



FILED
San Francisco County Superior Court

MAY 29 2024

CLERK OF THE COURT
BY: Christina Green
Deputy Clerk

LEXINGTON LAW GROUP
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Attorneys for Plaintiff
CENTER FOR ENVIRONMENTAL HEALTH

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

CENTER FOR ENVIRONMENTAL HEALTH,
a non-profit corporation,

Plaintiff,

v.

EASY SPIRIT LLC, et al.,
Defendants.

CENTER FOR ENVIRONMENTAL HEALTH,
a non-profit corporation,

Plaintiff,

v.

DOLLS KILL, INC., et al.,
Defendants.

Case Nos. ~~CGC-22-598022~~
CGC-22-602383

Assigned For All Purposes To The
Honorable Ethan P. Schulman, Dept. 304

**[PROPOSED] CONSENT JUDGMENT
AS TO DEFENDANTS AGRON, INC.,
ASICS AMERICA CORPORATION,
CENTRIC SOCKS LLC, CREST
BRANDS, LLC, DELTA GALIL USA,
INC., DOLLAR GENERAL
CORPORATION, DOLLS KILL, INC.,
GCE INTERNATIONAL, INC., GINA
GROUP LLC, GMA ACCESSORIES
INC., GOLD, INC., HANESBRANDS
INC., HIGH POINT DESIGN LLC, ILNA
INC., IMPLUS FOOTCARE, LLC,
JEFFERIES SOCKS, LLC, MAJESTY
BRANDS LLC, MICHAELS STORES,
INC., ORLY SHOE CORP., PREGER &
WERTENTEIL, INC., PVH LEGWEAR
LLC, RENFRO CORPORATION,
ROYCE TOO LLC, SHALOM
INTERNATIONAL CORP., SPIRIT
HALLOWEEN SUPERSTORES LLC,
STANCE, INC., UNITED LEGWEAR
COMPANY, LLC, USA LEGWEAR
LLC, VICTORIA'S SECRET & CO.,
AND WIESNER PRODUCTS, INC.**

1 **1. INTRODUCTION**

2 1.1 The parties to this Consent Judgment (“Parties”) are the Center for
3 Environmental Health (“CEH”) and Defendants Agron, Inc., Asics America Corporation, Centric
4 Socks LLC, Crest Brands, LLC, Delta Galil USA, Inc., Dollar General Corporation, Dolls Kill,
5 Inc., GCE International, Inc., Gina Group LLC, GMA Accessories Inc., Gold, Inc., Hanesbrands
6 Inc., High Point Design LLC, ILNA Inc., Implus Footcare, LLC, Jefferies Socks, LLC, Majesty
7 Brands LLC, Michaels Stores, Inc., Orly Shoe Corp., Preger & Wertenteil, Inc., PVH Legwear
8 LLC, Renfro Corporation, Royce Too LLC, Shalom International Corp., Spirit Halloween
9 Superstores LLC, Stance, Inc., United Legwear Company, LLC, USA Legwear LLC, Victoria’s
10 Secret & Co., and Wiesner Products, Inc. (“Settling Defendants”). CEH and Settling Defendants
11 are referred to collectively as the “Parties.”

12 1.2 CEH alleges that Settling Defendants manufacture, distribute, and/or sell
13 socks made primarily of polyester with spandex that contain Bisphenol A (“BPA”) in the State of
14 California or have done so in the past.

15 1.3 Beginning on September 1, 2021, CEH served 60-Day Notices of Violation
16 under Proposition 65 (The Safe Drinking Water and Toxic Enforcement Act of 1986, California
17 Health & Safety Code §§ 25249.5, *et seq.*) (“Notice”) to Settling Defendants, the California
18 Attorney General, the District Attorneys of every County in the State of California, and the City
19 Attorneys for every City in the State of California with a population greater than 750,000. The
20 Notices allege violations of Proposition 65 with respect to the presence of BPA in socks made
21 primarily of polyester with spandex.

22 1.4 On February 4, 2022, CEH filed the original complaint in the *CEH v. Easy*
23 *Spirit, et al.* case. On March 21, 2022, CEH filed the operative First Amended Complaint
24 (“FAC”) in that case. On October 13, 2022, CEH filed the operative Complaint (“Complaint”) in
25 the *Dolls Kill* case. Settling Defendants are parties to either the *Easy Spirit* FAC or the *Dolls Kill*
26 Complaint.

27 1.5 For purposes of this Consent Judgment only, the Parties stipulate that: (i) this
28 Court has jurisdiction over the allegations of violations contained in the operative complaint

1 applicable to Settling Defendant and personal jurisdiction over Settling Defendant as to the acts
2 alleged in those complaints; (ii) venue is proper in the County of San Francisco; and (iii) this
3 Court has jurisdiction to enter this Consent Judgment.

4 1.6 Nothing in this Consent Judgment is or shall be construed as an admission by
5 the Parties of any fact, conclusion of law, issue of law, or violation of law, nor shall compliance
6 with the Consent Judgment constitute or be construed as an admission by the Parties of any fact,
7 conclusion of law, issue of law, or violation of law. Nothing in this Consent Judgment shall
8 prejudice, waive, or impair any right, remedy, argument, or defense the Parties may have in any
9 other legal proceeding. This Consent Judgment is the product of negotiation and compromise and
10 is accepted by the Parties for purposes of settling, compromising, and resolving issues disputed in
11 this action.

12 **2. DEFINITIONS**

13 2.1 “Compliance Date” means the date that is twelve months following the
14 Effective Date or January 1, 2025, whichever is later.

15 2.2 “Covered Products” means socks designed for females whose composition
16 includes spandex and 51 percent or more polyester that are manufactured, distributed, and/or sold
17 by each Settling Defendant.

18 2.3 “Effective Date” means the date on which this Consent Judgment is entered by
19 the Court.

20 2.4 “Other Bisphenols” means Bisphenol AF (BPAF), Bisphenol AP (BPAP),
21 Bisphenol B (BPB), Bisphenol E (BPE), Bisphenol F (BPF), Bisphenol P (BPP), Bisphenol S
22 (BPS), and Bisphenol Z (BPZ).

23 2.5 “Reformulation Level” means 10 ppm BPA as measured by the Test Protocol.

24 2.6 “Test Protocol” means a standard method for measuring total BPA content as
25 set forth in Exhibit A.

26 2.7 “Manufacturer Defendant Releasees” means manufacturers, suppliers,
27 licensors, brand owners, and intellectual property owners of Covered Products for a Settling
28 Defendant.

1 **3. INJUNCTIVE RELIEF**

2 3.1 **Reformulation of Covered Products.** On and after the Compliance Date,
3 Settling Defendants shall not manufacture, distribute, sell, or offer for sale any Covered Product
4 in California that contains BPA in excess of the Reformulation Level except as provided in
5 Section 3.3 below.

6 3.2 **Specification to Suppliers.** No more than thirty (30) days after the Effective
7 Date, Settling Defendants shall issue specifications to their suppliers of Covered Products that
8 Covered Products shall not contain BPA in excess of the Reformulation Level.

9 3.3 **Sell-Through for Existing Inventory.** The reformulation requirements of
10 Section 3.1 shall not apply to Covered Products that Settling Defendant had purchased or entered
11 into a binding agreement to purchase prior to the Effective Date, including but not limited to
12 finished Covered Products in transit, in distribution centers, in inventory, or in the possession of
13 third-party distributors, retailers, and Manufacturer Defendant Releasees.

