

LONG-FORM NOTICE

IF YOU LIVE IN OREGON, AND PURCHASED IN OREGON SELECT CBD DROPS ON OR AFTER JUNE 19, 2021, YOU MAY BE ELIGIBLE FOR A CLASS ACTION SETTLEMENT.

This notice may affect your rights. Please read it carefully.

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

- The notice concerns a case called *Ronald Williamson v. Curaleaf, Inc.*, Case No. 3:22-cv-00782-IM (United States District Court for the District of Oregon).
- This class action settlement will completely resolve the lawsuit against Curaleaf, Inc. (“Curaleaf” or “Defendant”).
- The suit alleges that Curaleaf mislabeled products sold as Select CBD Drops that were labeled as containing cannabidiol (CBD) but in fact contained tetrahydrocannabinol (THC).
- Curaleaf denies any wrongdoing, including that it made any misrepresentations about the contents in its products.
- Pursuant to the settlement, defendant directly or through their insurers shall pay \$100,000 to the settlement fund which will be used to pay attorney fees to class counsel, and to pay up to \$200 on each timely and approved claim from the class members, or less depending on how many claims are submitted, until the fund is fully exhausted.
- Your legal rights are affected whether you act or do not act. Read this notice carefully.
- This notice summarizes the proposed settlement. For the precise terms and conditions of the settlement, please see the settlement agreement available at www.CuraleafSettlement.com.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

YOUR RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	This is the only way to get a payment. You can submit a valid and timely claim form online at www.CuraleafSettlement.com or by mail to <i>Curaleaf Settlement Administrator, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606</i> . If you fail to submit a claim, you will not receive a settlement payment.	September 27, 2023
EXCLUDE YOURSELF FROM THE CLASS	Opt Out of the lawsuit and the settlement. This is the only option that allows you to ever bring or join another lawsuit that raises the same legal claims against Curaleaf released by this settlement.	September 27, 2023
OBJECT	Write to the Court about why you do not like the settlement, the amount of attorneys’ fees, or the payment to the Plaintiff.	September 27, 2023
GO TO A HEARING	Speak in Court about the settlement. (If you object to any aspect of the settlement, you must submit a written objection by the Objection Deadline.)	November 14, 2023 2:00 P.M. PST
DO NOTHING	You will have no right to sue later for the claims released by the settlement.	

- 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.

Final Approval Fairness Hearing

On November 14, 2023, at 2:00 PM PST, the Court will hold a hearing to determine (1) whether the proposed settlement is fair, reasonable and adequate and should receive final approval; (2) whether to grant the applications for attorney’s fees and expenses brought by the Class Counsel; and (3) whether to grant the application for a class representatives’ payments to the Plaintiffs who brought the lawsuit. The hearing will be held in the courtroom of the Judge, Karin J. Immergut at Courtroom 13A, located at 1000 S.W. Third Ave., Portland, OR 97204. This hearing date may change without further notice to you. Consult the settlement website at www.CuraleafSettlement.com for updated information on the hearing date and time.

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How Do I Know If I Am Affected By The Litigation and Settlement?

This case involves Select CBD Drops manufactured by Curaleaf, Inc., on or after June 19, 2021 (the “Products”).

Specifically, the “Settlement Class” includes all individual consumers with an Oregon address who purchased one of the Defendant’s allegedly mislabeled Select CBD Drops on or after June 19, 2021.

The class does not include any non-individual corporate entity; Defendant or any entity that has a controlling interest in Defendant; Defendant’s current or former directors, officers, counsel, or their immediate families; any Judge assigned to this case; or any individuals who request exclusion or opt out from the Class or Settlement.

If the settlement does not become effective (for example, because it is not finally approved, or the approval is reversed on appeal), then this litigation will continue and any order preliminarily certifying the class for settlement purposes will be vacated.

What Is The Lawsuit About?

A lawsuit was originally brought against Curaleaf, Inc., (“Curaleaf”). The lawsuit alleges that Curaleaf manufactured Select CBD Drops that were labeled as containing cannabidiol (CBD) but in fact contained tetrahydrocannabinol (THC). Curaleaf denies that there is any factual or legal basis for the lawsuit. The Court has not determined whether Plaintiffs or Curaleaf are correct.

Why Is This Case Being Settled?

This case has been pending since May 30, 2022. Since then, Plaintiffs’ Counsel has investigated the allegations, and labeling of the Products and have engaged in extensive discovery, including depositions and document review. Before Curaleaf formally appeared in the Action the Parties engaged in mediation with the assistance of retired Supreme Court Justice Sue M. Leeson as mediator. As a result of these negotiations, the Parties now desire to settle the Action on the terms and conditions set forth in this Agreement, to provide fair compensation to the putative class members and to avoid the burden, expense, and uncertainty of continuing litigation.

After considering the risks and costs of further litigation, Representative Plaintiff and Class Counsel are satisfied that the terms and conditions of this Agreement are fair, reasonable, adequate and equitable, and that a settlement of the Action on the terms described in this Agreement is in the best interests of the putative class members.

What Is The Settlement?

This settlement proposes to release the claims of Oregon consumers based on defendant's alleged failure to properly label its Select CBD Drops.

As part of the settlement agreement, Defendant shall pay \$100,000 to the Settlement Fund. From the Settlement Fund, Class Counsel's Attorney Fee Award will be paid, and each approved claim shall be paid up to \$200, or less depending on how many claims are submitted. In addition to the \$100,000 payment to the Settlement Fund, Defendant shall be responsible for the costs of class notice and settlement administration.

