

LEGAL NOTICE

If you bought any of Dr. Dennis Gross Skincare, LLC's "C+Collagen" Products Between March 10, 2016, and June 28, 2024, you may be entitled to payment.

Kandel, et al. V. Dr. Dennis Gross Skincare, LLC, No. 1:23-cv-01967-ER
U.S. District Court for the Southern District of New York

What Is This Notice About? This Notice is to inform you of the settlement of the class action lawsuit referenced above (the "Action") with Dr. Dennis Gross Skincare LLC ("Defendant" or "DDG"). Plaintiffs in this lawsuit claim that Defendant deceptively labeled its "C+Collagen" products as containing "Collagen," when in fact, they did not contain any collagen. Defendant denies all claims in the lawsuit and denies that it did anything unlawful or improper. The Court did not rule in favor of either side. Rather, the parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

Am I A Member of The Class? You are a Settlement Class member if purchased any of Defendant's "C+Collagen" products in the United States, for personal or household use and not for resale or distribution, including DDG's C+Collagen Deep Cream, C+Collagen Serum, C+Collagen Mist, C+Collagen Eye Cream and C+Collagen Mask, and any other products sold with the C+Collagen label, whether sold alone or in combination with other products ("Class Products"), between March 10, 2016, and June 28, 2024, (the "Class Period").

What Does the Settlement Provide? With Court approval, the Settlement provides a Cash Award to Settlement Class Members that submit a valid and timely Claim Form. Settlement Class Members who previously purchased any of the Class Products during the Class Period may submit a claim to receive Fifty Dollars (\$50) per Class Product purchase, capped at two (2) or ten (10) Class Products, depending on whether they submit proof of purchase.

If the amount in the Net Settlement Fund (net of costs of notice and settlement administration, Settlement Class Counsel's attorneys' fees and litigation expenses and the service awards for Plaintiffs), is either less or more than the amount of the total cash claims submitted by Claimants, the claims of each Claimant will be decreased or increased, respectively, *pro rata*, to ensure the Settlement Fund is exhausted, with no reversion from the Settlement Fund to Defendant. *Pro rata* upward adjustment of cash claims shall be capped at one hundred dollars (\$100) per Class Product. Any amounts remaining in the Net Settlement Fund after checks are issued and cashed or expired shall be disbursed *cy pres*. Those Settlement Class Members whose payments are not cleared within one hundred and eighty (180) calendar days after issuance will be ineligible to receive a cash settlement benefit and the Settlement Administrator will have no further obligation to make any payment from the Settlement Fund pursuant to this Settlement Agreement or otherwise to such Settlement Class Member.

What Are My Rights and Options? You have three options:

You Can Make a Claim. Settlement Class Members who wish to receive a Cash Award **must** submit a Claim Form by visiting the Settlement Website, www.Cpluscollagenlawsuit.com, and submitting a Claim Form (which can also be printed and mailed). The deadline to **postmark or submit your claim online is September 27, 2024.**

You Can Object to the Settlement. You may also object to any part of this Settlement. Objections must be mailed to the Settlement Administrator and **postmarked no later than September 27, 2024.**

You Can "Opt-Out" of the Settlement. You can exclude yourself ("opt-out") of the Settlement by submitting an exclusion request to the Settlement Administrator that is **postmarked no later than September 27, 2024.** This is the only option that allows you to be part of any other lawsuit against Defendant about the legal claims in this case.

Details about how to opt-out, object, and submit your Claim Form are available on the Settlement Website.

The Fairness Hearing

On **October 31, 2024 at 10:30 am**, the Court will hold a hearing at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 619, to approve: (1) the Settlement as fair, reasonable, and adequate; and (2) the application for Plaintiffs' attorneys' fees and litigation costs of up to \$3,900,000, and payment of up to \$15,000 in total to the three Settlement Class Representatives. Settlement 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?

This is only a summary of the settlement. If you have questions or want to view the detailed notice or other documents about the Litigation, including the Settlement Agreement visit www.Cpluscollagenlawsuit.com, contact the Settlement Administrator by calling **1-844-931-3243**, by emailing info@cpluscollagenlawsuit.com, or by writing to DDG C Plus Collagen Settlement Administrator, P.O. Box 3553, Baton Rouge, LA 70821, or contact Class Counsel at DDG@Clarksonlawfirm.com.

BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK