



United States District Court for the Northern District of California

In re JUUL Labs, Inc. Marketing, Sales Practices, and Products Liability Litigation

Case No. 19-md-02913-WHO

Class Action Notice

Authorized by the U.S. District Court

Did you buy a JUUL product before December 7, 2022?

A class action Lawsuit and a Settlement of that Lawsuit could affect your rights.

You may be eligible to receive a payment from this and other Settlements of the Lawsuit totaling \$300 million

Your options:

- 1. Make a claim if you have not already.** *Get a payment.*
- 2. Do nothing.** *You will be bound by the Settlement and the Lawsuit and, unless you already submitted a claim, will get no payment from it.*
- 3. Opt out of the Settlement.**
- 4. Object to the Settlement.**

You are not being sued.

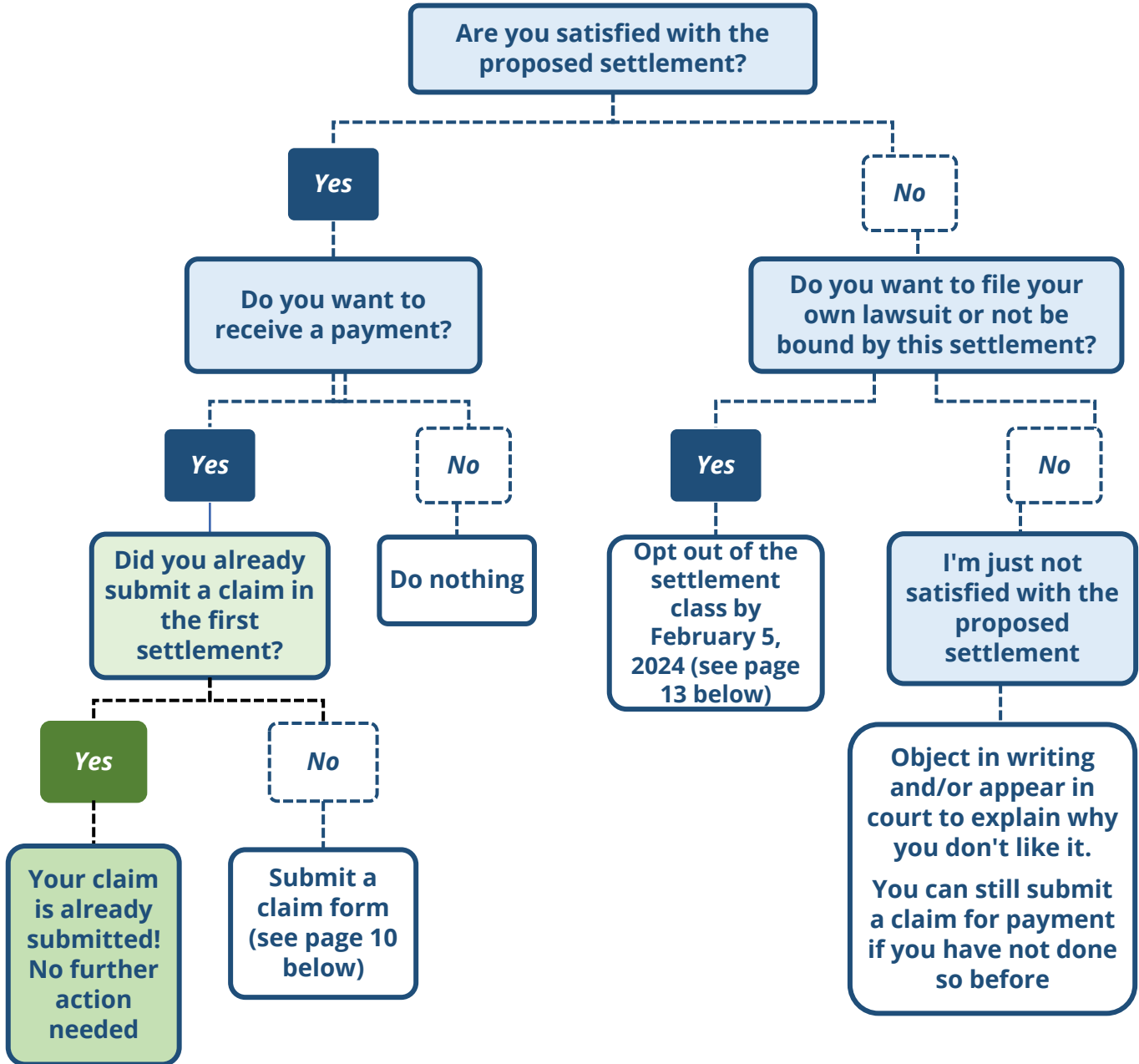
This notice explains the Lawsuit, the Settlement, and your legal rights and options.