14 3.4 **Notification to Suppliers Regarding Other Bisphenols.** No more than
15 ninety (90) days after the Effective Date, Settling Defendants shall request that their suppliers of
16 Covered Products, to the extent possible, not replace any intentionally added BPA with Other
17 Bisphenols in manufacturing the Covered Products. Nothing in this Section 3.4 shall be
18 construed to require a Settling Defendant, or its suppliers or customers, to test for the presence of
19 Other Bisphenols.

20 **4. ENFORCEMENT**

21 4.1 CEH may, by motion or application for an order to show cause before the
22 Superior Court of San Francisco County, enforce the terms and conditions contained in this
23 Consent Judgment.

24 4.2 Prior to bringing any motion or application to enforce the requirements of
25 Section 3 above, CEH shall provide Settling Defendant(s) with a Notice of Violation (“NOV”)
26 and a copy of any test results which purportedly support the NOV. The Parties shall then meet
27 and confer regarding the basis for the anticipated motion or application in an attempt to resolve it
28 informally, including providing Settling Defendant(s) with a reasonable opportunity of at least

1 thirty (30) days to cure any alleged violation, or so long as such cure is being diligently pursued
2 by the Settling Defendant and the Settling Defendant provides written notice to CEH regarding its
3 actions constituting the diligent pursuit. During the meet and confer process, upon request from
4 Settling Defendant, CEH will provide Settling Defendant with a sample of the Covered Product
5 or Products that form the basis of the NOV. Should Settling Defendant obtain a test result of that
6 sample from an independent accredited laboratory based in the United States that is below the
7 applicable Reformulation Level, CEH may either withdraw the NOV or request that the Parties
8 obtain a test result from a third laboratory, using agreed-upon methods of analysis permitted
9 under the specific protocol set forth on Exhibit A, agreed to by the Parties, a test which would be
10 paid for jointly by the Parties. The test result from the third laboratory will then serve as
11 determinative of the level of BPA in the Covered product. Should such attempts at informal
12 resolution fail, CEH may file an enforcement motion or application, provided that no enforcement
13 motion or application will be filed during the pendency of any additional testing described herein.

14 4.3 For purposes of this Section 4, a violation of Section 3 is established by a test
15 undertaken pursuant to the protocol in Exhibit A that includes equivalent-mass homogenized
16 samples from two or more units of the Covered Product that exceeds the Reformulation Level.
17 For avoidance of doubt, and by way of example, if a sample is taken from each of two socks in a
18 package, each sample shall be 0.5 grams and the two samples shall be homogenized and analyzed
19 together.

20 5. PAYMENTS

21 5.1 **Total Settlement Payment.** Within fifteen (15) days of the Effective Date,
22 each Settling Defendant shall pay the total settlement amount as described on the Exhibit B for
23 such Settling Defendant. As set forth thereon, the total settlement amount for each Settling
24 Defendant shall be paid in five separate checks in the amounts specified on Exhibit B for such
25 Settling Defendant and delivered as set forth below. Any failure by a Settling Defendant to
26 comply with the payment terms herein shall be subject to a stipulated late fee to be paid by
27 Settling Defendant in the amount of \$100 for each day the full payment is not received after the
28 applicable payment due date set forth above. The late fees required under this Section shall be

1 recoverable, together with reasonable attorneys' fees, in an enforcement proceeding brought
2 pursuant to Section 4 of this Consent Judgment. The Settlement Payment shall be divided as
3 among the following:

4 5.1.1 A civil penalty pursuant to Health & Safety Code § 25249.7(b). The civil
5 penalty shall be apportioned in accordance with Health & Safety Code §25249.12 (25% to CEH
6 and 75% to the State of California's Office of Environmental Health Hazard Assessment.
7 ("OEHHA")). This payment shall be delivered as follows:

8 For United States Postal Service Delivery:

9 Attn: Mike Gyurics
10 Fiscal Operations Branch Chief
11 Office of Environmental Health Hazard Assessment
12 P.O. Box 4010, MS #19B
13 Sacramento, CA 95812-4010

14 For Non-United States Postal Service Delivery:

15 Attn: Mike Gyurics
16 Fiscal Operations Branch Chief
17 Office of Environmental Health Hazard Assessment
18 1001 I Street, MS #19B
19 Sacramento, CA 95814

20 The CEH portion of the civil penalty shall be made payable to the Center for Environmental
21 Health and associated with taxpayer identification number 94-3251981. This payment shall be
22 delivered to Lexington Law Group, 503 Divisadero Street, San Francisco, CA 94117.

23 5.1.2 An Additional Settlement Payment ("ASP") in lieu of civil penalty
24 pursuant to Health & Safety Code § 25249.7(b), and California Code of Regulations, Title 11, §
25 3204. CEH will use such funds to continue its work educating and protecting people from
26 exposures to toxic chemicals, including BPA, in textiles and other products. CEH may also use a
27 portion of such funds to monitor compliance with this Consent Judgment and to purchase and test
28 Settling Defendant's products to confirm compliance. CEH shall obtain and maintain adequate
records to document that ASPs are spent on these activities and CEH agrees to provide such
documentation to the Attorney General within thirty days of any request from the Attorney
General. The payment pursuant to this Section shall be made payable to the Center for

1 Environmental Health and associated with taxpayer identification number 94-3251981. This
2 payment shall be delivered to Lexington Law Group, 503 Divisadero Street, San Francisco, CA
3 94117.

4 5.1.3 A reimbursement of a portion of CEH's reasonable attorneys' fees and
5 costs. The attorneys' fees and cost reimbursement shall be made in two separate checks with a
6 portion payable to the Lexington Law Group and associated with taxpayer identification number
7 94-3317175; and the remainder payable to the Center for Environmental Health and associated
8 with taxpayer identification number 94-3251981. Both of these payments shall be delivered to
9 Lexington Law Group, 503 Divisadero Street, San Francisco, CA 94117.

10 **6. MODIFICATION**

11 6.1 **Written Consent.** This Consent Judgment may be modified from time to
12 time by express written agreement of the Parties with the approval of the Court, or by an order of
13 this Court upon motion and in accordance with law.

14 6.2 **Meet and Confer.** Any Party seeking to modify this Consent Judgment shall
15 provide notice to and attempt in good faith to meet and confer with all affected Parties prior to
16 filing a motion to modify the Consent Judgment.

17 6.3 **Modification of Injunctive Relief.**

18 6.3.1 If CEH enters into any consent judgment ("Settlement Document") with
19 any other entity with respect to an alleged failure to warn of alleged exposures to BPA in socks
20 made primarily of polyester with spandex in which it agrees to different injunctive terms
21 (including without limitation a different Test Protocol), one or more Settling Defendants may
22 thereafter seek to modify this Consent Judgment as to them to adopt those injunctive terms and
23 comply with them instead of those presently set forth in Section 3. CEH agrees not to oppose a
24 Settling Defendant's request for modification, provided that the products at issue in the
25 Settlement Document are substantially similar to the Covered Products.

26 6.3.2 In the event that the different injunctive terms referenced in Section 6.3.1
27 involve the provision of clear and reasonable warnings, a Settling Defendant may seek to comply
28 with the warning requirement set forth therein, but shall provide CEH with notice thereof and

1 make an additional payment proportional with any additional payment required by the other
2 defendant to avail itself of the warning option in its Consent Judgment.

