

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

**IF YOU PURCHASED LA PURA PRODUCTS, YOU MAY BE ENTITLED TO
 MONETARY PAYMENT FROM A CLASS ACTION SETTLEMENT.**

A federal court has authorized this Notice. This is not a solicitation from a lawyer.

- A Settlement has been reached in a class action lawsuit to resolve allegations against Konnektive LLC and related parties (the “Konnektive Defendants”), relating to La Pura cosmetic products. The suit alleges that the marketing of La Pura cosmetics was false or misleading to consumers, and the Konnektive Defendants were involved in providing computer systems that aided the sale of these orders. The Konnektive Defendants deny these allegations but have settled this case to avoid further litigation and distraction of resources from their business. This Settlement only applies to the Konnektive Defendants and does not dismiss legal claims against other Defendants in the lawsuit.
- The Settlement provides for a payment by the Konnektive Defendants of either \$2 million or \$5 million based on the results of a bench trial that will occur at the end of this process. The Settlement trial streamlines what would otherwise be a longer trial with uncertainty about the amount the class would receive, if anything
- The Settlement offers Monetary Payments to individual purchasers of the La Pura cosmetic products between June 12, 2016 and October 10, 2024. No proof of purchase is required as purchases have already been verified via purchase records.
- Recently, notice was provided regarding a separate settlement with the Quick Box Defendants and related or affiliated entities (“Quick Box Settlement”). This Notice is for the Konnektive Defendants regarding another settlement within the same lawsuit. You are or may be a member of the Settlement Class in both settlements with separate rights as to each Settlement.
- Your legal rights are affected whether or not you act. ***Please read this Notice carefully.***

YOUR RIGHTS AND CHOICES		DEADLINE
Submit a Claim Form	The only way to get a Monetary Payment is to submit a Claim Form. You must submit separate Claim Forms for the Konnektive Settlement and the Quick Box Settlement to receive a Monetary Payment for each Settlement.	Submit a Claim Form by: March 8, 2025
Exclude Yourself	Get no Monetary Payment, but keep any right to file your own lawsuit against the Konnektive Defendants about the legal claims in this case. You must exclude yourself separately for this Settlement and for the Quick Box Settlement.	Submit an Exclusion: January 23, 2025
Object	Tell the Court why you don’t like the Settlement with the Konnektive Defendants. You will still be bound by the Settlement if the Court approves it and you may still file a Claim Form for a Monetary Payment.	Deadline to file an Objection: January 23, 2025
Attend A Hearing	Ask to speak to the Court about the fairness of the Settlement.	Deadline to file a Notice of Appearance: January 30, 2025
Do Nothing	Get no Monetary Payment from this Settlement. Give up legal rights against the Konnektive Defendants.	

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
 The Court in charge of this case still has to decide whether to approve the Settlement. Awards will be sent if the Court approves the Settlement and after appeals are resolved. Please be patient.

Questions? Call 1-877-658-0293 or Visit www.LaPuraClassActionSettlement.com.

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Questions? Call 1-877-658-0293 or Visit www.LaPuraClassActionSettlement.com.

BASIC INFORMATION

1. Why should I read this Notice?

If you were billed for La Pura Products between **June 12, 2016** and **October 10, 2024**, you are a member of a Settlement Class.

This Notice explains the class action lawsuit, the proposed Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to get the benefits.

The Court in charge of this case is the United States District Court for the Southern District of California. The lawsuit is known as *Tan v. Quick Box, LLC*, Case No. 3:20-cv-01082-LL-DDL. You may obtain additional updates on the status of the case by contacting Class Counsel (listed in Question 11 below), going to www.LaPuraClassActionSettlement.com, or viewing case information through the Court's system at www.Pacer.gov.

2. What is this lawsuit about?

This lawsuit is about whether La Pura Products were marketed in a false or misleading way. "La Pura Products" is a defined term under the Settlement Agreement, meaning "any product manufactured, marketed, sold, or otherwise promoted under the La Pura brand name or any variation thereof, including (but not limited to) La'Pura and LaPura." The suit alleges that Konnektive Defendants supplied computer systems used to assist in selling La Pura Products.

