

SUPERIOR COURT OF CALIFORNIA, ALAMEDA COUNTY

*Donna Connary, et al. v. S.C. Johnson & Son, Inc., No. RG20061675*

**If you are a United States resident who purchased certain Method products with  
“non-toxic” labels between May 14, 2016 and May 13, 2021**

**Your Rights May Be Affected by a Settlement and  
You May be Eligible for a Cash Refund.**

*The Superior Court of California, Alameda County authorized this notice. It is not a solicitation from a lawyer.  
Your legal rights are affected whether you act or do not act. Please read this notice carefully.*

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT A CLAIM FORM BY NOVEMBER 1, 2021</b>	This is the only way to get a cash payment.
<b>EXCLUDE YOURSELF BY OCTOBER 18, 2021</b>	Get out of the Settlement and retain your right to pursue your own lawsuit for these claims. Get no cash payment from the Settlement.
<b>OBJECT OR COMMENT BY OCTOBER 18, 2021</b>	Write to the Court about why you think the Settlement is unfair, inadequate, or unreasonable.
<b>ATTEND A HEARING TO DISCUSS THE SETTLEMENT ON NOVEMBER 16, 2021</b>	Speak in Court about the fairness of the Settlement. You can the hearing or you may hire an attorney to speak on your behalf.
<b>DO NOTHING</b>	You will get no cash payment. Give up rights to sue for the legal claims about the Method products in this case.

- These rights and options -- **and the deadlines to exercise them** -- are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made and credits will be given under the Settlement Agreement if the Court approves the Settlement and after appeals are resolved. Please be patient.

If you have any questions, then please read on and visit [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com).

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## BASIC INFORMATION

### 1. WHAT IS THIS NOTICE ABOUT?

You have a right to know about a proposed Settlement of a class action lawsuit, and about your options, before the Court decides whether to approve the Settlement.

The Court in charge of this case is the Superior Court of California, Alameda County (the “Court”) and the case is called Donna Connary, et al. v. S.C. Johnson & Sons, Inc., Case No. RG20061675. The four individuals who sued, Zoriana Pawluk-Florio, Adrienne Andry, Paul Torrecillas, and Donna Connary, are called the Plaintiffs, and the company they sued, S.C. Johnson & Son, Inc. (“SC Johnson”), is the Defendant.

This Notice explains the proposed Settlement of a class action lawsuit and your options and rights before the Court decides whether to approve the Settlement. If the Court approves the Settlement, an administrator appointed by the Court will make the payments that the Settlement allows after any appeals are resolved.

This Notice is not an expression of any opinion by the Court about the merits of any of the claims or defenses made by any of the parties in this case, or the fairness or adequacy of the proposed Settlement. This Notice summarizes the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

### 2. WHAT IS A CLASS ACTION LAWSUIT?

A class action is a lawsuit in which one or more individuals sue a company or other entity on behalf of all other people who have similar claims. Collectively, these people are referred to as a “class” or “class members.” In a class action, the court resolves certain legal issues, legal claims and defenses for all class members in one lawsuit, except for those who ask to be excluded from the class. (See below for more information about excluding yourself from the Class.)

### 3. WHAT IS THIS LAWSUIT ABOUT?

The lawsuit claims that the non-toxic labels on certain Method branded products are false and misleading. This settlement reflects that this matter is being resolved through negotiation rather than through a trial on the merits. The Method products’ non-toxic claim is based on SC Johnson’s rigorous product testing, which the company stands by. SC Johnson denies any liability to Plaintiffs or the Settlement Class. The disputed Method brand products can be found in the answer to Question 4 of this Notice and paragraph 2.18 of the Settlement Agreement available at [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com).

The Court did not decide who was right in the lawsuit. Instead, the Parties agreed to a settlement. By agreeing to a settlement, the Parties avoid the costs and risk of a trial and the Class will get benefits described in the Settlement. The Class Representatives and their attorneys believe that the Settlement is in the best interest of Class Members.

