

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

ISRAEL GARCIA, individually and on  
behalf of a class of similarly situated individuals,

Plaintiff,

No.: 16-CV-02574-MJD-BRT

v.

TARGET CORPORATION, a Minnesota  
corporation,

**MOTION FOR PRELIMINARY  
APPROVAL OF CLASS  
ACTION SETTLEMENT**

Defendant.

---

**PLAINTIFF'S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

---

Plaintiff Israel Garcia (“Plaintiff”), through his undersigned counsel, and pursuant to Fed. R. Civ. P. 23 and Local Rule 7-1, hereby moves for preliminary approval of the Settlement Agreement reached with Target Corporation (“Target”) in this matter for claims brought pursuant to the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* By this Motion and the concurrently filed memorandum of law in support, Plaintiff seeks preliminary approval of the Settlement Agreement, proposed claims procedure, and the proposed form and method of class notice pursuant to Federal Rule of Civil Procedure 23(e).

Plaintiff also respectfully requests that the Court appoint Plaintiff as Class Representative and Myles McGuire, Evan M. Meyers, Eugene Y. Turin of McGuire Law,

P.C.; Daniel M. Hutchinson of Lief Cabraser Heimann & Bernstein, LLP; Aaron Siri of Siri Glimstad LLP; Jarrett L. Ellzey of Hughes Ellzey, LLP; and Robert K. Shelquist of Lockridge Grindal Nauen, PLLP, as Class Counsel.

Dated: June 21, 2019

Respectfully submitted,

ISRAEL GARCIA, individually and on behalf of a Class of similarly situated individuals

By: /s/ Eugene Y. Turin  
One of his Attorneys

Myles McGuire (*pro hac vice*)  
Evan M. Meyers (*pro hac vice*)  
Eugene Y. Turin (*pro hac vice*)  
McGuire Law, P.C.  
55 W. Wacker Dr., 9th Fl.  
Chicago, IL 60601  
Tel: (312) 893-7002  
mmcguire@mcgpc.com  
emeyers@mcgpc.com  
eturin@mcgpc.com

Robert K. Shelquist  
Lockridge Grindal Nauen, PLLP  
100 Washington Ave., Ste. 220  
Minneapolis, MN 55401  
Tel: (612) 339-6900  
rkshelquist@locklaw.com

Daniel M. Hutchinson  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Fl.  
San Francisco, CA 94111  
Tel: (415) 956-1000  
Fax: (415) 956-1008  
dhuthcinson@lchb.com

*Counsel for Plaintiff Israel Garcia and  
the Proposed Class Counsel*