Please read entire notice carefully.

Another part of this case settled earlier this year. You need to make decisions about this second, new settlement that resolves the rest of the court case. If you already submitted a claim for payment from the first settlement and you want to receive a payment from this settlement, you do not need to submit your claim again.

To make the best decisions for you, read on.

THE \$45 MILLION SETTLEMENT WITH ALTRIA



Important things to know:

- You must file a claim to receive money from the Settlement.
- You only need to file one claim to receive payment from the two Settlements in this case. If you already submitted a claim for the first Settlement, you do not need to submit anything further to receive payment from the new settlement.
- If you do nothing, you will still be bound by the Settlement and the Lawsuit, and your rights will be affected.
- If you want to opt out or object, you must do so by February 05, 2024.
- You can learn more at: www.JUULclassaction.com

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Key Information

What is happening in this lawsuit?

A group of people filed a class action lawsuit against JUUL Labs, Inc., related individuals, and Altria. These plaintiffs claimed that Altria was a part of an enterprise that misled consumers concerning JUUL products' addictiveness and safety, causing them to pay more than they would have had accurate information been provided. They allege that the enterprise that Altria was a part of unlawfully marketed to minors. Altria denies these allegations.

What is a class action lawsuit?

A class action is a lawsuit in which one or more people sue on behalf of a larger group, called the Class.

In a settlement announced in December 2022, JUUL Labs, on behalf of itself, its directors and officers, and other entities (collectively referred to as JUUL), agreed to pay \$255 million to settle claims against it. Now, the remaining defendants—Altria and related companies—have agreed to pay an additional \$45 million to settle the remaining claims in the case.

The group of people who both JUUL and Altria have agreed to pay is called the Settlement Class and it includes everyone who purchased JUUL products from retail stores or online retailers or from JUUL directly before December 7, 2022. If you are in this group and want to get paid, you must file a claim. If you already submitted a claim as part of the first settlement involving JUUL, you do not need to submit anything further to receive payment from the new settlement involving Altria. If you have not submitted a claim previously you can do so by returning a claim form to the Settlement Administrator (see below) or by making a claim at www.JUULclassaction.com

What are my options?

Make a Claim to Get Paid from the Settlement	<p>To receive a payment from the Altria Settlement, you must make a claim.</p> <p>You only need to file one claim to receive payment from the settlements in the Lawsuit. If you already submitted a claim for the first settlement, you DO NOT need to submit anything further to receive payment from the new settlement.</p> <p>If you have not previously submitted a claim, you can do so on this website. You can return a claim form by mail or make a claim at www.JUULclassaction.com.</p> <p>If you bought directly from JUUL's website and have not previously submitted a claim, you should have received an email or postcard indicating the purchase amount on record for you that includes a claim code that is specific to you. You can return the postcard or make a claim online at www.JUULclassaction.com.</p>
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Do Nothing	If you do nothing, you will remain in the Settlement Class and be bound by the Settlement. If you did not submit a claim before and do not submit one now, you will not get any money from the Settlement. Read below for more details about the types of claims covered by the Lawsuit.
Opt Out of the Settlement	<p>You can opt out of the Settlement Class (also known as excluding yourself) if you want to sue Altria for claims similar to this case. If you previously opted out of the first settlement and you also wish to opt out of this new settlement, you must submit a new opt out form.</p> <p>If you opt out of the Settlement Class, you will retain your right to sue Altria but you will not be eligible to receive any money from the Altria Settlement (though you can still recover money from the JUUL Settlement if you submitted a claim).</p> <p>More detail on opting yourself out can be found on page 13.</p> <p>If you are considering bringing a separate claim against Altria, you should consult your own attorney who can advise you about any deadlines to file your claim.</p> <p>The deadline to opt out is: February 05, 2024.</p>
Opt Back Into the Settlement	If you opted out of the JUUL Settlement in this case, you have the opportunity to opt back in now that the rest of the lawsuit has settled. If you wish to opt back into the JUUL Settlement, you must notify the Settlement Administrator in writing using the contact information on page 15 .
Object to the Settlement	<p>If you are a member of the Settlement Class and do not opt out of the Altria Settlement, you can object to the Altria Settlement if you do not like any part of it.</p> <p>More detail on objecting to the Altria Settlement can be found on page 12.</p> <p>The deadline to object is: February 05,2024.</p>

What are the most important dates?