3 **7. CLAIMS COVERED AND RELEASED**

4 7.1 Provided that a Settling Defendant complies in full with its obligations under
5 Section 5, this Consent Judgment is a full, final and binding resolution between CEH on behalf of
6 itself and the public interest and that Settling Defendant and its parents, subsidiaries, affiliated
7 entities that are under common ownership, directors, officers, employees, agents, shareholders,
8 successors, assigns, and attorneys (“Defendant Releasees”), and all entities to which Settling
9 Defendant distributes or sells Covered Products, such as distributors, wholesalers, customers,
10 retailers as well as franchisees, suppliers, licensors and licensees (“Downstream Defendant
11 Releasees”), and Manufacturer Defendant Releasees of any violation of Proposition 65 based on
12 failure to warn about alleged exposure to BPA contained in Covered Products that were sold by
13 Settling Defendant prior to the Effective Date. For purposes hereof, Defendant Releasees,
14 Downstream Defendant Releasees, and Manufacturer Defendant Releasees shall be collectively
15 referred to as “Releasees”.

16 7.2 Provided that a Settling Defendant complies in full with its obligations under
17 Section 5, CEH, for itself, its agents, successors and assigns, releases, waives, covenants not to
18 sue, and forever discharges any and all claims against that Settling Defendant and all Releasees
19 arising from any violation of Proposition 65 or any other statutory or common law claims that
20 have been or could have been asserted by CEH individually regarding the failure to warn about
21 exposure to BPA contained in Covered Products (i) sold by Settling Defendant prior to the
22 Compliance Date or (ii) which Settling Defendants purchased or entered into binding
23 commitments to purchase prior to the Effective Date.

24 7.3 Provided that a Settling Defendant complies in full with its obligations under
25 Section 5, CEH shall file a dismissal with prejudice of the FAC and Complaint, or any other
26 complaint or cause of action asserted against any Releasee(s) of the Settling Defendant based on a
27 claim within the scope of Sections 7.1 and 7.2 that relates to Covered Products that were
28

1 manufactured, distributed, or sold by the Settling Defendant prior to the Effective Date provided
2 that the Releasee(s) agree to waive costs.

3 7.4 Compliance with the terms of this Consent Judgment by Settling Defendants
4 and Defendant Releasees shall constitute compliance with Proposition 65 by Settling Defendants,
5 Defendant Releasees, Downstream Defendant Releasees, and Manufacturer Defendant Releasees
6 with respect to any alleged failure to warn about BPA in Covered Products manufactured,
7 distributed, or sold by Settling Defendants after the Effective Date.

8 7.5 Nothing in this Section 7 affects CEH's right to commence or prosecute an
9 action under Proposition 65 against any person other than Settling Defendants, Defendant
10 Releasees, Downstream Defendant Releasees, or Manufacturer Defendant Releasees.

11 8. NOTICE

12 8.1 When CEH is entitled to receive any notice under this Consent Judgment, the
13 notice shall be sent by first class and electronic mail to:

14 Mark N. Todzo
15 Lexington Law Group
16 503 Divisadero Street
17 San Francisco, CA 94117
18 mtodzo@lexlawgroup.com

19 8.2 When a Settling Defendant is entitled to receive any notice under this Consent
20 Judgment, the notice shall be sent by first class and electronic mail to the person identified on
21 Exhibit B for such Settling Defendant.

22 8.3 Any Party may modify the person and address to whom the notice is to be sent
23 by sending the other Party notice by first class and electronic mail.

24 9. COURT APPROVAL

25 9.1 This Consent Judgment shall become effective upon entry by the Court. CEH
26 shall prepare and file a Motion for Approval of this Consent Judgment and Settling Defendants
27 shall support entry of this Consent Judgment.
28

1 9.2 If this Consent Judgment is not entered by the Court, it shall be of no force or
2 effect and shall never be introduced into evidence or otherwise used in any proceeding for any
3 purpose other than to allow the Court to determine if there was a material breach of Section 9.1.

4 **10. GOVERNING LAW AND CONSTRUCTION**

5 10.1 The terms of this Consent Judgment shall be governed by the laws of the State
6 of California.

7 **11. ATTORNEYS' FEES**

8 11.1 Except as provided in Section 11.2, should CEH prevail on any motion,
9 application for an order to show cause, or other proceeding pursuant to this Consent Judgment,
10 CEH shall be entitled to its reasonable attorneys' fees and costs incurred as a result of such
11 motion or application.

12 11.2 Should CEH prevail on any motion or application for enforcement of the
13 injunctive provisions pursuant to Section 4.1, and the Settling Defendant had provided to CEH,
14 before it filed such motion or application, a test report either (i) from a sample taken prior to the
15 issuance of the Notice of Violation, or (ii) from the sample of the Covered Product or Products
16 that form the basis of the NOV that was provided to the Settling Defendant by CEH, then CEH
17 may be awarded its reasonable attorneys' fees and costs only upon a finding by the Court that the
18 Settling Defendant's opposition to the motion or application lacked substantial justification. For
19 purposes of this Consent Judgment, the term substantial justification shall carry the same meaning
20 as used in the Civil Discovery Act of 1986, Code of Civil Procedure §§ 2016, *et seq.*

21 11.3 Should a Settling Defendant prevail on any motion application for an order to
22 show cause or other proceeding, that Settling Defendant may be awarded its reasonable attorneys'
23 fees and costs against CEH as a result of such motion or application upon a finding by the Court
24 that CEH's prosecution of the motion or application lacked substantial justification.

25 11.4 Except as otherwise provided in this Consent Judgment, each Party shall bear
26 its own attorneys' fees and costs.

27 11.5 Nothing in this Section 11 shall preclude a Party from seeking an award of
28 sanctions pursuant to law.

1 **12. TERMINATION OF INJUNCTIVE RELIEF**

2 12.1 Commencing on the fifth anniversary of the Compliance Date, a Settling
3 Defendant may terminate the injunctive relief in Section 3 of this Consent Judgment as to that
4 Settling Defendant by filing a Notice of Termination of Injunctive Relief with the Court and serving
5 it on CEH. Thirty days after the filing of the notice, the provisions of Sections 3 and Section 7.4
6 shall no longer apply to such Settling Defendant.

7 **13. ENTIRE AGREEMENT**

8 13.1 This Consent Judgment contains the sole and entire agreement and
9 understanding of the Parties with respect to the entire subject matter hereof, and any and all prior
10 discussions, negotiations, commitments or understandings related thereto, if any, are hereby
11 merged herein and therein. There are no warranties, representations or other agreements between
12 the Parties except as expressly set forth herein. No representations, oral or otherwise, express or
13 implied, other than those specifically referred to in this Consent Judgment have been made by any
14 Party hereto. No other agreements not specifically contained or referenced herein, oral or
15 otherwise, shall be deemed to exist or to bind any of the Parties hereto. Any agreements
16 specifically contained or referenced herein, oral or otherwise, shall be deemed to exist or to bind
17 any of the Parties hereto only to the extent that they are expressly incorporated herein. No
18 supplementation, modification, waiver or termination of this Consent Judgment shall be binding
19 unless executed in writing by the Party to be bound thereby. No waiver of any of the provisions
20 of this Consent Judgment shall be deemed or shall constitute a waiver of any of the other
21 provisions hereof whether or not similar, nor shall such waiver constitute a continuing waiver.

22 **14. SUCCESSORS AND ASSIGNS**

23 14.1 This Consent Judgment shall apply to and be binding upon CEH and each Settling
24 Defendant, and their respective divisions, subdivisions and subsidiaries, and the successors or
25 assigns of any of them.

26 **15. RETENTION OF JURISDICTION**

27 1.14 This Court shall retain jurisdiction of this matter to implement or modify the
28 Consent Judgment.