Plaintiffs have reached this Settlement with the Konnektive Defendants and a prior settlement with the Quick Box Defendants. Recently, you may have received notice of the Quick Box Settlement.

Plaintiffs' lawsuit is still ongoing against other Defendants. If applicable, you may receive a separate notice regarding the progress of the lawsuit and any resolution of legal claims against the other Defendants.

The Konnektive Defendants deny that they did anything wrong. This Settlement is not an admission of any liability. The Court has not decided who is right.

3. Why is the lawsuit a class action?

In a class action lawsuit, one or more people called "Class Representatives" sue on behalf of other people who have similar claims. The people together are a "Class" or "Class Members." The people who sue – and all the Class Members like them – are called the "Plaintiffs." The companies the Plaintiffs sued are called the "Defendants." One court resolves the issues for everyone in the Class – except for those people who choose to exclude themselves from the Class. U.S. District Judge Linda Lopez is in charge of this class action.

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or the Konnektive Defendants. Instead, both sides agreed to a settlement. By agreeing to settle, both sides avoid the cost and risk of a full trial and guarantee some amount of money will be paid to the class. Therefore, people who submit valid claims will get compensation. The Class Representative and their attorneys believe the Settlement is best for the Settlement Class and its members.

WHO IS IN THE SETTLEMENT?

To see if you are eligible for benefits, you first have to determine if you are a Class Member.

5. Am I part of the Settlement?

You are a Class Member if you are a consumer in the United States and were billed for products advertised, marketed, offered for sale, sold, shipped, or caused to be sold or shipped under the La Pura, La'Pura, LaPura brand names or any similar brand name, including any La Pura Product advertised, marketed, offered for sale, sold, shipped, or caused to be advertised, marketed, offered for sale, sold or shipped, by the La Pura and Rocket Management Group Parties between **June 12, 2016** and **October 10, 2024**.

Questions? Call 1-877-658-0293 or Visit www.LaPuraClassActionSettlement.com.

Excluded from the Settlement are: (i) jurists and mediators who are or have presided over the Action, Plaintiff's Counsel and Defendants' Counsel, their employees, legal representatives, heirs, successors, assigns, or any members of their immediate family; (ii) any government entity; (iii) the Konnektive Parties and any entity in which the Konnektive Parties have a controlling interest, any of their subsidiaries, parents, affiliates, and officers, directors, employees, legal representatives, heirs, successors, or assigns, or any members of their immediate family; and (iv) any persons who timely opt out of the Settlement Class.

THE SETTLEMENT BENEFITS – WHAT YOU GET

6. What does the Settlement provide?

The Settlement Fund will provide Monetary Payments to Class Members who submit valid claims. Class notice and claim administration expenses, Plaintiffs' Counsel's attorneys' fees and expenses and any service award to the Class Representative (discussed below) will also be paid out of the Settlement Fund, if approved by the Court. The settlement distribution process will be administered by an independent Settlement Administrator approved by the Court.

7. What can I get from the Settlement?

If you file a Pre-Populated Claim Form, you will be provided a Monetary Payment based on your purchases of La Pura Products as reflected in purchase records. Regardless of whether you file or filed a Claim Form for the Quick Box Settlement, you must file a separate Claim Form to receive a Monetary Payment from this Settlement with the Konnektive Defendants.

The Monetary Payment is subject to the ultimate amount the Konnektive Defendants pay to the Settlement Fund and is subject to a pro rata increase or decrease depending upon the amount remaining in the Net Fund after all eligible Claims are determined.

Based on the applicable purchase records, the Settlement Administrator will determine and notify Class Members of the Monetary Payment Class Members can receive via this Settlement Agreement.

Any money remaining in the Settlement Fund after payment of settlement notice and administration, attorneys' fees and costs (Question 12 below), and Class Representative service awards (Question 12 below) ordered by the Court, and valid Class Member Claims, will be paid pursuant to the *cy pres* doctrine to the National Consumer Law Center.

