



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 part of that Lawsuit could affect your rights.

You may be eligible to receive a payment from a \$255 Million Settlement of Part of the Lawsuit

Your options:

- 1. Make a claim.** *Get a payment.*
- 2. Do nothing.** *You will get no payment and be bound by the Settlement and the Lawsuit.*
- 3. Opt out of the Settlement or the Lawsuit.**
- 4. Object to the Settlement.**

You are not being sued.

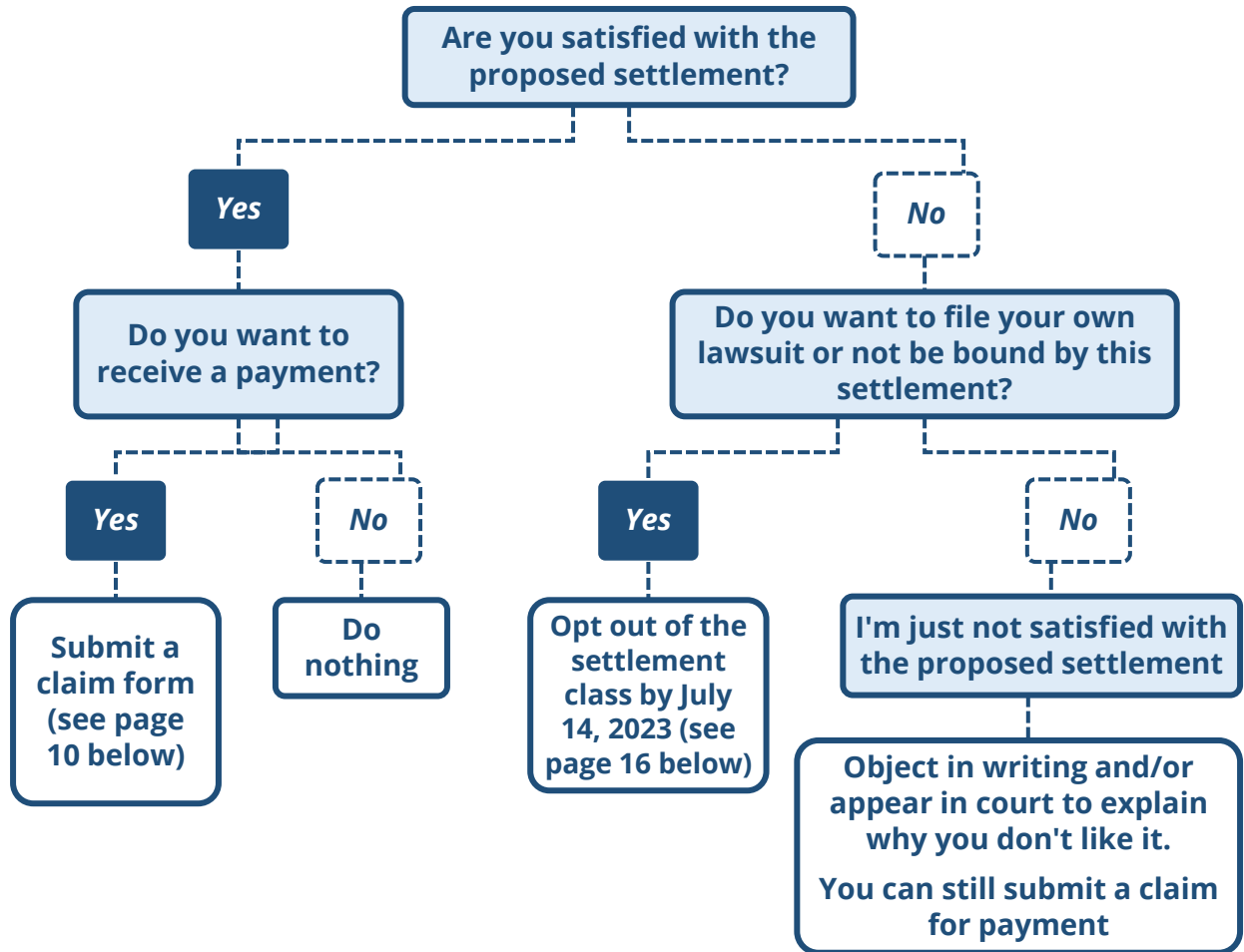
This notice explains the Lawsuit, the Settlement, and your legal rights and options.

Please read entire notice carefully.

You need to make decisions about two different parts of the case, the settlement and the continuing court case.

To make the best decisions for you, read on.

