lawsuit.
- P.C. Richard has agreed to ensure its website and mobile applications meet the success criteria of the Web Content Accessibility Guidelines 2.1, at Levels A and AA (June 5, 2018), published by the World Wide Web Consortium, available at [www.w3.org/TR/WCAG/](http://www.w3.org/TR/WCAG/) and to follow certain steps to ensure that its website and mobile applications becomes and remains accessible.
- You have the right to object to the settlement by June 5, 2023.
- The Court will hold a final hearing to determine whether to approve the settlement on June 27, 2023.
- Your legal rights are affected whether or not you act. Please read this Notice

carefully.

## **I. WHAT IS THIS LAWSUIT ABOUT?**

This case is a class action lawsuit. In a class action, one or more people sue on behalf of others who have similar claims. The person that sues is the class representative. All of the people who have similar claims are part of a “class.” Individual class members do not file lawsuits. Instead, a court resolves all of their claims at once.

This case is a class action that challenges the accessibility of: <https://www.pcrichard.com> (“Website”). Plaintiff alleged that the Website was not accessible to persons with vision disabilities. Plaintiff alleged that this violated the Americans with Disabilities Act. Plaintiff sought an order to require P.C. Richard to make its online content accessible to persons with vision disabilities.

## **II. WHO DOES THIS SETTLEMENT AFFECT?**

This settlement covers all individuals who are blind and/or who have a visual disability who use auxiliary aids and services to navigate digital content and who have accessed, attempted to access, or been deterred from attempting to access, or who will access, attempt to access, or be deterred from attempting to access <https://www.pcrichard.com> from the United States.

## **III. WHAT DOES THE SETTLEMENT PROVIDE?**

### **A. P.C. Richard Will Make Its Digital Properties Accessible.**

Under the settlement, P.C. Richard agrees to take steps to make <https://www.pcrichard.com>, its current mobile applications, and any new website or mobile application it develops or acquires (collectively “Digital Properties”) accessible to individuals who are blind and/or who have a visual disability and who use auxiliary aids and services to access digital content. P.C. Richard will ensure the Digital Properties meet the success criteria of the Web Content Accessibility Guidelines 2.1, at Levels A and AA (June 5, 2018), published by the World Wide Web Consortium, available at [www.w3.org/TR/WCAG/](http://www.w3.org/TR/WCAG/) and to follow certain steps to ensure that its website becomes and remains accessible.

### **B. P.C. Richard Will Institute Accessibility Procedures To Ensure Accessibility.**

P.C. Richard will also incorporate detailed steps into its accessibility policies and practices to ensure its Digital Properties become and remain accessible to individuals who are blind and/or who have a visual disability and who use auxiliary aids and services to access digital content.

1. For each new, renewed, or renegotiated contract with a vendor of Third-Party Content, P.C. Richard shall request that the vendor commit to provide content in a

format that conforms to WCAG 2.1 or can be made to conform to WCAG 2.1.

2. P.C. Richard shall be required to designate team of its employees and/or contractors as the Accessibility Coordination Team tasked to ensure the Digital Properties are accessible and that accessibility-related questions and concerns from consumers are resolved in a timely manner.
3. P.C. Richard shall retain an Accessibility Consultant knowledgeable about digital accessibility, the ADA, WCAG 2.1, and accessibility. The Accessibility Consultant's duties shall include, among other things: (a) assisting P.C. Richard to conduct an initial accessibility audit; (b) assisting P.C. Richard to develop and implement an accessibility strategy; (c) advising assisting P.C. Richard as to how to make the Digital Properties accessible; (d) assisting P.C. Richard in performing accessibility audits and end-user testing on a regular basis; (e) providing P.C. Richard with a status report on an annual basis that identifies content, features, and services on the Digital Properties that are not accessible and measures to remediate them; and (f) verifying the Digital Properties are accessible in the final Letter of Accessibility.
4. P.C. Richard shall complete an initial accessibility audit of <https://www.pcrichard.com>. The audit shall be conducted in a professional manner and benchmarked by appropriate processes, including automated and end-user testing, consistent with the accessibility consultant's recommendations.
5. P.C. Richard shall develop and implement an accessibility strategy designed to ensure that the Digital Properties are accessible.
6. P.C. Richard shall display a link to an accessibility statement at the beginning of a visitor's experience on the Digital Properties so that individuals who are blind and/or who have a visual disability and who use auxiliary aids and services can perceive the link to the accessibility statement as if it were located at the top of each homepage throughout the Digital Properties. This will ensure that individuals who are blind and/or who have a visual disability and who use auxiliary aids and services learn of the resources located on the accessibility statement.
7. P.C. Richard shall train all employees responsible for website or mobile application design, development, or maintenance to ensure the future design, development, and maintenance of the Digital Properties are and remain conformant to WCAG 2.1 A/AA.
8. P.C. Richard shall ensure its customer service personnel are trained to assist individuals with disabilities (including individuals who are blind and/or who have

a visual disability) who encounter difficulties using the Digital Properties and to timely assist such individuals within published hours of operation.