The deadline to make a claim for a settlement payment is February 05, 2024.

The deadline to opt out of the Settlement Class is February 05, 2024.

The deadline to object to the Settlement is February 05, 2024.

Learning About the Lawsuit

What is this Lawsuit about?

The Lawsuit alleges that Plaintiffs paid more for JUUL products than they otherwise would have paid if accurate information concerning the products' addictiveness and safety had been provided, and that JUUL products were unlawfully marketed to minors.

Plaintiffs also allege that JLI was an enterprise conducted by the individual defendants throughout the time JUUL has been sold, and by Altria for a portion of that time. Plaintiffs allege that the enterprise misled consumers concerning JUUL products' addictiveness and safety, and that the enterprise that Altria was a part of unlawfully marketed to minors.

A copy of the Complaint is available at www.JUULclassaction.com.

Altria denies these allegations and asserts that it did not violate any law.

The court has not decided whether Altria violated any laws. This notice is not an opinion by the court about whether the Plaintiffs or Defendants are right.

Where can I learn more?

You can get a complete copy of the Plaintiffs' complaint, the Settlement Agreement, and the Court's class certification order by visiting:

www.JUULclassaction.com

Why is there a Settlement?

Following the first settlement with JLI, the remaining defendant, Altria, and Plaintiffs agreed to the Altria Settlement to enable class members to receive money and avoid the costs and risks of trial against Altria. As a result of the Altria Settlement, members of the Settlement Class who submit valid claims (or did so previously) will get money payments without undue delay. Plaintiffs and their lawyers think the Altria Settlement is best for all members of the Settlement Class.

Which Defendants are in the first settlement and which ones are in the new one?

The first settlement, announced in December 2022, will release claims against JLI, its officers and directors, manufacturers of JUUL products, sellers of JUUL products, and other persons and entities identified in the first Settlement Agreement (and on the Settlement website).

This second settlement will release claims against Altria and its related entities, including Altria Group, Inc., Altria Client Services LLC, Altria Enterprises, LLC, Altria Group Distribution Company, Philip Morris USA, Inc. This new settlement includes all the remaining defendants in the lawsuit and will resolve the case completely.

What does it mean to “release” a claim?

If a claim is released, it is forever resolved and cannot be the basis for a new lawsuit.

What happens next in this Lawsuit?

If the Altria Settlement is approved by the Court, members of the Settlement Class who have submitted claims will be paid, and all claims of Settlement Class members against Altria will be dismissed.

What effect does this case have on personal injury claims?

The Settlement Class alleges **economic** injury to JUUL purchasers—that they were misled by JUUL and paid more for JUUL products than they otherwise would have, or that JUUL products would not have been purchased if they had not been marketed to minors.

The Settlement Class does not allege **personal** injury—the damage to health or welfare suffered by individuals who used JUUL products. If you have asserted personal injury claims, you may be eligible to recover as part of separate settlements that have been reached to resolve the personal injury claims in the Lawsuit. Deadlines and other important information regarding those separate settlements are included in the court’s order on www.JUULclassaction.com. Contact your lawyer with any questions.

You should consult with your own lawyer soon about any personal injury claims you may have because you may have missed the deadline for bringing a lawsuit for your personal injuries.

Important Facts About How The Settlement Might Affect You

How do I know if I am a member of the Settlement Class?

The Settlement Class includes all individuals who purchased, in the United States, a JUUL product from a brick and mortar or online retailer before December 7, 2022.

If you are in this group, you are a member of the Settlement Class and you must make a claim in order to receive a payment.

A “brick and mortar” retailer is a physical store in which you bought products in-person.

Note: You are not a member of the Settlement Class if:

- You purchased the JUUL product(s) **only from** another person who is not a retailer; or
- You are a Defendant, one of their employees, officers, directors, legal representatives, heirs, successors and wholly or partly owned subsidiaries or affiliated companies; or
- You are a judicial officer assigned to this case or a member of their immediate family, or associated court staff; or
- You timely and properly opt out of the Settlement Class.

What products are at issue in the Settlements?

The products included in the Settlements are any product designed, manufactured, produced, advertised, marketed, distributed, or sold by JUUL, or under the logo of JUUL, including “JUUL”-branded pods or devices. If you bought these products before December 7, 2022, you are in the Settlement Class.