1 **16. AUTHORITY TO STIPULATE TO CONSENT JUDGMENT**

2 16.1 Each signatory to this Consent Judgment certifies that he or she is fully
3 authorized by the Party he or she represents to stipulate to this Consent Judgment and to enter into
4 and execute the Consent Judgment on behalf of the Party represented and legally to bind that
5 Party.

6 **17. NO EFFECT ON OTHER SETTLEMENTS**

7 17.1 Nothing in this Consent Judgment shall preclude CEH from resolving any
8 claim against an entity other than Settling Defendant on terms that are different than those
9 contained in this Consent Judgment.

10 **IT IS SO ORDERED:**

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12 Dated: May 28, 2024

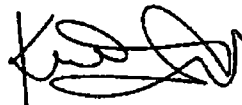


Judge of the Superior Court
ETHAN P. SCHULMAN

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15 **IT IS SO STIPULATED:**

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17 Dated: April 16, 2024

CENTER FOR ENVIRONMENTAL HEALTH

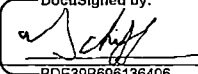
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Kizzy Charles-Guzman
Interim Chief Executive Officer

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Dated: 3/28/2024, 2024

AGRON, INC.

DocuSigned by:

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Anton Schiff
Printed Name

Co-CEO
Title

Dated: _____, 2024

ASICS AMERICA CORPORATION

Signature

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CENTRIC SOCKS LLC

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AGRON, INC.

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Printed Name

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Dated: _____, 2024
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ASICS AMERICA CORPORATION

DocuSigned by:
Paul Ljucovic
ECB78408746B4C9

Signature

Paul Ljucovic

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CFO, AAC

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Dated: _____, 2024

CENTRIC SOCKS LLC

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ASICS AMERICA CORPORATION

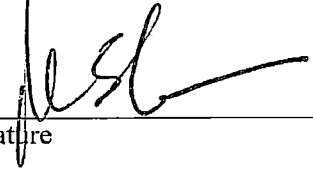
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Dated: April 9, 2024

CENTRIC SOCKS LLC



Signature

Marc Goldfarb

Printed Name

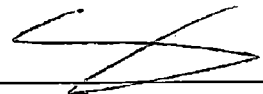
EVP, General Counsel

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Dated: 3/21, 2024

CREST BRANDS, LLC



Signature

Esa Levy

Printed Name

President

Title

Dated: _____, 2024

DELTA GALIL USA, INC.

Signature

Printed Name

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Dated: _____, 2024

DOLLAR GENERAL CORPORATION

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Dated: _____, 2024

CREST BRANDS, LLC

Signature

Printed Name

Title

Dated: April 5, 2024

DELTA GALIL USA, INC.

DocuSigned by:
Paul Gelb
DA4F77C7F982463...

Signature

Paul Gelb

Printed Name

GC & CAO

Title

Dated: _____, 2024

DOLLAR GENERAL CORPORATION

Signature

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Dated: _____, 2024

CREST BRANDS, LLC

Signature

Printed Name

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Dated: _____, 2024

DELTA GALIL USA, INC.

Signature

Printed Name

Title

Dated: 3/29, 2024

DOLLAR GENERAL CORPORATION

Kelly Collier
Signature

Kelly Collier
Printed Name

SVP, Assistant General Counsel
Title Business Law

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Dated: 3.26.2024, 2024

DOLLS KILL, INC.

Signature 

Olfa B'Chir
Printed Name

General Counsel
Title

Dated: _____, 2024

GCE INTERNATIONAL, INC.

Signature _____

Printed Name _____

Title _____

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Dated: _____, 2024

DOLLS KILL, INC.


Signature

Printed Name

Title

Dated: March 20, 2024

GCE INTERNATIONAL, INC.




Signature

Vlad Kaplan
Printed Name

CFO
Title

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Dated: April 9, 2024

GINA GROUP LLC


Signature

Morris Sakka

Printed Name

CFO

Title

Dated: _____, 2024

GMA ACCESSORIES INC.

Signature

Printed Name

Title

Dated: _____, 2024

GOLD, INC.

Signature

Printed Name

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Dated: _____, 2024

GINA GROUP LLC


Signature

Printed Name

Title

Dated: 4/9/, 2024

GMA ACCESSORIES INC.



Signature

SALVATORE MANCINO
Printed Name

EVP | CFO
Title

Dated: _____, 2024

GOLD, INC.

Signature

Printed Name

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Dated: _____, 2024

GINA GROUP LLC

Signature

Printed Name

Title

Dated: _____, 2024

GMA ACCESSORIES INC.

Signature

Printed Name

Title

Dated: March 28, 2024

GOLD, INC.

Kgold
Signature

Katherine Gold
Printed Name

CEO + President
Title

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Dated: April 9, 2024

HANESBRANDS INC.

V. Piekarski
Signature

VIRGINIA PIEKARSKI
Printed Name

Deputy General Counsel
Title
& Assistant Secretary

Dated: _____, 2024

HIGH POINT DESIGN LLC

Signature

Printed Name

Title

Dated: _____, 2024

ILNA INC.

Signature

Printed Name

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Dated: _____, 2024

HANESBRANDS INC.

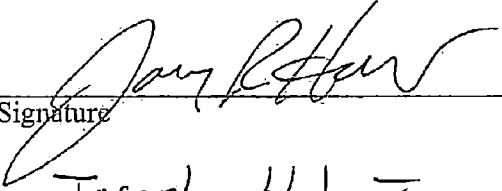
Signature

Printed Name

Title

Dated: March 21, 2024

HIGH POINT DESIGN LLC



Signature

Joseph Habert

Printed Name

President

Title

Dated: _____, 2024

ILNA INC.

Signature

Printed Name

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Dated: _____, 2024

HANESBRANDS INC.

Signature

Printed Name

Title

Dated: _____, 2024

HIGH POINT DESIGN LLC

Signature

Printed Name

Title

Dated: 04/10, 2024

ILNA INC.

Hilda McDuff
Signature

Hilda McDuff
Printed Name

President
Title

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Dated: March 25, 2024

IMPLUS FOOTCARE, LLC

Richard S. Donnell

Signature

Richard S. Donnell

Printed Name

General Counsel

Title

Dated: _____, 2024

JEFFERIES SOCKS, LLC

Signature

Printed Name

Title

Dated: _____, 2024

MAJESTY BRANDS LLC

Signature

Printed Name

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Dated: _____, 2024

IMPLUS FOOTCARE, LLC

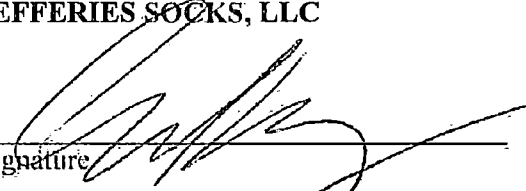
Signature

Printed Name

Title

Dated: 4/02, 2024

JEFFERIES SOCKS, LLC



Signature

ERNEST A. KOURY JR
Printed Name

MANAGER
Title

Dated: _____, 2024

MAJESTY BRANDS LLC

Signature

Printed Name

Title

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Dated: _____, 2024

IMPLUS FOOTCARE, LLC

Signature

Printed Name

Title

Dated: _____, 2024

JEFFERIES SOCKS, LLC

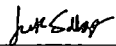
Signature

Printed Name

Title

Dated: Apr 8, 2024, 2024

MAJESTY BRANDS LLC



jacob safdeye (Apr 8, 2024 17:53 EDT)
Signature

Jack Safdeye

Printed Name

CEO

Title

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Dated: _____, 2024

MICHAELS STORES, INC.



Signature

David Kilpatrick

Printed Name

Assoc. General Counsel

Title

Dated: _____, 2024

ORLY SHOE CORP.

