

1 **LEXINGTON LAW GROUP**

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7 CENTER FOR ENVIRONMENTAL HEALTH

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9  
10 COUNTY OF SAN FRANCISCO

11 CENTER FOR ENVIRONMENTAL HEALTH,  
12 a non-profit corporation,

13  
14 Plaintiff,

15 v.

16 EASY SPIRIT LLC, et al.,

17 Defendants.

18  
19 CENTER FOR ENVIRONMENTAL HEALTH,  
20 a non-profit corporation,

21 Plaintiff,

22 v.

23 DOLLS KILL, INC., *et al.*,

24  
25 Defendants.  
26  
27  
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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 13.1 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.

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

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

**17. NO EFFECT ON OTHER SETTLEMENTS**

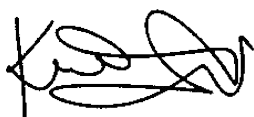
17.1 Nothing in this Consent Judgment shall preclude CEH from resolving any claim against an entity other than Settling Defendant on terms that are different than those contained in this Consent Judgment.

**IT IS SO ORDERED:**

Dated: \_\_\_\_\_, 2024  
\_\_\_\_\_  
Judge of the Superior Court

**IT IS SO STIPULATED:**

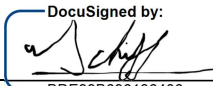
Dated: April 16, 2024  
**CENTER FOR ENVIRONMENTAL HEALTH**

  
\_\_\_\_\_  
Kizzy Charles-Guzman  
Interim Chief Executive Officer

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Dated: 3/28/2024, 2024

**AGRON, INC.**

DocuSigned by:  
  
Signature RDF39B696136406...

Anton Schiff  
Printed Name

Co-CEO  
Title

Dated: \_\_\_\_\_, 2024

**ASICS AMERICA CORPORATION**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

Dated: \_\_\_\_\_, 2024

**CENTRIC SOCKS LLC**

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Signature

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Printed Name

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Dated: \_\_\_\_\_, 2024

**AGRON, INC.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

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Dated: \_\_\_\_\_, 2024

**ASICS AMERICA CORPORATION**

29/3/2024

DocuSigned by:  
*Paul Ljucovic*  
ECB76408746B4C9  
\_\_\_\_\_  
Signature

Paul Ljucovic

\_\_\_\_\_  
Printed Name

CFO, AAC

\_\_\_\_\_  
Title

Dated: \_\_\_\_\_, 2024

**CENTRIC SOCKS LLC**

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Dated: \_\_\_\_\_, 2024

**AGRON, INC.**

\_\_\_\_\_  
Signature

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Printed Name

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Dated: \_\_\_\_\_, 2024

**ASICS AMERICA CORPORATION**

\_\_\_\_\_  
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Title

Dated: April 9, 2024

**CENTRIC SOCKS LLC**

  
\_\_\_\_\_  
Signature

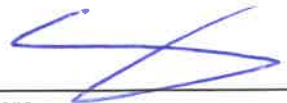
Marc Goldfarb  
\_\_\_\_\_  
Printed Name

EVP, General Counsel  
\_\_\_\_\_  
Title

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Dated: 3/21, 2024

**CREST BRANDS, LLC**

  
\_\_\_\_\_  
Signature

Erica Lewy  
\_\_\_\_\_  
Printed Name

President  
\_\_\_\_\_  
Title

Dated: \_\_\_\_\_, 2024

**DELTA GALIL USA, INC.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

Dated: \_\_\_\_\_, 2024

**DOLLAR GENERAL CORPORATION**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
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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

\_\_\_\_\_  
Printed Name

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Dated: \_\_\_\_\_, 2024

**CREST BRANDS, LLC**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

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

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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 Sarkis

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.**

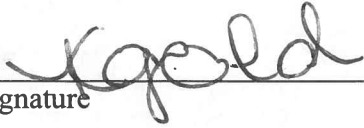
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\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

Dated: March 28, 2024

**GOLD, INC.**

  
\_\_\_\_\_  
Signature

Katherine Gold  
\_\_\_\_\_  
Printed Name

CEO + President  
\_\_\_\_\_  
Title

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Dated: April 9, 2024

HANESBRANDS INC.