What Can I Get In The Settlement?

The settlement provides for up to a \$200 payment to each settlement class member who files a timely approved claim form, depending on how many claims are submitted, until the fund is fully exhausted.

What Do Plaintiffs And The Lawyers Get?

To date, Plaintiffs' lawyers have not been compensated for any of their work on this case. The Plaintiffs' lawyers ("Class Counsel") will petition the Court for a fee of 25% of the common fund.

The Court will determine what amounts of fees, costs, expenses, and class representative payment to award. As with the Settlement itself, you can object to Class Counsel's fee request. The award of attorneys' fees, costs and expenses will be paid to Plaintiff's lawyers within 30 days after an order granting final approval to the settlement becomes final.

What Claims Are Released By The Settlement?

Effective upon the Final Approval, Representative Plaintiff, for himself and as the representative of the Class and on behalf of each Class Member who has not timely opted out or requested exclusion from the Settlement and each of their respective agents, successors, heirs, assigns, and any other person who can claim by or through them in any manner, shall have fully and finally released with prejudice all Released Claims against the Released Parties, as further defined by the terms of this Agreement.

How Do I File a Claim?

You can file a claim form by visiting the settlement website at www.CuraleafSettlement.com. Your claim form must be submitted electronically via the website or printed from the website, completed and timely postmarked by September 27, 2023, and mailed to *Curaleaf Settlement Administrator, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606*.

How Do I Exclude Myself From The Settlement And Litigation?

You can exclude yourself from the settlement class if you wish to retain the right to sue Curaleaf separately for any monetary claims over the mislabeling of the Products. If you exclude yourself, you cannot object to the terms of the settlement.

To exclude yourself (or "Opt Out"), you must mail or email a written request to exclude yourself from the settlement to the claim administrator at *Curaleaf Settlement Administrator, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606*. The written request for exclusion should: (a) state your name, mailing address, email address and telephone number; (b) state the words "I wish to be excluded from the Curaleaf Class Action Settlement"; (c) include your signature; and (d) be postmarked no later than the Exclusion Deadline.

Exclusion requests must be postmarked by September 27, 2023.

How Do I Object To The Settlement?

If you are a Settlement Class Member and do not exclude yourself, you can object to the Settlement, or any part of the Settlement, for example if you do not think the Settlement is fair. You can state reasons why you think the Court should not approve it. The Court will consider your views. To be considered valid, a written Objection must contain the following information: (a) your full name, address, and telephone number; (b) the word "Objection"; (c) a statement

attesting that you purchased at least one of Defendant's allegedly mislabeled Select CBD drops on or after June 19, 2021; (d) a description of the specific factual and legal grounds for your objection, including why you have chosen to object; (e) whether you are represented by counsel, and, if so, that counsel's full name, address and bar number; and (f) and the objection must be personally signed by you. You may (though are not required to) appear at the Final Approval Hearing, either in person or through your own counsel.

Any counsel representing you must file with the Court a notice of appearance and Points and Authorities in support of the objection, which brief shall contain any and all legal authority upon which you will rely and confirm whether the attorney intends to appear at the Final Approval Hearing. Copies of the documents set forth in this paragraph must be filed with the Court and delivered to Class Counsel and Defendant's Counsel no later than the Objection Deadline.

Any documents that you wish for the Court to consider must also be attached to the objection. Your objection to the Settlement must be mailed no later than September 27, 2023, to the following addresses:

**Curaleaf Settlement
Administrator**
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

**United States District
Court for the District of
Oregon**
1000 S.W. Third Ave.,
Portland, OR 97204

OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite
3150
Portland, Oregon 97204

Harrang Long P.C.
111 SW Columbia Street
Suite 950
Portland, OR 97201-5841

**The Law Office of Kelly
D. Jones**
819 SE Morrison St., Suite
255
Portland, OR 97214

If you object to the settlement but still want to submit a claim in the event the Court approves the settlement, you must still submit a timely claim according to the instructions described above.

When Will The Court Decide If The Settlement Is Approved?

The Court will hold a hearing on November 14, 2023, at 2:00 PM PST to consider whether to approve the settlement. The hearing will be held in the in the courtroom of the Judge, Karin J. Immergut at Courtroom 13A, located at 1000 S.W. Third Ave., Portland, OR 97204. This hearing date may change without further notice to you. Consult the settlement website at www.CuraleafSettlement.com, for updated information on the hearing date and time.

How Do I Get More Information?

You can contact the Claim Administrator at CuraleafSettlement@cptgroup.com, by calling 1-888-342-1379 or writing to *Curaleaf Settlement Administrator*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606. You can also obtain additional information by contacting Class Counsel:

Michael Fuller
michael@underdoglawyer.com
OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
Telephone (Direct): 503-222-2000

Kelly D. Jones
kellydonovanjones@gmail.com
The Law Office of Kelly D. Jones
819 SE Morrison St., Suite 255
Portland, OR 97214
Telephone (Direct): 503-847-4329

Alternatively, you may visit the office of the Clerk of the Court for the United States District Court for the District of Oregon, 1000 S.W. Third Ave., Portland, OR 97204 from 8:30 AM to 4:30 PM Monday through Thursday, and 9:30 AM to 4:30 PM on Friday, excluding Court holidays.

**DO NOT CONTACT THE COURT CONCERNING THIS NOTICE,
THE SETTLEMENT OR THE LAWSUIT.**