

If you bought a SoftSheen-Carson Optimum Amla Legend Rejuvenating Ritual hair relaxer kit, this class action notice may affect your rights.

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

- New York and Florida consumers have sued L'Oréal USA, Inc., and SoftSheen-Carson, LLC (“Defendants”), about whether their Amla Legend Rejuvenating Ritual hair relaxer kit (the “Amla Relaxer”) was misleadingly advertised and unsafely formulated.
- A court has allowed the lawsuit to be a class action of consumers who purchased the Amla Relaxer in New York and Florida. As part of the class action, the Court will consider whether Defendants violated New York and Florida law, whether New York and Florida consumers will be eligible to receive payments as a result, and whether an order preventing, among other things, Defendants from continuing to sell the Amla Relaxer is appropriate.
- The Court has allowed the lawsuit to be a class action on behalf of persons who purchased the Amla Relaxer in the State of New York on or after August 19, 2013.
- The Court has allowed the lawsuit to be a class action on behalf of all persons who purchased the Amla Relaxer in the State of Florida on or after December 1, 2012.
- The Court has not decided whether any law was broken. There is no money available now and no guarantee there will be. However, your rights are affected, and you have a choice to make now.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	Stay in this lawsuit. Await the outcome. Share in possible benefits. Give up certain rights. By doing nothing, you keep the possibility of getting money that may come from a trial or a settlement. But, you give up any rights to sue Defendants on your own about the same legal claims in this lawsuit.
ASK TO BE EXCLUDED	Get out of this lawsuit. Get no benefits from it. Keep rights. If you ask to be excluded and money is later awarded, you will not be allowed to ask for a payment. But, you would keep any rights to sue Defendants on your own about the same legal claims in this lawsuit.

- The consumer’s lawyers must prove their claims at a trial. The trial is currently set to begin **April 30, 2018**. If money is obtained, you will be notified about how to ask for a share.
- Your options are explained in this notice. To ask to be excluded, you must act by **April 2, 2018**.

QUESTIONS? CALL 1-844-659-0618 OR VISIT AMLARELAXERCLASSACTION.COM.

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BASIC INFORMATION

1. Why was this notice issued?

This notice explains that a Court has allowed, or “certified,” this case as a class action lawsuit that may affect you if you bought the Amla Relaxer product in New York anytime on or after August 19, 2013, or in Florida anytime on or after December 1, 2012. If this describes you, you may have legal rights and options before the Court decides whether the claims being made against Defendants on your behalf are correct.

Judge Jed S. Rakoff of the United States District Court for the Southern District of New York is overseeing the case, known as *In re Amla Litigation*, No. 16-CV-6593 (JSR).

2. What is this lawsuit about?

The lawsuit is about whether Defendants’ Amla Relaxer hair relaxer kit is misleading because it claims to be “No-Lye” and contain “Amla Oil from India” that will rejuvenate, nourish, and condition hair, but is actually unsafe and causes hair and skin damage when used as directed.

3. What products are included?

The lawsuit concerns Amla Legend Rejuvenating Ritual hair relaxer kits sold under the SoftSheen-Carson Optimum Salon Haircare brand.

4. What is a class action and who is involved?

In a class action, one or more people called “Class Representatives” (in this case, Sandi Turnipseed, Jasmin Hervey, Jennifer Sanon, and Tiffany Raines) sue on behalf of all people who have similar claims. Together, these people are called a “Class” or “Class members.” The people who sued—and all Class members like them—are called “Plaintiffs,” and L’Oréal USA, Inc., and SoftSheen-Carson, LLC, are called “Defendants.”

The Court will resolve the issues for all Class members, except for those who exclude themselves from the Class. Members of the Class might receive money and other benefits if they stay in the Class.