THE \$255 MILLION SETTLEMENT WITH JUUL LABS



THE ONGOING COURT CASE AGAINST ALTRIA



Important things to know:

- You must file a claim to receive money from the 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 July 14, 2023.
- 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. and related individuals and entities. These plaintiffs claimed that they paid more for JUUL products than they would have paid if they had been given accurate information about JUUL products' addictiveness and safety, and that JUUL products were unlawfully marketed to minors.

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.

JUUL Labs, on behalf of itself, its directors and officers, and other entities, has agreed to pay \$255 million to settle claims against it. The group of people who JUUL Labs has agreed to pay is called the Settlement Class and it includes everyone who purchased JUUL products from retail stores or from JUUL directly online before December 7, 2022. If you are in this group and want to get paid, you must file a claim by returning a claim form or make a claim on the settlement website at www.JUULclassaction.com.

Altria—another defendant in the lawsuit—and related companies are not parties to the settlement. The lawsuit will continue against them. The people who the Court has allowed to sue Altria and related companies are called the Court Classes, which are defined below. If you are in this group, that ongoing lawsuit **may affect your rights**.

What are my options?

| | |
|---|--|
| Make a Claim to Get Paid from the Settlement | <p>To receive a payment from the Settlement, you must make a claim. You can return a claim form by mail or make a claim at www.JUULclassaction.com.</p> <p>The only way to receive your settlement payment is to make a claim. If you bought directly from the JUUL Labs website, you should receive an email or postcard that may indicate 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> |
|---|--|

| | |
|---|---|
| <p>Do Nothing</p> | <p>If you do nothing, you will remain in the Settlement Class and be bound by the Settlement, but you will not get any money from the Settlement.</p> <p>If you do nothing, you will remain in the Court Classes and your claims against Altria and its related entities will continue to be bound by the orders of the Court.</p> <p>Staying in either the Settlement Class or the Court Classes does not preclude you from bringing any personal injury claims you may have. <u>Read below</u> for more details about the types of claims covered by the Lawsuit.</p> |
| <p>Opt Out of the Settlement</p> | <p>You can opt out of the Settlement Class (also known as excluding yourself) if you want to separately bring the kinds of claims against Defendants that are in this case.</p> <p>If you opt out of the Settlement Class, you will not get any settlement payment, but will retain your right to sue JUUL Labs and the other persons and entities on whose behalf it settled (which can be found on Appendix A to the Settlement Agreement).</p> <p>If you opt out of the Court Classes, you will not be entitled to money that may result from the case against Altria or be bound by the result, but you will retain your right to sue Altria and its related entities on your own.</p> <p>More detail on opting yourself out can be found <u>below</u>.</p> <p>If you are considering bringing a separate claim against Defendants, you should consult your own attorney (at your own expense) who can advise you about any deadlines to file your claim.</p> <p>The deadline to opt out is July 14, 2023.</p> |
| <p>Object to the Settlement</p> | <p>If you are a member of the Settlement Class and do not opt out, you can object to the Settlement if you do not like any part of it.</p> <p>More detail on objecting to the Settlement can be found <u>below</u>.</p> <p>The deadline to object is July 14, 2023.</p> |

What are the most important dates?

The deadline to make a claim for a settlement payment is **July 14, 2023**.

The deadline to opt out of the Settlement Class and/or some or all of the Court Classes is **July 14, 2023**.

The deadline to object to the Settlement is **July 14, 2023**.

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.

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

The Defendants deny these allegations and assert that they did not violate any law.

The court has not decided whether any Defendant 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?

JUUL Labs, on behalf of itself and other persons and entities, and Plaintiffs have agreed to the Settlement to avoid the costs and risks of trial. As a result of the Settlement, members of the Settlement Class who submit valid claims will get money payments without undue delay. Plaintiffs and their lawyers think the Settlement is best for all members of the Settlement Class.

Which Defendants are settling, and which ones are still being sued in the Lawsuit?

The proposed settlement will release claims against JUUL Labs, its officers and directors, manufacturers of JUUL products, sellers of JUUL products, and other persons and entities identified in the Settlement Agreement (and on the Settlement website). If you do not opt out of (or exclude yourself from) the Settlement Class, your claims against those persons and entities will be released and you will not be able to sue them for these claims. More information about the released claims is [below](#).

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.

The lawsuit also includes claims against Altria and related companies. If you are a member of the Court Classes defined below and do not opt out, you will be bound by any result from the litigation by the Court Classes against Altria. This may be your only chance to opt out.

What happens next in this Lawsuit?

If the Settlement is approved by the court, members of the Settlement Class who submit claims will be paid, and the claims of Settlement Class members will be dismissed against JUUL Labs and the persons and entities on whose behalf JUUL Labs has settled.