Signature

Printed Name

Title

Dated: _____, 2024

PREGER & WERTENTEIL, INC.

Signature

Printed Name

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Dated: _____, 2024

MICHAELS STORES, INC.


Signature

Printed Name

Title

Dated: Mar 26, 2024

ORLY SHOE CORP.



Signature

Michael McDermott
Printed Name

COO

Title

Dated: _____, 2024

PREGER & WERTENTEIL, INC.

Signature

Printed Name

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Dated: _____, 2024

MICHAELS STORES, INC.

Signature

Printed Name

Title

Dated: _____, 2024

ORLY SHOE CORP.

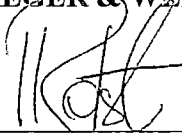
Signature

Printed Name

Title

Dated: March 27, 2024

PREGER & WERTENTEIL, INC.



Signature

Paul Rotstein

Printed Name

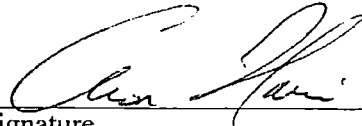
CEO

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Dated: March 28, 2024

PVH LEGWEAR LLC



Signature

Aaron Harari

Printed Name

CEO

Title

Dated: _____, 2024

RENFRO, LLC

Signature

Printed Name

Title

Dated: _____, 2024

ROYCE TOO LLC

Signature

Printed Name

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Dated: _____, 2024

PVH LEGWEAR LLC

Signature

Printed Name

Title

Dated: April 5, 2024

RENFRO LLC (F/K/A Renfro Corporation)

Corena Norris

Signature

Corena Norris

Printed Name

SVP, CHRO & General Counsel

Title

Dated: _____, 2024

ROYCE TOO LLC

Signature

Printed Name

Title

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Dated: _____, 2024

PVH LEGWEAR LLC

Signature

Printed Name

Title

Dated: _____, 2024

RENFRO, LLC

Signature

Printed Name

Title

Dated: April 10, 2024

ROYCE TOO LLC



Signature

Jim Cobb

Printed Name

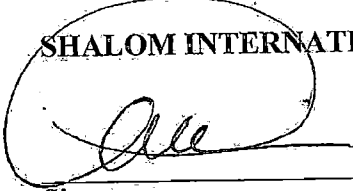
President

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Dated: 4/8, 2024

SHALOM INTERNATIONAL CORP.



Signature

Angelica Fudmes

Printed Name

Cfo

Title

Dated: _____, 2024

**SPIRIT HALLOWEEN SUPERSTORES
LLC**

Signature

Printed Name

Title

Dated: _____, 2024

STANCE, INC.

Signature

Printed Name

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Dated: _____, 2024

SHALOM INTERNATIONAL CORP.

Signature

Printed Name

Title

Dated: _____, 2024

**SPIRIT HALLOWEEN SUPERSTORES
LLC**

Kevin W. Mahony

Signature

KEVIN W. MAHONEY

Printed Name

SVP/GC

Title

Dated: 4/9, 2024

STANCE, INC.

Signature

Printed Name

Title

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Dated: _____, 2024

SHALOM INTERNATIONAL CORP.

Signature

Printed Name

Title

Dated: _____, 2024

**SPIRIT HALLOWEEN SUPERSTORES
LLC**

Signature

Printed Name

Title

Dated: April 10, 2024

STANCE, INC.

Kelly E. Bowman
Signature

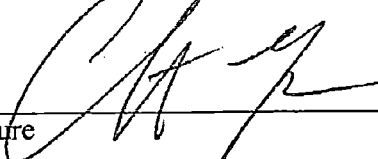
Kelly E. Bowman
Printed Name

VP legal
Title

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Dated: 3/27/, 2024

UNITED LEGWEAR COMPANY, LLC



Signature

Christopher Volpe

Printed Name

COO / CFO

Title

Dated: _____, 2024

USA LEGWEAR LLC

Signature

Printed Name

Title

Dated: _____, 2024

VICTORIA'S SECRET & CO.

Signature

Printed Name

Title

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Dated: _____, 2024

UNITED LEGWEAR COMPANY, LLC

Signature

Printed Name

Title

Dated: march 28, 2024

USA LEGWEAR LLC



Signature

Aaron Harari

Printed Name

CEO

Title

Dated: _____, 2024

VICTORIA'S SECRET & CO.

Signature

Printed Name

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Dated: _____, 2024

UNITED LEGWEAR COMPANY, LLC

Signature

Printed Name

Title

Dated: _____, 2024

USA LEGWEAR LLC

Signature

Printed Name

Title

Dated: April 9, 2024

VICTORIA'S SECRET & CO.

Leah A. Brndjar

Signature

Leah A. Brndjar

Printed Name

AVP - Legal Regulatory Affairs & Litigation

Title

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Dated: April 15, 2024

WIESNER PRODUCTS, INC.

Signature

DocuSigned by:

Andy Jha

Andy Jha

157FDADF852C437...

Printed Name

Chief Financial Officer

Title

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EXHIBIT A

“Test Protocol” as defined in Section 2.5 of the Consent Judgment means the following test method:

1. Homogenized sample of minimum 1 gram, cut in a manner to include materials from each region and color of the sock.
2. Quantitative solvent extraction by acetonitrile. If acetonitrile not available, may substitute with methanol.
3. Extraction by EPA methods 3540 (Soxhlet), 3546 (microwave), or hot plate for 3 hours at 40 degrees Celsius.
4. Analysis by LC/MS-MS, with isotope dilution; HPLC-DADMS, subject to performance criteria below. GC/MS-MS may be used if other methods not available and no derivatization of BPA is required.
5. Reporting limit of 0.5 mg/kg or lower.
6. Performance criteria – demonstration of accuracy, precision, and quality control, per EPA Method 3500C sections 9, 11, and 13. Include on-going routine quality control testing of method blanks, laboratory control samples/duplicates, and matrix spike samples/duplicates.

EXHIBIT B
Agron, Inc.

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1. **Name of Settling Defendant:** Agron, Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Adidas America, Inc.
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Mareen F. Gorsen Amy P. Lally SIDLEY AUSTIN LLP 1999 Avenue of the Stars, 17th Floor Los Angeles, CA 90067 maureen.gorsen@sidley.com lally@sidley.com	J. Simone Jones SIDLEY AUSTIN LLP One South Dearborn Chicago, IL 60603 jsimone.jones@sidley.com
---	---
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** October 13, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$95,000
Civil Penalty (Total)	\$12,000
- OEHHA (75%)	\$9,000
- CEH (25%)	\$3,000
Additional Settlement Payment	\$9,000
Total Attorneys' Fees and Costs	\$74,000
- LLG Fees and Costs	\$68,000

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- CEH Fees and Costs \$6,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Asics America Corporation

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1. **Name of Settling Defendant:** Asics America Corporation
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Mareen F. Gorsen Amy P. Lally SIDLEY AUSTIN LLP 1999 Avenue of the Stars, 17th Floor Los Angeles, CA 90067 maureen.gorsen@sidley.com lally@sidley.com	J. Simone Jones SIDLEY AUSTIN LLP One South Dearborn Chicago, IL 60603 jsimone.jones@sidley.com
---	---
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$47,500
Civil Penalty (Total)	\$6,000
- OEHHA (75%)	\$4,500
- CEH (25%)	\$1,500
Additional Settlement Payment	\$4,500
Total Attorneys' Fees and Costs	\$37,000
- LLG Fees and Costs	\$34,000
- CEH Fees and Costs	\$3,000