HOW TO GET BENEFITS FROM THE SETTLEMENT

8. How can I get my Monetary Payment?

If you are a Class Member, you must fill out and submit a Claim Form to qualify for a Monetary Payment. You can easily file your Claim at www.LaPuraClassActionSettlement.com. You can also download a paper Claim Form from the website or get one by calling the Settlement Administrator at 877-658-0293. The completed Claim Form must be submitted online by **March 8, 2025**, or by mail at the address below, received by **March 8, 2025**.

Settlement Administrator
P.O. Box 2449
Portland, OR 97208-2449

Regardless of whether you file or filed a Claim Form for the Quick Box Settlement, you must file a separate Claim Form to receive a Monetary Payment from this Settlement with the Konnektive Defendants.

Upon receiving a completed Claim Form, the Settlement Administrator will review the documentation and confirm or deny your eligibility for an award.

Questions? Call 1-877-658-0293 or Visit www.LaPuraClassActionSettlement.com.

9. When will I receive my Monetary Payment?

The Court will hold a hearing on **February 6, 2025** (which is subject to change), to decide whether to approve the Settlement with the Konnektive Defendants. Even if the Court approves the Settlement, there may be appeals. The appeal process can take time, perhaps more than a year. You will not receive your Monetary Payment until any appeals are resolved. Please be patient.

10. What am I giving up to receive these Settlement benefits?

Unless you exclude yourself (“opt out”) from the Settlement Class by timely submitting an Exclusion Request (see Questions 13-14 below), you will remain in the Settlement Class. By remaining in the Settlement Class, you “release” and can’t sue, continue to sue, or be part of any other lawsuit against the Konnektive Defendants about the “Released Claims” in this case. These Released Claims are only those claims that you could have brought based on the identical factual predicate of those claims brought in this case about the alleged misleading marketing and labeling of La Pura Products between June 12, 2016 and October 10, 2024.

You are not releasing your legal claims against any Defendant other than the Konnektive Defendants as part of this Settlement by staying in the Settlement Class.

The Settlement Agreement at Section VII (titled “Releases”) describes these “Released Claims” and the “Released Parties” in necessary legal terminology, so read these sections carefully. For ease of reference, the full release section of the Settlement Agreement is available at www.LaPuraClassActionSettlement.com or in the public court records on file in this lawsuit. For questions regarding the Releases or what they mean, you can also talk to one of the lawyers listed in Question 11 below for free, or you can talk to your own lawyer at your own expense.

THE LAWYERS REPRESENTING YOU

11. Do I have lawyers in this case?

The Court has appointed attorneys from the law firm Kneupper & Covey, PC of Huntington Beach, CA, to represent you and the other Class Members. The lawyers are called Class Counsel. They are experienced in handling similar class action cases. 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.

You may contact Class Counsel if you have any questions about this Notice or the Settlement. ***Please do not contact the Court.***

Class Counsel:
Kevin Kneupper
Cyclone Covey
KNEUPPER & COVEY, PC
17011 Beach Blvd., Ste. 900
Huntington Beach, CA 92647-5998
Tel: 512-420-8407
Email: cyclone@kneuppercovey.com
Website: www.kneuppercovey.com

12. How will the lawyers be paid?

Class Counsel will ask the Court for an award of attorneys’ fees of 1/3 of the ultimate Settlement Fund (either \$666,666.66 or \$1,666,666.66 depending on the final amount the Konnektive Defendants are to pay) and for reimbursement of expenses (approximately \$180,000). Any award of attorneys’ fees and costs will be paid from the Settlement Fund. Class Counsel will also ask the Court for a service award for the Class Representative. The purpose of the service award is to compensate the Plaintiff for her time, efforts and risks taken on behalf of the Settlement Class. Any award of payment to the Class Representative will be paid from the Settlement Fund.

