

United States District Court for the Northern District of California**IF YOU ARE LEGALLY BLIND AND ATTEMPTED TO ACCESS FASHION NOVA, INC.'S WEBSITE WITH SCREEN READING SOFTWARE BETWEEN FEBRUARY 26, 2018 AND NOW, YOU SHOULD READ THIS NOTICE AS YOUR RIGHTS MAY BE AFFECTED.**

The United States District Court for the Northern District of California authorized this notice. Please read it carefully. It's not junk mail, spam, an advertisement, or a solicitation by a lawyer. You are not being sued.

Basic Information	
<i>1. Why Was This Notice Issued?</i>	<p>A settlement was reached in the class action lawsuit, <i>Alcazar v. Fashion Nova, Inc.</i>, Case No. 4:20-cv-01434-JST (the "Action"), by Plaintiff Juan Alcazar ("Plaintiff") and Defendant Fashion Nova, Inc., currently known as Fashion Nova, LLC ("Fashion Nova").</p> <p>The United States District Court for the Northern District of California authorized this Notice because you have a right to know about the proposed settlement and all of your options before the Court decides whether to approve the proposed settlement. This Notice explains the Action, the settlement, your legal rights, what benefits are available, and who can get them.</p>
<i>2. What Is a Class Action?</i>	<p>In a class action, one or more people called "Class Representatives" or "Plaintiffs" (in this case, Juan Alcazar) sue on behalf of people who have similar claims. All these people are a "Class" and each is a "Class Member." One court resolves the issues for all Class Members, except for those who opt out of the Class.</p>
<i>3. What Is This Action About?</i>	<p>Plaintiff brought this Action against Fashion Nova, for himself and all others like him, alleging that Fashion Nova's website, https://www.fashionnova.com/ ("Website"), is inaccessible to legally blind individuals using screen reading software, denying these individuals an experience equivalent to that of sighted individuals.</p> <p>Fashion Nova denies these allegations and maintains that it did nothing wrong. The proposed settlement to resolve this Action is not an admission of guilt or wrongdoing by Fashion Nova, and it is not an admission by Fashion Nova of the truth of any of the allegations in the Action.</p>
<i>4. Why Was There a Settlement?</i>	<p>The Court has not decided in favor of the Classes or Fashion Nova. Instead, the Plaintiff, as the Class Representative, and Fashion Nova agreed to a settlement. This way, they avoid the cost, burden, and uncertainty of a trial and the individuals allegedly affected can get benefits. The Class Representative and his attorneys think the proposed settlement is best for all Class Members.</p> <p>The Court preliminarily approved the proposed settlement as fair, reasonable, and adequate; authorized this notice; and scheduled a hearing to determine whether to grant final approval.</p>

The Settlement Benefits	
<i>5. How Do I Know Whether I Am Part of the Settlement?</i>	<p>The Court certified this matter as a class action on September 6, 2022, and certified the following two Classes:</p>