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Centric Socks LLC

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- 1. Name of Settling Defendant:** Centric Socks LLC
- 2. Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** ABG Juicy Couture, LLC, Kohl's Inc., VF Corporation, VF Outdoor, LLC
- 3. Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street Suite 3300
San Francisco, CA 94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com

- 4. Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
- 5. Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022

- a. Date Complaint Filed:** February 4, 2022
- b. Date Settling Defendant(s) Named in Complaint:** March 21, 2022

6. Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):

Total Settlement Payment	\$123,500
Civil Penalty (Total)	\$16,000
- OEHHA (75%)	\$12,000
- CEH (25%)	\$4,000
Additional Settlement Payment	\$11,800
Total Attorneys' Fees and Costs	\$95,700

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- LLG Fees and Costs \$88,000
- CEH Fees and Costs \$7,700

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Crest Brands, LLC

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1. **Name of Settling Defendant:** Crest Brands, LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street Suite 3300
San Francisco, CA 94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** February 28, 2022
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** July 14, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$80,750
Civil Penalty (Total)	\$10,000
- OEHHA (75%)	\$7,500
- CEH (25%)	\$2,500
Additional Settlement Payment	\$7,500
Total Attorneys' Fees and Costs	\$63,250

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- LLG Fees and Costs \$57,250
- CEH Fees and Costs \$6,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Delta Galil USA, Inc.

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1. **Name of Settling Defendant:** Delta Galil USA, Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Columbia Sportswear Company
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Yael Tobi
TOBI LAW GROUP, PC
2625 Townsgate Rd., Suite 330
Westlake Village, CA 91361
ytobi@tobilaw.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** October 13, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
Civil Penalty (Total)	\$8,400
- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300
Total Attorneys' Fees and Costs	\$51,800
- LLG Fees and Costs	\$47,800
- CEH Fees and Costs	\$4,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	<p>For United States Postal Service Delivery:</p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 <p>For Non-United States Postal Service Delivery:</p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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EXHIBIT B
Dollar General Corporation

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1. **Name of Settling Defendant:** Dollar General Corporation
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Ryan Landis
GORDON REES SCULLY MANSUKHANI, LLP
5 Park Plaza, Suite 1100
Irvine, CA 92614
rlandis@grsm.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** October 13, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$20,000
Civil Penalty (Total)	\$2,400
- OEHHA (75%)	\$1,800
- CEH (25%)	\$600
Additional Settlement Payment	\$1,800
Total Attorneys' Fees and Costs	\$15,800
- LLG Fees and Costs	\$14,000
- CEH Fees and Costs	\$1,800

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Dolls Kill, Inc.

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1. **Name of Settling Defendant:** Dolls Kill, Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Ryan S. Landis
GORDON REES SCULLY MANSUKHANI, LLP
5 Park Plaza, Suite 1100
Irvine, CA 92614
rlandis@grsm.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** June 23, 2022
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Dolls Kill* San Francisco County Superior Court Case No. CGC-22-602383
 - a. **Date Complaint Filed:** October 13, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** October 13, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$33,250
Civil Penalty (Total)	\$4,000
- OEHHA (75%)	\$3,000
- CEH (25%)	\$1,000
Additional Settlement Payment	\$3,000
Total Attorneys' Fees and Costs	\$26,250
- LLG Fees and Costs	\$23,750
- CEH Fees and Costs	\$2,500

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
GCE International, Inc.

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- 1. Name of Settling Defendant:** GCE International, Inc.
- 2. Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** G-III Apparel Group, Ltd., Foot Locker, Inc., Penney OpCo LLC, CVS Pharmacy, Inc., Nordstrom, Inc., Target Corporation, Walmart Inc., Sam's West, Inc.
- 3. Person(s) to Receive Notices (Pursuant to Section 8.2):**

Michael C. Baum
Andrew V. Jablon
RESCH POLSTER & BERGER LLP
1840 Century Park East, 17th Floor
Los Angeles, California 90067
mbaum@rpblaw.com
ajablon@rpblaw.com

- 4. Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** November 10, 2021

- 5. Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022

- a. Date Complaint Filed:** February 4, 2022
- b. Date Settling Defendant(s) Named in Complaint:** March 21, 2022

- 6. Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$ 123,500
Civil Penalty (Total)	\$ 16,000
- OEHHA (75%)	\$ 12,000
- CEH (25%)	\$ 4,000
Additional Settlement Payment	\$ 11,800
Total Attorneys' Fees and Costs	\$ 95,700
- LLG Fees and Costs	\$ 88,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	<p>For United States Postal Service Delivery:</p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 <p>For Non-United States Postal Service Delivery:</p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Gina Group LLC

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- 1. **Name of Settling Defendant:** Gina Group LLC
- 2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** K-Swiss Inc.
- 3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**
 - Bao M. Vu
 - Kelly V. Beskin
 - STOEL RIVES LLP
 - 500 Capitol Mall, Suite 1600
 - Sacramento, CA 95814
 - bao.vu@stoel.com
 - kelly.beskin@stoel.com
- 4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
- 5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
- 6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$80,750
Civil Penalty (Total)	\$10,000
- OEHHA (75%)	\$7,500
- CEH (25%)	\$2,500
Additional Settlement Payment	\$7,500
Total Attorneys' Fees and Costs	\$63,250
- LLG Fees and Costs	\$57,250
- CEH Fees and Costs	\$6,000

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
GMA Accessories Inc.

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1. **Name of Settling Defendant:** GMA Accessories Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Bao M. Vu
Kelly V. Beskin
STOEL RIVES LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814
bao.vu@stoel.com
kelly.beskin@stoel.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 10, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$33,250
Civil Penalty (Total)	\$4,000
- OEHHA (75%)	\$3,000
- CEH (25%)	\$1,000
Additional Settlement Payment	\$3,000
Total Attorneys' Fees and Costs	\$26,250
- LLG Fees and Costs	\$23,750
- CEH Fees and Costs	\$2,500

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Gold, Inc.

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1. **Name of Settling Defendant:** Gold, Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Fruit of the Loom, Inc., Russell Brands LLC, Walmart Inc.
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Maureen F. Gorsen Amy P. Lally SIDLEY AUSTIN LLP 1999 Avenue of the Stars, 17th Floor Los Angeles, CA 90067 maureen.gorsen@sidley.com alally@sidley.com annie.yu@sidley.com	J. Simone Jones SIDLEY AUSTIN LLP One South Dearborn Chicago, IL 60603 jsimone.jones@sidley.com
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4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$80,750
Civil Penalty (Total)	\$10,000
- OEHHA (75%)	\$7,500
- CEH (25%)	\$2,500
Additional Settlement Payment	\$7,500
Total Attorneys' Fees and Costs	\$63,250

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- LLG Fees and Costs \$57,250
- CEH Fees and Costs \$6,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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**EXHIBIT B
Hanesbrands Inc.**

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- 1. Name of Settling Defendant:** Hanesbrands Inc.
- 2. Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** AYK International, Inc.
- 3. Person(s) to Receive Notices (Pursuant to Section 8.2):**

Maureen F. Gorsen
Amy P. Lally
SIDLEY AUSTIN LLP
1999 Avenue of the Stars, 17th Floor
Los Angeles, CA 90067
maureen.gorsen@sidley.com alally@sidley.com
annie.yu@sidley.com

J. Simone Jones
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603
jsimone.jones@sidley.com

- 4. Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021

- 5. Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022

a. Date Complaint Filed: February 4, 2022

b. Date Settling Defendant(s) Named in Complaint: March 21, 2022

- 6. Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$95,000
Civil Penalty (Total)	\$12,000
- OEHHA (75%)	\$9,000
- CEH (25%)	\$3,000