What if I’m still not sure if I’m included in the Settlement Class?

If you are not sure whether you are included in the Settlement Class, you may call 1-855-604-1734 or email info@JUULClassAction.com. Please do *not* contact Defendants or the Court.

What are the benefits of the Settlements?

The two settlements total over \$300,000,000. In the first settlement, JUUL has agreed to pay \$255,000,000 to settle the claims of the Settlement Class. In the second settlement, Altria has agreed to pay an additional \$45,531,250 to settle the remaining claims of the Settlement Class. Class members who submit a claim will be eligible to get paid from both Settlements after payment for the lawyers' fees and the case expenses described on page 16.

Your Options as a Settlement Class Member

What are my Options if I am a Settlement Class Member?

You have three options as a member of the Settlement Class. You can (1) file a claim to get paid from the Settlements (you do not need to file a new claim if you have already filed a claim), (2) do nothing and remain in the Settlement Class, or (3) opt out of the Settlement Class and retain your right to sue Altria. If you do nothing and have not previously submitted a claim, you will not receive a payment. You can also object to any part of the Settlement that you do not like, as long as you don't opt out of the Settlement Class.

Do I need to do anything to get paid?

YES. To get paid from the Settlements, you *MUST* submit a claim. You only need to file one claim to receive payment from the two Settlements in this case. If you already submitted a claim for the first settlement, you do not need to submit anything further to receive payment from the Altria settlement.

The deadline to make a claim for a settlement payment is February 05, 2024.

How do I submit a claim?

You can make a claim at www.JUULclassaction.com. If you received an email or postcard about the Settlements, you can click the link in the email to make a claim or return the postcard. You can also obtain a paper claim form by contacting the Settlement Administrator at the address, phone number, or email on page 17.

Claims submitted by third party filers will not be accepted.

The deadline to make a claim for a settlement payment is February 05, 2024.

How much will my payment be?

Each claim will be based on how much each claimant spent on JUUL products compared to other Settlement Class members. How much each claimant will receive is unknown at this time because it depends on how many claims are submitted. More information about how payments will be calculated can be found in the [Plan of Allocation](#) available at www.JUULclassaction.com.

What do I give up by making a Settlement claim?

If the Altria Settlement becomes final, you will be releasing Altria from all the claims identified in the Settlement Agreement. This means that you will not be able to start another lawsuit, continue another lawsuit, or be part of any other lawsuit against Altria seeking economic damages for JUUL product purchases during the class period, except as to claims asserted in *In re Juul Labs, Inc. Antitrust Litigation*, Case No. 3:20-cv-02345-WHO.

The Altria Settlement Agreement is available at www.JUULclassaction.com. The Altria Settlement Agreement describes the released claims.

What are the consequences of doing nothing?

If you do nothing and remain in the Settlement Class, then you will be bound by the Settlement. If you did not submit a claim before and do not submit one now, you won't get any money from the Altria Settlement. You will not be able to start another lawsuit, continue another lawsuit, or be part of any other lawsuit against Altria seeking economic damages for JUUL product purchases during the class period, except as to claims asserted in *In re Juul Labs, Inc. Antitrust Litigation*, Case No. 3:20-cv-02345-WHO.

What if I don't want to be a part of the Settlement Class?

You can opt out of the Settlement Class for purposes of the Altria Settlement. If you do so, you will retain your right to sue or continue to sue Altria and you will not be eligible to get paid from the Altria Settlement.

If you already opted out of the first settlement and you also want to opt out of the Altria settlement, you need to submit another opt out form.

Information about how to opt out of the Settlement Class is [on page 14](#).

How do I submit an objection to the Settlement?

If you are a member of the Settlement Class and you did not request to opt yourself out of the Settlement Class for purposes of the Altria Settlement, you may object to any aspect of the Settlement, including the fairness of the Settlement, the Plan of Allocation, and/or Class Counsel's requests for attorneys' fees and expenses.

If the Court denies approval of the Altria Settlement, none of the money in the Altria Settlement will be paid to class members and the Lawsuit will continue against Altria. If the Court rejects your objection, you will still be bound by the Altria Settlement.