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

\_\_\_\_\_  
Title



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Dated: \_\_\_\_\_, 2024

**HANESBRANDS INC.**

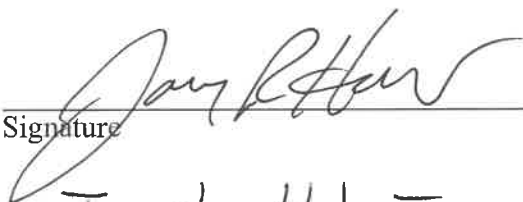
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Signature

\_\_\_\_\_  
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.**

  
\_\_\_\_\_  
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

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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.**

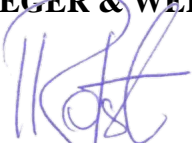
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Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

Dated: March 27, 2024

**PREGER & WERTENTEIL, INC.**

  
\_\_\_\_\_  
Signature

Paul Rotstein  
\_\_\_\_\_  
Printed Name


CEO  
\_\_\_\_\_  
Title



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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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Title

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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  
\_\_\_\_\_  
Title

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Dated: 4/8, 2024

**SHALOM INTERNATIONAL CORP.**

Signature

Angel Funes  
Printed Name

Cfo  
Title

Dated: \_\_\_\_\_, 2024

**SPIRIT HALLOWEEN SUPERSTORES  
LLC**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

Dated: \_\_\_\_\_, 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**

*Kevin W. Mahony*  
\_\_\_\_\_  
Signature

*KEVIN W. MAHONY*  
\_\_\_\_\_  
Printed Name

*SVP/CO*  
\_\_\_\_\_  
Title

Dated: 4/9, 2024

**STANCE, INC.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

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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

\_\_\_\_\_  
Title



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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*  
157FDADFB52C437...

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	J. Simone Jones
Amy P. Lally	
SIDLEY AUSTIN LLP	SIDLEY AUSTIN LLP
1999 Avenue of the Stars, 17th Floor	One South Dearborn
Los Angeles, CA 90067	Chicago, IL 60603
maureen.gorsen@sidley.com	jsimone.jones@sidley.com
lally@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	<b>For United States Postal Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States Postal Service Delivery:</b>  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
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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	\$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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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**

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

6 Jeffrey Margulies  
7 Lauren A. Shoor  
8 Eva Yang  
9 Ray Muro  
10 NORTON ROSE FULBRIGHT US LLP  
11 555 California Street Suite 3300  
12 San Francisco, CA 94104  
jeff.margulies@nortonrosefulbright.com  
lauren.shoor@nortonrosefulbright.com  
eva.yang@nortonrosefulbright.com  
raymond.muro@nortonrosefulbright.com

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

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

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

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

- 19
- 20 **6. Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**

21	Total Settlement Payment	\$123,500
22		
23	Civil Penalty (Total)	\$16,000
24	- OEHHA (75%)	\$12,000
25	- CEH (25%)	\$4,000
26	Additional Settlement Payment	\$11,800
27	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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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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- 2 **1. Name of Settling Defendant:** Crest Brands, LLC
- 3 **2. Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling**
- 4 **Defendant:** None
- 5 **3. Person(s) to Receive Notices (Pursuant to Section 8.2):**

6 Jeffrey Margulies  
7 Lauren A. Shoor  
8 Eva Yang  
9 Ray Muro  
10 NORTON ROSE FULBRIGHT US LLP  
11 555 California Street Suite 3300  
12 San Francisco, CA 94104  
jeff.margulies@nortonrosefulbright.com  
lauren.shoor@nortonrosefulbright.com  
eva.yang@nortonrosefulbright.com  
raymond.muro@nortonrosefulbright.com

- 13 **4. Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** February 28, 2022

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

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

18 **b. Date Settling Defendant(s) Named in Complaint:** July 14, 2022

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

21	Total Settlement Payment	\$80,750
22		
23	Civil Penalty (Total)	\$10,000
24	- OEHHA (75%)	\$7,500
25	- CEH (25%)	\$2,500
26	Additional Settlement Payment	\$7,500
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28	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	<b>For United States Postal Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States Postal Service Delivery:</b>  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><b>For United States Postal Service Delivery:</b></p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	<p><b>For Non-United States Postal Service Delivery:</b></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)	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**  
**Dollar General Corporation**

