

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF NEW YORK

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 TONY LUIB, individually and on behalf :
 of himself and all others similarly : Case No. 17-cv-03021 (BMC)
 situated, :
 :
 Plaintiff, :
 :
 - against - :
 :
 HENKEL CONSUMER GOODS INC., :
 :
 Defendant. :
 -----X

**SUPPLEMENTAL DECLARATION OF CAMERON R. AZARI, ESQ.
 ON SETTLEMENT NOTICE PLAN**

I, Cameron Azari, declare as follows:

1. My name is Cameron R. Azari, Esq. I am over the age of twenty-one and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am a nationally recognized expert in the field of legal notice and I have served as a legal notice expert in dozens of federal and state cases involving class action notice plans.
3. I am the Director of Legal Notice for Hilsoft Notifications, a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans. Hilsoft has been involved with some of the most complex and significant notices and notice programs in recent history. Hilsoft is a business unit of Epiq Systems Class Action & Claims Solutions, Inc. (“Epiq”). I executed a previous declaration that was filed in this matter; my February 28, 2019 *Declaration of Cameron R. Azari, Esq. on Settlement Notice Plan*, which outlined my experience and detailed the proposed notice plan in this matter.
4. The facts in this declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Hilsoft and

Epiq, who worked with us to implement the notification effort.

5. This declaration will describe the implementation of the Settlement Notice Plan (“Notice Plan” or “Plan”) for the parties’ Settlement in *Luib v. Henkel Consumer Goods Inc.*, Case No. 17-cv-03021, pending in the United States District Court for the Eastern District of New York.

OVERVIEW

6. On March 11, 2019, the Court entered an Order Granting Preliminary Approval of Settlement, Approval of Form Notice, and Scheduling of Final Approval Hearing (Dkt. No. 55, the “Order”), which appointed Epiq as the Notice and Settlement Administrator and approved the Notice Program (including proposed forms of notice). The Court also preliminarily certified a “Settlement Class,” defined as:

All persons and entities who, from May 19, 2013 to March 8, 2019, both resided in the United States (defined to including both states and territories of the United States), and purchased in the United States any variety or container size of Henkel’s Purex laundry detergent products that bear the phrase “Natural Elements” on the label, including but not limited to Purex Natural Elements Laundry Detergent, Purex Ultra Natural Elements HE Detergent, Purex Natural Elements HE Laundry Detergent, and Purex Natural Elements Ultra Concentrate HE, as well as all scents of such products, including but not limited to Linen & Lilies Scent, Lilac & White Lavender Scent, and Tropical Splash Scent (the “Products”).

Excluded from the Settlement Class are: (a) Henkel’s officers, directors, employees, and attorneys; (b) governmental entities; (c) the Court, the Court’s immediate family, and the Court staff; and (d) any person who timely and properly excludes himself or herself from the Settlement Class in accordance with the procedures approved by the Court.

7. After the Court’s preliminary approval of the Settlement, Hilsoft and Epiq began to implement the Notice Program. This declaration will detail the successful implementation of the Notice efforts and will also discuss the administration activity to date.

8. Rule 23 of the Federal Rules of Civil Procedure directs that the best notice practicable under the circumstances must include “individual notice to all members who can be identified through reasonable effort” and that “notice may be by one or more of the following: United States mail, electronic means, or other appropriate means.” Fed. R. Civ. P. 23(c)(2)(B). The notice effort here satisfied these requirements. Epiq received from the parties a small dataset (141 valid email addresses and 164 valid postal addresses) for potential members of the Settlement Class. Because data did not exist for the majority of the Settlement Class, an extensive paid online media plan was implemented that reached approximately 71.8% of potential Settlement Class Members (defined for media measurement purposes as “adults aged 18 years old and older who have purchased environmentally-friendly household cleaners”).

CAFA Notice

9. As described in the attached Declaration of Stephanie J. Fiereck, Esq. on Implementation of CAFA Notice, dated April 17, 2019 (“Fiereck Declaration”), on March 11, 2019, as required by the federal Class Action Fairness Act of 2005 (CAFA), 28 U.S.C. § 1715, and at the direction of Defendant Henkel Consumer Goods Inc., Epiq sent a CAFA notice packet (“CAFA Notice”) to 57 federal and state officials. The CAFA Notice was mailed by certified mail to 56 officials, including the Attorneys General of each of the 50 states, the District of Columbia, and the U.S. Territories. The CAFA Notice was also sent by United Parcel Service (“UPS”) to the Attorney General of the United States. The Fiereck Declaration is included as **Attachment 1** to this Declaration.

Individual Notice - Email

10. On April 12, 2019, Epiq disseminated a total of 141 Summary Email Notices to all potential Settlement Class Members for whom a facially valid email address was available. The

Summary Email Notice was created using an embedded html text format. This format provided easy to read text without graphics, tables, images and other elements that would increase the likelihood that the message could be blocked by Internet Service Providers (ISPs) and/or SPAM filters. Each Summary Email Notice was transmitted with a unique message identifier. If the receiving e-mail server could not deliver the message, a “bounce code” was returned along with the unique message identifier. For any Summary Email Notice for which a bounce code was received indicating that the message was undeliverable, at least two additional attempts were made to deliver the Notice by email. At the end of the initial Email Notice effort, 18 emails remained undeliverable.

11. The Summary Email Notice included an embedded link to the Settlement Website. By clicking the link, recipients are able to easily access the Long Form Notice, the Settlement Agreement, and other information about the Settlement, and they are also able to easily file an online Claim Form. The Summary Email Notice is included as **Attachment 2**.

Individual Notice – Mail

12. Prior to the initial Postcard Notice mailing, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the United States Postal Service (“USPS”).¹ Any addresses that were returned by the NCOA database as invalid were updated through a third-party address search service. In addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to ensure the quality of the zip code and verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. This address updating process is standard for the industry and for the majority of promotional mailings

¹ The NCOA database contains records of all permanent change of address submissions received by the USPS for the last four years. The USPS makes this data available to mailing firms and lists submitted to it are automatically updated with any reported move based on a comparison with the person’s name and known address.

that occur today.

13. On April 12, 2019, Epiq mailed 164 Summary Postcard Notices via USPS first class mail to known or potential Settlement Class Members with no associated email address. Each notice was a two image 4.25” x 5.5” Summary Postcard Notice. A copy of the Summary Postcard Notice as printed and mailed is included as **Attachment 3**. The return address on all of the Postcard Notices is a post office box maintained by Epiq. Just 2 Postcard Notices were returned as undeliverable.

14. Additionally, a Detailed Notice and a paper Claim Form was mailed via USPS first class mail to all persons who requested one via the toll-free phone number. As of July 5, 2019, 58 Detailed Notices have been mailed as a result of such requests. A copy of the Detailed Notice as printed and mailed is included as **Attachment 4**.

Internet Banner Notices

15. Banner Notices measuring 728 x 90 pixels, 300 x 600, 970 x 250, and 300 x 250 pixels were placed online across the popular display ad networks *Google Doubleclick* and *Sizmek*. Combined, these ad networks cover 90% of the U.S. population that is online. The Banner Notices appeared on thousands of websites including *Goodhousekeeping.com*, *HGTV.com*, *Weather.com*, and *Everydayfamily.com*. The Notices were targeted to adults 18+ in the U.S. who have purchased environmentally-friendly household cleaners. In addition, Banner Notices measuring 300 x 250 and 728 x 90 were placed on *Google Display Network's Affinity Audience* targeted to shoppers.

16. Banner notices measuring 254 x 133 pixels were also be placed on *Facebook*, targeted to adults 18+ and to adults 18+ who identified an interest in Purex and “natural” products. Facebook is the leading social networking site with over 200 million users in the U.S. In addition,

Banner Notices measuring 1080 x 1080 were placed on *Instagram* targeted to users who identified an interest in Purex products. Details of the online notice program as implemented are outlined in the table below.

<u>ONLINE</u>				
Network/Property	Impressions	Distribution	Duration	Unit Size
<i>Facebook</i>	90,530,274	National	4 weeks	254 x 133
<i>Instagram</i>	1,120,981	National	4 weeks	1080 x 1080
<i>Display Ad Networks (Google DoubleClick and Sizmek)</i>	315,061,764	National	4 weeks	300 x 600, 970 x 250, 300 x 250 & 728 x 90
<i>Google Display (Affinity Shoppers)</i>	9,496,409	National	4 weeks	300 x 250 & 728 x 90
Total Impressions:	416,209,428			

17. Combined, approximately 416 million adult impressions were generated by the Banner Notices, which ran from May 22, 2019 to June 20, 2019. Clicking on the banner linked the reader to the Settlement Website, where the reader could obtain detailed information about the Settlement and file an online claim. The Banner Notices are included as **Attachment 5**.

Internet Sponsored Search Listings

18. To make the Settlement Website easier to locate, sponsored search listings were acquired on the three most highly-visited internet search engines: Google, Yahoo!, and Bing. When search-engine visitors search on common keyword combinations—including “Laundry Detergent Settlement,” “Purex Class Action,” and “Detergent Settlement”—the sponsored search listing generally is displayed at the top of the page, above the search results, or in the upper right-hand column of the web-browser screen.

19. The sponsored search listings are set to run through the July 22, 2019 exclusion and objection deadlines. As of July 5, 2019, the sponsored listings have been displayed 66,891 times, resulting in 1,329 clicks that displayed the Settlement Website. A complete list of the sponsored

search keyword combinations is included as **Attachment 6**. An example of the sponsored search listing as displayed is included as **Attachment 7**.

Informational Release

20. To build additional reach and extend exposures, a party-neutral Informational Release was issued to approximately 5,000 general media (print and broadcast) outlets across the United States and 5,400 online databases and websites (including websites for large news outlets, local affiliate news stations, business journals, and trade organizations). The Informational Release served a valuable role by providing additional notice exposures beyond those already provided by the paid media. The Informational Release is included as **Attachment 8**.

Case Website, Toll-free Telephone Number, and Postal and Email Mailing Addresses

21. On April 11, 2019, a neutral, informational, Settlement Website (www.LaundryDetergentSettlement.com) was established so that members of the Settlement Class can obtain additional information and case documents, including the Long Form Notice, Settlement Agreement, Order Granting Preliminary Approval, paper Claim Form, and Answers to Frequently Asked Questions.

22. In addition, Settlement Class Members are able to file a Claim online through the Settlement Website. The Settlement Website also includes information on how members of the Settlement Class can request exclusion from the Settlement. The website address was prominently displayed in the Notices.