The claims of the Court Classes against Altria and related defendants will continue. A class action trial is scheduled to begin in 2024 against Altria. The Ninth Circuit Court of Appeals is reviewing the decision to let the claims against Altria proceed as a class action. The outcome of that appeal may impact whether the claims against Altria will proceed as a class action or whether trial will occur in 2024. There is no guarantee that Plaintiffs will win or obtain any additional money for any of the Court Classes.

What effect does this case have on personal injury claims?

The classes allege **economic** injury to JUUL purchasers—that they paid more for JUUL products than they otherwise would have if they had not been misled, or that JUUL purchasers would not have purchased JUUL products if they had not been marketed to minors.

The classes do not allege **personal** injury—the damage to health or welfare suffered by individuals who used JUUL Products. Participation in the Settlement or remaining in some or all of the Court Classes does not preclude you from bringing any personal injury claims you may have (subject to statute of limitations or any other laws that may prevent you from bringing a personal injury claim). If you have asserted personal injury claims, you may be eligible to recover as part of a separate settlement that has been reached to resolve the personal injury claims in the Lawsuit. Deadlines and other important information regarding that separate settlement 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.

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.
- 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 Settlement?

The products included in the Settlement are any JUUL product designed, manufactured, produced, advertised, marketed, distributed, or sold by JUUL Labs, or under the logo of JUUL, including “JUUL”-branded pods or devices. If you bought these products from a retail store, online retailer, or the Juul website before December 7, 2022, you are in the Settlement Class. To receive a payment, you must make a claim.

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 Settlement?

JUUL Labs, on behalf of itself and other persons and entities, has agreed to pay \$255,000,000 to settle the claims of the Settlement Class. Class members who submit a claim will be eligible to get paid from that Settlement amount after payment for the lawyers’ fees and the case expenses described below.

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 Settlement, (2) do nothing and remain in the Settlement Class but get no payment, or (3) opt out of the Settlement Class and receive no payments from the Settlement but retain your right to sue JUUL Labs and the persons and companies on whose behalf it settled. 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.

| | Submit a Claim | Do Nothing | Opt Out of the Settlement Class |
|---|----------------|------------|---------------------------------|
| Will I receive money from the Settlement if I . . . | Yes | No | No |
| Am I bound by the Settlement if I . . . | Yes | Yes | No |
| Can I pursue my own case for the specific claims in the Settlement against JUUL and the persons and entities it settled on behalf of if I . . . | No | No | Yes |

Do I need to do anything to get paid?

YES. To get paid from the Settlement, you *MUST* submit a claim.

The deadline to make a claim for a settlement payment is July 14, 2023.

How do I submit a claim?

You can make a claim at www.JUULclassaction.com. If you received an email or postcard about the Settlement, 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 [below](#).

The deadline to make a claim for a settlement payment is July 14, 2023.

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 is available in the [Plan of Allocation](#).

What do I give up by making a Settlement claim?

If the Settlement becomes final, you will be releasing JUUL Labs, and the persons and entities on whose behalf it settled 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 JUUL Labs, and the persons and entities on whose behalf it settled, based on the same legal claims and 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 that arise from alleged anticompetitive conduct.

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

What are the consequences of doing nothing?

If you do nothing and remain in the Settlement Class, you will be bound by the Settlement and won't get any money from the Settlement. You will not be able to start another lawsuit, continue another lawsuit, or be part of any other lawsuit against JUUL Labs, and the persons and entities on whose behalf it settled, based on the same legal claims and 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 that arise from alleged anticompetitive conduct. You may be unable to recover against Altria for economic harm resulting from JUUL purchases, including economic harms that arise from alleged anticompetitive conduct.

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

You can opt out of the Settlement Class, but if you do so you will not be eligible to receive payment from the Settlement. You will retain your right to sue or continue to sue JUUL Labs and the other persons and entities on whose behalf it settled.

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

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, 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, expenses, and Class Representatives' service awards.

If the Court denies approval of the Settlement, no settlement payments will be sent out from the Settlement and the Lawsuit will continue against JUUL Labs and the other defendants on whose behalf it settled. If the Court rejects your objection, you will still be bound by the Settlement.

To object to the 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 below. You must submit your objection so that it is postmarked on or before **July 14, 2023**. 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, 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 written statement of all grounds for your objection, including any legal support for the objection;
- 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 **July 14, 2023**.

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

What is *Not* Included in the Settlement

What part of the Lawsuit is not included in the Settlement?