5. Why is this lawsuit a class action?

The Court decided that this lawsuit could move towards a trial as a class action because it meets the requirements of Rule 23 of the Federal Rules of Civil Procedure, which governs class actions in federal court. For instance, the Court found the following:

- There are thousands of consumers who bought the Amla Relaxer in each of New York and Florida;
- There are legal questions and facts that are common to each of them;
- The Class Representatives’ claims are typical of the claims of the rest of the Class;
- The Class Representatives and the lawyers representing the Class will fairly and adequately represent the interests of the Class; and
- A class action would be a fair, efficient, and superior way to resolve this lawsuit.

More information about why the Court is allowing this lawsuit to be a class action is in the Court’s Order Granting Class Certification, which you may view at AmlaRelaxerClassAction.com.

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THE CLAIMS IN THE LAWSUIT

6. What does the lawsuit complain about?

The lawsuit says the Amla Relaxer hair relaxer kit is misleadingly advertised because it claims to be “No-Lye,” even though it is harsher on hair and skin than a lye relaxer, and because it claims to contain “Amla Oil from India” that will rejuvenate, nourish, and condition hair, even though it actually contains minuscule amounts of Amla Oil that provide no benefit.

Additionally, the lawsuit says that the Amla Relaxer is unsafe and causes damage to hair and skin, including scalp irritation and burning, dry and brittle hair, and hair breakage and loss, even when used as directed, and that the scalp protector included in the Amla Relaxer hair relaxer kit does not protect the scalp from irritation and burning when using the product.

As a result, the lawsuit says Defendants are making false, misleading, and deceptive statements on the Amla Relaxer labels and were unjustly enriched by selling the Amla Relaxer in violation of New York and Florida law. The Class Representatives say that they reviewed the labels on the Amla Relaxer products they bought, and were deceived in deciding to purchase the Amla Relaxer. You can read Plaintiffs’ Amended Consolidated Class Action Complaint at AmlaRelaxerClassAction.com.

7. How do Defendants answer?

Defendants deny the claims and allegations in the lawsuit. Defendants’ Answer to the Amended Consolidated Complaint can be viewed at AmlaRelaxerClassAction.com.

8. Has the Court decided who is right?

The Court has not decided which side is right. By establishing the Class and ordering that this notice be provided, the Court is not suggesting that Plaintiffs will win or lose this case. Lawyers for Plaintiffs must prove their case at a trial. The trial is currently set to begin **April 30, 2018**.

9. What are Plaintiffs asking for?

Plaintiffs seek to recover money from Defendants and have asked the Court to order Defendants to change their product labeling and related practices.

10. Is there any money available now?

No money is available now because the Court has not yet decided whether Defendants did anything wrong, and the two sides have not settled the case. There is no guarantee that money will ever be obtained. If it is, Class members will be notified about how to ask for a share.

WHO IS IN THE CLASS

You need to decide whether you are affected by this lawsuit.

11. Am I part of this class action?

The Court has allowed the following Classes to proceed to trial:

All persons in New York who, on or after August 19, 2013, purchased the Amla Relaxer.

All persons in Florida who, on or after December 1, 2012, purchased the Amla Relaxer.

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12. Are there exceptions to being included?

Excluded from the Classes are (1) Defendants and their subsidiaries and affiliates, (2) all persons who make a timely election to be excluded from the Classes, (3) governmental entities, and (4) the Court to which this case is assigned and its staff.

13. I am still not sure if I am included.

If you are still not sure whether you are included, you can visit the website, AmlaRelaxerClassAction.com, call 1-844-659-0618, send an email to info@AmlaRelaxerClassAction.com, or write to Amla Relaxer Class Action, P.O. Box 4098, Portland, OR 97208-4098 for more information.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the Class or whether to exclude yourself before the trial, and you have to decide this by **April 2, 2018**.

14. What happens if I do nothing at all?

By doing nothing, you are staying in the Class. You do not have to do anything now if you want to keep the possibility of getting money from this lawsuit. If you stay in and Plaintiffs obtain money either as a result of the trial or a settlement, you will be notified about how to ask for a share. Keep in mind that if you do nothing now, regardless of whether Plaintiffs win or lose the trial, you will not be able to sue, or continue to sue, Defendants—as part of any other lawsuit—about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all orders the Court issues and judgments the Court makes in this class action.

