Law Offices of Danialpour & Associates

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June 18, 2020

Attorneys for DW Global James J. Ward Baker & McKenzie LLP 1901 Avenue of The Stars STE 950 Los Angeles, CA 90067 Joe.ward@bakermckenzie.com

In Re: Withdrawal of 60-Day Notice

PHSA v. DW Global Inc.

Notice No. # 2020-01307 Date of Notice: 06/01/2020

To whom it may concern,

This letter is to confirm withdrawal of 60-Day Notice No. 2020-01307 in connection with Prop 65 which was served on 06/01/2020. Withdrawal is based on DW Global counsel's letter that DW Global Inc has less than 10 employees. Should you have any question or concern, please do not hesitate to contact me at (310) 444-0055.

Sincerely,

David Davar Danialpour



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June 8, 2020

David Davar Danialpour Danialpour & Associates 357 S. Robertson Blvd. 2nd Floor

Beverly Hills, CA 90211

Re: Public Health and Safety Advocates, LLC's June 1, 2020 Sixty Day Notice of

Proposition 65 Violation to DW Global, Inc.

Dear Mr. Danialpour:

I write on behalf of my client, DW Global, Inc. ("DW Global"), in response to Public Health and Safety Advocates, LLC's ("PHSA's") Sixty Day Notice of Violation ("Notice") alleging that DW Global violated Proposition 65 by exposing California consumers to products containing lead and cadmium. Please be advised that DW Global has less than 10 employees, which, as I am sure you know, means it is exempt from Proposition 65's requirements. *See* Cal. Health & Safety Code § 25249.11(b). Kindly confirm that PHSA will therefore withdraw its Notice.

Should PHSA proceed with any adverse action against DW Global relating to the Notice or Proposition 65, my client will defend itself vigorously and seek all appropriate relief, including sanctions against PHSA and your firm, for filing a baseless lawsuit. We certainly hope that will not be necessary, particularly given the unprecedented global pandemic that we are all facing right now.

This letter is sent without waiving any of DW Global's rights or defenses, each of which is expressly reserved.

Sincerely,

James J. Ward

Baker & McKenzie LLP