23. As of July 5, 2019, the Settlement Website has hosted 468,810 user sessions with a total of 1,785,747 page hits.

24. On April 11, 2019, a toll-free number (1-877-291-9488) was established to allow Class Members to call and get information about the Settlement in the form of recorded answers

to Frequently Asked Questions. Callers can also request that a Long Form Notice and Claim Form be sent by mail. This automated phone system is available 24 hours per day, 7 days per week. As of July 5, 2019, the toll-free number has handled 175 calls representing 433 minutes of use.

25. A post office box and an email inbox for correspondence about the Settlement were also established and maintained, allowing Settlement Class Members to contact the Settlement Administrator by mail and/or email with any specific requests or questions, including requests for exclusion. As of July 5, 2019, Epiq has received 15 pieces of correspondence by mail and 7,037 emails.

Exclusions and Objections

26. The deadline to request exclusion from the Settlement or to object to the Settlement is July 22, 2019. As of July 5, 2019, Epiq has received 1 request for exclusion from the Settlement Class. I am aware of no objections to the Settlement at the time of this declaration. After the exclusion request and objection deadline passes, Epiq will provide a completed Exclusion Request Report and address any objections that may relate to notice.

Status of Claims Process

27. As of July 5, 2019, Epiq has received 160,037 claims (159,746 online and 291 paper). With an August 10, 2019 claim filing deadline, these numbers are preliminary (additional claims will be received), and all claims are pending a complete review and audit by Epiq. There is a high likelihood that, after detailed review, the total number of valid claims will reduce from the total reported above, due to duplicate, withdrawn, or denied claims.

28. In accordance with Court's Preliminary Approval Order and the Settlement, Epiq will continue administering claims made through the August 10, 2019 deadline. If the Court

finally approves the Settlement, Epiq will cause all electronic and hard copy Claims to be processed, reviewed, and de-duplicated prior to preparing the finalized Distribution List. Once the finalized Distribution List has been prepared, Epiq will issue traditional bank checks to Claimants at the addresses that the Claimants provided during the claims process. In an effort to ensure that the checks will reach the intended Claimant, any checks returned as undeliverable by the USPS will be re-mailed to a forwarding address if one is available. Any checks that are returned as undeliverable by the USPS without a forwarding address will be subject to address verification searches (“skip tracing”), utilizing a wide variety of data sources, including public records, real estate records, electronic directory assistance listings, etc., to locate updated addresses. Checks will then be re-mailed to updated addresses located through skip tracing. After the completion of the distribution process, a final Distribution Report will be provided to the Court.

NOTICE PLAN REACH

29. In order to quantify the performance of the Notice Plan to the selected target audience (defined as “adults aged 18 years old and older who have purchased environmentally-friendly household cleaners”), data sources and tools that are commonly employed by experts in this field were used to analyze the reach² of the media portion of this Notice Program. These include GfK Mediamark Research & Intelligence, LLC (“MRI”) data,³ which provides statistically significant

² Reach is defined as the percentage of a class exposed to a notice, net of any duplication among people who may have been exposed more than once. Notice “exposure” is defined as the opportunity to read a notice.

³ GfK Mediamark Research & Intelligence, LLC (“MRI”) is a leading source of publication readership and product usage data for the communications industry. MRI offers comprehensive demographic, lifestyle, product usage and exposure to all forms of advertising media collected from a single sample. As the leading U.S. supplier of multimedia audience research, MRI provides information to magazines, televisions, radio, Internet, and other media, leading national advertisers, and over 450 advertising agencies—including 90 of the top 100 in the United States. MRI’s national syndicated data is widely used by companies as the basis for the majority of the media and marketing plans that are written for advertised brands in the U.S.

readership and product usage data, and Alliance for Audited Media (“AAM”)⁴ statements, which certify how many readers buy or obtain copies of publications. Online media planning data was provided by comScore, Inc.⁵ These tools, along with demographic breakdowns indicating how many people use each media vehicle, as well as computer software that take the underlying data and factor out the duplication among audiences of various media vehicles, allow us to determine the net (unduplicated) reach of a particular media schedule against the selected target. We combine the results of this analysis to help determine notice plan sufficiency and effectiveness.

30. Using this analysis, we can determine that the extensive paid online media plan that was implemented reached approximately 71.8% of potential Settlement Class Members (again, defined as “adults aged 18 years old and older who have purchased environmentally-friendly household cleaners”).

CONCLUSION

31. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, by federal and local rules and statutes, and further by case law pertaining to notice. This framework directs that the notice

⁴ Established in 1914 as the Audit Bureau of Circulations (“ABC”), and rebranded as Alliance for Audited Media (“AAM”) in 2012, AAM is a non-profit cooperative formed by media, advertisers, and advertising agencies to audit the paid circulation statements of magazines and newspapers. AAM is the leading third party auditing organization in the U.S. It is the industry’s leading, neutral source for documentation on the actual distribution of newspapers, magazines, and other publications. Widely accepted throughout the industry, it certifies thousands of printed publications as well as emerging digital editions read via tablet subscriptions. Its publication audits are conducted in accordance with rules established by its Board of Directors. These rules govern not only how audits are conducted, but also how publishers report their circulation figures. AAM’s Board of Directors is comprised of representatives from the publishing and advertising communities.

⁵ comScore, Inc. is a global leader in measuring the digital world and a preferred source of digital marketing intelligence. In an independent survey of 800 of the most influential publishers, advertising agencies and advertisers conducted by William Blair & Company in January 2009, comScore was rated the “most preferred online audience measurement service” by 50% of respondents, a full 25 points ahead of its nearest competitor.

program be designed to reach the greatest practicable number of potential Class Members and, in a settlement class action notice situation such as this, that the notice or notice program itself not limit knowledge of the availability of benefits—nor the ability to exercise other options—to Class Members in any way. All of these requirements were met in this case.

32. As stated above, using standard advertising media industry methodologies to calculate effectiveness of the notice plan, we arrive at a combined measurable reach of approximately 71.8%. Reach was enhanced further by the sponsored internet search listings and the Settlement Website. Many courts have accepted and understood that a 70% reach is more than adequate. In 2010, the Federal Judicial Center issued a Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide. This Guide states that, "the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70–95%." Here we were able to develop a Notice Plan that reached within that range.

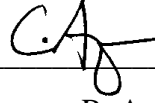
33. Our notice effort followed the guidance for how to satisfy due process obligations that a notice expert gleans from the United States Supreme Court's seminal decisions, which are: a) to endeavor to actually inform the class and b) to demonstrate that notice is reasonably calculated to do so:

- A. "But when notice is a person's due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it." *Mullane v. Central Hanover Trust*, 339 U.S. 306, 315 (1950).
- B. "[N]otice must be reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974) (citing *Mullane*, 339 U.S. at 314).

34. The Notice Program provided the best notice practicable under the circumstances of this case, conformed to all aspects of Federal Rule of Civil Procedure 23, and comported with the

guidance for effective notice articulated in the Manual for Complex Litigation 4th.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 8, 2019,
at Beaverton, Oregon.

A handwritten signature in black ink, appearing to read 'C. Azari', is written above a horizontal line.

Cameron R. Azari

Attachment 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

TONY LUIB, individually on behalf of himself and all others similarly situated,	:	
	:	Case No.: 1:17-cv-03021-BMC
<i>Plaintiff,</i>	:	
	:	
v.	:	
	:	
HENKEL CONSUMER GOODS INC.	:	
	:	
<i>Defendant.</i>	:	
	:	

**DECLARATION OF STEPHANIE J. FIERECK, ESQ.
ON IMPLEMENTATION OF CAFA NOTICE**

I, STEPHANIE J. FIERECK, ESQ., hereby declare and state as follows:

1. My name is Stephanie J. Fiereck, Esq. I am over the age of 21 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am the Legal Notice Manager for Epiq Class Action & Claims Solutions, Inc. (“Epiq”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans.
3. Epiq is a firm with more than 20 years of experience in claims processing and settlement administration. Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service, claims database management, claim adjudication, funds management and distribution services.
4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

CAFA NOTICE IMPLEMENTATION

5. At the direction of counsel for the Defendant Henkel Consumer Goods Inc., 57 officials, which included the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia and the United States Territories were identified to receive the CAFA notice.

6. Epiq maintains a list of these state and federal officials with contact information for the purpose of providing CAFA notice. Prior to mailing, the names and addresses selected from Epiq's list were verified, then run through the Coding Accuracy Support System ("CASS") maintained by the United States Postal Service ("USPS").¹

7. On March 11, 2019, Epiq sent 57 CAFA Notice Packages ("Notice"). The Notice was mailed by certified mail to 56 officials, including the Attorneys General of each of the 50 states, the District of Columbia and the United States Territories. The Notice was also sent by United Parcel Service ("UPS") to the Attorney General of the United States. The CAFA Notice Service List (USPS Certified Mail and UPS) is attached hereto as **Exhibit 1**.

8. The materials sent to the Attorneys General included a cover letter which provided notice of the proposed settlement of the above-captioned case. The cover letter is attached hereto as **Exhibit 2**.

9. The cover letter was accompanied by a CD, which included the following:

- a. Class Action Complaint and Civil Cover Sheet;
- b. All papers filed with Plaintiff's Motion, including all exhibits, were enclosed as "**Exhibit 2**" and contained the following documents among others:

¹ CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

- The Class Settlement Agreement, including all exhibits, attached as Exhibit 1 to the Declaration of Michael R. Reese in Support of Plaintiff's Motion;
- The Class Notice or Long Form Notice, attached as Exhibit B to the Class Settlement Agreement; and
- The Summary Notice or Short Form Notice, attached as Exhibit D to the Class Settlement Agreement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
April 17, 2019.


Stephanie J. Fiereck, Esq.

