United States District Court for the Western District of Pennsylvania

If you purchased All-Clad D3, D5, or LTD Cookware after January 1, 2015, you could get benefits from a class action settlement.

A court has authorized this notice. This is not a solicitation from a lawyer.

- A settlement has been reached in a class action lawsuit against All-Clad Metalcrafters, LLC and Groupe SEB USA, Inc. (collectively "Defendants") involving All-Clad's D3, D5, and LTD Cookware.
- The Settlement provides an opportunity to obtain significant benefits.
- Your legal rights are affected whether you act or don't act, so please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:		
SUBMIT A CLAIM FORM	Make a claim to receive the benefits provided under the Settlement.	Claims must be submitted by **April 18, 2023**. *See Question 8, below.*
EXCLUDE YOURSELF	Write to the Claims Administrator to opt out of the Settlement. This is the only option that allows you to be part of any other lawsuit, or your own lawsuit, against the Defendants about the legal claims released in this Settlement.	Requests for Exclusion must be postmarked by **December 8, 2022**. *See Questions 11-14, below.*
OBJECT	Write to the judge about why you do not like the Settlement.	Objections must be postmarked by **December 8, 2022**. *See Question 17, below.*
GO TO A HEARING	Ask to speak in court to the judge about the Settlement.	The Final Approval Hearing is currently scheduled for **January 26, 2023**. *See Questions 19-21, below.*
DO NOTHING	Give up the benefits you may be entitled to under the Settlement and your right to be part of any other lawsuit against the Defendants about the legal claims released by the Settlement.	*See Question 22, below.*

- These rights and options -- ***and the deadlines to exercise them*** -- are explained in this notice.
- The Court in charge of this case still must decide whether to approve the Settlement before any benefits can be distributed. Please be patient.

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1. Why have I received this notice?

A Court has authorized this notice because you have a right to know about the proposed settlement of this class-action lawsuit, and your options, before the Court decides whether to give "final approval" to the Settlement. This notice explains the lawsuit, the proposed Settlement, and your legal rights. You have received this notice because All-Clad's and its retailers' records indicate that you purchased All-Clad D3, D5, or LTD Cookware (the "Cookware") during the period from January 1, 2015 to July 29, 2022.

The Honorable J. Nicholas Ranjan of the United States District Court for the Western District of Pennsylvania is overseeing this class-action lawsuit, known as *All-Clad Metalcrafters, LLC, Cookware Marketing and Sales Practices Litigation* (the "Action"). Jean Greeff, Carol Egidio, Beira Montalvo, Miranda Murray, and Brandi Milford, the people who brought this litigation, are called the "Plaintiffs" or "Class Representatives," and the companies that were sued, All-Clad Metalcrafters, LLC and Groupe SEB USA, Inc., are called the "Defendants."

2. What is the lawsuit about?

This lawsuit involves All-Clad's D3, D5, and LTD Cookware (the "Cookware"). The lawsuit alleges that All-Clad advertised the Cookware as being "dishwasher safe" but, when cleaned in the dishwasher, one or more metal cooking layers may become thin and/or sharp, particularly along the rim of the Cookware ("Sharp Edges" or "Defect"). Defendants deny these allegations.

3. Why is this a class action?

In a class action, one or more people called "Class Representatives" assert claims on behalf of people who have similar claims. All of these people are the "Class" or "Class Members." One court resolves the issues for all Class Members, except for those who timely exclude themselves from (or "opt out" of) the Class. The Class Representatives in the Action are the Plaintiffs identified above. You have received this notice because you have been identified as potentially being a Class Member.

4. Why is there a Settlement?

All parties have agreed to a Settlement to avoid further cost and risk of a trial, and so that the people affected can begin getting benefits in exchange for releasing the Defendants from liability for the claims that were raised or could have been raised in the Action involving All-Clad's D3, D5, and LTD Cookware. The Settlement does not mean that the Defendants broke any laws, or otherwise did anything wrong, because Judge Ranjan did not decide which side was right. The Class Representatives and the lawyers representing them think the Settlement is fair and reasonable for the Class.