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Additional Settlement Payment	\$9,000
Total Attorneys' Fees and Costs	\$74,000
- LLG Fees and Costs	\$68,000
- CEH Fees and Costs	\$6,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
High Point Design LLC

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1. **Name of Settling Defendant:** High Point Design LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Fruit of the Loom, Inc., Russell Brands LLC, Viacom International Inc., Walmart Inc.
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street Suite 3300
San Francisco, CA.94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$95,000
Civil Penalty (Total)	\$12,000
- OEHHA (75%)	\$9,000
- CEH (25%)	\$3,000
Additional Settlement Payment	\$9,000

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Total Attorneys' Fees and Costs	\$74,000
- LLG Fees and Costs	\$68,000
- CEH Fees and Costs	\$6,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

**EXHIBIT B
ILNA Inc.**

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1. **Name of Settling Defendant:** ILNA Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Target Corporation; Dollar Tree Stores, Inc. and ABG Accessories, Inc. (a/k/a ABG Prince)
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street
Suite 3300
San Francisco, California 94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com

Arthur J. DeBaugh
WARD AND SMITH, P.A.
751 Corporate Center Drive, Suite 300 (27607)
Post Office Box 33009
Raleigh, NC 27636 3009
ajdebaugh@wardandsmith.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** October 13, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
Civil Penalty (Total)	\$8,400

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- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300
Total Attorneys' Fees and Costs	\$51,800
- LLG Fees and Costs	\$47,800
- CEH Fees and Costs	\$4,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Implus Footcare, LLC

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1. **Name of Settling Defendant:** Implus Footcare, LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jonathan A. Muenkel
NORTHSTAR LAW GROUP
1106 Second Street, #831
Encinitas, California 92024
jonathan@ns-lg.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$80,750
Civil Penalty (Total)	\$10,000
- OEHHA (75%)	\$7,500
- CEH (25%)	\$2,500
Additional Settlement Payment	\$7,500
Total Attorneys' Fees and Costs	\$63,250
- LLG Fees and Costs	\$57,250
- CEH Fees and Costs	\$6,000

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Jefferies Socks, LLC

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1. **Name of Settling Defendant:** Jefferies Socks, LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Bao M. Vu
Kelly V. Beskin
STOEL RIVES LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814
bao.vu@stoel.com
kelly.beskin@stoel.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** October 4, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$20,000
Civil Penalty (Total)	\$2,400
- OEHHA (75%)	\$1,800
- CEH (25%)	\$600
Additional Settlement Payment	\$1,800
Total Attorneys' Fees and Costs	\$15,800
- LLG Fees and Costs	\$15,800

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- CEH Fees and Costs \$0

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Majesty Brands LLC

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1. **Name of Settling Defendant:** Majesty Brands LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** With You LLC
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street Suite 3300
San Francisco, CA 94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 10, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
Civil Penalty (Total)	\$8,400
- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300
Total Attorneys' Fees and Costs	\$51,800

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- LLG Fees and Costs \$47,800
- CEH Fees and Costs \$4,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Michaels Stores, Inc.

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1. **Name of Settling Defendant:** Michaels Stores, Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

William F. Tarantino
Danielle E. Vallone
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105
WTarantino@mof.com
DVallone@mof.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** November 10, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$33,250
Civil Penalty (Total)	\$4,000
- OEHHA (75%)	\$3,000
- CEH (25%)	\$1,000
Additional Settlement Payment	\$3,000
Total Attorneys' Fees and Costs	\$26,250
- LLG Fees and Costs	\$23,750

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- CEH Fees and Costs \$2,500

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Orly Shoe Corp.

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1. **Name of Settling Defendant:** Orly Shoe Corp.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Authentic Brands LLC incorrectly sued as “Aeropostale, Inc.”, ABG-Aero Ipco, LLC incorrectly sued as “Authentic Brands Group LLC”, Dollar Tree Stores, Inc.
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Carol Brophy
Angela Sousa
STEPTOE LLP
One Market Plaza
Steuart Tower, 10th Floor, Suite 1050
San Francisco, CA 94105
cbrophy@steptoe.com
asousa@steptoe.com

4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022

a. **Date Complaint Filed:** February 4, 2022

b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022

6. **Defendant’s Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
Civil Penalty (Total)	\$8,400
- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300
Total Attorneys’ Fees and Costs	\$51,800

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- LLG Fees and Costs \$47,800
- CEH Fees and Costs \$4,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Preger & Wertenteil, Inc.

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1. **Name of Settling Defendant:** Preger & Wertenteil, Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street Suite 3300
San Francisco, CA 94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** June 23, 2022
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Dolls Kill* San Francisco County Superior Court Case No. CGC-22-602383
 - a. **Date Complaint Filed:** October 13, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** October 13, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
Civil Penalty (Total)	\$8,400
- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300

1 Total Attorneys' Fees and Costs \$51,800

2 - LLG Fees and Costs \$47,800

3 - CEH Fees and Costs \$4,000

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5 **7. Defendant's Allocation of Payments (Pursuant to Section 5.1):**

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Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
PVH Legwear LLC

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1. **Name of Settling Defendant:** PVH Legwear LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

John J. Allen
Tim C. Hsu
Alexandra R. Jernigan
ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
865 South Figueroa Street, Suite 2800
Los Angeles, CA 90017
jallen@allenmatkins.com
thsu@allenmatkins.com
ajernigan@allenmatkins.com

4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
- a. **Date Complaint Filed:** February 4, 2022
- b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022

6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
Civil Penalty (Total)	\$8,400
- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300
Total Attorneys' Fees and Costs	\$51,800

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- LLG Fees and Costs \$47,800
- CEH Fees and Costs \$4,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Renfro, LLC (Renfro Corporation)

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1. **Name of Settling Defendant:** Renfro, LLC (Renfro Corporation)
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Carhartt, Inc., Russell Brands LLC
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Nancy L. Stagg
KILPATRICK TOWNSEND & STOCKTON LLP
12255 El Camino Road, Suite 250
San Diego, CA 92130
nstag@kilpatricktownsend.com

Alexander Bullock
KILPATRICK TOWNSEND & STOCKTON LLP
701 Pennsylvania Avenue NW, Suite 200
Washington, DC 20004
abullock@kilpatricktownsend.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$80,750
Civil Penalty (Total)	\$10,000
- OEHHA (75%)	\$7,500
- CEH (25%)	\$2,500
Additional Settlement Payment	\$7,500

Total Attorneys' Fees and Costs	\$63,250
- LLG Fees and Costs	\$57,250
- CEH Fees and Costs	\$6,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	<p>For United States Postal Service Delivery:</p> <p>Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010</p> <p>For Non-United States Postal Service Delivery:</p> <p>Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814</p>
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Royce Too LLC

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1. **Name of Settling Defendant:** Royce Too LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Saucony, Inc., VF Corporation, and VF Outdoor, LLC
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street
Suite 3300
San Francisco, California 94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com

Arthur J. DeBaugh
WARD AND SMITH, P.A.
751 Corporate Center Drive, Suite 300 (27607)
Post Office Box 33009
Raleigh, NC 27636 3009
ajdebaugh@wardandsmith.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** November 10, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
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Civil Penalty (Total)	\$8,400
- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300
Total Attorneys' Fees and Costs	\$51,800
- LLG Fees and Costs	\$47,800
- CEH Fees and Costs	\$4,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010
		For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Shalom International Corp.

