

LEGAL NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

If You Purchased Adore Organic Innovation Products Marketed as Containing a Plant Stem Cell Formula, Then You May Benefit From a Proposed Class Action Settlement

Mollicone et al. v. Universal Handicraft, Inc., et al., Case No. 17-21468-CIV-RNS (S.D. Fla.)

If you purchased Adore Organic Innovation Products marketed as containing a plant stem cell formula, on or After September 29, 2012 and April 13, 2018, this Notice is to inform you of a proposed class action settlement that could affect your legal rights.

What Is This Notice About?

A proposed settlement has been reached in a class action lawsuit pending in the United States District Court for the Southern District of Florida between Lisa Mollicone and Millie Land on the one hand as plaintiffs, and Universal Handicraft, Inc. and Shay Sabag Segev on the other hand as defendants. The class action lawsuit alleges violations of consumer protection and warranty laws, and claims that the defendants misrepresented the anti-aging benefits of certain Adore Organic Innovation Products marketed in the United States as containing a plant stem cell formula. **Defendants deny all of these allegations. The Court did not rule in favor of Plaintiffs or Defendants.** Instead, because of the complexity and uncertainty of litigation, the parties negotiated and agreed to a proposed settlement in order to avoid the expense and risks of continuing with the lawsuit.

Am I a Member of the Class?

If you purchased, in the United States between September 29, 2012 and April 13, 2018, one or more of the following Adore Organic Innovation products marketed as containing a plant stem cell formula: (i) CELLMAX Redefining Facial Cream; (ii) CELLMAX Elite Facial Serum; (iii) CELLMAX Superior Supplement Facial Thermal Mask; (iv) Essence Facial Detoxifying Cleansing Cream; (v) Essence Facial Toner; (vi) Essence Facial Milk;

(vii) Essence Facial Cleanser; (viii) Snow White Facial Brightening Cream; (ix) Dreams Multi Active Night Cream; (x) Performer Sculpting Neck Serum; (xi) Essence Facial Serum; (xii) Essence Facial Hydrating Cream - normal to oily skin; (xiii) Essence Facial Hydrating Cream - normal to dry skin; (xiv) Advanced Firming Eye Cream; (xv) Advanced Firming Eye Serum; (xvi) Skin Tightening Instant Face Lift; (xvii) Golden Touch Magnetic Facial Mask; (xviii) Essence Facial Collagen Mask; (xix) Golden Touch 24k Techno-Dermis Facial Mask; (xx) Nourishing Hand and Body Lotion – Original; (xxi) Nourishing Hand and Body Lotion – Blossom; (xxii) Nature - Intensive Body Butter; (xxiii) Spirit – Calming Body Butter; (xiv) Spirit - Calming Body Peeling Scrub; and, (xv) Nature - Intensive Body Peeling Scrub (collectively the “Class Products”) for personal or household use and not for resale, then you are a Class Member.

Excluded from this definition of a Class Member are the following: (1) all judges and magistrates who have presided or are presiding over this action (or the judge or Magistrate presiding over the action through which this matter is presented for settlement); (2) the defendants, defendants' subsidiaries, parent companies, successors, predecessors, and any entity in which the defendants or their parents have a controlling interest and their current or former officers, directors, and employees;

(3) retailers of the Adore Products;
(4) persons who properly execute and file a timely Request for Exclusion from the class; and (5) legal representatives, successors or assigns of any such excluded person.

What Benefits Could I Receive?

For Class Members who submit a legible copy of a sales receipt or emailed order confirmation that shows that he or she purchased one or more Class Product(s) during the period from September 29, 2012 to April 13, 2018 (the "Receipt"), along with their Claim Form, Defendants will provide either: (i) \$25.00 cash per such Settlement Class Member; or (ii) an electronic gift card for 50% of the price paid for the Class Products reflected on the Receipt, up to a maximum gift card value of \$200 per any such Settlement Class Member, for use on the website: <https://www.adorecosmetics.com/>, and having a one-year expiration date. It should be noted that option (i) shall have a total cap of \$50,000.00 in cash available for the entire class. Accordingly, when a total of \$50,000 in cash has been claimed by Authorized Claimants, this cash option shall be deemed exhausted and no longer be available, and the remaining Authorized Claimants who submitted the required Receipt shall receive a Settlement Payment pursuant to option (ii). It should also be noted that, with respect to option (ii), the combined total value of all gift cards issued to Authorized Claimants who submitted a Receipt shall not exceed \$225,000 in gift cards. Eligible members of the Settlement Class who submit the required Receipt with their Claim Form may choose only one of the aforementioned options.

