

LEGAL NOTICE

IF YOU PURCHASED ONE OF MORE OF THE FOLLOWING PRODUCTS: (1) SIMPLE GREEN ALL-PURPOSE CLEANER; (2) SIMPLE GREEN ALL-PURPOSE CLEANER (FRESH); (3) SIMPLE GREEN ALL-PURPOSE CLEANER (LEMON); (4) SIMPLE GREEN ALL-PURPOSE CLEANER (LAVENDER); (5) SIMPLE GREEN OXY SOLVE TOTAL OUTDOOR CLEANER; (6) SIMPLE GREEN OXY SOLVE HOUSE AND SIDING CLEANER; (7) SIMPLE GREEN OXY SOLVE CONCRETE AND DRIVEWAY CLEANER; (8) SIMPLE GREEN OXY SOLVE DECK AND FENCE CLEANER; (9) SIMPLE GREEN WASH & WAX; (10) SIMPLE GREEN ALL-PURPOSE WIPES; (11) SIMPLE GREEN ALL-PURPOSE WIPES (LEMON); (12) SIMPLE GREEN MULTI-PURPOSE FOAMING CLEANER; (13) SIMPLE GREEN CARPET CLEANER; (14) SIMPLE GREEN MARINE ALL-PURPOSE BOAT CLEANER; (15) SIMPLE GREEN HEAVY DUTY BBQ & GRILL CLEANER; (16) SIMPLE GREEN HEAVY DUTY BBQ & GRILL CLEANER (AEROSOL); (17) SIMPLE GREEN OXY DOG STAIN & ODOR OXIDIZER; (18) SIMPLE GREEN BIO DOG; (19) SIMPLE GREEN ADVANCED DOG BIO BOOST STAIN & ODOR REMOVER; (20) SIMPLE GREEN CAT PET STAIN & ODOR REMOVER; AND (21) SIMPLE GREEN OUTDOOR ODOR ELIMINATOR, IN ANY SIZE OR PACKAGING TYPE (“SETTLEMENT CLASS PRODUCTS”), BETWEEN MAY 12, 2016 AND MAY 17, 2021, THEN YOU COULD BE ENTITLED TO MONEY FROM A CLASS ACTION SETTLEMENT

O'Brien et al. v. Sunshine Makers, Inc., San Bernardino Superior Court, Case No. CIV-SB-2027994

WHAT IS THIS NOTICE ABOUT?

A lawsuit brought by Christopher O'Brien and Tiffany Kipikasha (“Plaintiffs”) pending in the Superior Court of the State of California, County of San Bernardino (“Litigation”) may affect your rights. The Litigation resolves two lawsuits alleging Sunshine Makers, Inc. (“Defendant”) deceptively advertised, labeled, and packaged the Settlement Class Products as being “non-toxic” despite the products allegedly posing a risk of harm. Defendant denies these allegations, including denying that its products are toxic. The Court did not rule in favor of Plaintiffs or Defendant. The parties instead agreed to settle. The other lawsuit included within this settlement was brought by Plaintiff Michelle Moran in *Moran v. Sunshine Makers, Inc.*, U.S. District Court for the Northern District of California Case No. 4:20-cv-03242.

AM I A MEMBER OF THE CLASS?

The class is defined as all persons residing in the United States who purchased one or more Settlement Class Products between May 12, 2016 and May 17, 2021.

WHAT DOES THE SETTLEMENT PROVIDE?

With Court approval, the settlement provides cash payments based on the number of Settlement Class Products purchased and the number of Valid Claims submitted. Class members with proof of purchase may submit a claim for \$3.00 for each Settlement Class Product purchased. Class members without proof of purchase may submit a claim for up to \$30.00. These amounts will be increased proportionally (pro rata) if the total amount of claims does not exhaust all settlement funds and reduced proportionally (pro rata dilution) if the total amount of claims exceeds the settlement funds. The settlement also agrees to remove certain representations from the Settlement Class Product labels.

WHAT ARE MY RIGHTS?

You have three options:

1. You Can Accept the Settlement. Class Members who wish to receive a Cash Payment **must** submit a Claim Form on or before August 16, 2021 either online at www.SimpleGreenNonToxicSettlement.com or by mailing it to **Digital Settlement Group, LLC; P.O. Box 301; Valparaiso, IN 46384**. If you don't submit a timely Claim Form and don't exclude yourself from the settlement, you will be bound by the settlement and will not receive a Cash Payment. If you stay in the Class, you will be bound by all orders and judgments of the Court, and you won't be able to sue or continue to sue Defendant

as part of any other lawsuit involving the same claims as in this lawsuit.

2. You Can Object to the Settlement. You can ask the Court to deny approval of the Settlement or any part of the Settlement by objecting with the Court. You can't ask the Court to order a larger settlement. If you want the lawsuit to continue instead of settling, you must object. You may hire your own lawyer to appear in Court for you if you wish; however, you will be responsible for paying your lawyer. Objections will be considered by the Court only if filed in writing and mailed by August 16, 2021 to Superior Court of California, County of San Bernardino, San Bernardino District – Civil Division, 247 West Third Street, San Bernardino, CA 92415-0210 and also mailed to counsel for the parties. Objections must state your name, address, telephone number, name of this Litigation, factual and legal grounds for your objection, name, address, telephone number, and email address of any attorney representing you and any case in which you or your attorney has objected to a class action settlement previously and the result of that objection.

3. You Can “Opt Out” of the Settlement. If you exclude yourself from the Class – which is sometimes called “opting-out” of the Class – you won't get a payment from the settlement but won't be barred from asserting claims against Defendant in a separate lawsuit. Such notice shall include your name, address, telephone number, and signature and a statement that you want to be excluded from the lawsuit *O'Brien et al. v. Sunshine Makers, Inc.*, Case No. CIV-SB-2027994. Send the written notice postmarked by August 16, 2021 to Digital Settlement Group, LLC; P.O. Box 301; Valparaiso, IN 46384.

THE FAIRNESS HEARING

On September 21, 2021, at 10:00 am, the Court will hold a hearing at the San Bernardino Superior Court to approve: (1) the proposed settlement as fair, reasonable, and adequate; and (2) the application for Plaintiffs' attorneys' fees of up to \$1,450,000, plus costs and expenses, and payment of up to \$5,000 to each of the named plaintiffs. Class Members who support the proposed settlement do not need to appear at the hearing or take any other action to indicate their approval.

HOW CAN I GET MORE INFORMATION?

Please visit www.SimpleGreenNonToxicSettlement.com or contact Class Counsel at info@clarksonlawfirm.com, or call the Settlement Administrator at **1-877-426-0034**.