5. How do I know if I am part of the Settlement? What products are included in the Settlement?

The Settlement Class includes all persons in the United States, including Puerto Rico and the District of Columbia, who, between January 1, 2015 and July 29, 2022, have purchased All-Clad D3, D5, or LTD Cookware who do not exclude themselves from (opt-out of) the class.

6. What are the benefits of the Settlement?

If Judge Ranjan grants final approval of the Settlement and the Settlement becomes effective (the "Effective Date"), you may be entitled to the following benefits:

1. If your Cookware exhibited the "Sharp Edges" issue you can submit a claim and choose from the following options:
    a. Return the Damaged Cookware to All-Clad in exchange for new D3/D5 cookware of the same type/style and also claim a $75.00 refund (*discontinued LTD cookware will be replaced with similar D3 cookware*);
    or
    b. Return the Damaged Cookware to All-Clad and exchange for either (i) a Hard Anodized (HA1) five-piece fry-pan set (SKU 2100122734) or (ii) an Essentials Hard Anodized Nonstick thirteen-piece cookware set (SKU 2100120788) (all of which are dishwasher safe);
    or
    c. Return the Damaged Cookware to All-Clad and claim a future purchase credit of 50% off purchases, up to a total purchase of $1,200.00 (up to a $600.00 value), for any product(s) on All-Clad's website.

2. If your Cookware did not exhibit the "Sharp Edges" issue or it did but you discarded the Cookware (preventing you from returning the Cookware and demonstrating "sharp edges") you can submit a claim, with proof of purchase, for a future purchase credit of 35% off purchases, up to a total purchase of $750.00 (up to a $262.50 value), on any product(s) on All-Clad's website. Proof of purchase can include a store receipt, invoice, order confirmation, credit card receipt, canceled check, or other document(s) demonstrating that you purchased Cookware during the class period.

Defendants will create a fund of up to $4,000,000.00 to pay for the refunds offered under option 1(a). If the total value of refunds sought exceeds $4,000,000.00, each refund will be reduced proportionally.

In order to obtain reimbursement, you must submit a Claim Form and provide all the information requested in the Claim Form.

7. What am I giving up in exchange for the Settlement benefits?

If the Settlement becomes final, Class Members will be releasing Defendants and related people and entities from all of the claims described and identified in Paragraph 31 of the Settlement Agreement. In essence, the claims Class Members are releasing are all claims related to their purchase of All-Clad D3, D5, or LTD Cookware which relate to the "Sharp Edges" issue or "dishwasher safe" representations. The Settlement Agreement is available on the Important Documents page of the Settlement website. The Settlement Agreement describes the released claims with specific descriptions, in necessarily accurate legal terminology, so read it carefully.

Judge Ranjan has appointed specific lawyers to represent you in this lawsuit and Settlement. You can talk to one of the lawyers listed in Answer 15 below, free of charge, if you have questions about the released claims or what they mean. You can also speak with your own lawyer, should you have one, about this Settlement.

8. How do I get the benefits of the Settlement?

If you are a Class Member and would like to obtain the reimbursement benefits (described in Answer 6, above), you need to complete the Claim Form that accompanies this Notice and submit it through the Settlement website (www.Multi-PlyCookwareSettlement.com) or mail it to the address provided on the Claim Form. Claim Forms must be **postmarked or submitted no later than April 18, 2023**.

If you have any questions on how to complete the Claim Form or what information is needed, you can call the Claims Administrator at 1-833-611-3044 or visit the FAQ page of the Settlement website.

9. What if my claim is denied?

There is a process in the Settlement Agreement to resolve disagreements between you and Defendants over your claim. During this process, the court-appointed lawyers listed in the answer to Question 15 below will represent you in any dispute regarding relief under the terms of the Settlement, and the dispute will be handled in accordance with the procedures set forth in the Settlement Agreement. You may have the right to appeal a denied claim. If you have questions regarding this process, contact Settlement Class Counsel below.