Exhibit 1

UPS

Company	FullName	Address1	Address2	City	State	Zip
US Department of Justice	William Barr	950 Pennsylvania Ave NW		Washington	DC	20530

CAFA Notice Service List

USPS Certified Mail

Company	FullName	Address1	Address2	City	State	Zip
Office of the Attorney General	Kevin G Clarkson	PO Box 110300		Juneau	AK	99811
Office of the Attorney General	Steve Marshall	501 Washington Ave		Montgomery	AL	36104
Office of the Attorney General	Leslie Carol Rutledge	323 Center St	Suite 200	Little Rock	AR	72201
Office of the Attorney General	Mark Brnovich	2005 N Central Ave		Phoenix	AZ	85004
Office of the Attorney General	CAFA Coordinator	Consumer Law Section	455 Golden Gate Ave Ste 11000	San Francisco	CA	94102
Office of the Attorney General	Phil Weiser	Ralph L Carr Colorado Judicial Center	1300 Broadway 10th Fl	Denver	CO	80203
Office of the Attorney General	William Tong	55 Elm St		Hartford	CT	06106
Office of the Attorney General	Karl A. Racine	441 4th St NW		Washington	DC	20001
Office of the Attorney General	Kathy Jennings	Carvel State Office Bldg	820 N French St	Wilmington	DE	19801
Office of the Attorney General	Ashley Moody	State of Florida	The Capitol PL-01	Tallahassee	FL	32399
Office of the Attorney General	Chris Carr	40 Capitol Square SW		Atlanta	GA	30334
Department of the Attorney General	Clare E. Connors	425 Queen St		Honolulu	HI	96813
Iowa Attorney General	Thomas J Miller	1305 E Walnut St		Des Moines	IA	50319
Office of the Attorney General	Lawrence G Wasden	700 W Jefferson St Ste 210	PO Box 83720	Boise	ID	83720
Office of the Attorney General	Kwame Raoul	100 W Randolph St		Chicago	IL	60601
Indiana Attorney General's Office	Curtis T Hill Jr	Indiana Government Center South	302 W Washington St 5th Fl	Indianapolis	IN	46204
Office of the Attorney General	Derek Schmidt	120 SW 10th Ave 2nd Fl		Topeka	KS	66612
Office of the Attorney General	Andy Beshear	Capitol Ste 118	700 Capitol Ave	Frankfort	KY	40601
Office of the Attorney General	Jeff Landry	1885 N Third St		Baton Rouge	LA	70802
Office of the Attorney General	Maura Healey	1 Ashburton Pl		Boston	MA	02108
Office of the Attorney General	Brian E. Frosh	200 St Paul Pl		Baltimore	MD	21202
Office of the Attorney General	Aaron Frey	6 State House Sta		Augusta	ME	04333
Department of Attorney General	Dana Nessel	PO Box 30212		Lansing	MI	48909
Office of the Attorney General	Keith Ellison	445 Minnesota St	Suite 1400	St Paul	MN	55101
Missouri Attorney General's Office	Eric Schmitt	PO Box 899		Jefferson City	MO	65102
MS Attorney General's Office	Jim Hood	Walter Sillers Bldg	550 High St Ste 1200	Jackson	MS	39201
Office of the Attorney General	Tim Fox	Department of Justice	PO Box 201401	Helena	MT	59620
Attorney General's Office	Josh Stein	9001 Mail Service Ctr		Raleigh	NC	27699
Office of the Attorney General	Wayne Stenehjem	State Capitol	600 E Boulevard Ave Dept 125	Bismarck	ND	58505
Nebraska Attorney General	Doug Peterson	2115 State Capitol		Lincoln	NE	68509
Office of the Attorney General	Gordon MacDonald	NH Department of Justice	33 Capitol St	Concord	NH	03301
Office of the Attorney General	Gurbir S Grewal	8th Fl West Wing	25 Market St	Trenton	NJ	08625
Office of the Attorney General	Hector Balderas	408 Galisteo St	Villagra Bldg	Santa Fe	NM	87501
Office of the Attorney General	Aaron Ford	100 N Carson St		Carson City	NV	89701
Office of the Attorney General	Letitia James	The Capitol		Albany	NY	12224
Office of the Attorney General	Dave Yost	30 E Broad St 14th Fl		Columbus	OH	43215
Office of the Attorney General	Mike Hunter	313 NE 21st St		Oklahoma City	OK	73105
Office of the Attorney General	Ellen F Rosenblum	Oregon Department of Justice	1162 Court St NE	Salem	OR	97301
Office of the Attorney General	Josh Shapiro	16th Fl Strawberry Square		Harrisburg	PA	17120
Office of the Attorney General	Peter F Neronha	150 S Main St		Providence	RI	02903
Office of the Attorney General	Alan Wilson	Rembert Dennis Office Bldg	1000 Assembly St Rm 519	Columbia	SC	29201
Office of the Attorney General	Jason Ravnsborg	1302 E Hwy 14 Ste 1		Pierre	SD	57501
Office of the Attorney General	Herbert H. Slatery III	PO Box 20207		Nashville	TN	37202
Office of the Attorney General	Ken Paxton	300 W 15th St		Austin	TX	78701
Office of the Attorney General	Sean D. Reyes	Utah State Capitol Complex	350 North State St Ste 230	Salt Lake City	UT	84114
Office of the Attorney General	Mark R. Herring	202 North Ninth Street		Richmond	VA	23219
Office of the Attorney General	TJ Donovan	109 State St		Montpelier	VT	05609
Office of the Attorney General	Bob Ferguson	800 Fifth Avenue	Suite 2000	Seattle	WA	98104
Office of the Attorney General	Josh Kaul	PO Box 7857		Madison	WI	53707
Office of the Attorney General	Patrick Morrissey	State Capitol Complex	Bldg 1 Room E 26	Charleston	WV	25305
Office of the Attorney General	Bridget Hill	2320 Capitol Avenue		Cheyenne	WY	82002
Department of Legal Affairs	Talauega Eleasalo V. Ale	Executive Office Building	3rd Floor	Pago Pago	AS	96799
Attorney General Office of Guam	Leevin T Camacho	Administration Division	590 S Marine Corps Dr Ste 901	Tamuning	GU	96913
Office of the Attorney General	Edward Manibusan	Administration Bldg	PO Box 10007	Saipan	MP	96950
PR Department of Justice	Wanda Vazquez Garced	Apartado 9020192		San Juan	PR	00902
Department of Justice	Carol Thomas-Jacobs	34-38 Kronprindsens Gade	GERS Bldg 2nd Fl	St Thomas	VI	00802

Exhibit 2



ROCKEFELLER CENTER
1270 AVENUE OF THE AMERICAS
24TH FLOOR
NEW YORK, NY 10020
T 212.307.5500 F 212.307.5598 www.Venable.com

March 11, 2019

Edward P. Boyle

VIA UPS or USPS Certified Mail

T 212.808.5675
F 212.307.5598
epboyle@venable.com

The Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

The State Attorneys General and other "appropriate state officials" as defined by 28 U.S.C. § 1715(a)(2) (See Attached Distribution List)

Re: Notice of Proposed Class Action Settlement in *Luib v. Henkel Consumer Goods Inc.*, No. 1:17-cv-03021-BMC (E.D.N.Y.) (Cogan, J.)

Dear Sir/Madam:

We write on behalf of Henkel Consumer Goods Inc. ("Henkel") in connection with the action referenced above, which is pending in the U.S. District Court for the Eastern District of New York before the Honorable Brian M. Cogan (the "Action"). Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, Henkel hereby provides notice that on March 1, 2019, Plaintiff Tony Luib ("Plaintiff") filed with the Court an Unopposed Motion for Preliminary Approval of Class Action Settlement, Preliminary Certification of Settlement Class, and Approval of Notice Plan (the "Motion").

In compliance with § 1715(b) of CAFA, Henkel is providing you with the information and documents described in the statute, as detailed below. These materials are contained on the enclosed CD-ROM:

- 28 U.S.C. § 1715(b)(1): A copy of the Class Action Complaint and Civil Cover Sheet filed by Plaintiff in the Action on May 19, 2017, enclosed as "**Exhibit 1**."
- 28 U.S.C. § 1715(b)(2): There are currently no judicial hearings scheduled in the Action.
- 28 U.S.C. § 1715(b)(3)-(b)(4): A copy of all papers filed with Plaintiff's Motion, including all exhibits, is enclosed as "**Exhibit 2**" and contains the following documents, among others:
 - The Class Settlement Agreement, including all exhibits, attached as Exhibit 1 to the Declaration of Michael R. Reese in Support of Plaintiff's Motion (*see*

VENABLE LLP

March 11, 2019

Page 2

§ 1715(b)(4));

- The Class Notice or Long Form Notice, attached as Exhibit B to the Class Settlement Agreement (*see* § 1715(b)(3)); and
 - The Summary Notice or Short Form Notice, attached as Exhibit D to the Class Settlement Agreement (*see* § 1715(b)(3)).
- 28 U.S.C. § 1715(b)(5): Other than the Class Settlement Agreement, there are no settlement agreements or other agreements contemporaneously made between class counsel and counsel for Henkel.
 - 28 U.S.C. § 1715(b)(6): At the time of this notice, the Court has not issued any final judgment or notice of dismissal in the Action.
 - 28 U.S.C. § 1715(b)(7): Henkel sells the products which are the subject matter of this Action nationwide, including the United States Territories, and so it is possible that class members may be domiciled anywhere in the United States and its Territories. Henkel does not sell the products directly to consumers, nor does it have means to reliably track where consumers may purchase the products. Class member awards are subject to the information provided by class members on the claim form. Therefore, it is not feasible to estimate the number or domicile of potential class members, nor the estimated awards class members may receive at this time.
 - 28 U.S.C. § 1715(b)(8): The Court has not issued an opinion related to the settlement at the time of this notice.

If you have any questions about this notice, the Action, the proposed settlement, or the enclosed materials, or if you need any further information, please contact me via telephone at 212-808-5675, via email at epboyle@venable.com, or via letter at 1270 Avenue of the Americas, New York, New York 10020.

Respectfully,



Edward P. Boyle

encl.

cc: Counsel of Record (*via email*)

Attachment 2

From: mail@msgbsvc.com on behalf of Luib v. Henkel Purex Settlement
<info@laundrydetergentsettlement.com>
Sent:
To:
Subject: Court Authorized Notice of Settlement

If you purchased any Purex Natural Elements Laundry Detergent Products, you may be eligible to receive a payment from a Class Action Settlement.

If you purchased any Defendant Henkel Consumer Goods Inc.'s ("Defendant") Purex laundry detergent products that bear the phrase "Natural Elements" on the label, you may be eligible to receive a payment from a Class Action Settlement ("Settlement"). A lawsuit was filed against Defendant alleging that the "Natural Elements" statements on the labeling, marketing, and advertising of the Products are misleading because they include synthetic ingredients. The case was filed by Tony Luib ("Plaintiff") and is called *Luib v. Henkel Consumer Goods Inc.*, Case No. 1:17-cv-03021-BMC (E.D.N.Y.). Defendant denies that it has done anything wrong, or that the label is untrue or misleading in any way. The Court has not decided who is right. Both sides have agreed to settle the dispute and provide an opportunity for payments and other benefits to Settlement Class Members (defined below).