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

6 Ryan Landis  
7 GORDON REES SCULLY MANSUKHANI, LLP  
8 5 Park Plaza, Suite 1100  
9 Irvine, CA 92614  
10 rlandis@grsm.com

- 11 **4. Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** October 13, 2021

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

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

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

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

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19 Total Settlement Payment	\$20,000
20 Civil Penalty (Total)	\$2,400
21 - OEHHA (75%)	\$1,800
22 - CEH (25%)	\$600
23 Additional Settlement Payment	\$1,800
24 Total Attorneys' Fees and Costs	\$15,800
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26 - LLG Fees and Costs	\$14,000
27 - CEH Fees and Costs	\$1,800
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1 **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	<p><b>For United States Postal Service Delivery:</b></p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	<p><b>For Non-United States Postal Service Delivery:</b></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)	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

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

Payee	Type	Deliver To
OEHHA (Taxpayer identification number 68-0284486)	Penalty	<p><b>For United States Postal Service Delivery:</b></p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	<p><b>For Non-United States Postal Service Delivery:</b></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)	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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- 2 **1. Name of Settling Defendant:** GCE International, Inc.
- 3 **2. Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling**
- 4 **Defendant:** G-III Apparel Group, Ltd., Foot Locker, Inc., Penney OpCo LLC, CVS
- 5 **Pharmacy, Inc., Nordstrom, Inc., Target Corporation, Walmart Inc., Sam's West, Inc.**
- 6 **3. Person(s) to Receive Notices (Pursuant to Section 8.2):**

7 Michael C. Baum  
8 Andrew V. Jablon  
9 RESCH POLSTER & BERGER LLP  
10 1840 Century Park East, 17th Floor  
11 Los Angeles, California 90067  
12 mbaum@rpblaw.com  
13 ajablon@rpblaw.com

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

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

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

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

- 20 **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

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- CEH Fees and Costs \$ 7,700

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

<b>Payee</b>	<b>Type</b>	<b>Deliver To</b>
OEHHA (Taxpayer identification number 68-0284486)	Penalty	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></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
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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></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**  
**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):**

<b>Payee</b>	<b>Type</b>	<b>Deliver To</b>
OEHHA (Taxpayer identification number 68-0284486)	Penalty	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></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

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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	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></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

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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	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></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	<p>Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117</p>

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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

1 **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	<p><b>For United States Postal Service Delivery:</b></p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	<p><b>For Non-United States Postal Service Delivery:</b></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)	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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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@mofo.com  
DVallone@mofo.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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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.**

- 1
- 2 **1. Name of Settling Defendant:** Orly Shoe Corp.
- 3
- 4 **2. Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling**
- 5 **Defendant:** Authentic Brands LLC incorrectly sued as “Aeropostale, Inc.”, ABG-Aero
- 6 **Ipco, LLC incorrectly sued as “Authentic Brands Group LLC”, Dollar Tree Stores, Inc.**
- 7
- 8 **3. Person(s) to Receive Notices (Pursuant to Section 8.2):**

9 Carol Brophy  
10 Angela Sousa  
11 STEPTOE LLP  
12 One Market Plaza  
13 Steuart Tower, 10th Floor, Suite 1050  
14 San Francisco, CA 94105  
15 cbrophy@steptoe.com  
16 asousa@steptoe.com

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

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

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

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

- 23 **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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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.**

- 1
- 2 **1. Name of Settling Defendant:** Preger & Wertenteil, Inc.
- 3 **2. Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling**
- 4 **Defendant:** None
- 5 **3. Person(s) to Receive Notices (Pursuant to Section 8.2):**
- 6 Jeffrey Margulies
- 7 Lauren A. Shoor
- 8 Eva Yang
- 8 Ray Muro
- 9 NORTON ROSE FULBRIGHT US LLP
- 9 555 California Street Suite 3300
- 10 San Francisco, CA 94104
- 10 jeff.margulies@nortonrosefulbright.com
- 11 lauren.shoor@nortonrosefulbright.com
- 11 eva.yang@nortonrosefulbright.com
- 12 raymond.muro@nortonrosefulbright.com
- 13 **4. Date of 60-Day Notice of Violation (Pursuant to Section 1.3):** June 23, 2022
- 14
- 15 **5. Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for*
- 16 *Environmental Health v. Dolls Kill* San Francisco County Superior Court Case No. CGC-
- 17 *22-602383*
- 18 **a. Date Complaint Filed:** October 13, 2022
- 19 **b. Date Settling Defendant(s) Named in Complaint:** October 13, 2022
- 20 **6. Defendant's Settlement Payment and Allocation (Pursuant to Section 5.1):**
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|-------------------------------|----------|
| Total Settlement Payment      | \$66,500 |
| Civil Penalty (Total)         | \$8,400  |
| - OEHHA (75%)                 | \$6,300  |
| - CEH (25%)                   | \$2,100  |
| Additional Settlement Payment | \$6,300  |
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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):**