For class members who do not submit a Receipt with their Claim Form, Defendants will provide one \$50 electronic gift card per

such class member for use on the website: <https://www.adorecosmetics.com/>, and having a one-year expiration date. The combined total value of all gift cards issued to Authorized Claimants who filed a Claim without a Receipt shall not exceed \$100,000 in gift cards.

If the value of claims received from all Authorized Claimants exceeds the maximum Settlement Fund, then the Settlement Payments to each Authorized Claimant will be reduced *pro rata*, so that each Authorized Claimant receives a portion of the offered relief.

What Are My Rights?

You have a choice of whether to stay in the Class or not, and you must decide this now. If you stay in the Class, you will be legally bound by all orders and judgments of the Court, and you will not be able to sue, or continue to sue, Defendants as part of any other lawsuit involving the same claims that are in this lawsuit. This is true even if you do nothing by not submitting a claim.

1. You can accept the Settlement

If you wish to receive the benefits under the Settlement, you **MUST** submit a Claim Form by no later than August 21, 2018. You can obtain and/or submit a Claim Form: (1) on the Internet at www.PlantStemCellSettlement.com; or (2) by calling the Claims Administrator at 1-877-752-6801; or (3) by mailing a written request for a Claim Form including your name and mailing address by regular mail to: Plant Stem Cell Settlement, c/o Classaura Class Action Administration, 1718 Peachtree St #1080 Atlanta GA 30309.

If you fail to timely submit a Claim Form and do not timely exclude yourself from the Settlement, then you will be bound by the Settlement but will not receive any benefits

of the Settlement.

2. You can object to the Settlement

If you believe the Settlement is unsatisfactory, you may **file** a written objection **with the Clerk of the Court** for the United States District Court for the Southern District of Florida **and** send copies to the following Counsel representing the Class and Defendants:

Counsel for Plaintiffs and the Class

Ronald A. Marron
LAW OFFICES OF RONALD A.
MARRON
651 Arroyo Drive
San Diego, CA 92103
Telephone: (619) 696-9006
Email: ron@consumersadvocates.com

Counsel for Defendants

Susan J. Latham and Jeffrey D. Feldman
COZEN O'CONNOR
Southeast Financial Center, 30th Floor
200 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305-358-5001
Facsimile: 305-358-3309
Email: slatham@cozen.com;
jfeldman@cozen.com

If you choose to object to the Settlement, then your written objection must be received by no later than July 2, 2018.

3. You can "opt out" of the Settlement

If you do not object to the Settlement but, nevertheless, simply do not want to participate in this Settlement, you must provide written notice indicating your desire to exclude yourself from the Settlement. Such notice must include your name, address, and telephone number. You must

deliver the request for exclusion from settlement to the Settlement Administrator at Adore Class Action Settlement, c/o Classaura Class Action Administration, 1718 Peachtree St #1080 Atlanta GA 30309, or submit a valid exclusion form online through the Settlement Website. The request must be postmarked or submitted online no later than July 2, 2018. Please be advised that if you request exclusion from or "opt out" from the Settlement, you will not receive any benefits under the Settlement, and will be responsible for any attorneys' fees and costs you incur if you choose to pursue your own lawsuit.

The Fairness Hearing

On August 10, 2018, at 8:30 a.m., the Court will hold a hearing in the United States District Court for the Southern District of Florida to determine: (1) whether the proposed Settlement is fair, reasonable and adequate and should receive final approval; and (2) whether the Class Counsel's application for an award of attorneys' fees and expenses should be granted. Objections to the proposed Settlement by Class Members will be considered by the Court at such hearing, but only if such objections are timely filed in writing with the Court and sent to Plaintiffs' and Defendants' counsel by no later than July 2, 2018, as explained above.

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?

If you have questions or would like a more detailed notice or other documents about this lawsuit and your rights, visit www.PlantStemCellSettlement.com. You may also contact the Settlement Administrator by emailing

Contact@PlantStemCellSettlement.com, or by writing to: Plant Stem Cell Settlement, c/o Classaura Class Action Administration, 1718 Peachtree St #1080 Atlanta GA 30309, or by calling 1 (877)752-6801. Please do not contact the Court or Clerk for information.

By order of the United States District Court for the Southern District of Florida.