

LAW OFFICES  
**BRODSKY SMITH**

9465 WILSHIRE BLVD., STE. 300  
 BEVERLY HILLS, CA 90212  
 877.534.2590  
 www.brodskysmith.com

**NEW JERSEY OFFICE**  
 20 BRACE RD., STE. 350  
 CHERRY HILL, NJ 08034  
 856.795.7250

**NEW YORK OFFICE**  
 240 MINEOLA BOULEVARD  
 MINEOLA, NY 11501  
 516.741.4977

**PENNSYLVANIA OFFICE**  
 TWO BALA PLAZA, STE. 805  
 BALA CYNWYD, PA 19004  
 610.667.6200

April 16, 2026

Member/Manager Excello Products LLC PO Box 58410 Seattle WA 98138	President/CEO Design Imports India 22627 68 <sup>th</sup> Avenue South Kent, WA 98031
Member/Manager Catalyst Brands LLC The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	President/CEO Simon Property Group, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
Member/Manager Penney IP LLC dba JC Penney c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	President/CEO Simon Property Group, Inc. c/o CT Corporation System 155 Federal Street, Suite 700 Boston, MA 02110
Partner Brookfield Property Partners L.P. 73 Front Street, 5 <sup>th</sup> Floor Hamilton HM 12 BERMUDA	Member/Manager Penney OPCO LLC c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203
Member/Manager Penney IP LLC c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	President/CEO Herman Pearl Company c/o VJG Registered Agent Services LLC 1201 Pacific Ave., Suite 1900 Tacoma, WA 98402-4315
President/CEO Herman Pearl Company c/o VJG Registered Agent Services LLC PO Box 1315 Tacoma, WA 98401-1315	

AND THE PUBLIC PROSECUTORS LISTED ON THE DISTRIBUTION LIST ACCOMPANYING  
 THE ATTACHED CERTIFICATE OF SERVICE

Re: Withdraw of Notice of Violation of California Health & Safety Code §25249.6, et seq.  
 AG# 2026-00964 only as to Simon Property Group, Inc., Penney IP LLC dba JC Penney,  
 Brookfield Property Partners L.P., Penney OPCO LLC, Penney IP LLC

To Whom It May Concern:

Please be advised that on March 3, 2026, Brodsky Smith, on behalf of Ema Bell ("Bell"), provided notice to the above individuals, entities and public prosecutors identified on the accompanying distribution list regarding violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65") with respect to the following consumer product:

<b>Product</b>	<b>Non- Exclusive Examples of the Product</b>
Ceramic products with exterior decorations sold and/or distributed by Herman Pearl Company in California	Design Imports Triangle 6 Piece Napkin Rings UPC# 0 72456 10241 6

We, as counsel for Bell, hereby withdraw the March 3, 2026 Notice only as to Simon Property Group, Inc., Penney IP LLC dba JC Penney, Brookfield Property Partners L.P., Penney OPCO LLC, Penney IP LLC.

Sincerely,



\_\_\_\_\_  
Evan J. Smith