	<p style="text-align: center;"><u>The Nationwide Class</u></p> <p>All legally blind individuals who have attempted to access Fashion Nova’s Website by the use of screen reading software during the applicable limitations period up to and including final judgment in this Action</p> <p style="text-align: center;"><u>The California Class</u></p> <p>All legally blind individuals in the State of California who have attempted to access Fashion Nova’s Website by the use of screen reading software during the applicable limitations period up to and including final judgment in this Action</p> <p>If you fit either description, you are a Class Member, and are thus included in the settlement.</p>
6. <i>What Should I Do If I’m Still Unsure Whether I Am a Class Member?</i>	<p>If you are still unsure whether you are a Class Member, you can visit the website www.FashionNovaAccessibilitySettlement.com, call toll-free 1-888-678-2596, or write to the Settlement Administrator, <i>Alcazar v. Fashion Nova, Inc.</i>, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606 or email FashionNovaAccessibilitySettlement@cptgroup.com, for more information.</p>
7. <i>What Does the Settlement Provide?</i>	<p>Plaintiff, as Class Representative, and Fashion Nova (the “Parties”) have agreed to settle the Action. As part of the settlement, Fashion Nova will pay \$5,150,000.00 (the “Gross Settlement Amount”) and has agreed to make changes to its Website so that it is accessible to legally blind individuals.</p> <p>Fashion Nova will deposit the Gross Settlement Amount into an account controlled by the Settlement Administrator, a neutral company appointed by the Court to send this notice, calculate and make payments to California Class Members, process Class Members’ opt-out requests, and perform other tasks necessary to administer the settlement.</p> <p>The portion of the Gross Settlement Amount remaining after deducting any Court-approved attorneys’ fees and costs, incentive award to the Class Representative, and administrative and notice costs is the Net Settlement Amount. The Settlement Administrator will distribute from the Net Settlement Amount the Class Payment that will be made available to California Class Members in accordance with the description provided in the response to Question 8 below.</p> <p>It is possible the Court will decline to grant final approval of the settlement or decline to enter a judgment. It is also possible the Court will enter a judgment that is reversed on appeal. Plaintiff and Fashion Nova have agreed that, should either of these events occur, the settlement will be void.</p>
8. <i>Am I Eligible to Receive a Class Payment and, If So, How Much Will I Receive?</i>	<p>Under California’s Unruh Act, Cal. Civ. Code §§ 51, <i>et seq.</i>, California Class Members may receive a one-time payment of up to \$4,000.00.</p> <p>The exact amount of your payment will depend on certain circumstances. First, only one payment will be allowed per household. If there are two or more California Class Members in your household, you can only receive one payment for all household members.</p> <p>Second, payments may vary depending upon the number of California Class Members who make Approved Claims. If the Net Settlement Amount is</p>

	<p>sufficient to make a \$4,000 payment for each Approved Claim, each such Approved Claim will receive \$4,000. If the Net Settlement Amount is not sufficient to pay each Approved Claim \$4,000, the Settlement Administrator will divide the Net Settlement Amount equally among all Approved Claims, and in that event, your payment may be less than \$4,000.</p> <p>If the Net Settlement Amount is sufficient to pay \$4,000 to all Approved Claims, any remaining amounts will be paid to the American Foundation for the Blind.</p> <p>The Class Payments will be distributed to California Class Members who timely submit Approved Claims, after Court-approved deductions are made from the Gross Settlement Amount.</p> <p>Plaintiff and/or Class Counsel will ask the Court to approve the following deductions from the Gross Settlement Amount, the amounts of which will be decided by the Court at the final approval hearing:</p> <ul style="list-style-type: none"> • Up to \$1,287,500 (25% of the Gross Settlement Amount) to Class Counsel as attorneys' fees and up to \$1,235,259.03 for their litigation expenses. To date, Class Counsel have worked and incurred expenses on this case without any payment. • Up to \$1,000 to the Class Representative as an incentive award for filing the Action, working with Class Counsel and representing the Classes. An incentive award will be the only monies the Class Representative will receive other than the Class Representative's Class Payment, should he elect to receive a Class Payment. • Up to \$158,000 to the Settlement Administrator for services administering the settlement. <p>Class Members have the right to object to any of these deductions. The Court will consider all objections.</p>
<p>9. <i>I Am a California Class Member, How Do I Get a Class Payment?</i></p>	<p>If you received this notice, fit the description of the California Class, and do not opt out of the California Class, you must submit a Claim Form to receive a Class Payment. In the Claim Form, to be eligible to receive a Class Payment, California Class Members must attest that: (1) they are legally blind; (2) they visited Fashion Nova's Website with the intention of visiting a Fashion Nova physical store; (3) while visiting Fashion Nova's Website they attempted to find physical store locations and were unable do so through the exercise of reasonable diligence; and (4) the approximate dates of their visit to Fashion Nova's Website.</p> <p>You have the option of electing to receive a Class Payment by either check or electronic payment. To receive a Class Payment, you must inform the Settlement Administrator on the Claim Form and let the Settlement Administrator know whether you elect to receive the payment by check or electronic payment and the corresponding mailing address or banking information for the payment's distribution. You can access the Claim Form and submit a claim for a Class Payment by visiting www.FashionNovaAccessibilitySettlement.com. The deadline to submit Claim Forms is October 20, 2025. If your claim is an Approved Claim, the Settlement Administrator will then issue a check that you can cash or will</p>