WHO IS INCLUDED IN THE SETTLEMENT?

The Settlement Class Members include all persons and entities in the United States or its territories, from May 19, 2013 to **March 8, 2019**, that both resided in the United States (defined as including both states and territories of the United States), and purchased any of the Products in the United States. "**Products**" means all varieties and container sizes of Henkel's Purex laundry detergent products that bear the phrase "Natural Elements" on the label, including but not limited to Purex Natural Elements Laundry Detergent, Purex Ultra Natural Elements HE Detergent, Purex Natural Elements HE Laundry Detergent, and Purex Natural Elements Ultra Concentrate HE, as well as all scents of such products, including but not limited to Linen & Lilies Scent, Lilac & White Lavender Scent, and Tropical Splash Scent, regardless of unit size, marketed and sold by the Defendant in the United States. More information about the Settlement and the Products involved in the Settlement is available at the Settlement website, laundrydetergentsettlement.com, or by calling 877-291-9488.

WHAT DOES THE SETTLEMENT PROVIDE?

The Settlement provides for a Qualified Settlement Fund in the amount of \$1,500,000 to pay (1) eligible Claims submitted by Settlement Class Members; (2) the fees and expenses of the attorneys representing Plaintiff and the Settlement Class in the lawsuit ("Class Counsel"); (3) notice and claim administration expenses; (4) any necessary taxes; and (5) any Incentive Awards made by the Court to Plaintiff. Settlement Class Members who timely submit valid Claim Forms are entitled to receive a cash payment from the Qualified Settlement Fund. The actual amount recovered by each Settlement Class Member will not be determined until after the Claim Period has ended and all Claims have been calculated.

WHAT ARE MY RIGHTS?

Submit a Claim Form. If you wish to participate in the Settlement and be eligible to receive benefits under the Settlement, you must fill out and submit a Claim Form by **August 10, 2019**. You can obtain a Claim Form by (1) visiting the Settlement website, laundrydetergentsettlement.com, where you can file your Claim online or print a Claim Form to submit by mail; (2) mailing a written request for a Claim Form to the Settlement Administrator: P.O. Box 3240, Portland, OR 97208-3240; or (3) emailing the Settlement Administrator at info@laundrydetergentsettlement.com. If you do not timely submit a valid Claim Form and do not exclude yourself from the Settlement, you will be bound by the Settlement but will not receive any benefits of the Settlement.

Object to the Settlement. If you do not agree with the Settlement or any part of it, you may submit a written objection to the Court. The deadline for submitting an objection is **July 22, 2019**.

“Opt Out” or Exclude Yourself from the Settlement. If you do not want a payment from the Settlement, and you want to keep the right to sue or continue to sue the Defendant on your own about the claims released in this Settlement, you must exclude yourself by **July 22, 2019**, or you give up any right to sue the Defendant for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately. If you exclude yourself, you cannot get money from this Settlement. The class notice, available at laundrydetergentsettlement.com, explains how to exclude yourself or object. If you do nothing, you will be bound by the Court’s decisions.

THE COURT’S FINAL APPROVAL HEARING

The Court will hold a hearing on **August 19, 2019** to consider whether to approve the Settlement, Class Counsel’s request for attorneys’ fees of up to thirty-three percent (33%) of the Qualified Settlement Fund in addition to reimbursement for expenses and costs, and an Incentive Award for the Plaintiff of \$7,500 from the Qualified Settlement Fund. You or your own lawyer may appear and speak at the hearing at your own expense.

FOR MORE INFORMATION

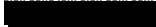
Call Toll-Free at 877-291-9488 or Visit laundrydetergentsettlement.com

Please note: This e-mail message was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message

If you would prefer not to receive further messages from this sender, please [Click Here](#) and confirm your request.

Attachment 3

Public Settlement Administration
PO Box 3240
Portland, OR 97208-3240



A lawsuit was filed against Defendant Henkel Consumer Goods Inc. alleging that the “Natural Elements” statement on the labeling, marketing, and advertising of certain Purex laundry detergent products is misleading because they include synthetic ingredients. Defendant denies it has done anything wrong, and the Court has not decided who is right. Both sides have decided to settle the dispute.

WHO IS INCLUDED IN THE SETTLEMENT?

The Settlement Class Members include all persons and entities that, from May 19, 2013 to March 8, 2019, both resided in the U.S. or its territories and purchased in the U.S. or its territories any variety and container size of Henkel’s Purex laundry detergent products that bear the phrase “Natural Elements” on the label.

WHAT DOES THE SETTLEMENT PROVIDE?

The Settlement provides for \$1,500,000 to pay (1) eligible claims submitted by Settlement Class Members; (2) the fees and expenses of the attorneys representing the Plaintiff and the Settlement Class in the lawsuit; (3) notice and claim administration expenses; (4) any necessary taxes; and (5) any Incentive Award made by the Court to Plaintiff.

WHAT ARE MY RIGHTS?

Submit a Claim Form. If you wish to be eligible to receive benefits under the Settlement, you must fill out and submit a Claim Form by **August 10, 2019**. You can obtain a Claim Form by (1) visiting LaundryDetergentSettlement.com; (2) mailing a written request for a Claim Form to P.O. Box 3240, Portland, OR 97208-3240; or (3) emailing info@LaundryDetergentSettlement.com. **If you do not timely submit a valid Claim Form and do not exclude yourself from the Settlement, you will be bound by the Settlement but will not receive any benefits of the Settlement.**

Object to the Settlement. If you do not agree with the Settlement or any part of it, you may submit a written objection to the Court by **July 22, 2019**.

“Opt Out” or Exclude Yourself from the Settlement. If you do not want a payment from the Settlement, and you want to keep the right to sue or continue to sue the Defendant on your own about the claims released in this Settlement, you must exclude yourself by **July 22, 2019**.

THE COURT’S FINAL APPROVAL HEARING

The Court will hold a hearing on **August 19, 2019** to consider whether to approve the Settlement, Class Counsel’s request for attorneys’ fees of up to 33% of the Qualified Settlement Fund in addition to reimbursement for expenses and costs, and an Incentive Award for the Plaintiff of \$7,500 from the Qualified Settlement Fund.

For more information:

Call Toll-Free at 877-291-9488 or visit LaundryDetergentSettlement.com

Attachment 4

Purex Settlement Administrator
PO Box 3240
Portland, OR 97208-3240



000 0000001 00000000 0001 0014 00002 INS:
[Redacted]

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UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

**If you purchased any Purex Natural Elements Products
Between May 19, 2013 and March 8, 2019,
You May be Eligible to Receive a Payment from a Class Action Settlement.**

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

- A proposed nationwide Settlement has been reached in a class action lawsuit involving all varieties and container sizes of Defendant Henkel Consumer Goods Inc.’s (“Defendant”) Purex laundry detergent products that bear the phrase “Natural Elements” on the label (“Products”). The Settlement resolves litigation over Defendant’s labeling of the Products.
- You may be eligible to participate in the proposed Settlement, if it is finally approved, if you purchased any Products between **May 19, 2013** and **March 8, 2019**.
- The Settlement will provide payments to those who qualify. You will need to file a Claim Form at LaundryDetergentSettlement.com to get a payment from the Settlement.
- Your legal rights are affected whether you act or do not act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY AUGUST 10, 2019	This is the only way you can receive a payment.
EXCLUDE YOURSELF BY JULY 22, 2019	You will not receive a payment from the Settlement. This is the only option that allows you to ever be a part of any other lawsuit against the Defendant about the labeling of the Products or legal claims in this case.
OBJECT BY JULY 22, 2019	Submit a written objection to the Court about why you think the settlement is unfair, inadequate, or unreasonable.
GO TO A HEARING AUGUST 19, 2019 AT 10AM	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	You will not receive a payment from the Settlement. You will give up your rights to ever sue the Defendant about the labeling of the Products or the legal claims in this case.

- These rights and options—and the deadlines to exercise them—are explained in this notice. The deadlines may be moved, canceled, or otherwise modified, so please check the Settlement Website, LaundryDetergentSettlement.com, regularly for updates and further details.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.



WHAT THIS NOTICE CONTAINS:

BASIC INFORMATION

1. Why is there a notice?
2. What is this lawsuit about?
3. Why is this a class action?
4. Why is there a Settlement?

WHO IS IN THE SETTLEMENT?

5. How do I know if I am in the Settlement?
6. Which Products are included in the Settlement?
7. What if I am still not sure if I am included in the Settlement?

SETTLEMENT BENEFITS

8. What does the Settlement provide?
9. What can I get from the Settlement?
10. What am I giving up to stay in the Class?

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13. How do I get out of the Settlement?
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19. How will the lawyers be paid?

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21. Do I have to come to the hearing?
22. May I speak at the hearing?

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23. What happens if I do nothing at all?

GETTING MORE INFORMATION

24. How do I get more information?

BASIC INFORMATION

1. Why is there a notice?

You have a right to know about a proposed Settlement of a class action lawsuit, and about your options, before the Court decides whether to approve the Settlement.

The Court in charge of this case is the United States District Court for the Eastern District of New York (the “Court”), and the case is called *Luib v. Henkel Consumer Goods Inc.*, Case Number. 1:17-cv-03021-BMC. The individual who sued is called the Plaintiff, and the company he sued, Henkel Consumer Goods Inc., is called the Defendant.

2. What is this lawsuit about?

The lawsuit alleges that the “Natural Elements” statements on the labeling, marketing, and advertising of the Products are misleading because the Products include synthetic ingredients. Defendant asserts that the label is accurate in all respects. The Court has not decided who is right.

3. Why is this a class action?

In a class action, one or more people, called the “Class Representative(s),” sue on behalf of people who have similar claims. All these people are in a “class” or are “class members,” except for those who exclude themselves from the class. United States District Court Judge Brian M. Cogan in the United States District Court for the Eastern District of New York is in charge of this class action.

4. Why is there a Settlement?

The Defendant is not admitting that it did anything wrong, but both sides want to avoid the cost of further litigation. The Court has not decided in favor of the Plaintiff or the Defendant. The Class Representative and his attorneys think the Settlement is best for everyone who may have been affected. The Settlement provides the opportunity for Settlement Class Members to receive Settlement benefits.

WHO IS IN THE SETTLEMENT?

