

60-DAY NOTICE OF VIOLATION

California Safe Drinking Water and Toxic Enforcement Act

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| Date: | September 30, 2013 |
| To: | Victoria Donati, General Counsel and Corporate Secretary – Euromarket Designs, Inc. dba Crate & Barrel California Attorney General's Office District Attorney's Office for 58 Counties City Attorneys for San Francisco, San Diego, San Jose, Sacramento and Los Angeles |
| From: | Michael DiPirro |

This Notice of Violation is provided to you pursuant to and in compliance with California Health and Safety Code Section 25249.7(d). For general information regarding the California Safe Drinking Water and Toxic Enforcement Act, you may contact the Office of Environmental Health Hazard Assessment's ("OEHHA") Proposition 65 Implementation Office at (916) 445-6900. Attached for your reference is a summary, "Proposition 65 In Plain Language," provided by the California Office of Environmental Health Hazard Assessment's ("OEHHA") (copies not provided to public enforcement agencies).

This Notice of Violation is provided by Michael DiPirro. I am a citizen of the State of California acting in the interest of the general public. I am dedicated to protecting the environment, promoting awareness of exposures to toxic chemicals in products sold in California, improving human health and supporting environmentally sound practices.

Identified below are specific examples of products recently purchased and witnessed as being available for purchase or use in California that are within the categories or types of offending products covered by this Notice. I believe and allege that the sale of the offending products also has occurred without the requisite Proposition 65 "clear and reasonable warnings" at one or more location and/or via other means including, but not limited to, transactions made over-the-counter, business-to-business, through the internet and/or via a catalog by the Violator and other retailers and distributors of the manufacturer, including, but not limited to the retailer(s) and/or distributor(s) listed below.

Description of Violations:

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| Violator: | Euromarket Designs, Inc. dba Crate & Barrel |
| Toxic Chemical: | Di(2-ethylhexyl)phthalate ("DEHP") DEHP is also known as Bis (2- ethylhexyl) Phthalate. Exposures to DEHP occur from use of the products identified in this Notice. |
| Product Category: | Vinyl/PVC Placemats |

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| Non-exclusive Example of Type of Product¹: | Poinsettia Placemat (#369675) |
| Retailer(s): | Crate & Barrel, Sonoma County, Northern California |
| Manufacturer(s)/ Distributor(s): | Euromarket Designs, Inc. dba Crate & Barrel |
| Types of Harm: | Birth Defects and Other Reproductive Harm |
| Description of Exposure: | These exposures occur in homes, workplaces and everywhere else throughout California where these products are handled or used. As a result of the sales of these products, exposures to the listed chemical have been occurring without clear and reasonable warnings as required by Proposition 65. |
| Routes of Exposure: | Ingestion, Dermal Reasonably foreseeable use of the products identified in this Notice results in human exposures to DEHP. DEHP is contained in the Vinyl/PVC Placemats. The routes of exposure for the violations are: (1) dermal absorption directly through the skin when consumers wear, touch, use, or handle the products; (2) ingestion via hand to mouth contact after consumers touch, use, or handle the products; and (3) direct ingestion when consumers place their hands in their mouths while using the products or otherwise place the products in their mouths. |
| Time Period of Exposure: | The violations have been occurring since at least September 30, 2010, and are continuing to this day. |

Resolution of Noticed Claims: Based on the allegations set forth in this Notice, I intend to file a citizen enforcement lawsuit against the alleged Violator unless such Violator enters into a binding written agreement to: (1) recall products already sold; (2) take effective measures to prevent unwarned DEHP exposures from products sold in the future and to ensure that the requisite health hazard warnings are provided to those who have received such products; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249(b). If the alleged Violator is interested in resolving this dispute without resorting to expensive and time-consuming litigation, please feel free to contact me through my counsel identified below. It should be noted that neither my counsel nor I can: (1) finalize any settlement until after the 60-day notice period has expired; nor (2) speak for the Attorney General or any District or City Attorney who received this Notice of Violation. Therefore, while reaching an agreement with me will resolve my claims, such agreement may not satisfy the public prosecutors.

Please direct any inquiries regarding this Notice to Michael DiPirro through his counsel David Bush at Bush & Chaput, 755 Baywood Drive, Petaluma, CA 94954; Telephone: (707) 658-4444.

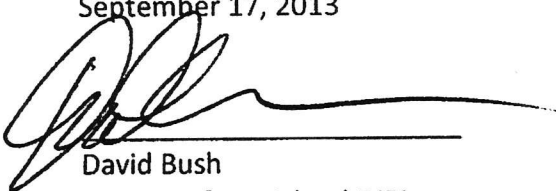
¹ The specifically identified examples of the types of products that are subject to this Notice are for the recipients' benefit to assist in their investigation of, among other things, the magnitude of potential exposure to the listed chemical from other items within the product categories/types listed in Exhibit A. These examples are not meant to be an exhaustive or comprehensive identification of each specific offending product of the types listed under "Product Category." Further, it is this citizen's position that the alleged Violator is obligated to continue to conduct in good faith an investigation into other specific products within the types or categories described above that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the notice recipients' custody or control) during the relevant period so as to ensure that the requisite toxic warnings were and are provided to California citizens prior to purchase.

