60-DAY NOTICE OF VIOLATION

SENT IN COMPLIANCE WITH CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)

DATE: June 30, 2015

TO: Sainty International, LLC, Burbank Paint Company, Inc., and the public prosecutors listed on the service list accompanying the attached proof of service.

FROM: Isabel Ruggeri

I. INTRODUCTION

I, Isabel Ruggeri, am a citizen of the State of California acting in the interest of the general public. I am dedicated to protecting the environment, improving human health and the health of ecosystems, and supporting environmentally sound practices. This Notice is provided to the public agencies listed above pursuant to California Health & Safety Code §25249.6 et seq. ("Proposition 65"). As noted above, notice is also being provided to the violators, Sainty International, LLC and Burbank Paint Company, Inc. (the "Violators").

II. NATURE OF THE VIOLATION

A. Violators: Sainty International, LLC, 3112 Seaborg Ave, Unit C, Ventura, CA 93022; Burbank Paint Company, Inc., 548 S San Fernando Blvd., Burbank, CA 91502.

B. Time Period of Exposure: Violations have been occurring since at least June 30, 2014, and continue to occur to this day.

C. Listed Chemical: Lead.

D. Types of Harm: Birth defects and other reproductive harm.

E. Types of Products: The specific types of products causing the violations are tape measures, including but not limited to the "Tempest" tape measures, being sold by Violators throughout California. All products within the type covered by this Notice shall be hereinafter referred to as the "products."

F. Routes of Exposure: Ingestion and dermal contact.

G. Description of Exposure: The sales of these products in California dating as far back as June 30, 2014 are subject to this notice. 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. Without proper warnings regarding the toxic effects of exposures to the listed chemical, resulting from contact with the products, California citizens lack the information necessary to make informed decisions on whether and how to eliminate (or reduce) the risk of exposure to the toxic chemical from the reasonably foreseeable use of the products. California consumers, including children, through the act of buying, acquiring or using the products, are exposed to the listed chemical. By way of example but not limitation, exposures occur when California

citizens use, display, clean, pack, unpack, arrange, store, or otherwise handle the products. These actions cause consumers to be exposed directly or indirectly through the routine touching of the parts or portions of the products containing readily available surface amounts of the listed chemical. Additionally, exposure can occur through the routine touching and ingesting of other materials that are contaminated with the listed chemical from the products as a result of these tasks. People likely to be exposed include both children and adults.

III. CONTACT INFORMATION

Please direct all questions concerning this notice to me through my attorney's office at the following address:

Lucas T. Novak, Esq.
Law Offices of Lucas T. Novak
8335 W Sunset Blvd., Suite 217
Los Angeles, CA 90069
Tel: (323) 337-9015
Email: lucas.nvk@gmail.com

IV. PROPOSITION 65 INFORMATION

For the Violators' reference, attached is a copy of "Proposition 65: A Summary" which has been prepared by Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at (916) 445-6900.

V. RESOLUTION OF NOTICED CLAIMS

Based on the allegations set forth in this Notice, the noticing party intends to file a Private Enforcer lawsuit against the alleged Violators unless such Violators enters into a binding written agreement to: (1) recall products already sold or undertake best efforts to ensure that the requisite health hazard warnings are provided to those who have received such products; (2) provide clear and reasonable warnings for products sold in the future or reformulate such products to eliminate the lead exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health & Safety Code §25249.7(b). If the alleged Violators are interested in resolving this dispute without resorting to expensive and time-consuming litigation, please feel free to contact counsel identified above. It should be noted that a Private Enforcer cannot: (1) finalize any settlement until after the 60-day notice period has expired; or (2) speak for the Attorney General or any District or City Attorney who received this Notice. Therefore, while reaching an agreement with me will resolve my claims, such agreement may not satisfy the public prosecutors.

CERTIFICATE OF MERIT

Health and Safety Code Section 25249.7(d)

I, Lucas Novak, Esq. hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice have violated Health and Safety Code §25249.6 by failing to provide clear and reasonable warnings;

2. I am the attorney for the noticing party;

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has 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 Violators will be able to establish any of the affirmative defenses set forth in the statute;

5. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including information identified in Health and 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).

Dated: June 30, 2015

Lucas Novak, Esq.

PROOF OF SERVICE

I, Lucas Novak, Esq., declare under penalty of perjury:

I am an active member of the California State Bar, a citizen of the United States over the age of 18 years, and not a party to the within action; my business address is 8335 W Sunset Blvd., Suite 217, Los Angeles, CA 90069.

On June 30, 2015, I served the following documents:

60-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH & SAFETY CODE §25249.7(d);

PROPOSITION 65: A SUMMARY (not sent to the public enforcement agencies);

CERTIFICATE OF MERIT; AND

CERTIFICATE OF MERIT ATTACHMENTS (served only on the Attorney General)

by placing a true copy thereof enclosed in a sealed envelope with postage for first class mail thereon fully prepaid in Los Angeles, California, in the United States mail addressed as follows, and to the public prosecutors listed in the attached service list:

Sainty International, LLC Attn: Current President or CEO 3112 Seaborg Ave, Unit C Ventura, CA 93022	Sainty International, LLC Attn: Current President or CEO 2231 Sturgis Rd, Suite #B Oxnard, CA 93030
Sainty International, LLC Attn: Jeffrey S Miles 512 N Fulton St. Ojai, CA 93023	Burbank Paint Company, Inc. Attn: James M. Jennings, Jr. 548 S San Fernando Blvd. Burbank, CA 91502

Additionally, on this date, I uploaded the documents listed above to the California Attorney General via its website:

Office of the California Attorney General
Proposition 65 Enforcement Reporting
ATTN: Prop 65 Coordinator
1515 Clay Street, Suite 2000
P.O. Box 70550
Oakland, CA 94612-0550
http://oag.ca.gov/prop65