<b>Payee</b>	<b>Type</b>	<b>Deliver To</b>
OEHHA (Taxpayer identification number 68-0284486)	Penalty	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></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  
PVH Legwear LLC**

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

6 John J. Allen  
7 Tim C. Hsu  
8 Alexandra R. Jernigan  
9 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP  
10 865 South Figueroa Street, Suite 2800  
11 Los Angeles, CA 90017  
12 jallen@allenmatkins.com  
13 thsu@allenmatkins.com  
14 ajernigan@allenmatkins.com

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

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

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

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

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

20	Total Settlement Payment	\$66,500
21		
22	Civil Penalty (Total)	\$8,400
23	- OEHHA (75%)	\$6,300
24	- CEH (25%)	\$2,100
25	Additional Settlement Payment	\$6,300
26	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	<b>For United States Postal Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States Postal Service Delivery:</b>  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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- 2 **1. Name of Settling Defendant:** Renfro, LLC (Renfro Corporation)
- 3 **2. Name(s) of Section 7.3 defendants that are to be dismissed as Releasees of Settling**
- 4 **Defendant:** Carhartt, Inc., Russell Brands LLC
- 5 **3. Person(s) to Receive Notices (Pursuant to Section 8.2):**

6 Nancy L. Stagg  
7 KILPATRICK TOWNSEND & STOCKTON LLP  
8 12255 El Camino Road, Suite 250  
9 San Diego, CA 92130  
10 nstagg@kilpatricktownsend.com

11 Alexander Bullock  
12 KILPATRICK TOWNSEND & STOCKTON LLP  
13 701 Pennsylvania Avenue NW, Suite 200  
14 Washington, DC 20004  
15 abullock@kilpatricktownsend.com

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

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

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

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

- 22 **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

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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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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  
Royce Too LLC**

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- 2   **1. Name of Settling Defendant:** Royce Too LLC
- 3
- 4   **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
- 5   **3. Person(s) to Receive Notices (Pursuant to Section 8.2):**

6       Jeffrey Margulies  
7       Lauren A. Shoor  
8       Eva Yang  
9       Ray Muro  
10       NORTON ROSE FULBRIGHT US LLP  
11       555 California Street  
12       Suite 3300  
13       San Francisco, California 94104  
14       jeff.margulies@nortonrosefulbright.com  
15       lauren.shoor@nortonrosefulbright.com  
16       eva.yang@nortonrosefulbright.com  
17       raymond.muro@nortonrosefulbright.com

18       Arthur J. DeBaugh  
19       WARD AND SMITH, P.A.  
20       751 Corporate Center Drive, Suite 300 (27607)  
21       Post Office Box 33009  
22       Raleigh, NC 27636 3009  
23       ajdebaugh@wardandsmith.com

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

- 25   **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

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

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

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

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

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

11 Payee	12 Type	13 Deliver To
14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Penalty	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></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

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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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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**

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

6 Jeffrey Margulies  
7 Lauren A. Shoor  
8 Eva Yang  
9 Ray Muro  
10 NORTON ROSE FULBRIGHT US LLP  
11 555 California Street Suite 3300  
12 San Francisco, CA 94104  
jeff.margulies@nortonrosefulbright.com  
lauren.shoor@nortonrosefulbright.com  
eva.yang@nortonrosefulbright.com  
raymond.muro@nortonrosefulbright.com

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

- 14
- 15 **5. Complaint Naming Settling Defendant (Pursuant to Section 1.4):** *Center for*  
16 *Environmental Health v. Easy Spirit* San Francisco County Superior Court Case No.  
CGC-22-598022

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

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

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

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

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1 Total Attorneys' Fees and Costs \$37,000