5. How do I know if I am in the Settlement?

The Settlement Class includes all persons and entities who, from **May 19, 2013** to **March 8, 2019** (the “Class Period”), both resided in the United States (defined as including both states and territories of the United States) and purchased any of the Products in the United States. Excluded from the Settlement Class are: (a) Defendant’s officers, directors, employees, and attorneys; (b) governmental entities; (c) the Court, the Court’s immediate family, and the Court staff; and (d) any person who timely and properly excludes himself or herself from the Settlement Class in accordance with the procedures approved by the Court.

6. Which Products are included in the Settlement?

The Settlement includes all varieties and container sizes of Henkel’s Purex laundry detergent products that bear the phrase “Natural Elements” on the label, including but not limited to Purex Natural Elements Laundry Detergent, Purex Ultra Natural Elements HE Detergent, Purex Natural Elements HE Laundry Detergent, and Purex Natural Elements Ultra Concentrate HE, as well as all scents of such products, including but not limited to Linen & Lilies Scent, Lilac & White Lavender Scent, and Tropical Splash Scent, regardless of unit size, that were sold in the United States or its territories during the Class Period.



7. What if I am still not sure if I am included in the Settlement?

If you are not sure whether you are a Settlement Class Member, or have any other questions about the Settlement Agreement, you should visit the Settlement Website, LaundryDetergentSettlement.com, or call the toll-free number, 877-291-9488.

SETTLEMENT BENEFITS

8. What does the Settlement provide?

The Settlement provides for a Qualified Settlement Fund in the amount of \$1,500,000. The Settlement Fund will be to pay (1) Eligible Claims submitted by Settlement Class Members; (2) Attorneys' Fees and Expenses; (3) Notice and Claim Administration Expenses; (4) any necessary taxes; and (5) any Incentive Award made by the Court to Plaintiff. Settlement Class Members who timely submit valid Claim Forms are entitled to receive a cash payment from the Settlement. The actual amount recovered by each Settlement Class Member will not be determined until after the Claim Period has ended and all Claims have been calculated.

9. What can I get from the Settlement?

If you submit a valid Claim Form by the deadline, you can get a payment from the Settlement. For details regarding how payment amounts will be calculated, please visit the Settlement Website, LaundryDetergentSettlement.com.

10. What am I giving up to stay in the Class?

Unless you exclude yourself from the Settlement, you cannot sue the Defendant, continue to sue, or be part of any other lawsuit against the Defendant about the claims released in this Settlement. It also means that all of the decisions by the Court will bind you. Below is a summary of Released Claims. The full Release is described more fully in the Settlement Agreement and describes exactly the legal claims that you give up if you stay in the Settlement Class. The Settlement Agreement is available at the Settlement Website, LaundryDetergentSettlement.com.

“Released Claims” means, with the exception of claims for bodily injury, any claim, cross-claim, liability, right, demand, action, suit, matter, obligation, damage, restitution, disgorgement, loss or cost, attorney’s fee, expense, indemnity, or cause of every kind and/or description that Plaintiff, the Settlement Class or any member thereof had or have, including assigned claims, whether in arbitration, administrative, or judicial proceedings, whether in law or equity, whether as individual claims, claims asserted on a class basis or on behalf of the general public, whether known or unknown, asserted or unasserted, suspected or unsuspected, latent or patent, that is, has been, could reasonably have been, or in the future might reasonably be asserted by Plaintiff or any members of the Settlement Class, either in the Action or in any action or proceeding in this Court or in any other court or forum, regardless of legal theory or the law under which such action may be brought, and regardless of the type or amount of relief or damages claimed, against any of the Released Persons (defined below), arising out of or relating to “natural” or other nature-related representations claims, images or colors, including but not limited to the term “Natural Elements” and other uses of “natural” or similar terms, on the labeling, marketing, ingredients, or advertising of the Products, through any medium (including but not limited to on-label, Internet, television, radio, and print). Released Claims do not include any claims for bodily injury.

“Released Persons” includes Henkel Consumer Goods Inc., Henkel Corporation, and Henkel U.S. Operations Corporation, their successors and predecessors, each of their parents, subsidiaries, affiliates, and any of their officers, directors, employees, shareholders, partners, privies, agents, attorneys, representatives, accountants, insurers, assignees, trustees, executors, and all persons acting by, through, under the direction of, or in concert with them. Released Persons also means and includes all suppliers, distributors, resellers, retailers, customers, co-packers, advertisers, and any other persons involved in the development, advertising, marketing, labeling, formulation, distribution, or sale of the Products.

HOW TO GET A PAYMENT

11. How can I get a payment?

To be eligible to receive a payment from the Settlement, you must complete and submit a valid and timely Claim Form. You can complete and submit your Claim Form online at the Settlement Website, LaundryDetergentSettlement.com. The Claim Form can be downloaded from the Settlement Website and submitted via mail, as well. You can request a Claim Form be sent to you by sending a written request to the Settlement Administrator by mail or by email.

MAIL: Purex Settlement Administrator
P.O. Box 3240
Portland, OR 97208-3240

EMAIL: info@LaundryDetergentSettlement.com

Please read the instructions carefully, fill out the Claim Form, and mail it postmarked no later than **August 10, 2019** to: Purex Settlement Administrator, P.O. Box 3240, Portland, OR 97208-3240, or submit your Claim Form online at the Settlement Website, LaundryDetergentSettlement.com, by **August 10, 2019**.

If you do not submit a valid Claim Form by the deadline, you will not receive a payment.

12. When will I get my payment?

Payments will be mailed to Settlement Class Members who send in valid and timely Claim Forms after the Court grants “final approval” to the Settlement and after any and all appeals are resolved. If the Court approves the Settlement after a hearing on **August 19, 2019**, there may be appeals. It’s always uncertain whether these appeals can be resolved, and resolving them can take time.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from the Settlement, and you want to keep the right to sue or continue to sue the Defendant on your own about the claims released in this Settlement, then you must take steps to get out. This is called excluding yourself—or it is sometimes referred to as “opting out” of the Settlement Class.

13. How do I get out of the Settlement?

To exclude yourself (or “Opt-Out”) from the Settlement, you must complete and mail to the Settlement Administrator a written request that includes the following:

- Your name and address;
- The name of the case: *Luib v. Henkel Consumer Goods Inc.*, Case No. 1:17-cv-03021-BMC;
- A statement that you want to be excluded from this Settlement; and
- Your signature. Your exclusion request must be signed by you personally, and may not be signed by an attorney or other person acting on your behalf.

You must mail your exclusion request, postmarked no later than **July 22, 2019**, to:

Purex Settlement Administrator
P.O. Box 3240
Portland, OR 97208-3240

If you do not include the required information or submit your request for exclusion on time, you will remain a Settlement Class Member and will not be able to sue the Defendant about the claims in this lawsuit. In that event, you also will not be eligible to receive a payment from the Settlement.



14. If I do not exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendant or any other Released Persons for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately. You must exclude yourself from this Settlement Class to pursue or continue your own lawsuit against Defendant or any other Released Persons concerning the labeling, marketing, ingredients, or advertising of the Products. If you properly exclude yourself from the Settlement Class, you shall not be bound by any orders or judgments entered in the Action relating to the Settlement.

15. If I exclude myself, can I still get a payment?

No. You will not get any money from the Settlement if you exclude yourself. If you exclude yourself from the Settlement, do not send in a Claim Form asking for benefits.

OBJECTING TO THE SETTLEMENT

16. How can I tell the Court if I do not like the Settlement?

A Settlement Class Member may object to the proposed Settlement. A Settlement Class Member may object to the Settlement either on his or her own without an attorney, or through an attorney hired at his or her expense. Any objection must be in writing, signed by the Settlement Class Member (and his or her attorney, if individually represented), filed with the Court, with a copy delivered to Class Counsel and Defendant’s Counsel at the addresses set forth below, no later than **July 22, 2019**. Any objection shall contain a caption or title that identifies it as “Objection to Class Settlement in *Luib v. Henkel Consumer Goods Inc.* (E.D.N.Y. Case No. 1:17-cv-03021-BMC).”

The written objection must include: (a) a heading which refers to the Action; (b) the objector’s name, address, telephone number, and, if represented by counsel, his/her counsel; (c) a declaration submitted under penalty of perjury that the objector purchased the Product during the period of time described in the Settlement Class definition or receipt(s) reflecting such purchase(s); (d) a statement whether the objector intends to appear at the Final Approval Hearing, either in person or through counsel; (e) a statement of the objection and the grounds supporting the objection; (f) copies of any papers, briefs, or other documents upon which the objection is based; (g) the name and case number of all objections to class action settlements made by the objector in the past five (5) years; and (h) the objector’s signature.

Your objection, along with any supporting material you wish to submit, must be filed with the Court, with a copy delivered to Class Counsel and Defendant’s Counsel no later than **July 22, 2019** at the following addresses:

COURT	CLASS COUNSEL	CLASS COUNSEL
The United States District Court for the Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201	Christopher J. Moreland Halunen Law 1650 IDS Center, 80 S. 8th St. Minneapolis, MN 55402	Michael R. Reese Reese, LLP 100 West 93rd Street, 16th Floor New York, NY 10025
CLASS COUNSEL	DEFENDANT’S COUNSEL	
Jason P. Sultzer The Sultzer Law Group PC 77 Water Street, 8th Floor New York, NY 10005	Edward P. Boyle Venable LLP 1270 Ave of the Americas 24th Floor New York, NY 10020	

17. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is telling the Court that you do not want to be part of the Settlement. If you exclude yourself from the Settlement, you have no basis to object to the Settlement because it no longer affects you.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court has appointed these lawyers and firms as “Class Counsel,” meaning that they were appointed to represent all Settlement Class Members: Christopher J. Moreland of Halunen Law; Michael R. Reese of Reese, LLP; and Jason Sultzer of The Sultzer Law Group PC.

You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

19. How will the lawyers be paid?

Class Counsel intends to file a motion on or before **July 8, 2019** seeking thirty-three percent (33%) of the Qualified Settlement Funds in addition to reimbursement for costs incurred by Class Counsel. The fees and expenses awarded by the Court will be paid from the Settlement. The Court will determine the amount of fees and expenses to award. Class Counsel will also request that \$7,500.00 be paid from the Settlement to the named Plaintiff who helped the lawyers on behalf of the whole Class.

THE COURT’S FAIRNESS HEARING

20. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing on **August 19, 2019 at 10:00 AM** at the United States District Court for the Eastern District of New York, before the Honorable Brian M. Cogan, United States District Judge, in Courtroom 8D South, at 225 Cadman Plaza East, Brooklyn, NY 11201.