	<p>initiate an electronic payment after the Court issues its final approval of the settlement.</p> <p>If you elect to receive a Class Payment by check, your check will show the date when the check expires (the “void date”). If you don’t cash your Class Payment by the void date, your check will be automatically cancelled, and the monies will be irrevocably lost to you.</p> <p><i>If you choose to receive a check and change your address, be sure to notify the Settlement Administrator as soon as possible. Question 29 of this Notice has the Settlement Administrator’s contact information.</i></p>
<i>10. When Will Class Payments Be Made to California Class Members?</i>	<p>The Court will hold a hearing on February 12, 2026 to decide whether to grant final approval of the settlement. Class Payments will be distributed to California Class Members after the Court grants final approval of the settlement and any objections are overruled with finality. The Court may also elect to move the final approval hearing to a different date or time in its sole discretion, without providing further notice to the Classes. The date and time of the final approval hearing can be confirmed at www.FashionNovaAccessibilitySettlement.com.</p>
<i>11. I am a California Class Member, What If I Lose My Settlement Check?</i>	<p>If you lose or misplace your settlement check before cashing it, contact the Settlement Administrator, who will replace it as long as you request a replacement before the void date on the face of the original check. If you do not request a replacement check before the void date, you will have no way to recover the Class Payment.</p>

Claims Released by Class Members	
<i>12. What Rights Am I Giving Up to Stay in the Class?</i>	<p>Unless you opt out, you will remain in the Class. If the settlement is approved and becomes final, all of the Court’s Orders will apply to you and legally bind you. You won’t be able to sue, continue to sue, or be part of any other lawsuit against Fashion Nova that is related to the subject matter or remedies of the claims in this Action. The rights you are giving up are part of the Released Claims, which are explained in Question 13, below.</p>
<i>13. What Are the Released Claims?</i>	<p>Each Class Member, and each of their respective successors, assigns, legatees, heirs, and personal representatives, will be deemed to have released Fashion Nova and its past, present, and future successors and predecessors in interest, all of their past or present subsidiaries, affiliates, direct or indirect parents, divisions, partners, and privities, and each of the foregoing entities’ past, present, and future officers, directors, shareholders, employees, agents, principals, heirs, representatives, accountants, auditors, consultants, attorneys, and insurers, (the “Released Defendant Parties”), of all manner of action, causes of action, demands, rights, suits, obligations, debts, contracts, agreements, promises, liabilities, damages, charges, penalties, losses, costs, expenses, and attorneys’ fees, of any nature whatsoever, under any law, including but not limited to any federal common or statutory law or any state’s common or statutory law, known or unknown, in law or equity, fixed or contingent, which they have or may have, those claims that were alleged or that could have been pleaded based upon the factual allegations alleged in the Action and that arose during the Class Period (the “Class Released Claims”), except for claims relating to the enforcement of the Agreement. For the avoidance of doubt, the Released</p>

	Defendant Parties are intended to include all individuals or entities who or which could be alleged to be liable for any of the alleged inaccessibility issues alleged in the Complaint against Fashion Nova. As the sole exception to the above, California Class Members who have timely and properly requested to opt out from the California Class, and each of their respective successors, assigns, legatees, heirs, and personal representatives, will be deemed to have released Fashion Nova and the Released Defendant Parties from all Released Claims save only claims for damages arising under the Unruh Civil Rights Act, California Civil Code § 51; such California Class Members will release claims for any injunctive relief under the Unruh Civil Rights Act and all other Released Claims.
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Opting Out of the Settlement	
<i>14. Who can Opt Out of the Settlement?</i>	Only California Class Members may choose to opt-out of the Settlement.
<i>15. What Does It Mean to Opt Out of the Settlement?</i>	If you want to keep the right to sue or continue to sue Fashion Nova at your expense for any claim related to the subject matter of this Action, and you do not want to receive a Class Payment from this settlement, you must take steps to get out of the settlement. This is called opting out of, or excluding yourself from, the settlement.
<i>16. How Can I Request to Opt Out of the Settlement?</i>	<p>To opt out, you must send a letter with the following information:</p> <ul style="list-style-type: none"> • Your full name, address, telephone number, and email address; • A statement that you wish to opt out of the Class in <i>Alcazar v. Fashion Nova, Inc.</i>, Case No. 4:20-cv-01434-JST; and • Your signature. <p>You can download a form to use for your opt-out request at www.FashionNovaAccessibilitySettlement.com.</p> <p>You must mail your signed opt-out request to:</p> <p style="text-align: center;"><i>Alcazar v. Fashion Nova, Inc.</i> c/o CPT Group, Inc. 50 Corporate Park Irvine, CA 92606</p> <p><i>Your opt-out request must be postmarked no later than October 20, 2025 or it will be invalid.</i></p> <p>You must make the request yourself. If someone else makes the request for you, it will not be valid.</p>
<i>17. If I Opt Out, Can I Still Get a Class Payment as a California Class Member?</i>	No. If you opt out, you are telling the Court that you don't want to be part of the Class in this settlement. You can only get a Class Payment if you are a member of the California Class, remain in the California Class, and submit an Approved Claim. See Question 9 for more information.
<i>18. If I Do Not Opt Out, Can I Sue Fashion Nova for the Same Claims Later?</i>	No. Unless you opt out, you are giving up the right to sue Fashion Nova regarding any claims that are related to the subject matter of the claims in this Action. You must opt out of this Action to start or continue with your own lawsuit or be part of any other lawsuit against Fashion Nova related to the subject matter of the claims in this Action.

