

**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 \$5.5 million Settlement has been reached in a class action lawsuit to resolve allegations against Quick Box LLC and related parties (the “Quick Box 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 Quick Box Defendants were involved in the fulfillment of these orders. The Quick Box Defendants deny these allegations but have settled this case to avoid further litigation and distraction of resources from their business.
- The Settlement offers Monetary Payments to individual purchasers of the La Pura cosmetic products between June 20, 2016 and September 9, 2024. No proof of purchase is required as purchases have already been verified via purchase records.
- 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.	Submit a Claim Form by: February 5, 2025
Exclude Yourself	Get no Monetary Payment, but keep any right to file your own lawsuit against Defendant about the legal claims in this case.	Submit an Exclusion: December 23, 2024
Object	Tell the Court why you don’t like the Settlement. 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: December 23, 2024
Attend A Hearing	Ask to speak to the Court about the fairness of the Settlement.	January 6, 2025 Deadline to file a Notice of Appearance: December 30, 2024
Do Nothing	Get no Monetary Payment. Give up legal rights.	

- 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 20, 2016 and September 9, 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. 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 Quick Box Defendants fulfilled these orders regarding La Pura Products. Defendant denies that it 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 company the Plaintiffs sued (in this case Quick Box LLC, among others) is called the "Defendant." 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 Defendant. Instead, both sides agreed to a settlement. By agreeing to settle, both sides avoid the cost and risk of a trial, and people who submit valid claims will get compensation. The Class Representative and her 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 were billed for La Pura Products between June 20, 2016 and September 9, 2024.

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 Quick Box Parties and any entity in which The Quick Box 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.

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

THE SETTLEMENT BENEFITS – WHAT YOU GET

6. What does the Settlement provide?

The \$5.5 million 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. The Monetary Payment 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, the amount of Class Members can receive via the 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 1-877-658-0293. The completed Claim Form must be submitted online by **February 5, 2025**, or by mail at the address below, received by **February 5, 2025**.

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

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

9. When will I receive my Monetary Payment?

The Court will hold a hearing on January 6, 2025 (which is subject to change), to decide whether to approve the Settlement. 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 Quick Box 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 20, 2016 and September 9, 2024.

The Settlement Agreement at Section VIII (titled "Releases") describes these "Released Claims" and the "Released Parties" in necessary legal terminology, so read these sections carefully. 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.

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

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:
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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 up to 1/3 of the Settlement Fund (\$1,833,333.33) and for reimbursement of expenses incurred through the date of the Settlement (\$84,040.37) and additional expenses incurred related to this notice and the administration of payment of the award (which will be disclosed in the motion for attorney's fees and costs, but are currently estimated at \$124,456). 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 (up to \$6,000). The purpose of the service awards 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.

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 Quick Box 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 *Tan v. Quick Box LLC*, Case No. 3:20-cv-01082. 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 **December 23, 2024** to: Tan v. Quick Box 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.

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 Quick Box Defendants about the legal issues in this case.

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

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 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;
- 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 Defendant's Counsel received no later than **December 23, 2024**, to the following addresses:

<u>Court:</u> Clerk United States District Court, Southern District of California 221 West Broadway San Diego, CA 92101	<u>Class Counsel:</u> Kevin Kneupper Cyclone Covey Kneupper & Covey PC 17011 Beach Blvd, Suite 900 Huntington Beach, CA 92647	<u>Defense Counsel:</u> David T. Biderman Thomas J. Tobin Perkins Coie LLP 1888 Century Park East, Suite 1700 Los Angeles, CA 90067
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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.

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

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

The Court will hold a Final Approval Hearing on January 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 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 the 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.

19. May I speak at the Final Approval Hearing?

As long as you do not exclude yourself, you can (but do not have to) participate and speak for yourself in this lawsuit and Settlement. This is called making an appearance. You can also have your own lawyer speak for you, but you will have to pay for the lawyer yourself.

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 **December 30, 2024**, 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 Settlement. Unless you exclude yourself, you will not be permitted to continue to assert Released Claims in any other lawsuit against the Quick Box Defendants about the legal issues in this case, ever again.

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 Tan v. Quick Box 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.

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

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, 221 West Broadway, San Diego, CA 92101, 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