At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider how much to pay Class Counsel and the Class Representative. If there are objections, the Court will consider them at this time. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

21. Do I have to come to the hearing?

No. Class Counsel will answer any questions that the Court may have, but you may come at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you filed and mailed your written objection on time to the proper addresses, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

22. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your “Notice of Intent to Appear.” Please refer to question 16 above for more information.

Your Notice of Intent to Appear must be filed with the Court and served on Class Counsel and Defendant’s Counsel no later than **July 30, 2019**.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you do nothing, you will not get a payment from the Settlement. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant about the legal issues in this case, ever again.



GETTING MORE INFORMATION

24. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can review a complete copy the Settlement Agreement and other information at the Settlement Website, LaundryDetergentSettlement.com. To the extent there is any inconsistency between the Settlement Agreement and this notice, the Settlement Agreement controls. If you have additional questions or want to request a Claim Form, you can visit the Settlement Website, LaundryDetergentSettlement.com. You can also write to the Settlement Administrator by mail or email, or call toll-free.

MAIL: Purex Settlement Administrator
P.O. Box 3240
Portland, OR 97208-3240

EMAIL: info@LaundryDetergentSettlement.com

PHONE: 877-291-9488

Updates will be posted at the Settlement Website, LaundryDetergentSettlement.com, as information about the Settlement process becomes available.

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE CONCERNING THIS CASE.



Luib v. Henkel Consumer Goods Inc. Claim Form Instructions

INSTRUCTIONS FOR COMPLETING THE CLAIM FORM

This Claim Form is solely for persons and entities who purchased Purex Natural Elements laundry detergent products in the United States or its territories from **May 19, 2013** to **March 8, 2019** (“Settlement Class Members”). The Settlement is described at the Settlement Website: LaundryDetergentSettlement.com.

If you believe you are an eligible Settlement Class Member and you wish to apply to receive benefits under the Settlement, you must complete and submit a Claim Form. Please read the full Class Notice carefully before completing a Claim Form. The Class Notice is available at the Settlement Website: LaundryDetergentSettlement.com. You may submit your Claim Form online at the Settlement Website or by printing the Claim Form below and mailing it to the Settlement Administrator.

ONLINE: Visit the Settlement Website, LaundryDetergentSettlement.com, and submit your claim online.

MAIL: P.O. Box 3240
Portland, OR 97208-3240

If you submit your Claim Form online, you must do so on or before **August 10, 2019**. If you are mailing your Claim Form by first-class United States Mail, it must be postmarked no later than **August 10, 2019**.

If you have questions about the Claim Form, please visit the Settlement Website, LaundryDetergentSettlement.com, or contact the Settlement Administrator via email at info@LaundryDetergentSettlement.com or toll-free at 877-291-9488.

CLAIM FORM REMINDER CHECKLIST

Before submitting this Claim Form, please make sure you:

1. Complete all fields in Section A (Name and Contact Information) of this Claim Form.
2. In Section B of this Claim Form, list all of the Purex Natural Elements laundry detergent products you purchased in the United States or its territories, and provide the information you can regarding date and location of purchase.
3. In order to receive a benefit under the Settlement, **YOU MUST** sign the Attestation under Penalty of Perjury in Section C of this Claim Form attesting under penalty of perjury that you purchased the Purex Natural Elements laundry detergent product(s) for which you are submitting your Claim Form.
4. If you are submitting Proof of Purchase documentation in support of your Claim Form, include copies of your Proof of Purchase documentation. Do not send original documents.

Please keep a copy of your Claim Form for your records.

000 00000006 000000000 0006 0014 00002 INS:





Your claim must be postmarked by: August 10, 2019

Luib v. Henkel Consumer Goods Inc. Claim Form

SECTION A: NAME AND CONTACT INFORMATION

Provide your name and contact information below. It is your responsibility to notify the Settlement Administrator of any changes to your contact information after the submission of your Claim Form.

First Name	MI	Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>

Street Address

City	State	ZIP Code
<input type="text"/>	<input type="text"/>	<input type="text"/>

Phone Number

 - -

Email Address

SECTION B: PUREX NATURAL ELEMENTS PRODUCT PURCHASE VERIFICATION

You can submit a Claim Form if you purchased any variety or size of Purex laundry detergent products that bear the phrase “Natural Elements” on the label in the United States or its territories in the time period **May 19, 2013**, to **March 8, 2019** (“Class Period”).

For each of these listed Products that you purchased during the Class Period, fill out the form below. Indicate which purchases for which you are attaching Proof of Purchase documentation. Proof of Purchase means receipts or other evidence establishing that you purchased a specific quantity of Products at a specific price, on a specific date, from a specific location, during the Class Period.

There is no limit to the number of claims you can submit for Products for which you provide valid Proof of Purchase documentation. You can submit a maximum of 10 claims for Products for which you do not have Proof of Purchase. You can submit one (1) Claim Form per household.

Purex Natural Elements Product <input style="width: 100%; height: 20px;" type="text"/> Container Size (oz) Approx. Date of Purchase MM-YYYY <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 20px; height: 20px;" type="text"/> - <input style="width: 100px; height: 20px;" type="text"/> Retail Location Where Product Was Purchased <input style="width: 100%; height: 20px;" type="text"/>	# Products Purchased <input style="width: 100%; height: 20px;" type="text"/> State or Territory of Purchase <input style="width: 20px; height: 20px;" type="text"/> Proof of Purchase Attached? <input type="checkbox"/> Yes <input type="checkbox"/> No
---	---

Purex Natural Elements Product <input style="width: 100%; height: 20px;" type="text"/> Container Size (oz) Approx. Date of Purchase MM-YYYY <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 20px; height: 20px;" type="text"/> - <input style="width: 100px; height: 20px;" type="text"/> Retail Location Where Product Was Purchased <input style="width: 100%; height: 20px;" type="text"/>	# Products Purchased <input style="width: 100%; height: 20px;" type="text"/> State or Territory of Purchase <input style="width: 20px; height: 20px;" type="text"/> Proof of Purchase Attached? <input type="checkbox"/> Yes <input type="checkbox"/> No
---	---

Purex Natural Elements Product <input style="width: 100%; height: 20px;" type="text"/> Container Size (oz) Approx. Date of Purchase MM-YYYY <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 20px; height: 20px;" type="text"/> - <input style="width: 100px; height: 20px;" type="text"/> Retail Location Where Product Was Purchased <input style="width: 100%; height: 20px;" type="text"/>	# Products Purchased <input style="width: 100%; height: 20px;" type="text"/> State or Territory of Purchase <input style="width: 20px; height: 20px;" type="text"/> Proof of Purchase Attached? <input type="checkbox"/> Yes <input type="checkbox"/> No
---	---

Purex Natural Elements Product <input style="width: 100%; height: 20px;" type="text"/> Container Size (oz) Approx. Date of Purchase MM-YYYY <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 20px; height: 20px;" type="text"/> - <input style="width: 100px; height: 20px;" type="text"/> Retail Location Where Product Was Purchased <input style="width: 100%; height: 20px;" type="text"/>	# Products Purchased <input style="width: 100%; height: 20px;" type="text"/> State or Territory of Purchase <input style="width: 20px; height: 20px;" type="text"/> Proof of Purchase Attached? <input type="checkbox"/> Yes <input type="checkbox"/> No
---	---

IF YOU NEED ADDITIONAL SPACE TO LIST YOUR TRANSACTIONS, PLEASE PHOTOCOPY THIS PAGE AND CHECK THIS BOX:





SECTION C: ATTESTATION UNDER PENALTY OF PERJURY

I declare, under penalty of perjury, that the information in the Claim Form is true and correct to the best of my knowledge, and that I purchased the Product(s) claimed above in the United States, while residing in the United States, during the Class Period. I understand that my Claim Form may be subject to audit, verification, and Court review. Neither I nor any other member of my household has previously submitted a Claim Form in this Settlement.

Signature

Date:

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MM DD YY

Print Name

Please note that you will not be eligible to receive any Settlement benefits unless you sign above.

Attachment 5

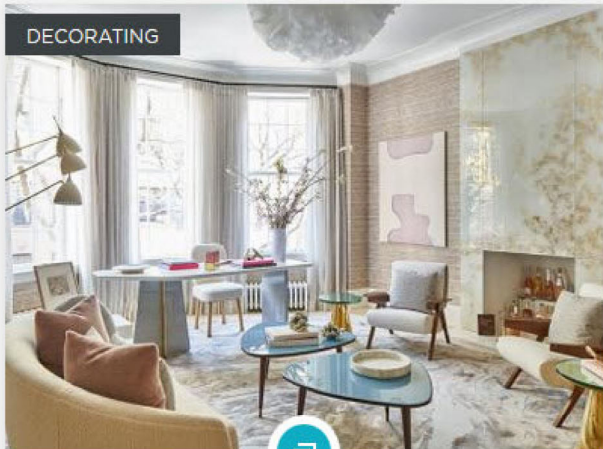


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PARENTING

12 Stress-Free Tips for Camping With Kids

BY: ERIN GIFFORD



ENTERTAINING

Party Patriotically With a Red, White and Blue Backyard Bash

BY: H. CAMILLE SMITH

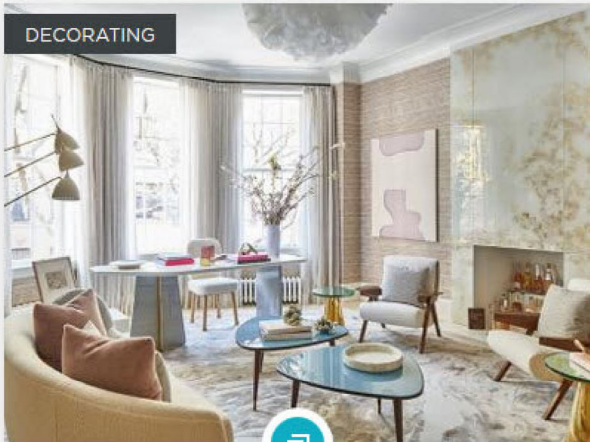


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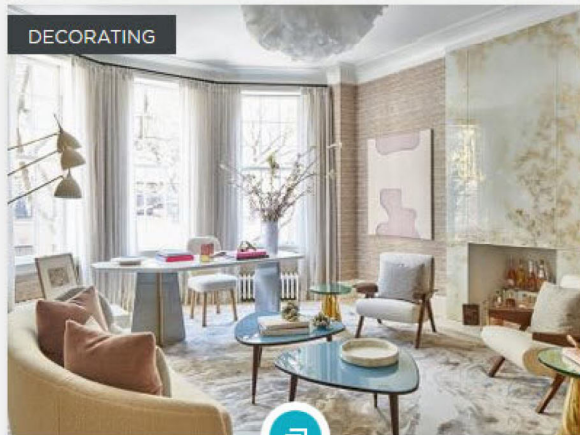
BY: H. CAMILLE SMITH