CERTIFICATE OF MERIT
Health & Safety Code § 25249.7(d)

I, David Bush, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the party identified in the notice has violated Health & Safety Code § 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney who represents the noticing party.
3. Members of my firm and I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies or other data regarding the alleged exposure to the listed chemical that is the subject of this action.
4. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and the information did not prove that the alleged Violator(s) will be able to establish any of the affirmative defenses set forth in the statute.
5. The copy of the Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health & Safety Code § 25249.7(h)(2), i.e. (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies or other data reviewed by those persons.

September 17, 2013



David Bush
Attorney for Michael DiPirro

PROOF OF SERVICE

I declare that:

I am employed in Sonoma County, California; my business address is 755 Baywood Drive, Petaluma, CA 94954. I am over the age of 18 years and not a party to the within cause.

On September 30, 2013, I served true copies of the following documents:

60-DAY NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT;

PROPOSITION 65 IN PLAIN LANGUAGE (only sent to the Violator(s));

CERTIFICATE OF MERIT; and

CERTIFICATE OF MERIT ATTACHMENTS (SERVED ONLY ON THE ATTORNEY GENERAL)

On this date, I deposited fully prepaid and sealed envelopes containing the above-mentioned documents with the United States Postal Service, addressed to the following individuals as follows:

on the alleged Violator(s) listed below via First Class Certified Mail through the United States Postal Service by placing a true and correct copy in a sealed envelope, addressed to the entities listed below and providing each envelope to a United States Postal Service Representative:

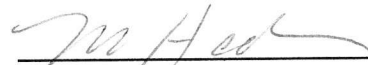
Victoria Donati, General Counsel and Corporate Secretary
Euromarket Designs, Inc. dba Crate & Barrel
1250 Techny Road
Northbrook, IL 60062

as well as providing copies to the public enforcers by placing a true and correct copy in a sealed envelope, addressed to each party listed below, and served as follows:

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| <i>Electronically via the Attorney General website:</i> | The Attorney General of the State of California; |
| <i>By placing each envelope in a United States Postal Service mailbox, postage prepaid:</i> | The District Attorney for Each of the 58 counties in California; and The City Attorney for Los Angeles, San Diego, San Jose, San Francisco and Sacramento |

A list of addresses for each of these recipients is attached.

Executed on September 30, 2013, at Petaluma, California.