9. P.C. Richard shall modify its existing bug fix policies, practices, and procedures to include the elimination of bugs that create accessibility barriers, including those that prohibit effective communication or impair the accessibility of the Digital Properties.
10. P.C. Richard shall provide support during regular business hours to assist individuals with disabilities who encounter accessibility issues regarding the Digital Properties.

**C. P.C. Richard Will Create A Dispute Resolution Procedure To Address Accessibility Issues.**

Additionally, P.C. Richard will forward any complaint or issue raised to its customer services regarding the accessibility of its Digital Properties to Class Counsel (defined below), who shall work with P.C. Richard to ensure the issue is resolved consistent with the proposed settlement. Class Counsel will monitor P.C. Richard's compliance with the settlement as well.

**D. P.C. Richard Will Pay Class Co-Counsel's Attorneys' Fees And Costs.**

The settlement also provides that the named individual plaintiff who served as class representative will receive a \$1,500.00 incentive award, subject to court approval, in return for a release of his individual claims.

Finally, East End Trial Group LLC ("Class Counsel"), the attorneys who represent the class, will have the right to seek attorneys' fees and costs up to (a) \$55,000.00 for work performed up to P.C. Richard's deadline to make its Digital Properties accessible, (b) \$20,000.00 for additional work if P.C. Richard requires one extra year to make the Digital Properties accessible, and (c) another \$20,000.00 if P.C. Richard requires a second year to make the Digital Properties accessible. Class Counsel will file a motion asking the Court to award reasonable fees and costs to reimburse them for work they performed on this case. The Court must approve the amount awarded even if the parties reach an agreement on the amount. This motion for fees and costs will be available at <https://www.PCRichardADAsettlement.com> within seven days after it is filed with the Court.

**IV. DOES THE SETTLEMENT AFFECT MY LEGAL RIGHTS?**

All class members will be bound by the terms of the settlement relating to access to the Digital Properties for individuals who are blind and/or who have a visual disability and who use auxiliary aids and services to access digital content, if the settlement agreement is approved by the Court. If the settlement is approved, all class members will release and forever discharge all claims for injunctive relief under all federal, state, and local laws related to alleged

discrimination by P.C. Richard against individuals who are blind and/or who have a visual disability and who use auxiliary aids and services to access digital content that arose before the Settlement Agreement becomes effective. Class members, other than the named plaintiff in the lawsuit, are not releasing any claims for monetary damages.

#### **V. CAN I OBJECT TO THE SETTLEMENT?**

You have the right to object to the proposed settlement agreement if you do not like part or all of it.

If you wish to object to the proposed settlement, you must do so in writing on or before June 5, 2023. Your written objections must:

- a) clearly identify the case name and number, *Douglass v. P.C. Richard & Son, LLC*, Case No. 2:22-cv-399-MPK (W.D. Pa.);
- b) be submitted to the Court either by mailing them to the Clerk of the Court for the United States District Court for the Western District of Pennsylvania, 700 Grant Street, Courtroom 9C, Pittsburgh, PA 15219, or by filing them in person at any location of the United States District Court for the Western District of Pennsylvania;
- c) and be received on or before June 5, 2023.

If you wish to appear and present your objection orally at the fairness hearing, you must first submit a written objection and in your written objection you must indicate your intention to appear and be heard at the fairness hearing. If you appear through your own attorney, you are responsible for paying that attorney.

#### **VI. DO I HAVE A LAWYER IN THIS CASE?**

The Court has appointed Kevin Tucker, Kevin Abramowicz, Stephanie Moore, and Chandler Steiger of East End Trial Group as Lead Counsel (“Class Counsel”) on behalf of the class members. Class Counsel’s contact information can be found in Section 41.1 of the settlement agreement.

You do not need to hire a lawyer because Class Counsel is working on your behalf. You do not need to pay Class Counsel, as the settlement provides that P.C. Richard will pay their fees and costs in an amount approved by the Court.