To object to the Altria Settlement, you (or your lawyer if you have one) must submit a written objection to the Court and send the objection to the Settlement Administrator at the addresses on page 13. You must submit your objection on or before February 05, 2024. Your objection can include any supporting materials, papers, or briefs that you want the Court to consider. Your objection must include:

- Your full name, address, telephone number, and, if available, email address;
- The case name and number: *In re JUUL Labs, Inc. Marketing, Sales Practices, and Products Liability Litigation*, No. 19-md-02913-WHO (N.D. Cal.);
- Documentation demonstrating that you are a member of the Class and/or this statement, followed by your signature: "I declare under penalty of perjury under the laws of the United States of America that [insert your name] is a member of the Class.";
- A clear statement that you are objecting to the Altria Settlement;
- A written statement of all grounds for your objection, including any legal support for the objection, making sure to say whether your objection relates only to you, to part of the class, or the entire class;
- Copies of any papers, briefs, or other documents your objection is based on;
- The name, address, email address, and telephone number of every attorney representing you; and
- A statement saying whether you and/or your attorney intend to appear at the Final Approval Hearing and, if so, a list of all persons, if any, who will be called to testify in support of the objection.

You must submit your objection to the Court and to the Settlement Administrator by February 05, 2024.

Office of the Clerk of Court
U.S. District Court for the
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102

In re JUUL Labs, Inc.
Settlement Administrator
P.O. BOX 5730
Portland, OR 97228-5730
Email:
info@JUULClassAction.com

A fairness hearing will be held on March 6, 2024, subject to change by the Court. If you would like to attend the fairness hearing, please monitor the Settlement website for information on how to attend and for information regarding any change of time or date.

Is any part of the Lawsuit not included in the Settlement?

No. The first settlement with JUUL Labs and this new settlement with Altria include all the defendants in the case and all the claims brought by the Class. If both Settlements are approved, the Lawsuit will end.

Opting Out / Excluding Yourself

What are the consequences of excluding myself?

You have the right to opt yourself out of the Settlement Class—also known as “excluding yourself” from the Class. If you opt out so that you can start, or continue, your own lawsuit against Altria, you should talk to your own lawyer soon, because you may have missed the deadline to file a claim. You will be responsible for the cost of any services provided by your own lawyer.

This will be your only opportunity to opt out of the Settlement Class for the Altria Settlement. The deadline to opt out of the JUUL Settlement has passed.

What happens if I opt out of the Settlement Class?

If you opt out of the Settlement Class for the Altria Settlement, you will not be eligible to receive payment from the Altria Settlement. You may be able to file a lawsuit against (or continue to sue) Altria about the legal claims brought on behalf of the Settlement Class.

If you opt out of the Settlement Class but participate in the personal injury settlement, your ability to bring claims against Altria may be impacted. You should speak with your own lawyer about how participating in the personal injury

settlement may impact your rights even if you opt out of the class action Settlement.

How do I opt out?

You can opt out of the Settlement Class with respect to the Altria Settlement by going to www.JUULclassaction.com and filling out the online form, or by sending a letter via first class U.S. mail saying that you want to opt out of the Altria Settlement in *In re JUUL Labs, Inc. Marketing, Sales Practices, and Products Liability Litigation*, No. 19-md-02913-WHO (N.D. Cal.) to the Settlement Administrator at the below address:

In re JUUL Labs, Inc.
Settlement Administrator
P.O. BOX 5730
Portland, OR 97228-5730

Be sure to include your name, address, telephone number, and your signature. If you are under 18 years old and do not want your name included on the list of opt-outs filed with the Court, your letter must state that you are under 18.

If you wish to opt out of the Settlement Class, you must do so individually and separately; no consolidated or group opt-outs will be accepted.

To opt out, you must complete the online form opting out of any or all of the Classes by, or send your letter requesting exclusion postmarked no later than, February 5, 2024.

If I opted out of the JUUL Settlement, can I opt back in now?

If you opted out of the first Settlement in this case, you have the opportunity to opt back in now that the rest of the lawsuit has settled.

If you wish to opt back in, you must notify the Settlement Administrator by sending a letter via first class U.S. mail saying that you want to opt back into the

Settlements in *In re JUUL Labs, Inc. Marketing, Sales Practices, and Products Liability Litigation*, No. 19-md-02913-WHO (N.D. Cal.) to the below address:

In re JUUL Labs, Inc.
Settlement Administrator
P.O. BOX 5730
Portland, OR 97228-5730

Your letter should include your name, address, telephone number, and your signature.

If you want to receive payment from both Settlements after opting back in, you must also submit a claim form, as described above.

The Lawyers Representing You

Do I have a lawyer in the case?