The Lawyers Representing the Classes	
<i>19. Do I Have a Lawyer in This Case?</i>	<p>Yes. The Court appointed the following attorneys to represent you as Class Counsel:</p> <p style="text-align: center;">Thiago M. Coelho Wilshire Law Firm, PLC 3055 Wilshire Boulevard, 12th Floor Los Angeles, California 90010</p> <p>You do not have to pay Class Counsel out of your own pocket. If you want to be represented by your own lawyer and have that lawyer appear in Court for you in this case, you may hire one at your own expense.</p>
<i>20. How Will Class Counsel Be Paid?</i>	<p>Class Counsel will ask the Court for an award of attorneys' fees of up to \$1,287,500 (25% of the Gross Settlement Amount) and up to \$1,235,259.03 for their litigation expenses, as well as an incentive award of up to \$1,000 to the Class Representative. Class Counsel will move for both the incentive award and for attorneys' fees and costs, and the Court will determine the amounts to be awarded. All of these amounts, as well as the administrative and notice costs associated with the settlement, will be paid from the \$5,150,000 that the Parties settled for before making Class Payments to California Class Members.</p> <p>A copy of Class Counsel's motion for attorneys' fees and costs and for the Class Representative's incentive award will be available at www.FashionNovaAccessibilitySettlement.com by August 28, 2025.</p>
<i>21. May I Get My Own Lawyer?</i>	<p>If you are a Class Member, you are not required to hire your own lawyer because Class Counsel is representing you. However, if you want your own lawyer, you may hire one at your own expense. If you opt out of the settlement, you will no longer be represented by Class Counsel once the settlement is approved.</p>

Objecting to the Settlement	
<i>22. How Can I Tell the Court I Do Not Like the Settlement?</i>	<p>If you are a Class Member, you can tell the Court if there is something about the settlement that you do not like by submitting an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the proposed settlement. If the Court denies approval, no Class Payments will be sent out and the Action will continue.</p> <p>You may object to the settlement in writing by sending written notice to the Settlement Administrator. All written objections and supporting papers must (a) clearly identify the case name and number (<i>Alcazar v. Fashion Nova, Inc.</i>, Case No. 4:20-cv-01434-JST); (b) include your full name, address, telephone number, and email address of your attorney (if you are represented by counsel); (c) state the grounds for the objection; (d) be mailed to the Settlement Administrator at <i>Alcazar v. Fashion Nova, Inc.</i>, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606; and (e) be postmarked on or before October 20, 2025.</p> <p>You may also appear and request to make an objection at the final approval hearing before the Court on February 12, 2026, either in person or through</p>