Questions? Call 1-877-658-0293 or Visit www.LaPuraClassActionSettlement.com.

YOUR RIGHTS – EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a Monetary Payment, but want to keep the right to sue or continue to sue the Konnektive Defendants on your own, on the basis of the legal issues in this case, then you must take steps to exclude yourself from the Settlement (get out of the Settlement). This is called "excluding yourself"—or is sometimes referred to as "opting out" of the settlement class.

13. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a "Request for Exclusion" in the form of a letter or Request for Exclusion form stating that you want to be excluded from the Konnektive Settlement in *Tan v. Quick Box LLC*, Case No. 3:20-cv-01082-LL-DDL. Be sure to include your name, address, telephone number, and basis upon which you are a Class Member. You must mail your Request for Exclusion received by **January 23, 2025** to Settlement Administrator, P.O. Box 2449, Portland, OR 97208-2449. Request for Exclusion forms can be obtained online at www.LaPuraClassActionSettlement.com.

If you do not follow these procedures and deadlines, you will remain a Class Member and lose any opportunity to exclude yourself from the Settlement. This means that your rights will be determined in this lawsuit by the Settlement Agreement if it receives final approval from the Court.

Regardless of whether you requested exclusion for the Quick Box Settlement, if you do not want to be bound by the Settlement with the Konnektive Defendants, you must request exclusion from this Settlement with the Konnektive Defendants.

Excluding yourself from this Settlement will not affect your rights related to the other Defendants in this lawsuit.

14. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, you cannot receive Monetary Payments. But, you may sue, continue to sue, or be part of a different lawsuit against the Konnektive Defendants about the legal issues in this case.

Excluding yourself from this Settlement will not affect your rights related to the other Defendants in this lawsuit.

YOUR RIGHTS – OBJECTING TO THE SETTLEMENT

You can tell the Court that you don't agree with the Settlement or some part of it.

15. How do I tell the Court that I don't like the Settlement?

If you're a Class Member, you can object to the Settlement with the Konnektive Defendants if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. Note: You can't ask the Court to order a different Settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement awards will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

To object, you must send a letter. Be sure to include the following information:

- a. The case name and number (*Tan v. Quick Box, LLC*, Case No. 3:20-cv-01082-LL-DDL);
- b. Your name, address, telephone number and, if represented by counsel, the name, address, and telephone number of your counsel;
- c. A statement under oath that you are a Class Member;
- d. A statement whether you intend to appear at the Final Approval Hearing, either in person or through counsel;
- e. A statement of all your objections and the specific grounds supporting your objections;
- f. A statement whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class;

Questions? Call 1-877-658-0293 or Visit www.LaPuraClassActionSettlement.com.

- g. Copies of any papers, briefs, or other documents upon which your objection is based; and
- h. Your handwritten, dated signature (the signature of your counsel, an electronic signature, and the annotation “/s/” or similar annotation will not suffice).

Your objection must be submitted to the Court either by mailing (or by filing it at any location of the United States District Court for the Southern District of California) and served on Class Counsel and Konnektive Defendants’ Counsel received no later than **January 23, 2025** to the following addresses:

<p><u>Court:</u> Clerk United States District Court, Southern District of California 221 West Broadway San Diego, CA 92101</p>	<p><u>Class Counsel:</u> Kevin Kneupper Cyclone Covey Kneupper & Covey PC 17011 Beach Blvd., Ste. 900 Huntington Beach, CA 92647</p>	<p><u>Konnektive Defense Counsel:</u> Christopher Queally 5 Park Plaza, Suite 1100 Irvine, CA 92614</p>
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If you timely file an objection it will be considered by the Court at the Final Approval Hearing. You do not need to attend the Final Approval Hearing for the Court to consider your objection.

The Court will require substantial compliance with these requirements above. If you do not submit a written objection in accordance with the deadline and procedure set forth above, you will waive your right to be heard at the Final Approval Hearing. However, the Court may excuse your failure to file a written objection upon a showing of good cause, which, if granted, would permit you to still appear at the Final Approval Hearing and object to the Settlement.