## WHO IS INCLUDED IN THE SETTLEMENT?

### 4. HOW DO I KNOW IF I AM IN THE SETTLEMENT CLASS?

The Settlement Class includes all persons who resided in the United States and purchased in the United States certain Method products with “non-toxic” labels from May 14, 2016 to May 13, 2021 for use, and not for resale. The Method Products at issue in this case, and for which Class Members may make a claim, include all sizes and fragrances of the following:

Questions? Call toll-free 1-855-763-1115 or visit [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com).

Method All-Purpose Cleaner	Method Squirt + Mop Hard Floor Cleaner
Method All-Purpose Cleaner for Dog	Method Bathroom Cleaner
Method All-Purpose Cleaner for Cat	Method Wood for Good Daily Clean
Method All-Purpose Cleaning Wipes	Method Dish Soap, Method Smarty Dish
Method All-Purpose Cleaning Wipes for Dog	Method Smarty Dish Plus
Method All-Purpose Cleaning Wipes for Cat	Method PowerDish
Method Squirt + Mop Wood Floor Cleaner	Method Daily Granite Cleaner
Method Foaming Bathroom Cleaner	Method Stainless Steel Polish
Method Glass + Surface Cleaner	Method Heavy Duty Degreaser
Method Wood for Good Polish	Method Daily Shower Cleaner

Excluded from the Settlement Class are: (a) SC Johnson’s board members or executive-level officers, including its attorneys; (b) governmental entities; (c) the Court, the Court’s immediate family, and the Court staff; and (d) any person that timely and properly excludes himself or herself from the Settlement Class in accordance with the procedures approved by the Court.

If you are not sure whether you are a Settlement Class Member, or have any other questions about the Settlement, you should visit the Settlement Website, [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com) or call the toll-free number (855) 763-1115.

## **THE SETTLEMENT BENEFITS**

### **5. WHAT DOES THE SETTLEMENT PROVIDE?**

The Settlement establishes a \$2,250,000.00 fund. The fund will be used to pay class notice and administration costs, attorneys’ costs, fees and expenses, named Plaintiffs’ Service Awards, and cash payments to Class Members who submit a timely and valid Claim Form. Additionally, ninety (90) days after the Settlement is approved and any appeals are resolved, the products at issue in this lawsuit will no longer be advertised as “non-toxic.” Details are described in Section 4 of the Settlement, which is available at [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com).

The specific amount of cash that you may receive depends on the number of Method products with non-toxic labels you purchased, whether you have receipts for those purchases, and the number of valid claims submitted. You can choose to receive a cash payment based on the number of qualifying products you purchased between May 14, 2016 and May 13, 2021, as follows:

- A Class Member who has acceptable proof(s) of purchase may seek reimbursement of \$1.00 for every purchased Product submitted with a valid Claim Form. Acceptable proof of purchase includes itemized store receipts, loyalty/membership card print-outs, non-identical original UPC codes, and pictures of non-identical UPC codes. A Class Member submitting a Claim Form with acceptable proofs of purchase must also state under penalty of perjury that the Class Member purchased the Product(s) for personal use, and the approximate date(s) of purchase(s).
- A Class Member who does not have acceptable proof of purchase may seek reimbursement of \$1.00 for up to ten (10) purchased Products for which they submit a valid Claim Form. A Class Member submitting a Claim Form without proof of purchase must also state under penalty of perjury that the Class Member purchased the Product(s) for personal use, and the approximate date(s) of purchase(s).
- A Class Member may file a Claim Form seeking reimbursement both for Products for which they submit written proof of purchase, and Products for which they do not submit written proof of purchase. These claims will be subject to the requirements and maximum recovery amounts permitted for each type of claim,

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and requires a statement under penalty of perjury that the Class Member purchased the Products for personal use, and the approximate dates of purchases.

If the total amount of valid claims (plus other authorized fees, costs, expenses and Service Awards) exceeds the amount in the Settlement Fund, then each Claimant's award will be proportionately reduced. If money remains in the Settlement Fund after all valid claims (plus other authorized fees, costs, expenses and Service Awards) are paid, each Claimant's award will be proportionately increased.

In addition to the monetary benefits provided by the Settlement, the products at issue in this lawsuit will no longer be advertised as "non-toxic."

