

Class Member ID: <<ClaimID>>

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

### UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

*Habberfield v. Boohoo.com USA, Inc.*, No. 2:22-cv-03899-GW (JEMx)

This Notice is to inform you of the settlement of the class action lawsuit referenced above (the “Action”) with Boohoo/BoohooMAN, PrettyLittleThing, and Nasty Gal, the “Defendants” in this case. Plaintiffs Laura Habberfield, Keona Kalu, Katie Runnells, Juanita Carmet Cachadina, Sarah Huebner, Yesenia Valiente, Veronica Walton, Lisa Murphy, Nicole Hill, Nicole Stewart, Me’Lisa Thimot, and Marika Walton (collectively, the “Plaintiffs” or “Class Representatives”) allege that Defendants engaged in a deceptive pricing scheme by advertising artificially inflated original prices on their U.S. websites in that they rarely sold their products at the advertised original price. Plaintiffs allege Defendants routinely marked down and discounted these inflated prices, which gave customers the false impression that they were getting a deal or bargain. Plaintiffs contend Defendants have violated various consumer protection and false advertising laws and have committed fraud. Defendants deny all of the allegations made in the Action. The Court has not determined who is right. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

**Am I a Class Member?** You are a Settlement Class Member in the case referenced above if:

- You purchased products in any state or U.S. territory other than California from Boohoo/BoohooMAN’s U.S. websites from April 1, 2016 through June 17, 2022;
- You purchased products in any state or U.S. territory other than California from PrettyLittleThing’s U.S. website from April 1, 2016 through June 17, 2022; or
- You purchased products in any state or U.S. territory other than California from Nasty Gal’s U.S. website from February 28, 2017 through June 17, 2022.

**What Can I Get?** Defendants will provide Gift Cards with Free Shipping to customers outside of California who purchased products from Defendants. Those individuals included in the settlement who choose not to opt out of the settlement will automatically receive one or more \$10 Gift Cards by email that may be used with no shipping charges on the U.S. website of the Defendant company above that provided the Gift Card. There is no requirement to file a claim.

You are eligible to receive up to three Gift Cards, one from Boohoo/BoohooMAN, one from PrettyLittleThing, and one from Nasty Gal, depending on whether you purchased items from the U.S. websites of one or more of these companies during the Class Periods reflected above.

**How Do I Get a Gift Card?** There is no requirement to file a claim. If you do not affirmatively opt out within the prescribed time period, you will automatically receive one to three Gift Cards in the above-styled case depending on whether you purchased from one, two, or all three of the Defendants identified above. You will receive the Gift Card(s) at the email address you have on file with each Defendant. If you would like to provide a different email address to receive your Gift Card(s), you may contact the Settlement Administrator to make arrangements.

**What are My Other Options?** You may exclude yourself from the Settlement Class by sending a letter to the Settlement Administrator postmarked no later than September 15, 2023. If you exclude yourself, you cannot get a settlement Gift Card, but you keep any rights you may have to sue Defendants over the legal issues in the lawsuit. You and/or your lawyer also have the right to object to the proposed settlement and appear before the Court to present the reasons for your objection. Your written objection must be submitted and postmarked no later than September 15, 2023. Specific instructions about how to object to, or exclude yourself from, the

settlement are available at [www.BoohooNationwidePricingSettlement.com](http://www.BoohooNationwidePricingSettlement.com). If you do nothing, and the Court approves the settlement, you will be bound by all of the Court's orders and judgments. In addition, your claims against Defendants and their affiliates that this settlement resolves will be released.

**Who Represents Me?** The Court has appointed Yasin M. Almadani, Esq. of Almadani Law and Ahmed Ibrahim, Esq. of AI Law, PLC to represent you and other Settlement Class Members. These attorneys are called Class Counsel. You will not be charged out of pocket for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

**When Will the Court Consider the Proposed Settlement?** The Court will hold the Final Approval Hearing at 8:30 a.m. on November 2, 2023 at the United States Courthouse, 350 West 1st Street, Courtroom 9D, 9th Floor, Los Angeles, CA 90012. At that hearing, the Court will: hear any objections concerning the fairness of the settlement; determine the fairness of the settlement; decide whether to approve Class Counsel's request for attorneys' fees and costs; and decide whether to award the Class Representatives \$1,500 each for their services in helping to bring and settle this case. Defendants have agreed that Class Counsel may be paid reasonable attorneys' fees in an amount to be determined by the Court. Any amounts awarded by the Court to Class Counsel or Class Representatives will be paid separately by Defendants and will not reduce the amount of Gift Card value available to Settlement Class Members.

**How Do I Get More Information?** For more information, including a more detailed Class Notice, a copy of the Settlement Agreement and other documents, go to [www.BoohooNationwidePricingSettlement.com](http://www.BoohooNationwidePricingSettlement.com), contact the Settlement Administrator by calling 1-855-482-3483 or by writing to Boohoo/PrettyLittleThing/Nasty Gal Nationwide Pricing Class Action Settlement Administrator, P.O. Box 6188, Novato, CA 94948-6188, or contact Class Counsel by emailing [YMA@LawALM.com](mailto:YMA@LawALM.com) or [AIBrahim@AILawFirm.com](mailto:AIBrahim@AILawFirm.com).