#### **VII. WHEN AND WHERE WILL THE COURT APPROVE THE SETTLEMENT?**

The Court will hold a hearing to decide whether to approve the settlement on June 27, 2023. At this hearing, the Court will consider whether the settlement is fair, reasonable, and

adequate. You are not required to attend the final fairness hearing.

### **VIII. HOW DO I GET MORE INFORMATION ABOUT THE SETTLEMENT?**

This notice summarizes the proposed settlement. For the precise terms and conditions of the settlement, please see the settlement agreement available at <https://www.PCRichardADAsettlement.com>, contact Class Counsel using the information below, access the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.pawd.uscourts.gov>, or visit the office of the Clerk of the Court for the United States District Court for the Western District of Pennsylvania, 700 Grant Street, Courtroom 9C, Pittsburgh, PA 15219, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

To obtain a copy of this notice in alternate formats, contact Class Counsel using the information below.

### **IX. CONTACT INFORMATION**

Please do not contact the Court, the Court clerk's office, or Defense Counsel with questions about this settlement. Any questions must be directed to Class Counsel at the numbers and addresses below.

Class Counsel:

Kevin Tucker  
Kevin Abramowicz  
Stephanie Moore  
Chandler Steiger  
EAST END TRIAL GROUP LLC  
6901 Lynn Way, Suite 215  
Pittsburgh, PA 15208  
ktucker@eastendtrialgroup.com  
kabramowicz@eastendtrialgroup.com  
smoore@eastendtrialgroup.com  
csteiger@eastendtrialgroup.com  
Tel. (412) 877-5220  
<https://eastendtrialgroup.com/>

**[END EXHIBIT A]**

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**Homepage Link Notice Pursuant to Section 28.1.4 (No Later than April 6, 2023)**

Link alternative text: "Click to view our ADA class action settlement notice"

**Social Media Notice Pursuant to Section 28.1.5 (No Later than April 6, 2023)**

“Visit <https://www.PCRichardADAsettlement.com> to learn more about P.C. Richard’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>.”

**In-App Notice Pursuant to Section 28.1.6 (No Later than April 6, 2023)**

“Visit <https://www.PCRichardADAsettlement.com> to learn more about P.C. Richard’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>.”

**Blog Post Notice Pursuant to Section 28.1.7 (No Later than April 6, 2023)**

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- The settlement covers all individuals who are blind and/or who have a visual disability who use auxiliary aids and services who have accessed, attempted to access, been deterred from accessing, will access, will attempt to access, or will be deterred from accessing: <https://www.PCRichardADAsettlement.com>.
- The class action lawsuit alleges that P.C. Richard & Son, LLC (“P.C. Richard”) 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 applications do not discriminate against individuals who are blind and/or who have a visual disability who use auxiliary aids and services to access digital content.
- P.C. Richard denies all liability in the case and asserts that its current practices do not violate applicable federal, state, and local law.
- The settlement, which must be approved by the Court, would resolve the lawsuit.
- P.C. Richard has agreed to ensure its website and mobile applications meet the success criteria of the Web Content Accessibility Guidelines 2.1, at Levels A and AA (June 5, 2018), published by the World Wide Web Consortium, available at [www.w3.org/TR/WCAG/](http://www.w3.org/TR/WCAG/) and to follow certain steps to ensure that its website and mobile applications becomes and remains accessible.
- You have the right to object to the settlement by June 5, 2023.
- The Court will hold a final hearing to determine whether to approve the settlement on June 27, 2023.
- Your legal rights are affected whether or not you act. Please read this Notice carefully.

## **X. WHAT IS THIS LAWSUIT ABOUT?**

This case is a class action lawsuit. In a class action, one or more people sue on behalf of others who have similar claims. The person that sues is the class representative. All of the people who have similar claims are part of a “class.” Individual class members do not file lawsuits. Instead, a court resolves all of their claims at once.

This case is a class action that challenges the accessibility of: <https://www.pcrichard.com> (“Website”). Plaintiff alleged that the Website was not accessible to persons with vision disabilities. Plaintiff alleged that this violated the Americans with Disabilities Act. Plaintiff sought an order to require P.C. Richard to make its online content accessible to persons with vision disabilities.

## **XI. WHO DOES THIS SETTLEMENT AFFECT?**

This settlement covers all individuals who are blind and/or who have a visual disability who use auxiliary aids and services to navigate digital content and who have accessed, attempted to access, or been deterred from attempting to access, or who will access, attempt to access, or be deterred from attempting to access <https://www.pcrichard.com> from the United States.