The claims that have been asserted by the Court Classes 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., are not included in the Settlement. If you are a member of one of the Court Classes (defined below) and you do not opt out of the Court Classes, you will be bound by the result of that ongoing litigation. That means that if the Court Classes win money, you may be entitled to a recovery. If the Court Classes lose their case, your claims against Altria and related entities may be released and you may be unable to recover from Altria for economic harm resulting from JUUL purchases. This may be your only opportunity to opt out.

You may be entitled to payment from this Settlement regardless of whether you opt out of the Court Classes or whether the Court Classes prevail against Altria.

How do I know if I am a member of one or more of the Court Classes?

The claims against Altria and its related entities will proceed as a class action on behalf of two classes, or groups of people (the “Court Classes”), that the Court has certified. The Court Classes could include you.

The Court of Appeals is currently reviewing the Court’s decision to certify the Court Classes. If the Court of Appeals decides that the decision to certify was correct, the claims of the Court Classes will proceed to trial unchanged. A decision by the Court of Appeals that the decision to certify was incorrect in whole or in part may result in the Court Classes or claims they assert being narrowed, or the Court Classes being unable to proceed as a class action.

Subject to the exclusions listed below, the Court Classes include:

- (a) Nationwide Class: All persons who purchased from brick and mortar or online retailers, in the United States up and until December 31, 2021, one or more JUUL pods, whether sold in packs of four or two, or as part of Starter Kits (which include both JUUL pods and a JUUL device).
- (b) Nationwide Youth Class: All persons who purchased from brick and mortar or online retailers, in the United States up and until November 31, 2019, one or more JUUL devices, pods, or kits and were under the age of eighteen at the time of purchase.

You may be a members of both Court Classes. Membership in one Court Class does not preclude you from membership in the other.

You are not a member of any of the Classes if:

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

What products are at issue in the claims of the Court Classes?

The JUUL Products at issue in the Lawsuit are: JUUL devices (sold as a Basic Kit), JUUL pods with 5% nicotine strength that came in packs of four and packs of two, and Starter Kits that include a device and four pods. Unlike the Settlement, the claims of the Court Classes do not include chargers and other JUUL Product accessories.

What if I'm still not sure if I'm a member of the Court Classes?

If you are not sure whether you are included in one or more of the Court Classes, you may call 1-855-604-1734 or email info@juulclassaction.com. Please do not contact Defendants or the Court.

What claims apply to each Court Class?

The Court Classes bring claims under federal law against Altria and related entities. The Nationwide Class alleges that JUUL Labs was an enterprise conducted by the individual defendants throughout the time JUUL has been sold, and by Altria for a portion of that time. The Nationwide Class alleges that the enterprise misled consumers concerning JUUL products' addictiveness and safety, causing them to pay more than they would have had accurate information been provided. The Nationwide Youth Class alleges that the enterprise that Altria was a part of unlawfully marketed to minors. Altria denies these allegations.

Your decision to either remain in the Court Class(es) or opt out of one or both of the Court Classes may impact your ability to bring claims against Altria and its related entities under state or federal laws seeking economic damages for JUUL Product purchases during the class period.

Your Options as a Court Class Member

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

You have three options as a Court Class member. You can (1) do nothing and remain in the Court Classes, (2) opt out of both Court Classes, or (3) opt out of one Court Class but not the other if you are a member of both Court Classes.

| | Do nothing and remain in all the Court Classes | Opt Out of some, but not all, of the Court Classes | Opt Out of all the Court Classes |
|--|---|---|---|
| Am I bound by the terms of this Lawsuit if I . . . | Yes | Yes to those you do not opt out of; Maybe to those you opt out of | No |
| Can I pursue my own case for the specific claims in this Lawsuit if I . . . | No | No to those you do not opt out of; Maybe to those you opt out of | Yes |
| Will I have legal representation for the claims in this Lawsuit if I . . . | Yes | No to those you opt out of | No (unless you get your own attorney at your own expense) |

What are the consequences of doing nothing?

If you do nothing you will remain in the Court Classes. You will keep the right to a share of any money that may come from a trial or settlement of the Class(es)'s claims in this Lawsuit against Altria. All the Court's orders in the case relating to the Court Class(es) for which you remain a member will apply to you and legally bind you. You will also be bound by any judgment in the Lawsuit related to the claims of the Court Class(es) you do not opt out of.

You may not be able to start another lawsuit, continue another lawsuit, or be part of any other lawsuit against Altria based on the same legal claims and seeking economic damages for JUUL Product purchases during the class period.