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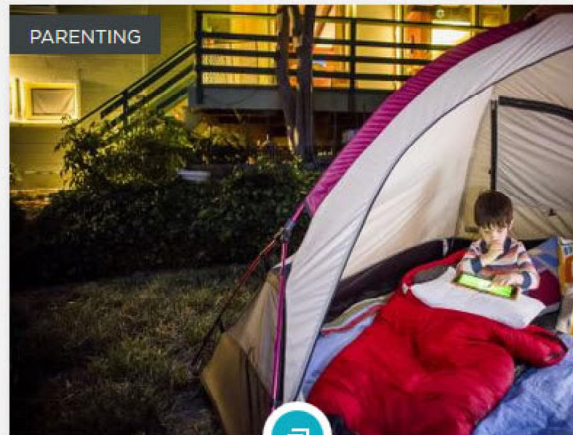


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Health & Fitness

3 techniques to calm yourself when anxiety kicks in

TPSY

If you purchased any Purex Natural Elements Laundry Detergent Products

Health & Fitness

This is the difference between feeling anxious and having an anxiety...

SELF

Health & Fitness

Jillian Michaels says ditch these foods and do this workout to blast belly fat

PopSugar

Health & Fitness

Are veggie chips or straws better for you than potato chips?

Time

Health & Fitness

I'm not shredding for my wedding, but I am finally getting healthy

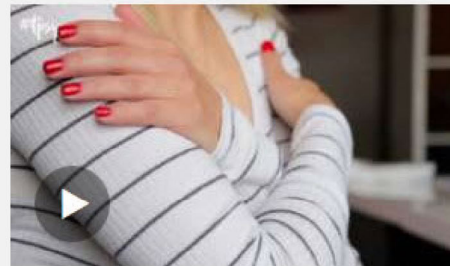
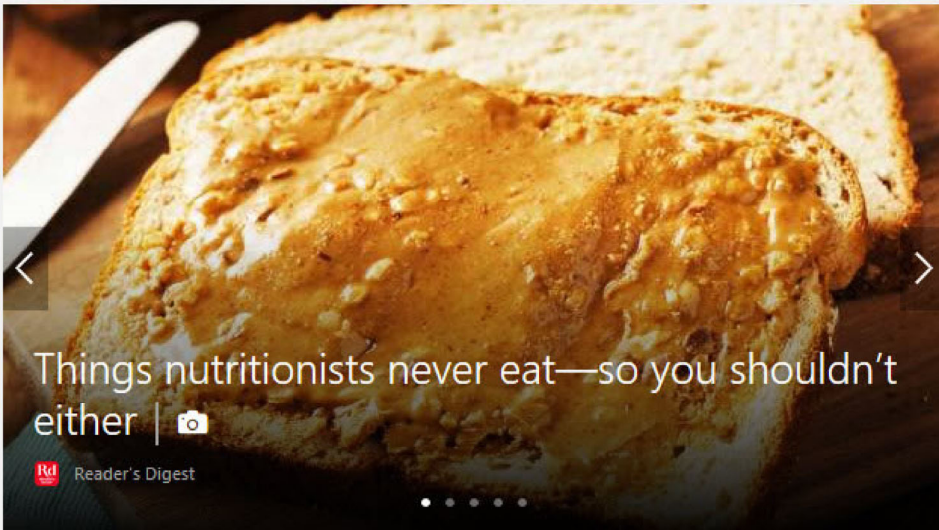
PopSugar



Health



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Health & Fitness

3 techniques to calm yourself when anxiety kicks in

TPSY

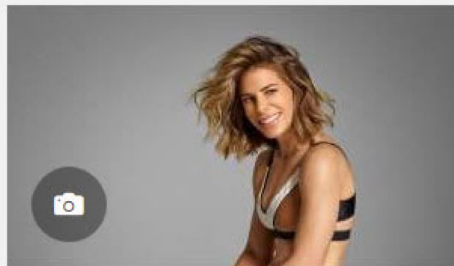
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Health & Fitness

This is the difference between feeling anxious and having an anxiety...

Self



Health & Fitness

Jillian Michaels says ditch these foods and do this workout to blast belly fat

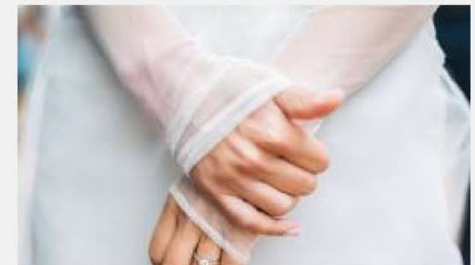
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Health & Fitness

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Health & Fitness

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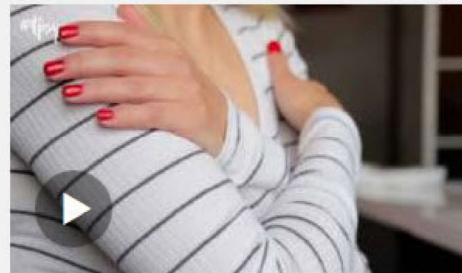
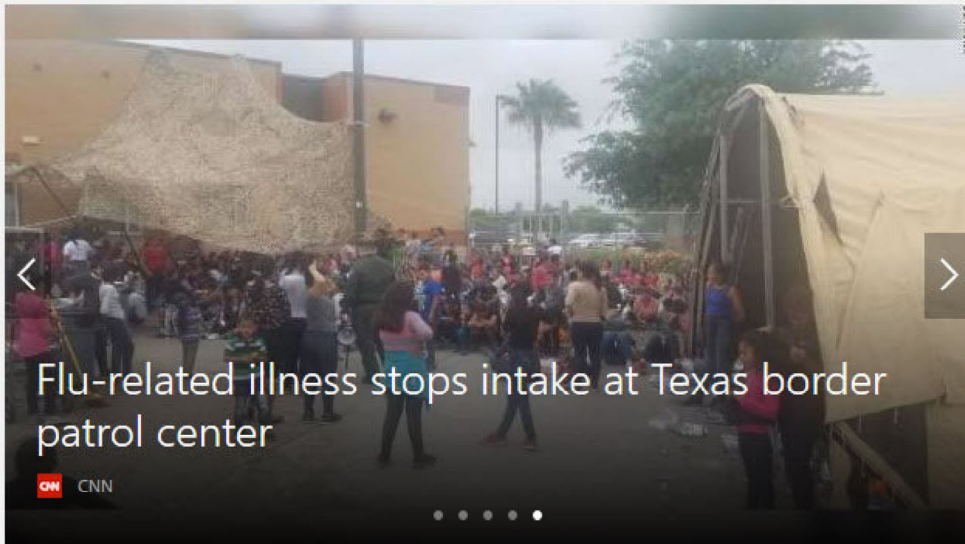
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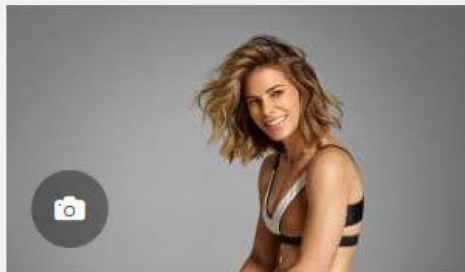
www.laundrydetergentsettlement.com



Health & Fitness

This is the difference between feeling anxious and having an anxiety...

Self



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Washington, DC 5 Day Weather

9:58 am EDT [Print](#)

DAY	DESCRIPTION	HIGH / LOW	PRECIP	WIND	HUMIDITY
TODAY MAY 22	Mostly Cloudy	75°/61°	0%	SE 7 mph	36%
THU MAY 23	Mostly Cloudy	88°/70°	20%	SSW 11 mph	58%
FRI MAY 24	Partly Cloudy	84°/62°	0%	NW 13 mph	47%
SAT MAY 25	Partly Cloudy	84°/70°	20%	SSE 9 mph	56%
SUN MAY 26	Mostly Cloudy	91°/70°	10%	WNW 10 mph	54%

Here to help strong wind go right.

If you purchased any Purex Natural Elements Laundry Detergent Products

[Weather](#) [Temperature](#) [Wind](#)

TODAY'S WEATHER **MAY 22, 2019**

RAIN MIX SNOW ICY SEVERE FOG

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you may be eligible to receive a payment from a Class Action Settlement.

Weather **Temperature** Wind



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Weather Temperature Wind

TODAY'S WEATHER

MAY 22, 2019

RAIN MIX SNOW ICY SEVERE FOG

If you purchased any Purex Natural Elements Laundry Detergent Products

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Streetwear Is Still Hot. Influencers, a Survey Says, Are Not.



A new report highlights the way that a fashion subculture has been overtaken by big business.

1d ago · By JONAH ENGEL BROMWICH

Snakes on an Astral Plane



Our columnist braves a ritualistic encounter with boa constrictors.