Michael Hader

SERVICE LIST

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| The Honorable Nancy O'Malley Alameda County District Attorney 1225 Fallon Street, Room 900 Oakland, CA 94612 | The Honorable Robert Burns Lassen County District Attorney 220 S. Lassen Street, Ste. 8 Susanville, CA 96130 | The Honorable Candice Hooper- Mancino San Benito County District Attorney 419 4 th Street, Second Floor Hollister, CA 95203 | The Honorable Greg Cohen Tehama County District Attorney PO Box 519 Red Bluff, CA 96080 |
| The Honorable Terese Drabec Alpine County District Attorney 270 Laramie Street, PO Box 248 Markleeville, CA 96120 | The Honorable Steve Cooley Los Angeles County District Attorney 210 West Temple Street, Suite 1800D Los Angeles, CA 90012 | The Honorable Michael Ramos San Bernardino County District Attorney 316 N. Mountain View Avenue San Bernardino, CA 92415 | The Honorable Michael B. Harper Trinity County District Attorney PO Box 310 Weaverville, CA 96093 |
| The Honorable Todd Riebe Amador County District Attorney 708 Court Street Jackson, CA 95642 | The Honorable Michael Keitz Madera County District Attorney 209 West Yosemite Avenue Madera, CA 93637 | The Honorable Bonnie Durmanis San Diego County District Attorney 330 W. Broadway Street San Diego, CA 92101 | The Honorable Phillip Cline Tulare County District Attorney 221 South Mooney Boulevard. Suite 224 Visalia, CA 93291 |
| The Honorable Michael Ramsey Butte County District Attorney 25 County Center Drive Oroville, CA 95965 | The Honorable Edward Berberian Marin County District Attorney 3501 Civic Center Drive, Room 130 San Rafael, CA 94903 | The Honorable George Gascon San Francisco County District Attorney 850 Bryant Street, Room 322 San Francisco, CA 94103 | The Honorable Donald Seegerstrom, Jr. Tuolumne County District Attorney 423 North Washington Street Sonora, CA 95370 |
| The Honorable Barbara Yook Calaveras County District Attorney 891 Mountain Ranch Road San Andreas, CA 95249 | The Honorable Robert Brown Mariposa County District Attorney 5101 Jones Street, PO Box 730 Mariposa, CA 95338 | The Honorable James Willett San Joaquin County District Attorney PO Box 990 Stockton, CA 95201 | The Honorable Gregory Totten Ventura County District Attorney 800 South Victoria Avenue Ventura, CA 95370 |
| The Honorable John R. Poyner Colusa County District Attorney 547 Market Street, Suite 102 Colusa, CA 95932 | The Honorable C. David Eyster Mendocino County District Attorney PO Box 1000 Ukiah, CA 95482 | The Honorable Gerald Shea San Luis Obispo County District Attorney 1035 Palm Street San Luis Obispo, CA 93408 | The Honorable Jeff Reisig Yolo County District Attorney 301 Second Street Woodland, CA 95695 |
| The Honorable Mark Peterson Contra Costa County District Attorney 725 Court Street, Fourth Floor Martinez, CA 94553 | The Honorable Larry Morse II Merced County District Attorney 2222 M Street Merced, CA 95340 | The Honorable Stephen Wagstaffe San Mateo County District Attorney 400 County Center, Third Floor Redwood City, CA 94603 | The Honorable Patrick McGrath Yuba County District Attorney 215 Fifth Street Marysville, CA 95901 |
| The Honorable Jon Alexander Del Norte County District Attorney 450 H Street, Room 171 Crescent City, CA 95531 | The Honorable Christopher Brooke Modoc County District Attorney 204 S. Court Street, Room 202 Alturas, CA 96101 | The Honorable Joyce Dudley Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA 93101 | The Honorable Carmen Trutanich Office of the City Attorney, Los Angeles 200 North Main Street Los Angeles, CA 90012 |
| The Honorable Vernon Pierson El Dorado County District Attorney 515 Main Street Placerville, CA 95667 | The Honorable George Booth Mono County District Attorney PO Box 617 Bridgeport, CA 93517 | The Honorable Jeffrey Rosen Santa Clara County District Attorney 70 West Hedding Street, West Wing San Jose, CA 95110 | The Honorable Jan Goldsmith Office of the City Attorney, San Diego 1200 Third Avenue, Suite 1620 San Diego, CA 92101 |
| The Honorable Elizabeth Egan Fresno County District Attorney 2220 Tulare, Street, #1000 Fresno, CA 93721 | The Honorable Dean Flippo Monterey County District Attorney PO Box 1131 Salinas, CA 93902 | The Honorable Bob Lee Santa Cruz County District Attorney 701 Ocean Street, Room 200 Santa Cruz, CA 95060 | The Honorable Eileen M. Teichert Office of the City Attorney, Sacramento PO Box 1948 Sacramento, CA 95812 |
| The Honorable Robert Maloney Glenn County District Attorney PO Box 430 Willows, CA 95988 | The Honorable Gary Lieberstein Napa County District Attorney PO Box 720 Napa, CA 94559 | The Honorable Stephen Carlton Shasta County District Attorney 1525 Court Street, Third Floor Redding, CA 96001 | The Honorable Dennis J. Herrera Office of the City Attorney, San Francisco City Hall, Room 234 San Francisco, CA 94102 |

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| The Honorable Paul Gallegos Humboldt County District Attorney 825 5 th Street Eureka, CA 95501 | The Honorable Clifford Newell Nevada County District Attorney 110 Union Street Nevada City, CA 95959 | The Honorable Lawrence Allen Sierra County District Attorney 100 Courthouse Square, Second Floor Downieville, CA 95936 | The Honorable Richard Doyle Office of the City Attorney, San Jose 200 East Santa Clara Street San Jose, CA 95113 |
| The Honorable Gilbert Otero Imperial County District Attorney 940 West Main Street, Suite 102 El Centro, CA 92243 | The Honorable Tony Rackauckas Orange County District Attorney 401 Civic Center Drive West Santa Ana, CA 92701 | The Honorable James Kirk Andrus Siskiyou County District Attorney PO Box 986 Yreka, CA 96097 | |
| The Honorable Arthur Maillet Inyo County District Attorney P.O. Drawer D Independence, CA 93526 | The Honorable Ronald Owens Placer County District Attorney 10810 Justice Center Drive, Suite 240 Roseville, CA 95678 | The Honorable David Paulson Solano County District Attorney 675 Texas Street, Suite 4500 Fairfield, CA 94533 | Office of the California Attorney General Proposition 65 Reporting ATTN: Prop 65 Coordinator 1515 Clay Street, Suite 2000 Oakland, CA 94612-0550 |
| The Honorable Lisa Green Kern County District Attorney 1215 Truxtun Avenue Bakersfield, CA 93301 | The Honorable David Hollister Plumas County District Attorney 520 Main Street, Room 404 Quincy, CA 95971 | The Honorable Jill Ravitch Sonoma County District Attorney 600 Administration Drive, Room 212J Santa Rosa, CA 95403 | |
| The Honorable Greg Strickland Kings County District Attorney 1400 West Lacey Boulevard Hanford, CA 93230 | The Honorable Paul Zellerbach Riverside County District Attorney 3660 Orange Street Riverside, CA 92501 | The Honorable Birgit Fladager Stanislaus County District Attorney 832 12 th Street, Suite 300 Modesto, CA 95354 | |
| The Honorable Donald Anderson Lake County District Attorney 255 North Forbes Street Lakeport, CA 95453 | The Honorable Jan Scully Sacramento County District Attorney 901 G Street Sacramento, CA 95814 | The Honorable Carl Adams Sutter County District Attorney 446 Second Street Yuba City, CA 95991 | |