The Court has appointed Dena Sharp of Girard Sharp LLP to serve as Class Counsel for the Settlement Class.

Dena C. Sharp
GIRARD SHARP LLP
601 California Street, 14th Fl.
San Francisco, CA 94108
Telephone: (415) 981-4800

Ms. Sharp and the other lawyers listed below also serve as Co-Lead Counsel in the Lawsuit.

Sarah R. London
LIEFF CABRASER HEIMANN & BERNSTEIN
275 Battery Street, Fl. 29
San Francisco, CA 94111
Telephone: (415) 956-1000

Dean Kawamoto
KELLER ROHRBACK L.L.P.
1201 Third Ave., Ste. 3200
Seattle, WA 98101
Telephone: (206) 623-1900

Ellen Relkin
WEITZ & LUXENBERG
700 Broadway

New York, NY 10003
Telephone: (212) 558-5500

These lawyers do not represent you individually, only as a member of the Class. Class Counsel are experienced in handling similar cases against other companies.

Should I get my own lawyer?

You are not required to hire your own lawyer to submit a Settlement claim. Class Counsel are working on your behalf as a member of the Class. However, if you wish to do so, you may retain your own lawyer at your own expense. Your own lawyer may appear on your behalf in this Lawsuit.

How will the lawyers be paid?

The lawyers representing the Settlement Class will request an award from the Court for attorneys' fees not to exceed thirty percent (30%) of the \$45,531,250 Altria Settlement plus any accrued interest. Class Counsel will also seek reimbursement of costs and expenses (1) advanced in litigating the case not to exceed \$1,000,000 and (2) for providing notice and administering the settlement not to exceed \$4,500,000.

All awards for attorneys' fees and expenses are subject to Court approval and will be paid from the Settlement Fund only after the Court approves them.

Class counsel's motion for the payment of attorneys' fees and expenses will be available in the [Important Documents](#) page of the website by January 15, 2024.

Members of the Settlement Class will not individually have to pay any attorneys' fees or expenses in connection with the Lawsuit.

Key Resources

How do I get more information?

This notice contains a summary of the Lawsuit. More detailed information about the Lawsuit, copies of the Plaintiffs' complaint, the Court's order certifying the Classes, and other filings are available at www.JUULclassaction.com. Complete copies of public pleadings, Court rulings, and other filings are available for review and copying at the Office of the Clerk of Court, United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102 during normal business hours.

Additional information about the Lawsuit is available at www.JUULclassaction.com or you can call the Settlement Administrator toll-free at 1-855-604-1734 or by email at info@JUULClassAction.com.

You can also contact Class Counsel at the addresses listed below:

Case website	www.JUULclassaction.com				
Settlement Administrator	In re JUUL Labs, Inc. Settlement Administrator P.O. BOX 5730 Portland, OR 97228-5730				
Class Counsel and Co-Lead Counsel (Consumers' lawyers)	<table> <tr> <td>Dena C. Sharp GIRARD SHARP LLP 601 California Street, 14th Fl. San Francisco, CA 94108 Telephone: (415) 981-4800</td> <td>Dean Kawamoto KELLER ROHRBACK L.L.P. 1201 Third Ave., Ste. 3200 Seattle, WA 98101 Telephone: (206) 623-1900</td> </tr> <tr> <td>Sarah R. London LIEFF CABRASER HEIMANN & BERNSTEIN 275 Battery Street, Fl. 29 San Francisco, CA 94111 Telephone: (415) 956-1000</td> <td>Ellen Relkin WEITZ & LUXENBERG 700 Broadway New York, NY 10003 Telephone: (212) 558-5500</td> </tr> </table>	Dena C. Sharp GIRARD SHARP LLP 601 California Street, 14th Fl. San Francisco, CA 94108 Telephone: (415) 981-4800	Dean Kawamoto KELLER ROHRBACK L.L.P. 1201 Third Ave., Ste. 3200 Seattle, WA 98101 Telephone: (206) 623-1900	Sarah R. London LIEFF CABRASER HEIMANN & BERNSTEIN 275 Battery Street, Fl. 29 San Francisco, CA 94111 Telephone: (415) 956-1000	Ellen Relkin WEITZ & LUXENBERG 700 Broadway New York, NY 10003 Telephone: (212) 558-5500
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Court (DO NOT CONTACT)	Office of the Clerk of Court United States District Court for the Northern District of California 450 Golden Gate Avenue San Francisco, CA 94102				