## **6. WHEN WILL I GET MY PAYMENT?**

Payments for valid claims will be distributed if the Court grants final approval of the Settlement, after any appeals are resolved, and final approval of the Settlement is upheld.

If the Court approves the Settlement after the hearing on November 16, 2021, at 3:00 pm there may be appeals. We do not know how much time it could take to resolve any appeals that may be filed. If the Court does not approve the Settlement or the Settlement is not approved as a result of any appeal that may be brought, you will not receive a cash payment for your purchases of the Products through this Settlement.

## **7. HOW DO I GET A PAYMENT? SUBMIT A CLAIM FORM?**

If you are a Class Member and you want to participate in the Settlement, you must complete and submit a Claim Form by November 1, 2021. You can find the Claim Form at [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com), by calling (855) 763-1115, or by writing to Method Products Settlement, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

The Claim Form can be submitted online or by mail. If you choose to submit it online, you must do so no later than **November 1, 2021**. If you choose to submit a hard-copy of the Claim Form by mail, it must be postmarked by **November 1, 2021** and mailed to:

Method Products Settlement  
c/o Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

If you do not submit a valid Claim Form by the deadline, you will not receive a cash payment from the Settlement.

## **REMAINING IN THE SETTLEMENT**

### **8. WHAT AM I GIVING UP IF I STAY IN THE SETTLEMENT CLASS?**

If you do not exclude yourself from the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against about the legal issues in this case. It also means that all of the decisions by the Court will bind you. The Release, which is described more fully in Section 2.21 of the Settlement Agreement, explains the legal claims you give up if you stay in the Settlement Class. The Settlement Agreement is available at the Settlement Website, [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com).

If the Settlement is not approved, litigation will resume and the case will proceed as if the parties did not agree to a Settlement. If litigation resumes, it is possible the Class will not recover anything.

## 9. WHAT HAPPENS IF I DO NOTHING AT ALL?

If you do nothing, you will not get any cash from this Settlement and you will not be able to sue for any of the Released Claims described in the Settlement Agreement.

### THE LAWYERS REPRESENTING YOU

## 10. WHO REPRESENTS ME?

The Court has appointed Wyatt A. Lison, Esq. of Feinstein Doyle Payne & Kravec, LLC, 429 Fourth Avenue, Law & Finance Building, Suite 1300, Pittsburgh, PA 15219 as “Class Counsel,” meaning that he was appointed to represent all Class Members.

## 11. WILL I HAVE TO PAY THE LAWYERS?

No. You will not be responsible for any costs or attorneys’ fees incurred in this lawsuit. If the Court approves the proposed Settlement, Class Counsel will request that the Court award them attorneys’ fees, costs and/or expenses to be paid out of the Settlement Fund. Class Counsel in this case will not seek more than \$750,000.00 for any attorneys’ fees, costs and expenses.

The Plaintiffs will also ask the Court for a Service Award of \$2,500.00 each for their costs, time and effort acting as a Plaintiff and for their willingness to bring this litigation and act on behalf of other consumers. Any Service Awards will be paid out of the Settlement Fund and must be approved by the Court.

### EXCLUDING YOURSELF FROM THE SETTLEMENT

## 12. HOW DO I GET OUT OF - OR EXCLUDE MYSELF FROM THE SETTLEMENT?

If you want to keep the right to sue or continue to sue SC Johnson on your own about the legal issues in this case, then you must take steps to get out. This is called excluding yourself – or it is sometimes referred to as “opting out” – of the Settlement Class.

To exclude yourself (or “Opt-Out”) from the Settlement, you must complete and send by U.S. Mail to the Settlement Administrator a written request that includes the following:

- Your name and address;
- The name of the case: Connary, et al. v. S.C. Johnson & Son, Inc., Case No. RG20061675;
- A statement that you want to be excluded from this Settlement; and
- Your signature.

You must mail your exclusion request, postmarked no later than **October 18, 2021** to:

Method Products Settlement  
ATTN: Exclusion Request  
P.O. Box 58220  
Philadelphia, PA 19102

If you do not include the required information, or if you do not submit your request for exclusion on time, you will remain a Settlement Class Member and will not be able to sue or continue to sue SC Johnson about the claims in this lawsuit.