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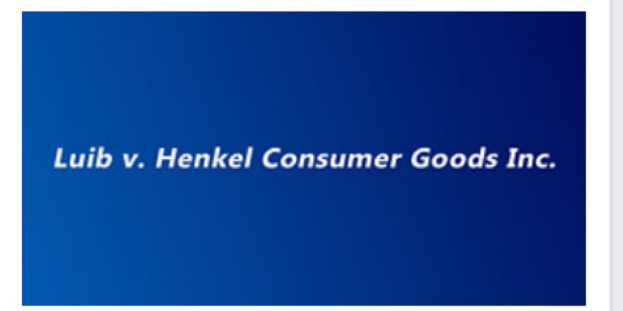
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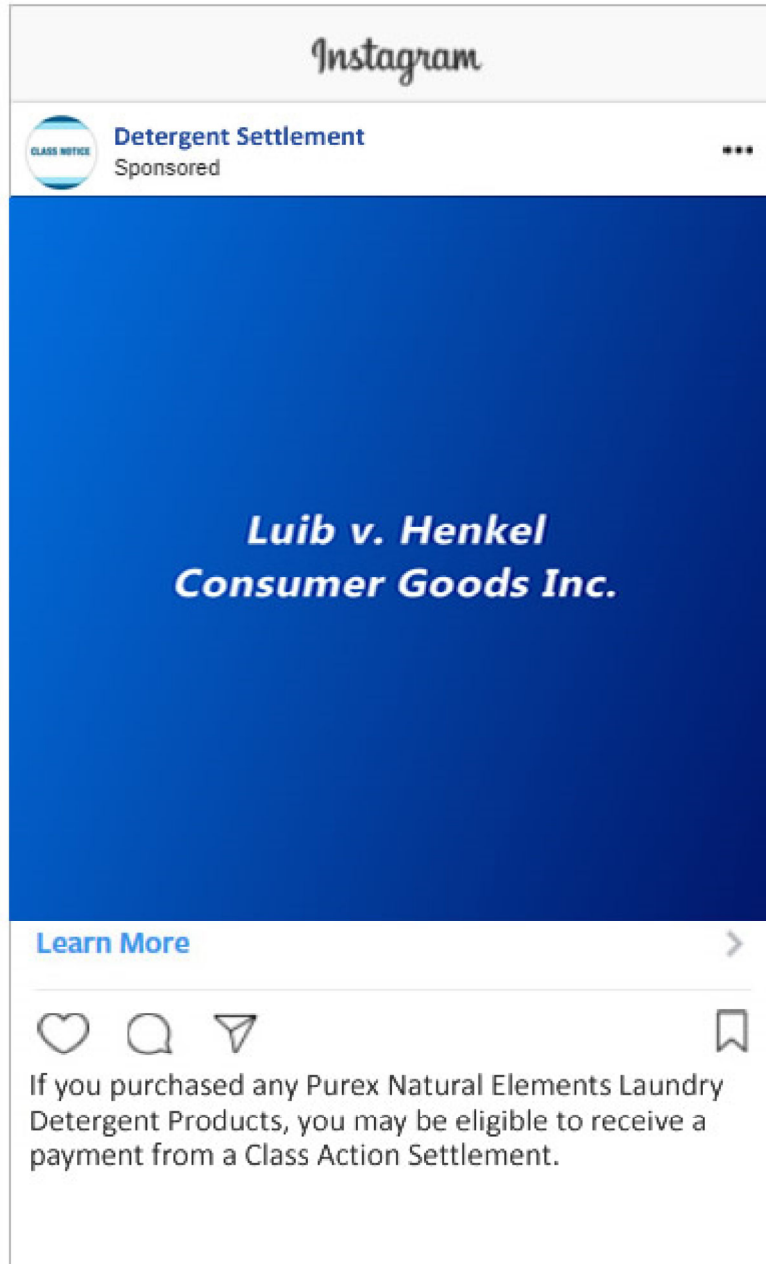
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Detergent Settlement
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The image shows a screenshot of an Instagram post. At the top, the word "Instagram" is written in its signature font. Below that, the post header includes a circular icon with the words "CLASS NOTICE" inside, followed by the text "Detergent Settlement" and "Sponsored" below it. To the right of the header is a three-dot menu icon. The main content of the post is a solid blue rectangle with the text "*Luib v. Henkel Consumer Goods Inc.*" centered in white. Below the blue rectangle is a white bar containing the text "Learn More" in blue, followed by a right-pointing chevron icon. Underneath this bar are icons for a heart, a comment bubble, a paper plane, and a bookmark. At the bottom of the post, there is a paragraph of text: "If you purchased any Purex Natural Elements Laundry Detergent Products, you may be eligible to receive a payment from a Class Action Settlement."

Instagram

 **Detergent Settlement**
Sponsored

*Luib v. Henkel
Consumer Goods Inc.*

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If you purchased any Purex Natural Elements Laundry Detergent Products, you may be eligible to receive a payment from a Class Action Settlement.

Attachment 6

Sponsored Search Keywords

1. Purex laundry detergent
2. Natural laundry detergent
3. Natural elements
4. Purex
5. Luib
6. Henkel
7. Henkel Consumer Goods
8. HE detergent
9. HE laundry detergent
10. Ultra concentrate HE
11. Purex proposed settlement
12. Purex class action
13. Purex litigation
14. Purex lawsuit
15. Purex settlement
16. Laundry detergent class action
17. Laundry detergent settlement
18. Laundry detergent litigation
19. Laundry detergent lawsuit
20. Detergent class action
21. Detergent settlement
22. Detergent litigation
23. Detergent lawsuit
24. Purex natural elements laundry detergent
25. Purex ultra natural elements HE detergent
26. Purex natural elements HE laundry detergent
27. Purex natural elements ultra concentrate HE
28. Linen Lilies scent
29. Lilac white lavender scent
30. Linen scent
31. Lilac scent
32. White lavender scent

Attachment 7



purex settlement



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About 53,900 results (0.41 seconds)

Detergent Settlement | Luib v. Henkel Consumer Goods

www.laundrydetergentsettlement.com/

Purchased **Purex** Natural Elements Laundry Detergent Products? Click above.

Purex Natural Elements Laundry Detergent Class Action Settlement ...

<https://topclassactions.com/...settlements/.../891015-purex-natural-elements-laundry-d...>

Apr 15, 2019 - A \$1.5 million class action **settlement** resolves claims that **Purex** Natural Elements laundry detergent contains synthetic ingredients despite its ...

Purex Settlement - Home

<https://laundrydetergentsettlement.com/>

Apr 11, 2019 - If you purchased any **Purex** Natural Elements Laundry Detergent ... 2019, You May be Eligible to Receive a Payment from the **Settlement**.

[Submit a Claim](#) · [FAQs](#) · [Documents](#) · [Contact Us](#)

Attachment 8

If you purchased any Purex Natural Elements Laundry Detergent Products, you may be eligible to receive a payment from a Class Action Settlement

NEWS PROVIDED BY

Reese, LLP →

May 22, 2019, 09:00 ET

NEW YORK, May 22, 2019 /PRNewswire/ -- If you purchased any Defendant Henkel Consumer Goods Inc.'s ("Defendant") Purex laundry detergent products that bear the phrase "Natural Elements" on the label, you may be eligible to receive a payment from a Class Action Settlement ("Settlement"). A lawsuit was filed against Defendant alleging that the "Natural Elements" statements on the labeling, marketing, and advertising of the Products are misleading because they include synthetic ingredients. The case was filed by Tony Luib ("Plaintiff") and is called *Luib v. Henkel Consumer Goods Inc.*, Case No. 1:17-cv-03021-BMC (E.D.N.Y.). Defendant denies that it has done anything wrong, or that the label is untrue or misleading in any way. The Court has not decided who is right. Both sides have agreed to settle the dispute and provide an opportunity for payments and other benefits to Settlement Class Members (defined below).

WHO IS INCLUDED IN THE SETTLEMENT?

The Settlement Class Members include all persons and entities in the United States or its territories, from **May 19, 2013** to **March 8, 2019**, that both resided in the United States (defined to including both states and territories of the United States), and purchased any of the Products in the United States. "**Products**" means all varieties and container sizes of Henkel's Purex laundry detergent products that bear the phrase "Natural Elements" on the label,

Case 1:17-cv-03021-BMG Document 57-3 Filed 07/08/19 Page 64 of 65 PageID #: 793
including but not limited to Purex Natural Elements Laundry Detergent, Purex Ultra Natural Elements HE Detergent, Purex Natural Elements HE Laundry Detergent, and Purex Natural Elements Ultra Concentrate HE, as well as all scents of such products, including but not limited to Linen & Lilies Scent, Lilac & White Lavender Scent, and Tropical Splash Scent, regardless of unit size, marketed and sold by the Defendant in the United States. More information about the Settlement and the Products involved in the Settlement is available at the Settlement website, laundrydetergentsettlement.com, or by calling 877-291-9488.

WHAT DOES THE SETTLEMENT PROVIDE?

The Settlement provides for a Qualified Settlement fund in the amount of \$1,500,000 to pay (1) eligible claims submitted by Settlement Class Members; (2) the fees and expenses of the attorneys representing Plaintiff and the Settlement Class in the lawsuit ("Class Counsel"); (3) notice and claim administration expenses; (4) any necessary taxes; and (5) any Incentive Awards made by the Court to Plaintiff. Settlement Class Members who timely submit valid claim forms are entitled to receive a cash payment from the Qualified Settlement fund. The actual amount recovered by each Settlement Class Member will not be determined until after the claim period has ended and all claims have been calculated.

WHAT ARE MY RIGHTS?

Submit a Claim Form. If you wish to participate in the Settlement and be eligible to receive benefits under the Settlement, you **must** fill out and submit a claim form by **August 10, 2019**. You can obtain a claim form by (1) visiting the Settlement website, laundrydetergentsettlement.com, where you can file your claim online or print a claim form to submit by mail; (2) mailing a written request for a claim form to the Settlement Administrator: P.O. Box 3240, Portland, OR 97208-3240; or (3) e-mailing the Settlement Administrator at info@laundrydetergentsettlement.com. If you do not timely submit a valid claim form and do not exclude yourself from the Settlement, you will be bound by the Settlement but will not receive any benefits of the Settlement.

Object to the Settlement. If you do not agree with the Settlement or any part of it, you may submit a written objection to the Court. The deadline for submitting an objection is **July 22, 2019**.

Case 1:17-cv-03921-BMG Document 57-2 Filed 07/08/19 Page 65 of 65 PageID #: 704
"Opt Out or Exclude Yourself from the Settlement." If you do not want a payment from the Settlement, and you want to keep the right to sue or continue to sue the Defendant on your own about the claims released in this Settlement, you must exclude yourself by **July 22, 2019**, or you give up any right to sue the Defendant for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately. If you exclude yourself, you cannot get money from this Settlement. The class notice, available at laundrydetergentsettlement.com, explains how to exclude yourself or object. If you do nothing, you will be bound by the Court's decisions.

THE COURT'S FINAL APPROVAL HEARING

The Court will hold a hearing on **August 19, 2019** at 10:00 a.m. to consider whether to approve the Settlement, Class Counsel's request for attorneys' fees of up to thirty-three percent (33%) of the Qualified Settlement fund in addition to reimbursement for expenses and costs, and an Incentive Award for the Plaintiff of \$7,500 from the Qualified Settlement fund. You or your own lawyer may appear and speak at the hearing at your own expense.

FOR MORE INFORMATION

Call Toll-Free at 877-291-9488 or visit laundrydetergentsettlement.com

SOURCE Reese, LLP