2 - LLG Fees and Costs \$34,000

3 - CEH Fees and Costs \$3,000

4 **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	<b>For United States Postal Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States Postal Service Delivery:</b>  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

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

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Payee	Type	Deliver To
<p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>OEHHA (Taxpayer identification number 68-0284486)</p>	<p>Penalty</p>	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></p> <p>Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment 1001 I Street, MS #19B Sacramento, CA 95814</p>
<p>16</p> <p>17</p> <p>18</p> <p>Center For Environmental Health (Taxpayer identification number 94-3251981)</p>	<p>Penalty</p>	<p>Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117</p>
<p>19</p> <p>20</p> <p>21</p> <p>Center For Environmental Health (Taxpayer identification number 94-3251981)</p>	<p>ASP</p>	<p>Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117</p>
<p>22</p> <p>23</p> <p>24</p> <p>Lexington Law Group (Taxpayer identification number 94-3317175)</p>	<p>Fee and Cost</p>	<p>Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117</p>
<p>25</p> <p>26</p> <p>Center For Environmental Health (Taxpayer identification number 94-3251981)</p>	<p>Fee and Cost</p>	<p>Mark Todzo Lexington Law Group 503 Divisadero Street San Francisco, CA 94117</p>

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**EXHIBIT B**  
**United Legwear Company, LLC**

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

7 Jeffrey Margulies  
8 Lauren A. Shoor  
9 Eva Yang  
10 Ray Muro  
11 NORTON ROSE FULBRIGHT US LLP  
12 555 California Street Suite 3300  
13 San Francisco, CA 94104  
14 jeff.margulies@nortonrosefulbright.com  
15 lauren.shoor@nortonrosefulbright.com  
16 eva.yang@nortonrosefulbright.com  
17 raymond.muro@nortonrosefulbright.com

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

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

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

- 24 **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



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

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

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Payee	Type	Deliver To
<p>6 OEHHA            7 (Taxpayer identification            8 number 68-0284486)</p>	<p>9 Penalty</p>	<p>10 <b>For United States Postal            11 Service Delivery:</b>            12 Attn: Mike Gyurics            13 Fiscal Operations Branch            14 Chief            15 Office of Environmental            16 Health Hazard Assessment            17 P.O. Box 4010, MS #19B            18 Sacramento, CA 95812-4010</p> <p>19 <b>For Non-United States            20 Postal Service Delivery:</b>            21 Attn: Mike Gyurics            22 Fiscal Operations Branch            23 Chief            24 Office of Environmental            25 Health Hazard Assessment            26 1001 I Street, MS #19B            27 Sacramento, CA 95814</p>
<p>19 Center For Environmental            20 Health            21 (Taxpayer identification            number 94-3251981)</p>	<p>22 Penalty</p>	<p>23 Mark Todzo            24 Lexington Law Group            25 503 Divisadero Street            26 San Francisco, CA 94117</p>
<p>22 Center For Environmental            23 Health            24 (Taxpayer identification            number 94-3251981)</p>	<p>25 ASP</p>	<p>26 Mark Todzo            27 Lexington Law Group            503 Divisadero Street            San Francisco, CA 94117</p>
<p>25 Lexington Law Group            26 (Taxpayer identification            number 94-3317175)</p>	<p>27 Fee and Cost</p>	<p>Mark Todzo            Lexington Law Group            503 Divisadero Street            San Francisco, CA 94117</p>

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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	<b>For United States Postal            Service Delivery:</b>  Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010  <b>For Non-United States            Postal Service Delivery:</b>  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 TRAUIG, LLP 18565 Jamboree Road, Suite 500 Irvine, CA 92612 ocampoh@gtlaw.com	Madeline Orlando GREENBERG TRAUIG, 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	<p><b>For United States Postal Service Delivery:</b></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><b>For Non-United States Postal Service Delivery:</b></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
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



1 **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	<p><b>For United States Postal Service Delivery:</b></p> Attn: Mike Gyurics Fiscal Operations Branch Chief Office of Environmental Health Hazard Assessment P.O. Box 4010, MS #19B Sacramento, CA 95812-4010
Center For Environmental Health (Taxpayer identification number 94-3251981)	Penalty	<p><b>For Non-United States Postal Service Delivery:</b></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)	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