## 13. IF I DO NOT EXCLUDE MYSELF, CAN I SUE SC JOHNSON FOR THE SAME THING LATER?

No. Unless you exclude yourself, you give up any right to sue SC Johnson for the claims that the Settlement resolves, including any claims relating to SC Johnson for any of the Released Claims. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately. You must exclude yourself from this Settlement Class to continue your own lawsuit.

#### **14. IF I EXCLUDE MYSELF, CAN I GET ANYTHING FROM THIS SETTLEMENT?**

If you exclude yourself, you cannot submit a claim to receive money from the Settlement.

### **OBJECTING TO THE SETTLEMENT**

#### **15. HOW DO I OBJECT TO THE SETTLEMENT?**

If there is something about the Settlement that you do not like, you may send an objection to the Settlement Administrator or appear at the Final Approval Hearing to share your objection with the Court. If you object, you will still be in the Settlement, remain a Class Member, and be eligible to receive cash benefits if the Settlement is approved and you timely submit a valid Claim Form. **Even if you object, you should return a Claim Form to receive a cash payment.**

If you want to object, you can submit a written objection to the Settlement Administrator or appear at the Final Approval Hearing to share your objection with the Court. Your written objection should include:

- Your name, address, and telephone number;
- Your signature and the signature of any attorney representing you for the objection;
- The reason(s) why you object;
- The case name and number of the lawsuit, which is *Connary, et al. v. S.C. Johnson & Son, Inc.*, Case No. RG20061675.
- If you are represented by a lawyer, the name, address and telephone number of that lawyer.
- A declaration signed by you stating, under penalty of perjury, what product(s) you purchased and approximate date(s) of your purchase(s).

**You should submit your written objection to the Settlement Administrator** postmarked no later than **October 18, 2021** to Method Products Settlement, ATTN: Objection Request, P.O. Box 58220, Philadelphia, PA 19102. Details about how to appear at the Final Approval Hearing to share your objection with the Court are in the answer to Question 16.

### **THE COURT'S FAIRNESS HEARING**

#### **16. THE HEARING TO DECIDE WHETHER TO APPROVE THE SETTLEMENT.**

The Court has scheduled a Fairness Hearing for the Settlement on **November 16, 2021 at 3:00 pm**. The Fairness Hearing will take place at Dept. 23 of the Administration Building, 1221 Oak Street, 4th Floor, Oakland, CA 94612 or the hearing may be conducted virtually by online or telephonic means. The hearing may be moved to a different date or time without additional notice, so please check [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com) or call (855) 763-1115 for updates.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will also consider how much the lawyers representing Class Members should be paid and if the named Plaintiffs should receive Service Awards. After the hearing, the Court will decide whether to grant final approval of the Settlement. We do not know how long these decisions will take.

You do not have to come to the hearing. Class Counsel will answer any questions that the Court may have. But you may come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As

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long as you mailed your written objection on time to the proper addresses, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

## **GETTING MORE INFORMATION**

### **17. WHERE DO I GET MORE INFORMATION?**

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement, Claim Form and other information at [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com). You may also write or email with questions to [info@HouseholdProductsSettlement.com](mailto:info@HouseholdProductsSettlement.com) or by mail to Method Products Settlement, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. You can also get a Claim Form by calling the toll-free number, (855) 763-1115.

The pleadings and other records in this litigation may be examined online on the Alameda County Superior Court's website at <https://publicrecords.alameda.courts.ca.gov/PRS/> after arriving at the website, click the 'Search By Case Number' link, then enter *RG20061675* as the case number and click 'SEARCH.' Images of every document filed in the case may be viewed through the 'Register of Actions' at a minimal charge. You may also view images of every document filed in the case free of charge by using one of the computer terminal kiosks available at each court location that has a facility for civil filings.

If you have any questions concerning any matter raised in this Notice, please visit [www.HouseholdProductsSettlement.com](http://www.HouseholdProductsSettlement.com).

**PLEASE DO NOT CALL OR WRITE THE COURT  
OR THE CLERK'S OFFICE CONCERNING THIS CASE.**