	<p>your lawyer, if you choose to retain your own lawyer. The Court may elect to move the final approval hearing to a different date or time in its sole discretion, without providing further notice to the Classes. The date and time of the final approval hearing can be confirmed at www.FashionNovaAccessibilitySettlement.com.</p> <p>Before deciding whether to object, you may wish to see what Plaintiff and Fashion Nova are asking the Court to approve. At least 28 days before the final approval hearing, Class Counsel and/or Plaintiff will file in Court a Motion for Final Approval that includes, among other things, the reasons why they think the proposed settlement is fair. At least 30 days before October 20, 2025, Class Counsel and/or Plaintiff will file in Court a motion stating (i) the amount Class Counsel is requesting for attorneys' fees and litigation expenses and (ii) the amount the Class Representative is requesting as an incentive award. You can access these documents on the settlement website at www.FashionNovaAccessibilitySettlement.com.</p>
23. <i>What Is the Difference Between Objecting and Opting Out?</i>	<p>Objecting is simply telling the Court that you don't like something about the settlement. Opting out is telling the Court that you don't want to be part of the Classes. If you opt out, you cannot object because the settlement no longer affects you.</p>

The Court's Final Approval Hearing	
24. <i>What Is a Final Approval Hearing?</i>	<p>The Court will hold a hearing, called the "Final Approval Hearing," to decide whether to approve the settlement. You may attend and you may ask to speak, but you don't have to.</p>
25. <i>When and Where Will the Court Decide Whether to Approve the Settlement?</i>	<p>The Court will hold the final approval hearing on February 12, 2026, at 2:00 P.M., via Zoom Webinar at https://www.cand.uscourts.gov/jst before Judge Jon S. Tigar.</p> <p>To learn how to access the Zoom Webinar, please visit: https://www.cand.uscourts.gov/zoom/.</p> <p>At this hearing, the Court will decide whether to approve the settlement, Class Counsel's request for attorneys' fees and costs, and any incentive awards to the Class Representative. If there are objections, the Court will consider them. The Court may elect to move the final approval hearing to a different date or time in its sole discretion, without providing further notice to the Classes. The date and time of the final approval hearing can be confirmed at www.FashionNovaAccessibilitySettlement.com.</p> <p>If the Court approves the settlement and enters judgment, the Court's order and notice of judgment will be available on the settlement website at www.FashionNovaAccessibilitySettlement.com.</p>
26. <i>Do I Have to Attend the Final Approval Hearing?</i>	<p>No. Class Counsel will answer any questions the Court may have. However, you are welcome to come to the final approval hearing at your own expense and ask the Court to speak. If you send an objection by mail, you do not have to come to the final approval hearing to talk about it, but you may do so if you like. You may also pay your own lawyer to attend, but that is not necessary.</p>

27. <i>May I Speak at the Final Approval Hearing?</i>	You may ask the Court for permission to speak at the final approval hearing. You can attend (or hire a lawyer at your expense to attend on your behalf)
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If You Do Nothing	
28. <i>What Happens If I Do Nothing At All?</i>	If you are a Class Member and you do nothing, you will give up the rights explained in Question 13, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Fashion Nova related to the Action or for claims that in any way are related to the subject matter of the claims in this Action. If you are a California Class Member and do not timely submit a valid Claim Form, you will not receive a Class Payment.

More Information	
29. <i>How Can I Get More Information?</i>	<p>Visit the website at www.FashionNovaAccessibilitySettlement.com, where you will find the settlement agreement and other related documents. You may also call or write to Class Counsel or the Settlement Administrator using the information below.</p> <p style="text-align: center;"><u>Class Counsel</u> Thiago M. Coelho Wilshire Law Firm, PLC 3055 Wilshire Boulevard, 12th Floor Los Angeles, California 90010 Email: thiago.coelho@wilshirelawfirm.com Email: ConsumerLitigation@wilshirelawfirm.com</p> <p style="text-align: center;"><u>Settlement Administrator</u> <i>Alcazar v. Fashion Nova, Inc.</i> c/o CPT Group, Inc. 50 Corporate Park, Irvine, CA 92606 1-888-678-2596 FashionNovaAccessibilitySettlement@cptgroup.com</p> <p>You may also view Court documents filed in this case by going to the Court's website at Court's electronic docket system at https://ecf.cand.uscourts.gov/cgi-bin/ShowIndex.pl and entering the case number for this case, Case No. Case No. 4:20-cv-01434-JST. You can also inquire about reviewing court documents in the Clerk's Office at the at the Ronald V. Dellums Federal Building & United States Courthouse, 1301 Clay Street, Oakland, California 94612 by calling (510) 637-3530.</p> <p>Do NOT telephone the Court to obtain information about the settlement.</p>