

Tom's of Maine Litigation
c/o JND Legal Administration
P.O. Box 91398
Seattle, WA 98111

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LEGAL NOTICE

If You Purchased Tom's of Maine Deodorant or Toothpaste On or After September 24, 2015 in California, New York, or Florida, A Class Action Lawsuit May Affect Your Legal Rights

You may be affected by a class action lawsuit alleging that Colgate-Palmolive Co. and Tom's of Maine, Inc. ("Defendants") misrepresented their toothpaste and deodorant products ("Tom's Products") as "natural," when they allegedly contain non-natural ingredients. The lawsuit is called *de Lacour v. Colgate-Palmolive Co.*, Case No. 16-cv-8364-KW and is in the United States District Court for the Southern District of New York.

WHO'S INCLUDED? The Court has allowed the lawsuit to be a class action against Defendants on behalf of all persons who purchased Tom's of Maine deodorant and/or toothpaste products on or after September 24, 2015 in the states of New York, California, and Florida. If you purchased a Tom's of Maine deodorant or toothpaste product in either New York, California, or Florida on or after September 24, 2015, you are a Class Member, and your rights may be affected.

WHAT IS THE CASE ABOUT? Plaintiffs allege that Colgate-Palmolive Co. and Tom's of Maine, Inc. misrepresented their deodorant and toothpaste products by labeling them as "Natural" when they allegedly contain non-natural ingredients. The Plaintiffs are generally asking the Defendants to provide a monetary recovery to the Class for damages resulting from the alleged mislabeling of the Tom's Products with the "Natural" claim. Defendants stand by their "Natural" labeling, deny that they misrepresent the ingredients in Tom's of Maine deodorant and toothpastes, and deny any wrongdoing. The Court has not decided whether the Plaintiffs' claims have any merit. Over the course of the suit, and possibly at a trial, the lawyers for the Plaintiffs will have to prove their case.

WHAT ARE YOUR OPTIONS? 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 won't be able to sue, or continue to sue, Defendants as part of any other lawsuit involving the same claims that are in this lawsuit. If money or benefits are obtained, you will be notified about how to get a share. To stay in the Class, you do not have to do anything now. If you ask to be excluded from the Class, you cannot get any money or benefits from this lawsuit if any are awarded, but you will keep any rights to sue Defendants for these claims, and will not be bound by any orders or judgments of the Court. To ask to be excluded, send a letter to the address on the front of this postcard. This letter must actually be received by the addressee on or before **January 13, 2022**. Your letter must contain: (1) the name of this lawsuit, *de Lacour v. Colgate-Palmolive Co.*, Case No. 16-cv-8364-KW; (2) your full name and current address; (3) a clear statement of intention to exclude yourself; and (4) your signature. You may hire your own lawyer to appear in Court for you if you wish; however, if you do, you will be responsible for paying that lawyer on your behalf.

For more information, visit www.lawsuit-toms.com. You may also contact Class Counsel by email at info@bursor.com, or by writing to: Tom's of Maine Litigation, c/o JND Legal Administration, P.O. Box 91398, Seattle, WA 98111.