

From: Kroll Settlement Administration LLC

To:

Re: YOUNG LIVING ESSENTIAL OILS CLASS ACTION

Unique ID: <<Refnum>>

**IF YOU PURCHASED ITEMS FROM ESSENTIAL OIL PRODUCTS
FROM YOUNG LIVING FOR PERSONAL CONSUMPTION FROM THE
PERIOD OF JANUARY 1, 2017, THROUGH APRIL 25, 2024, AND SUBMIT
AN APPROVED CLAIM, YOU MAY BE ELIGIBLE TO RECEIVE
A CASH PAYMENT AND YOUNG LIVING COUPON**

*Purchases made may be subject to Proof of Purchase review.
The Settlement Administrator may verify your claim.*

Why did I get this email Notice? A Settlement has been proposed in a class action lawsuit pending in the Circuit Court of St. Clair County, Illinois (“Illinois Court”) titled *MacNaughton, et al. v. Young Living Essential Oils, LC* (the “Litigation”). According to available records, you might be a “Settlement Class Member.” The purpose of this email Notice is to inform you of the Litigation and the Settlement so that you may decide what steps to take in relation to it.

What is the Litigation about? Plaintiffs Lori MacNaughton and Lisa Ladonski (the “Plaintiffs” or “Class Representatives”) filed a lawsuit against Young Living Essential Oils, LC (“Young Living”), on behalf of themselves and all others similarly situated. The Litigation alleges that Young Living engaged in “unlawful and deceptive conduct” in the “marketing, sale, and delivery” of its line of essential oil products.

Young Living denies each and every one of the allegations of unlawful conduct, any wrongdoing, and any liability whatsoever, and no court or other entity has made any judgment or other determination of any liability. Young Living further denies that any Settlement Class Member is entitled to any relief and, other than for Settlement purposes, that this Litigation is appropriate for certification as a class action.

The issuance of this email Notice is not an expression of the Illinois Court’s opinion on the merits or the lack of merits of the Class Representatives’ claims in the Litigation. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties, expenses and expenditure of resources associated with ongoing litigation.

Am I a Settlement Class Member? You are a Settlement Class Member if during the time period above you purchased Products from Young Living for personal consumption.

What relief does the Settlement provide? Young Living will pay a total of up to \$5,000,000 for payment of the following: (i) Approved Claims for benefits submitted by Claimants; (ii) the Settlement Administration Expenses actually incurred by the Settlement Administrator; (iii) the Fee Award; and (iv) any Service Awards.

Claimants who submit an Approved Claim are eligible for the following:

- a. ***With Proof Benefit:*** Claimants with Proof of Purchase will be eligible for a benefit of \$2 (Two Dollars) per Unit, with a maximum benefit amount of \$20 (Twenty Dollars) per Household. Claimants with Proof of Purchase will also be eligible to receive the below benefit for up to \$5 (Five Dollars) in additional compensation for purchases of essential oil Products from Young Living without Proof of Purchase.

- b. ***Without Proof Benefits:*** Claimants without Proof of Purchase will be eligible for a benefit of \$1 (One Dollar) per Unit, with a maximum benefit amount of \$5 (Five Dollars) per Household if they submit a sworn statement on the claim form attesting that up to five (5) products were purchased, but Proof of Purchase is not available.
- c. ***Pro Rata Adjustment:*** If the total value of all Approved Claims plus the Service Awards, the Fee Award, payment of Settlement Administration Expenses, any federal, state, and/or local taxes of any kind (including any interest or penalties thereon) and any and all other fees, costs, or expenses exceed the Settlement Fund, the benefits payable to the Claimants shall be reduced *pro rata* so that the total value of all Approved Claims plus the Service Awards, the Fee Award, payment of Settlement Administration Expenses, any federal, state, and/or local taxes of any kind (including any interest or penalties thereon) and any and all other fees, costs, or expenses, does not exceed the Settlement Fund.
- d. ***Young Living Coupon:*** All Claimants who submit an Approved Claim, including the Class Representatives, shall additionally be eligible for a \$5 (Five Dollar) Young Living coupon, with total coupon redemptions to be capped at \$5,000,000 (Five Million Dollars). Redemption of the \$5 (Five Dollar) coupon shall be subject to the following terms and conditions: (i) a Claimant cannot use the coupon on a Young Living loyalty rewards order; (ii) Claimants cannot combine the coupon with other of Young Living's offers; (iii) the Claimant's personal volume credit shall be reduced in the same amount as the value of the coupon; (iv) the coupon can be used only on an order of \$25 (Twenty-Five Dollars) or more; and (v) the coupon will be valid for a period of six (6) months. Additionally, each coupon will be marked with a unique code to prevent misuse.

How can I get a Settlement Payment? If you received a Notice of this Settlement and wish to receive a Settlement Payment, you must complete a Claim Form. The Claim Form will be accessible on the Settlement website, www.essentialoilsclassaction.com, by using the Unique ID listed at the top of this email. Alternatively, you may request a paper Claim Form by contacting the Settlement Administrator, or by downloading one from the Documents section of the Settlement website. The Claim Form may be submitted at the Settlement website or by postal mail. Read the instructions carefully, fill out the Claim Form, and postmark it by the Claims Deadline of **June 24, 2024**, or submit it online on or before **June 24, 2024**.

CLICK HERE TO ACCESS THE SETTLEMENT WEBSITE

What are my other options? If you don't want to be legally bound by the Settlement, you must exclude yourself by **June 8, 2024**, or you won't be able to sue Young Living about the legal claims in the Litigation ever again. If you exclude yourself, you cannot receive a Settlement Payment from this Settlement. If you stay in the Settlement, you may object to it by **June 8, 2024**. The Long Notice available at www.essentialoilsclassaction.com explains how to request exclusion or object. The Illinois Court will hold a Final Approval Hearing on **July 15, 2024**, at **9:00 a.m. CT** to consider whether to approve the Settlement and a Fee Petition by the Class Counsel not to exceed \$1,500,000 in attorneys' fees plus litigation costs, and Service Awards for the Class Representatives who each will request \$2,500 for their service. You may ask to appear at the hearing – with a lawyer at your expense or without one - but you don't have to.

More information? For complete information about the Settlement, to view the Settlement Agreement, related Court documents and Claim Form, and to learn more about how to exercise your various options under the Settlement, visit www.essentialoilsclassaction.com. You may also write to the Settlement Administrator at the postal address: *MacNaughton et al. v. Young Living Essential Oils, LC*, c/o Kroll Settlement Administration LLC, PO Box 5324, New York, NY 10150-5324.

Questions? Visit www.essentialoilsclassaction.com or call (833) 462-3478.