Remaining in the Court Class(es) may preclude you from bringing your own claims against Altria under other laws based on the same or similar facts and may affect your ability to recover from Altria for economic harm resulting from JUUL purchases. The Court has not decided whether remaining in the Court Class(es) would impact your rights to bring your claims under other laws. Remaining in the Court Class(es) will not affect your ability to participate in the Settlement with JUUL Labs and the persons and entities on whose behalf it has settled. If you have questions about how remaining in the Court Class(es) would affect your rights, you should consult your own attorney.

What if I don't want to be a part of the Court Classes?

You can opt out of one or both of the Court Classes. If you do so, you will not be eligible to receive payment from any money that class recovers as part of a settlement or judgment.

Information about how to opt yourself out of the Court Classes is [below](#).

Opting Out / Excluding Yourself

What are the consequences of excluding myself?

You have the right to opt yourself out of the Settlement Class and some or all of the Court Classes you are a member of—also known as “excluding yourself” from the Classes. If you opt out of any of the Classes so that you can start, or continue, your own lawsuit against any of the Defendants in the Lawsuit, 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, and may be your only opportunity to opt out of the Court Classes.

What happens if I opt out of the Settlement Class?

If you opt out of the Settlement Class, you will not be eligible to receive payment from the Settlement. You may be able to file a lawsuit against (or continue to sue) JUUL Labs, and the persons and entities on whose behalf it settled, 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 JUUL Labs and the persons and entities on whose behalf it settled 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.

What happens if I opt out of ONE or BOTH of the Court Classes?

You may be a member of one or both of the Court Classes. (For example, if you purchased a JUUL Product when you were under the age of 18, you may be a member of both the Court Classes). You have the option of excluding yourself (i.e., opting out of) from one or both Classes that you are a member of.

If you opt out of BOTH of the Court Classes you won't get any money or benefits that the Court Classes may recover, even if Plaintiffs obtain them as a result of trial or from any settlement between Altria and Plaintiffs. If you opt out, you will not be legally bound by any of the Court's orders related to the Court Classes or any judgment or release entered in

this Lawsuit related to the Court Classes, and you may be able to file a lawsuit against (or continue to sue) Altria about the legal claims brought on behalf of the Court Classes.

If you are a member of both the Court Classes and choose to opt out of ONE but not both of the Court Classes, you won't get any money or benefits received by the members of the Court Class you chose to opt out of. You will keep the right to a share of any recovery that may come from a trial or settlement of this Lawsuit related to the Classes you remain a part of, but you will not be able to pursue your own claims against Altria for the same legal theories being pursued by the Class you remain a part of. You also may be bound by rulings regarding the other Class.

Remaining in the Court Class(es) may prevent you from filing your own lawsuit against Altria under laws other than those brought by the Court Classes and may affect your ability to recover from Altria for economic harm resulting from JUUL purchases. Remaining in the Court Class(es) will not affect your ability to participate in the Settlement with JUUL Labs and the persons and entities on whose behalf it has settled. The Court has not made any decisions concerning any other claims or whether they can proceed as a class action.

How do I opt out?

You can opt out of the Settlement Class or one or both of the Court Classes (i.e., "opt out" of the Class(es)) 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 (1) all the Classes, or (2) one or more of the Classes, 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 of age 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, or mail your letter requesting exclusion so that it is postmarked no later than **July 14, 2023**.

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 counsel for the Court Classes.

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 Classes. 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 pursue the claims in this Lawsuit or 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, particularly if you have concerns over how staying in the Court Classes may affect your rights, 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 \$255 million settlement plus any accrued interest. Class Counsel will also seek reimbursement of costs and expenses (1) advanced in litigating the case not to exceed \$6,000,000, and (2) for providing notice and administering the settlement not to exceed \$7,000,000. Class Counsel will also request service awards for the eighty-six (86) Class Representatives not to exceed a total of \$1,000,000 in service awards in recognition of their work on behalf of the entire Settlement Class to achieve the Settlement.

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 June 23, 2023.

For the lawsuit that will continue against Altria, the lawyers representing the Court Classes will only get paid if Plaintiffs and the Court Classes win or settle the claims against Altria. If Plaintiffs win or settle the claims against Altria, then Class Counsel will ask the Court to approve reasonable attorneys' fees, as well as reimbursement of expenses incurred on behalf of the Court Classes. If the Court grants Class Counsel's requests, fees and expenses would either be deducted from any money obtained for the Court Classes, or the Court may order Altria to pay attorneys' fees and costs in addition to any money awarded to the Court Classes.

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

Key Resources

How I get more information?

This notice contains a summary of the Lawsuit. More detailed information about the Lawsuit, copies of 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 to copy 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 (Consumers' lawyers) | <table border="0"> <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 | | | | |