15. What happens if I ask to be excluded?

If you exclude yourself from the Class—which also means to remove yourself from the Class, and is sometimes called “opting out” of the Class—you will not get money from this lawsuit, even if Plaintiffs obtain money as a result of the trial or from any settlement (that may or may not be reached) between Defendants and Plaintiffs. However, you may then be able to sue or continue to sue Defendants about the same legal claims that are involved in this case, now or in the future. If you exclude yourself, you will not be legally bound by the Court’s judgments in this class action.

If you pursue your own lawsuit after you exclude yourself, you may have to hire and pay your own lawyer to prove your claims in that suit.

16. How do I ask to be excluded?

To exclude yourself, you must send a letter that says you want to be excluded from *In re Amla Litigation*. Include your name, address, telephone number, email address, and signature. You must mail your letter requesting to be excluded from the Class postmarked by **April 2, 2018**, to the following address: Amla Relaxer Class Action, P.O. Box 4098, Portland, OR 97208-4098. You cannot exclude yourself by phone, email, or fax.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

The Court has appointed the following lawyers to represent you as “Class Counsel.” These lawyers are experienced in handling similar cases.

Rosemary M. Rivas
Levi & Korsinsky, LLP
44 Montgomery Street, Suite 650
San Francisco, CA 94104
ZLK.com

Andrea Clisura
Levi & Korsinsky, LLP
30 Broad Street, 24th Floor
New York, NY 10004
ZLK.com

Lori G. Feldman
Geragos & Geragos, APC
7 West 24th Street
New York, NY 10010
Geragos.com

Mark J. Geragos
Geragos & Geragos, APC
644 South Figueroa Street
Los Angeles, CA 90017
Geragos.com

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18. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel are working on your behalf. If you want your own lawyer to represent you in this litigation, you may have to pay that lawyer. You can ask him or her to appear in Court for you in this case if you want someone other than Class Counsel to speak for you.

19. How will the lawyers be paid?

If Class Counsel obtains money or other benefits for Class members, they may ask the Court for fees, costs, and expenses. You will not have to pay any of these fees, costs, and expenses. If the Court grants their request, the fees, costs, and expenses could be deducted from any money obtained for Class members or paid separately by Defendants.

THE TRIAL

The Court has scheduled a trial to decide who is right in this case.

20. How and when will the Court decide who is right?

If the case is not dismissed or settled, Class Counsel will have to prove Plaintiffs' claims at a trial. The trial is currently set to begin **April 30, 2018**, in Courtroom 14B, 14th Floor of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007-1312. The date may change, so check the website to be kept informed of the trial schedule. During the trial, the Judge and/or a jury will hear all of the evidence so that a decision can be reached about whether Plaintiffs are right about their claims in the lawsuit. Plaintiffs will have to prove their claims. There is no guarantee that Plaintiffs will win or that they will get money for the Class.

21. Do I have to come to the trial?

You will not need to attend the trial. Class Counsel will present the case for Plaintiffs, and the lawyers for Defendants will present their defenses. You and/or your own lawyer are welcome to come, at your own expense. Check the website to be kept informed of the trial schedule.

22. Will I get money after the trial?

If Plaintiffs obtain money as a result of the trial or a settlement, you will be notified about how to ask for a share or what your other options are at that time. These things are not known right now. Court orders and other important information about the case may be posted on the website, AmlaRelaxerClassAction.com, as it becomes available.

GETTING MORE INFORMATION

23. Are more details available?

Visit the website at AmlaRelaxerClassAction.com, where you will find the Court's Order Granting Class Certification, Plaintiffs' Amended Class Action Complaint, and Defendants' Answer to the Amended Complaint. For more information, you may call 1-844-659-0618, send an email to info@AmlaRelaxerClassAction.com, or write to Amla Relaxer Class Action, P.O. Box 4098, Portland, OR 97208-4098.

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