Also on this date, I transmitted via electronic mail the documents listed above to the electronic mail addresses as follows:

Stacey Grassini, Deputy District Attorney 900 Ward Street Martinez, CA 94553 sgrassini@contracostada.org	Dije Ndreu, Deputy District Attorney PO Box 1131 Salinas, CA 93902 Prop65DA@co.monterey.ca.us	Gary Lieberstein, District Attorney 931 Parkway Mall Napa, CA 94559 CEPD@countyofnapa.org
Paul E. Zellerbach, District Attorney 3072 Orange Street Riverside, CA 92501 Prop65@rivcoda.org	Yen Dang, Assistant District Attorney 70 W Hedding St San Jose, CA 95110 epu@da.sccgov.org	Stephan R. Passalacqua, District Attorney 600 Administration Dr Sonoma, CA 95403 jbarnes@sonoma-county.org
Phillip J. Cline, District Attorney 221 S Mooney Blvd Visalia, CA 95370 Prop65@co.tulare.ca.us	Gregory D. Totten, District Attorney 800 S Victoria Ave Ventura, CA 93009 daspecialops@ventura.org	Birgit Fladager, District Attorney of Stanislaus County 832 12th Street, Ste 300 Modesto, CA 95354 Prop65@standa.org

The electronic transmissions were reported as sent and without error.

Executed on June 30, 2015, at Los Angeles, California.

Lucas Novak, Esq.

SERVICE LIST

District Attorney of Alameda County 1225 Fallon Street, Rm 900 Oakland, CA 94612	District Attorney of Alpine County 270 Laramie St., P.O. Box 248 Markleeville, CA 96120	District Attorney of Amador County 708 Court Street, Suite 202 Jackson, CA 95642
District Attorney of Butte County Administration Building 25 County Center Drive Oroville, CA 95965	District Attorney of Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney of Colusa County 547 Market Street, Ste 102 Colusa, CA 95932
District Attorney of Del Norte County 450 H Street, Ste 171 Crescent City, CA 95531	District Attorney of El Dorado County 515 Main Street Placerville, CA 95667	District Attorney of Fresno County 2220 Tulare Street, Ste 1000 Fresno, CA 93721
District Attorney of Glenn County P.O. Box 430 Willows, CA 95988	District Attorney of Humboldt County 825 5th Street Eureka, CA 95501	District Attorney of Imperial County 940 W. Main Street, Ste 102 El Centro, CA 92243
District Attorney of Inyo County P.O. Drawer D Independence, CA 93526	District Attorney of Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney of Kings County 1400 West Lacey Blvd. Hanford, CA 93230

District Attorney of Lake County 255 N. Forbes Street Lakeport, CA 95453	District Attorney of Lassen County 220 S. Lassen Street, Ste 8 Susanville, CA 96130	District Attorney of Los Angeles County 210 W. Temple Street, Ste 18000 Los Angeles, CA 90012-3210
District Attorney of Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney of Marin County 3501 Civic Center Drive, Rm. 130 San Rafael, CA 94903	District Attorney of Mariposa County 5101 Jones St., P.O. Box 730 Mariposa, CA 95338
District Attorney of Mendocino County P.O. Box 1000 Ukiah, CA 95482	District Attorney of Merced County 2222 "M" Street Merced, CA 95340	District Attorney of Modoc County 204 S. Court Street, Rm. 202 Alturas, CA 96101-4020
District Attorney of Mono County P.O. Box 617 Bridgeport, CA 93517	District Attorney of Nevada County 201 Commercial Street Nevada City, CA 95959	District Attorney of Orange County 401 Civic Center Drive West Santa Ana, CA 92701
District Attorney of Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678	District Attorney of Plumas County 520 Main Street, Rm. 404 Quincy, CA 95971	District Attorney of Sacramento County 901 "G" Street Sacramento, CA 95814
District Attorney of San Benito County 419 Fourth Street, 2nd Floor Hollister, CA 95023	District Attorney of San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415	District Attorney of San Diego County 330 West Broadway San Diego, CA 92101
District Attorney of San Francisco County 850 Bryant Street, Rm 322 San Francisco, CA 94103	District Attorney of San Joaquin County P.O. Box 990 Stockton, CA 95201	District Attorney of San Luis Obispo County 1050 Monterey Street, Rm 450 San Luis Obispo, CA 93408
District Attorney of San Mateo County 400 County Center, 3rd Floor Redwood City, CA 94063	District Attorney of Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	District Attorney of Santa Cruz County 701 Ocean Street, Rm. 200 Santa Cruz, CA 95060
District Attorney of Shasta County 1355 West Street Redding, CA 96001	District Attorney of Sierra County Courthouse 100 Courthouse Sq., 2nd Floor Downieville, CA 95936	District Attorney of Siskiyou County P.O. Box 986 Yreka, CA 96097
District Attorney of Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	San Jose City Attorney's Office 200 East Santa Clara Street San Jose, CA 95113	District Attorney of Sutter County 446 Second Street Yuba City, CA 95991
District Attorney of Tehama County P.O. Box 519 Red Bluff, CA 96080	District Attorney of Trinity County P.O. Box 310 Weaverville, CA 96093	District Attorney of Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney of Yolo County 301 Second Street Woodland, CA 95695	District Attorney of Yuba County 215 Fifth Street Marysville, CA 95901	Los Angeles City Attorney's Office 800 City Hall East 200 N. Main Street Los Angeles, CA 90012
San Diego City Attorney's Office 1200 Third Avenue, Ste 1620 San Diego, CA 92101	San Francisco City Attorney's Office City Hall, Room 234 1 Dr. Carlton B. Goodlett Place San Francisco, CA 94102	