16. What’s the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you don’t like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you don’t want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because you are no longer part of the case.

YOUR RIGHTS – APPEARING AT THE FINAL APPROVAL HEARING

The Court will hold a “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.

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

The Court will hold a Final Approval Hearing on **February 6, 2025**, at the United States District Court for the Southern District of California, 221 West Broadway San Diego, CA 92101.

At the hearing, the Court will hear any comments, objections, and arguments concerning the fairness of the proposed Konnektive Settlement, including the amount requested by Class Counsel for attorneys’ fees and expenses. If there are objections, the Court will consider them. You do not need to attend this hearing. You also do not need to attend to have a comment or objection considered by the Court. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

Note: The date and time of the Final Approval Hearing are subject to change by Court Order. Any change will be posted at www.LaPuraClassActionSettlement.com You should check this website or the Court’s PACER website to confirm that the date and/or time have not changed.

18. Do I have to attend the Final Approval Hearing?

No. Class Counsel will answer all questions Judge Lopez may have. But, you are welcome to attend the hearing at your own expense. If you submit an objection, you do not have to attend the hearing to talk about your objection. As long as you filed your written objection by the deadline, the Judge will consider it. You may also pay your own lawyer to attend, but it is not necessary.

Questions? Call 1-877-658-0293 or Visit www.LaPuraClassActionSettlement.com.

19. May I speak at the Final Approval Hearing?

No. Class Counsel will answer all questions Judge Lopez may have. But, you are welcome to attend the hearing at your own expense. If you submit an objection, you do not have to attend the hearing to talk about your objection. As long as you filed your written objection by the deadline, the Judge will consider it. You may also pay your own lawyer to attend, but it is not necessary.

If you want to appear, or if you want your own lawyer instead of Class Counsel to speak for you in this lawsuit, you must send a letter saying that it is your “Notice of Intention to Appear in *Tan v. Quick Box, LLC*.” Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be received by **January 30, 2025**, and be sent to the Clerk of Court at the address listed in Question 15.

If you want to speak at the Final Approval Hearing without having followed these procedures, you may do so if you demonstrate good cause to the Court.

YOUR RIGHTS – DO NOTHING

20. What happens if I do nothing at all?

If you do nothing, you’ll be part of the Settlement Class, but get no Monetary Payment from the Konnektive Settlement. Unless you exclude yourself, you will not be permitted to continue to assert Released Claims in any other lawsuit against the Konnektive Defendants about the legal issues in this case, ever again.

If you filed a timely and valid Claim Form for the Quick Box Settlement, you may receive a Monetary Payment under that Settlement if approved by the Court.

If you do nothing for the Konnektive Settlement, your rights related to the other Defendants in this lawsuit will not be affected.

GETTING MORE INFORMATION

21. Are there more details about the Settlement?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.LaPuraClassActionSettlement.com or by contacting Class Counsel by email or telephone at the address or number listed in response to Question 11 above.

22. How do I get more information?

You can call toll-free 1-877-658-0293, write to Settlement Administrator, P.O. Box 2449, Portland, OR 97208-2449, or go to www.LaPuraClassActionSettlement.com, where you will find answers to common questions about the Settlement, a Claim Form, motions for approval of the Settlement and Class Counsel’s request for attorneys’ fees and expenses, and other important documents in the case.

You can also access information about this case through the Court’s Public Access to Court Electronic Records (PACER) system. To learn about PACER and register for a PACER account, go to <https://www.Pacer.gov/>. Once you have a PACER account, you can access and retrieve documents from the Court’s docket for the Action at <https://ecf.casd.uscourts.gov/>. You can also access and retrieve documents from the Court’s docket by visiting the Clerk’s Office located at United States District Court for the Southern District of California, Southern District of California, 221 West Broadway, San Diego, CA 921012, during business hours.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT’S CLERK TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS

Questions? Call 1-877-658-0293 or Visit www.LaPuraClassActionSettlement.com.