10. When will I get the Settlement benefits?

If you have submitted a claim, your Claim Form will be processed and benefits will be issued on a continuing, rolling basis after the later of the Claims Deadline or the Effective Date. ***We anticipate the Effective Date will be on or about March 19, 2023. Please check the Settlement website for the actual Effective Date.***

11. Can I exclude myself from this Settlement?

Yes. If you want to keep the right to sue or if you are already suing Defendants in another action over the legal issues in this case, then you must take steps to opt out of this Settlement. This is called asking to be excluded from – sometimes called "opting out" of – the Settlement.

12. If I exclude myself, can I get anything from this Settlement?

No. If you ask to be excluded, you cannot object to the Settlement and you will not receive any of the benefits of the Settlement. But you may sue, continue to sue, or be part of a different lawsuit against Defendants in the future, including for claims that this Settlement resolves. You will not be bound by anything that happens in this lawsuit.

13. If I don't exclude myself, can I sue later?

No. Unless you exclude yourself, you give up the right to sue Defendants for the claims that this Settlement resolves.

14. How do I exclude myself from the Settlement?

To exclude yourself from the Settlement, you must send a letter by mail saying that you want to be excluded from *IMO All-Clad Metalcrafters, LLC Cookware Marketing and Sales Practices Litig.*, MDL No. 2988, Master Case No. 2:21-mc-491-NR. Be sure to include: (1) your full name and current address; (2) the All-Clad Cookware you purchased and the date(s) of purchase; (3) specifically and clearly state your desire to be excluded from the Settlement and from the Settlement Class; and (4) your signature. You cannot ask to be excluded over the phone or via email or the internet. You must mail your request to be excluded, postmarked no later than **December 8, 2022**, to the Claims Administrator at the address below:

IMO All-Clad Settlement
Attn: Exclusions
P.O. Box 58220
Philadelphia, PA 19102

Failure to comply with any of these requirements for excluding yourself may result in you being bound by this Settlement.

15. Do I have a lawyer in the case?

The Plaintiffs and you have been represented by lawyers and a law firm that has prosecuted this case. Judge Ranjan has appointed the following lawyers to represent you and other Class Members as Settlement Class Counsel:

Harper T. Segui
Martha Geer
Rachel Soffin
MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC
825 Lowcountry Blvd., Suite 101
Mount Pleasant, South Carolina 29464
T: 919-600-5000
F: 919-600-5035

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

16. How will the lawyers be paid?

As part of the resolution of the Action, Settlement Class Counsel and Defendants have agreed that Settlement Class Counsel may apply to the Judge for an award of attorneys' fees, costs, expenses, and service awards not to exceed $2,000,000.00, inclusive of service awards to each of the three Plaintiffs in the amount of $2,500.00 ($12,500.00 in total). Defendants have agreed not to oppose this request. The Settlement Class Counsel fees and expenses, inclusive of the service awards to the class representatives, will be paid separate and apart from any relief provided to the Class and will not reduce the value of the benefits distributed to Class Members. Defendants will also separately pay the costs to administer the Settlement. Judge Ranjan will determine the amount of attorneys' fees, costs, expenses, and service awards after evaluating Plaintiffs' submission.

17. How do I tell the Court if I don't like the Settlement?

You can object to the Settlement if you don't like some part of it. You can give reasons why you think Judge Ranjan should not approve it. To object, send a letter saying that you object to the Settlement in *IMO All-Clad Metalcrafters, LLC Cookware Marketing and Sales Practices Litig.*, MDL No. 2988, Master Case No. 2:21-mc-491-NR. You must include: (1) your full name, current address, current telephone number, email address, and the name of your lawyer and your lawyer's address if you are represented by a lawyer other than Settlement Class Counsel; (2) the Cookware and the date(s) of purchase, with proof of purchase; (3) whether the objection applies only to you, to a specific subset of the Class, or to the entire Class; (4) a statement of the position(s) you wish to assert, including the factual and legal grounds for the position; and (5) any documents that you wish to submit in support of your position.; (6) a Notice of Intention to Appear at the Final Approval Hearing if you intend to appear in person at the hearing; and (7) your signature. **The objection must be mailed to the Clerk of the Court, with copies to Settlement Class Counsel, and Defendant's Counsel at the below addresses.** The mailed copies must be **postmarked no later than December 8, 2022**:

COURT	Clerk, United States District Court For the Western District of Pennsylvania Joseph F. Weis, Jr. U.S. Courthouse 700 Grant Street Pittsburgh, PA 15219
CLASS COUNSEL	Harper T. Segui Martha Geer Rachel Soffin **MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC** 900 W. Morgan Street Raleigh, NC 27603
DEFENDANTS' COUNSEL	Christopher J. Dalton Melissa J. Bayly **Buchanan Ingersoll & Rooney PC** 550 Broad Street, Suite 810 Newark, New Jersey 07102-4582

18. What's the difference between objecting and excluding?

Objecting is simply telling Judge Ranjan that you don't like something about the Settlement. You can object only if you stay in the Settlement. Excluding yourself is telling Judge Ranjan that you don't want to be part of the Settlement, and thus do not want to receive any benefits from the Settlement as described in Answer 6. If you exclude yourself, you have no basis to object because the Settlement no longer affects you.

19. When and where will Judge Ranjan decide whether to approve the Settlement?

Judge Ranjan will hold a "Final Approval Hearing" to decide whether to approve the Settlement on **January 26, 2023 at 10:00 a.m.**, by Zoom link (https://pawd-uscourts.zoomgov.com/j/1604790167) from the Joseph F. Weis, Jr. U.S. Courthouse, 700 Grant Street, Pittsburgh, PA 15219. (*If any participant, including any class member, needs the Zoom information ahead of the Final Approval Hearing, they should contact Judge Ranjan's chambers at 412-208-7495*.) At this hearing, Judge Ranjan will determine whether the Settlement is fair, adequate, and reasonable and whether the objections by Class Members, if any, have merit. If you have filed an objection on time, and also filed a Notice of Intention to Appear, as described in Answer 21 below, you may attend and ask to speak, but you don't have to. However, Judge Ranjan will only listen to people who have asked to speak at the hearing (*See* Answer 21 below). At this hearing, Judge Ranjan will also decide the service awards for the Class Representatives, as well as the attorney's fees for the lawyers representing the Class Members. We do not know how long the Court's decision will take, and the hearing date may change due to other court business.

20. Do I need to go to the hearing?

No. Settlement Class Counsel will answer any questions Judge Ranjan may have, but you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mail your valid written objection on time, Judge Ranjan will consider it. You may also pay another lawyer to attend, but that's not required.

21. May I speak at the hearing?

You may ask Judge Ranjan for permission to speak at the Final Approval Hearing. To do so, you must file a "Notice of Intent to Appear" in *IMO All-Clad Metalcrafters, LLC Cookware Marketing and Sales Practices Litig.*, MDL No. 2988, Master Case No. 2:21-mc-491-NR. Be sure to include your name, address, telephone number, signature, and other requirements outlined in Answer 17. Your Notice of Intent to Appear must be **postmarked no later than December 8, 2022**, and mailed to the addresses listed in Answer 17. You cannot speak at the hearing if you have excluded yourself from the Settlement.

22. What if I do nothing?

If you do nothing, you will give up the right to be part of any other lawsuit against Defendants about the legal claims released by the Settlement. **You will not receive any of the benefits described in Answer 6 offered by this Settlement unless you timely submit a Claim Form**.

23. Are there more details about the Settlement?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement available on the settlement website (www.Multi-PlyCookwareSettlement.com). You may also contact the Claims Administrator with any questions at info@Multi-PlyCookwareSettlement.com or by phone at 1-833-611-3044.