

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.

DK HOUSEHOLD BRANDS CORP.,

Defendant.

Case No. 2:25-cv-01183-CCW

EXHIBIT 2
NOTICE PLAN

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NOTICE PLAN

1. **Within twenty-one (21) days** of the Court's Order Granting Plaintiff's Motion to Certify Class For Settlement Purposes and for Preliminary Approval of Class Action Settlement ("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 Appropriate Auxiliary Aids and Services.

(d) Display a link to the Settlement Website at the beginning of the Digital Properties' landing or home pages. 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 60 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/adhocdesignproducts>, https://www.instagram.com/adhoc_design, <https://www.facebook.com/coleandmason>, <https://www.instagram.com/coleandmasonusa/>, <https://www.tiktok.com/@coleandmasonusa>, <https://www.facebook.com/ChefKenHom>, <https://x.com/ChefKenHom>, <https://x.com/swissmar>, https://www.instagram.com/swissmar_official/, <https://www.youtube.com/user/swissmarimports>, <https://www.facebook.com/ZylissUSA/>, <https://www.instagram.com/zylissusa/>, and <https://www.tiktok.com/@zylissusa>. 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.DKHouseholdADAsettlement.com> to learn more about DK Household'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) Cause an accessible in-app notice to be published via Defendant's Mobile Applications. Defendant shall ensure this notice is fully accessible to individuals who use Appropriate Auxiliary Aids and Services. Defendant shall ensure this notice shall appear at least once to any user that accesses Defendant's Mobile Applications during the Agreement Term.

Visit <https://www.DKHouseholdADAsettlement.com> to learn more about DK Household'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>.

(g) 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.

(h) Cause an email in the form set forth below to be sent to each subscriber of Defendant's newsletter. The email's subject line shall read: "Our agreement to make DK Household's store accessible to individuals who are blind or who have a visual disability". 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. DK Household Brands Corp.*, Case No. 2:25-cv-01183 (W.D. Pa.). The lawsuit alleges that DK Household 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, DK Household agrees to make its websites, 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.DKHouseholdADAsettlement.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. **Within twenty-eight (28) days after the 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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4. **Within sixty (60) days after the Order**, Defendant or Defendant's counsel shall file a declaration evidencing Defendant's compliance with this order.

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

6. **No less than five (5) days before the fairness hearing**, Defendant shall file a declaration identifying the number of visitors to the Settlement Website.