## **XII. WHAT DOES THE SETTLEMENT PROVIDE?**

### **E. P.C. Richard Will Make Its Digital Properties Accessible.**

Under the settlement, P.C. Richard agrees to take steps to make <https://www.pcrichard.com>, its current mobile applications, and any new website or mobile application it develops or acquires (collectively “Digital Properties”) accessible to individuals who are blind and/or who have a visual disability and who use auxiliary aids and services to access digital content. P.C. Richard will ensure the Digital Properties meet the success criteria of the Web Content Accessibility Guidelines 2.1, at Levels A and AA (June 5, 2018), published by the World Wide Web Consortium, available at [www.w3.org/TR/WCAG/](http://www.w3.org/TR/WCAG/) and to follow certain steps to ensure that its website becomes and remains accessible.

### **F. P.C. Richard Will Institute Accessibility Procedures To Ensure Accessibility.**

P.C. Richard will also incorporate detailed steps into its accessibility policies and practices to ensure its Digital Properties become and remain accessible to individuals who are blind and/or who have a visual disability and who use auxiliary aids and services to access digital content.

11. For each new, renewed, or renegotiated contract with a vendor of Third-Party Content, P.C. Richard shall request that the vendor commit to provide content in a format that conforms to WCAG 2.1 or can be made to conform to WCAG 2.1.

12. P.C. Richard shall be required to designate team of its employees and/or contractors as the Accessibility Coordination Team tasked to ensure the Digital Properties are accessible and that accessibility-related questions and concerns from consumers are resolved in a timely manner.
13. P.C. Richard shall retain an Accessibility Consultant knowledgeable about digital accessibility, the ADA, WCAG 2.1, and accessibility. The Accessibility Consultant's duties shall include, among other things: (a) assisting P.C. Richard to conduct an initial accessibility audit; (b) assisting P.C. Richard to develop and implement an accessibility strategy; (c) advising assisting P.C. Richard as to how to make the Digital Properties accessible; (d) assisting P.C. Richard in performing accessibility audits and end-user testing on a regular basis; (e) providing P.C. Richard with a status report on an annual basis that identifies content, features, and services on the Digital Properties that are not accessible and measures to remediate them; and (f) verifying the Digital Properties are accessible in the final Letter of Accessibility.
14. P.C. Richard shall complete an initial accessibility audit of <https://www.pcrichard.com>. The audit shall be conducted in a professional manner and benchmarked by appropriate processes, including automated and end-user testing, consistent with the accessibility consultant's recommendations.
15. P.C. Richard shall develop and implement an accessibility strategy designed to ensure that the Digital Properties are accessible.
16. P.C. Richard shall display a link to an accessibility statement at the beginning of a visitor's experience on the Digital Properties so that individuals who are blind and/or who have a visual disability and who use auxiliary aids and services can perceive the link to the accessibility statement as if it were located at the top of each homepage throughout the Digital Properties. This will ensure that individuals who are blind and/or who have a visual disability and who use auxiliary aids and services learn of the resources located on the accessibility statement.
17. P.C. Richard shall train all employees responsible for website or mobile application design, development, or maintenance to ensure the future design, development, and maintenance of the Digital Properties are and remain conformant to WCAG 2.1 A/AA.
18. P.C. Richard shall ensure its customer service personnel are trained to assist individuals with disabilities (including individuals who are blind and/or who have a visual disability) who encounter difficulties using the Digital Properties and to timely assist such individuals within published hours of operation.

19. P.C. Richard shall modify its existing bug fix policies, practices, and procedures to include the elimination of bugs that create accessibility barriers, including those that prohibit effective communication or impair the accessibility of the Digital Properties.
20. P.C. Richard shall provide support during regular business hours to assist individuals with disabilities who encounter accessibility issues regarding the Digital Properties.

**G. P.C. Richard Will Create A Dispute Resolution Procedure To Address Accessibility Issues.**

Additionally, P.C. Richard will forward any complaint or issue raised to its customer services regarding the accessibility of its Digital Properties to Class Counsel (defined below), who shall work with P.C. Richard to ensure the issue is resolved consistent with the proposed settlement. Class Counsel will monitor P.C. Richard's compliance with the settlement as well.

**H. P.C. Richard Will Pay Class Co-Counsel's Attorneys' Fees And Costs.**

The settlement also provides that the named individual plaintiff who served as class representative will receive a \$1,500.00 incentive award, subject to court approval, in return for a release of his individual claims.

