UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re: Target Corporation Customer Data Security Breach Litigation

This document relates to:
All Financial Institution Cases

MDL No. 14-2522 (PAM/JJK)

NOTICE OF HEARING ON FINANCIAL INSTITUTION PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND NOTICE PLAN

PLEASE TAKE NOTICE that Financial Institution Plaintiffs Umpqua Bank, Mutual Bank, Village Bank, CSE Federal Credit Union, and First Federal Savings of Lorain will move this Court on December 2, 2015 at 2:00 p.m. in Courtroom 7D before the Honorable Paul A. Magnuson, United States District Judge, the United States Courthouse, 316 North Robert Street, St. Paul, Minnesota, for an Order: (1) certifying the Settlement Class for purposes of settlement; (2) appointing Financial Institution Plaintiffs as representatives of the Settlement Class; (3) appointing Financial Institution Plaintiffs' Co-Lead Counsel and the undersigned counsel as Settlement Class Counsel; (4) granting preliminary approval of the proposed Settlement; (5) approving the proposed form and manner of notice to the Settlement Class; (6) directing that the notice to the Settlement Class be disseminated by Settlement Administrator, Dahl Administration LLC, in the manner described in the Settlement and in the Declaration of Jeffrey D. Dahl; (7) establishing a deadline for Settlement Class members to request exclusion from the Settlement Class or file objections to the Settlement; and (8) setting the proposed

schedule for completion of further settlement proceedings, including scheduling the final fairness hearing.

Dated: December 2, 2015

Respectfully submitted,

CHESTNUT CAMBRONNE PA

By: /s/ Karl L. Cambronne
Karl L. Cambronne (MN 14321)
Jeffrey D. Bores (MN 227699)
Bryan L. Bleichner (MN 0326689)
17 Washington Avenue North, Suite 300
Minneapolis, MN 55401
Telephone: (612) 339-7300
kcambronne@chestnutcambronne.com
jbores@chestnutcambronne.com
bbleichner@chestnutcambronne.com

Coordinated Lead Counsel for Plaintiffs

ZIMMERMAN REED, LLP

By: /s/ Charles S. Zimmerman
Charles S. Zimmerman (MN 120054)
J. Gordon Rudd, Jr. (MN 222082)
Brian C. Gudmundson (MN 336695)
David M. Cialkowski (306526)
1100 IDS Center, 80 South 8th St.
Minneapolis, MN 55402
Telephone: (612) 341-0400
charles.zimmerman@zimmreed.com
gordon.rudd@zimmreed.com
brian.gudmundson@zimmreed.com
david.cialkowski@zimmreed.com

Lead Counsel for Financial Institution Plaintiffs