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1. **Name of Settling Defendant:** Shalom International Corp.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**
Bao M. Vu
Kelly V. Beskin
STOEL RIVES LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814
bao.vu@stoel.com
kelly.beskin@stoel.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
Civil Penalty (Total)	\$8,400
- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300
Total Attorneys' Fees and Costs	\$51,800
- LLG Fees and Costs	\$47,800
- CEH Fees and Costs	\$4,000

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Spirit Halloween Superstores LLC

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1. **Name of Settling Defendant:** Spirit Halloween Superstores LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street Suite 3300
San Francisco, CA 94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** November 10, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$47,500
Civil Penalty (Total)	\$6,000
- OEHHA (75%)	\$4,500
- CEH (25%)	\$1,500
Additional Settlement Payment	\$4,500

1 Total Attorneys' Fees and Costs \$37,000
 2 - LLG Fees and Costs \$34,000
 3 - CEH Fees and Costs \$3,000
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5 **7. Defendant's Allocation of Payments (Pursuant to Section 5.1):**

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Stance, Inc.

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1. **Name of Settling Defendant:** Stance, Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Richard J. McNeil
CROWELL & MORING LLP
3 Park Plaza, 20th Floor
Irvine, CA 92614
RMcNeil@crowell.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** June 23, 2022
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Dolls Kill* San Francisco County Superior Court Case No. CGC-22-602383
 - a. **Date Complaint Filed:** October 13, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** October 13, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$47,500
Civil Penalty (Total)	\$6,000
- OEHHA (75%)	\$4,500
- CEH (25%)	\$1,500
Additional Settlement Payment	\$4,500
Total Attorneys' Fees and Costs	\$37,000
- LLG Fees and Costs	\$34,000
- CEH Fees and Costs	\$3,000

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
United Legwear Company, LLC

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1. **Name of Settling Defendant:** United Legwear Company, LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Skechers USA, Inc., TRB Acquisitions, LLC, Puma North America, Inc., Dick's Sporting Goods, Inc.
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Jeffrey Margulies
Lauren A. Shoor
Eva Yang
Ray Muro
NORTON ROSE FULBRIGHT US LLP
555 California Street Suite 3300
San Francisco, CA 94104
jeff.margulies@nortonrosefulbright.com
lauren.shoor@nortonrosefulbright.com
eva.yang@nortonrosefulbright.com
raymond.muro@nortonrosefulbright.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$ 123,500
Civil Penalty (Total)	\$ 16,000
- OEHHA (75%)	\$ 12,000
- CEH (25%)	\$ 4,000
Additional Settlement Payment	\$ 11,800

Total Attorneys' Fees and Costs	\$ 95,700
- LLG Fees and Costs	\$ 88,000
- CEH Fees and Costs	\$ 7,700

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	<p>For United States Postal Service Delivery:</p> <p>Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010</p> <p>For Non-United States Postal Service Delivery:</p> <p>Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814</p>
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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**EXHIBIT B
USA Legwear LLC**

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1. **Name of Settling Defendant:** USA Legwear LLC
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** ABG-Reebok
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

John J. Allen
Tim C. Hsu
Alexandra R. Jernigan
ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
865 South Figueroa Street, Suite 2800
Los Angeles, CA 90017
jallen@allenmatkins.com
thsu@allenmatkins.com
ajernigan@allenmatkins.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** September 1, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$66,500
Civil Penalty (Total)	\$8,400
- OEHHA (75%)	\$6,300
- CEH (25%)	\$2,100
Additional Settlement Payment	\$6,300
Total Attorneys' Fees and Costs	\$51,800

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- LLG Fees and Costs \$47,800
- CEH Fees and Costs \$4,000

7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

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Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
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EXHIBIT B
Victoria's Secret & Co.

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1. **Name of Settling Defendant:** Victoria's Secret & Co.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** None
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Hazel Ocampo GREENBERG TRAURIG, LLP 18565 Jamboree Road, Suite 500 Irvine, CA 92612 ocampoh@gtlaw.com	Madeline Orlando GREENBERG TRAURIG, LLP 400 Capitol Mall, Suite 2400 Sacramento, CA 95814 orlandom@gtlaw.com
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4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** June 23, 2022
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Dolls Kill* San Francisco County Superior Court Case No. CGC-22-602383
 - a. **Date Complaint Filed:** October 13, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** October 13, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$47,500
Civil Penalty (Total)	\$6,000
- OEHHA (75%)	\$4,500
- CEH (25%)	\$1,500
Additional Settlement Payment	\$4,500
Total Attorneys' Fees and Costs	\$37,000
- LLG Fees and Costs	\$34,000
- CEH Fees and Costs	\$3,000

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

EXHIBIT B
Wiesner Products, Inc.

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1. **Name of Settling Defendant:** Wiesner Products, Inc.
2. **Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling Defendant:** Easy Spirit, LLC, Target Corporation, Five Below, Inc., 1616 Holdings, Inc.
3. **Person(s) to Receive Notices (Pursuant to Section 8.2):**

Anne M. Ellis
BUCHALTER
18400 Von Karman Avenue, Suite 800
Irvine, CA 92612-0514
aellis@buchalter.com
4. **Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** December 20, 2021
5. **Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No. CGC-22-598022
 - a. **Date Complaint Filed:** February 4, 2022
 - b. **Date Settling Defendant(s) Named in Complaint:** March 21, 2022
6. **Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

Total Settlement Payment	\$95,000
Civil Penalty (Total)	\$12,000
- OEHHA (75%)	\$9,000
- CEH (25%)	\$3,000
Additional Settlement Payment	\$9,000
Total Attorneys' Fees and Costs	\$74,000
- LLG Fees and Costs	\$68,000
- CEH Fees and Costs	\$6,000

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7. Defendant's Allocation of Payments (Pursuant to Section 5.1):

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	For United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010 For Non-United States Postal Service Delivery: Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	ASP	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Lexington Law Group (Taxpayer identification number 94-3317175)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117
Center For Environmental Health (Taxpayer identification number 94-3251981)	Fee and Cost	Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117

CERTIFICATE OF ELECTRONIC SERVICE
(CCP 1010.6(6) & CRC 2.260(g))

I, Felicia Green, a Deputy Clerk of the Superior Court of the County of San Francisco, certify that I am not a party to the within action.

On May 29, 2024, I electronically served CONSENT JUDGMENT AS TO DEFENDANTS AGRON, INC., ASICS AMERICA CORPORATION, CENTRIC SOCKS LLC, CREST BRANDS, LLC, DELTA GALIL USA, INC., DOLLAR GENERAL CORPORATION, DOLLS KILL, INC., GCE INTERNATIONAL, INC., GINA GROUP LLC, GMA ACCESSORIES INC., GOLD, INC., HANESBRANDS INC., HIGH POINT DESIGN LLC, ILNA INC., IMPLUS FOOTCARE, LLC, JEFFRIES SOCKS, LLC, MAJESTY BRANDS LLC, MICHAELS STORES, INC., ORLY SHOE CORP., PREGER & WERTENTEIL, INC., PVH LEGWEAR LLC, RENFRO CORPORATION, ROYCE TOO LLC, SHALOM INTERNATIONAL CORP., SPIRIT HALLOWEEN SUPERSTORES LLC, STANCE, INC., UNITED LEGWEAR COMPANY, LLC, USA LEGWEAR LLC, VICTORIA'S SECRET & CO., AND WIESNER PRODUCTS, INC. via File & ServeXpress on the recipients designated on the Transaction Receipt located on the File & ServeXpress website.

Dated: **MAY 29 2024**

Brandon E. Riley, Court Executive Officer

By: 
Felicia Green, Deputy Clerk