Finally, East End Trial Group LLC ("Class Counsel"), the attorneys who represent the class, will have the right to seek attorneys' fees and costs up to (a) \$55,000.00 for work performed up to P.C. Richard's deadline to make its Digital Properties accessible, (b) \$20,000.00 for additional work if P.C. Richard requires one extra year to make the Digital Properties accessible, and (c) another \$20,000.00 if P.C. Richard requires a second year to make the Digital Properties accessible. Class Counsel will file a motion asking the Court to award reasonable fees and costs to reimburse them for work they performed on this case. The Court must approve the amount awarded even if the parties reach an agreement on the amount. This motion for fees and costs will be available at <https://www.PCRichardADAsettlement.com> within seven days after it is filed with the Court.

**XIII. DOES THE SETTLEMENT AFFECT MY LEGAL RIGHTS?**

All class members will be bound by the terms of the settlement relating to access to the Digital Properties for individuals who are blind and/or who have a visual disability and who use auxiliary aids and services to access digital content, if the settlement agreement is approved by the Court. If the settlement is approved, all class members will release and forever discharge all claims for injunctive relief under all federal, state, and local laws related to alleged discrimination by P.C. Richard against individuals who are blind and/or who have a visual disability and who use auxiliary aids and services to access digital content that arose before

the Settlement Agreement becomes effective. Class members, other than the named plaintiff in the lawsuit, are not releasing any claims for monetary damages.

#### **XIV. CAN I OBJECT TO THE SETTLEMENT?**

You have the right to object to the proposed settlement agreement if you do not like part or all of it.

If you wish to object to the proposed settlement, you must do so in writing on or before June 5, 2023. Your written objections must:

- d) clearly identify the case name and number, *Douglass v. P.C. Richard & Son, LLC*, Case No. 2:22-cv-399-MPK (W.D. Pa.);
- e) be submitted to the Court either by mailing them to the Clerk of the Court for the United States District Court for the Western District of Pennsylvania, 700 Grant Street, Courtroom 9C, Pittsburgh, PA 15219, or by filing them in person at any location of the United States District Court for the Western District of Pennsylvania;
- f) and be received on or before June 5, 2023.

If you wish to appear and present your objection orally at the fairness hearing, you must first submit a written objection and in your written objection you must indicate your intention to appear and be heard at the fairness hearing. If you appear through your own attorney, you are responsible for paying that attorney.

#### **XV. DO I HAVE A LAWYER IN THIS CASE?**

The Court has appointed Kevin Tucker, Kevin Abramowicz, Stephanie Moore, and Chandler Steiger of East End Trial Group as Lead Counsel (“Class Counsel”) on behalf of the class members. Class Counsel’s contact information can be found in Section 41.1 of the settlement agreement.

You do not need to hire a lawyer because Class Counsel is working on your behalf. You do not need to pay Class Counsel, as the settlement provides that P.C. Richard will pay their fees and costs in an amount approved by the Court.

#### **XVI. WHEN AND WHERE WILL THE COURT APPROVE THE SETTLEMENT?**

The Court will hold a hearing to decide whether to approve the settlement on June 27, 2023. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. You are not required to attend the final fairness hearing.

## **XVII. HOW DO I GET MORE INFORMATION ABOUT THE SETTLEMENT?**

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To obtain a copy of this notice in alternate formats, contact Class Counsel using the information below.

## **XVIII. CONTACT INFORMATION**

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Class Counsel:

Kevin Tucker  
Kevin Abramowicz  
Stephanie Moore  
Chandler Steiger  
EAST END TRIAL GROUP LLC  
6901 Lynn Way, Suite 215  
Pittsburgh, PA 15208  
ktucker@eastendtrialgroup.com  
kabramowicz@eastendtrialgroup.com  
smoore@eastendtrialgroup.com  
csteiger@eastendtrialgroup.com  
Tel. (412) 877-5220  
<https://eastendtrialgroup.com/>

**Email Notice Pursuant to Section 28.1.8 (No Later than April 6, 2023)**

Email subject line: “Our agreement to make P.C. Richard’s store accessible to individuals who are blind and/or who have a visual disability”

Email content:

“A proposed settlement has been reached that would resolve the class action lawsuit *Douglass v. P.C. Richard & Son, LLC*, Case No. 2:22-cv-399 (W.D. Pa.). The lawsuit alleges that P.C. Richard 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 do not discriminate against individuals who are Blind and/or who have a Visual Disability. Under the settlement, P.C. Richard agrees to make its website, mobile apps, 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.PCRichardADAsettlement.com>. Have questions? Contact East End Trial Group at <https://eastendtrialgroup.com>.”