

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<b>IN RE: HAIR RELAXER MARKETING SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 3060</b> Case No. 23 C 818 Judge Mary M. Rowland  <b>This document relates to:</b> All Cases
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**JOINT STATUS REPORT FOR THE DECEMBER 12, 2024  
DISCOVERY STATUS CONFERENCE**

Co-Lead Counsel for Plaintiffs and counsel for Defendants provide this Joint Status Report in advance of the discovery status conference scheduled for December 12, 2024 before the Honorable Magistrate Judge Beth W. Jantz.

I. ***General Discovery Issues***

**Plaintiffs' Position:**

In June of 2023 (18 months ago), Plaintiffs served interrogatories and document requests on the Defendants seeking the following information (among other things):

- Brand names for all Hair Relaxer Products (Rog Set 1, #2)
- The product name of each Hair Relaxer Product made available for sale and distribution in the US under that Brand Name (Rog. Set 1, #3)
- The years each Hair Relaxer Product was on the market (Rog Set 1, #4)
- Certain chemicals and ingredients in Hair Relaxer Products (Rog Set 1, #6)
- All final Labels for Hair Relaxer Products (RFP Set 1, #6)
- All Instructions for Use for all Hair Relaxer Products (RFP Set 1, #7)

Judge Rowland ordered that final and complete responses to those sets of discovery be provided no later than February 28, 2024 (10 months ago). See ECF 352 (Dec. 27, 2023 Minute Order) (setting February 29, 2024 as deadline for responses to Plaintiffs' first set of discovery, "no extensions"); see also ECF 417 (Jan. 25, 2024 Minute Order) ("Defendants must complete all production in response to the first round of written discovery by 2/29/24. The Court will not extend this deadline."). See also ECF 421 at 74:4-10 (Jan. 25, 2024 transcript) ("All this stuff on the first set [of discovery], it has to be done by February 29th. There's no more extensions on that. . . I don't know what defendant is telling me they can't do it by then. Get more paralegals. It's got to be done."). However, that information is not complete for all Defendants.

In December of 2023 (12 months ago), Plaintiffs served additional interrogatories and seeking the following information (among other things):

- The identity of each component part of the Defendants' Hair Relaxer Products (Rog Set 2, # 6)
- The identity of all instructions or warnings as well as any draft instructions and/or warning that have accompanied each Hair Relaxer Product (Rog Set 6, # 3)
- The changes to instructions or warnings over time (Rog Set 6, #4)
- The identity of specific chemical composition of each Hair Relaxer Product and any changes over time (Rog Set 6, #2)

Since then, Plaintiffs have spent countless hours attempting to piece together the disparate information that has dribbled in from each Defendant to determine whether Defendants had even provided complete responses to these requests. Plaintiffs have also engaged in countless meet and confers over the months in an attempt to figure out what they had, what had been withheld, what did not exist, and what was still to come. To be clear, Plaintiffs do not represent that Defendants have not produced *any* information; rather, as previewed for this Court at the November 14, 2024 Case Management Conference, Plaintiffs *do* represent that they do not have *all* information concerning *all* products and/or brands manufactured or sold by each Defendant.

The result of that months long process by the Plaintiffs is set forth in Exhibit A. Exhibit A is a list of the categories of information that Plaintiffs believe are outstanding from each Defendant, as well as the particular brands or products that fall into each category. Put differently, Plaintiffs provide Exhibit A for the purpose of illustrating what they believe to be missing from the responses that they have received; it is not being provided to ask the Court to make a product-by-product determination of whether all information has been provided to date.

As this Court has noted, this information is indisputably relevant to the issues in this case. *See also* ECF 421 at 21:23-22:9 (Nov. 14, 2024 transcript) (“It strikes me as sort of pretty clearly responsive, relevant...”). Further, as Judge Rowland correctly stated, all Parties needed this information ten months ago so all could move on to the other important issues in the case. That has not happened to date and Plaintiffs ask that this Court enter an Order requiring all Defendants to finalize their responses to the discovery requests fully and completely no later than December 20, 2024.

While Defendants protest that this request is nothing but a back-door way to serve additional interrogatories, that is simply untrue. Instead, it is a way to get each Defendant to provide complete information concerning all of the Hair Relaxer Products that they have made or sold *in response to discovery that was served a year or more ago*. One example is the Plaintiffs' request for information concerning the identity of the chemicals that Defendants chose to put in their Hair Relaxer products. While Plaintiffs have long stated that the case concerned the totality of the Hair Relaxer Product as sold and as intended for use, as opposed to simply the individual

chemicals themselves, the Defendants have – since the inception of this MDL almost two years ago – repeatedly previewed their defense that Plaintiffs would need to point to a specific product and product ingredient at trial. See, e.g., ECF 303 at 31:10-12 (Nov. 17, 2023 hearing transcript) (Strength of Nature counsel: “But we need to know what about those products is at issue here. There are hundreds and hundreds of ingredients at play.”); ECF 421 at 28: 5-13 (Jan. 25, 2024 hearing transcript) (Court: “But what I think you're been trying to say to me is. . . 'So we don't know if it's salt that causes the cancer or whatever other product it is.' Is that your issue?” Namaste counsel: “Correct, Your Honor.”). However, now, on the eve of the close of written discovery, Defendants have not yet provided the Plaintiffs with a complete list of all chemicals that they used in each product for each year that the product was on the market. Plaintiffs will need that information to prepare for Defendants’ defense of this lawsuit – and certainly the Defendants cannot be permitted to raise this issue while simultaneously refusing or being unable to provide the Plaintiffs with the very information that apparently goes to the heart of their defense of this case.

Defendants have invoked Judge Rowland’s guidance when it suited them. For example, Defendants have leaned heavily into one of Judge Rowland’s oral orders, interpreting Fed. R. Civ. P. 33, but they have transformed Court guidance that was intended to streamline discovery into behavior that obscures and delays the case. Specifically, although Judge Rowland has permitted Defendants to answer interrogatories with documents if they can point to the specific document by Bates number that answer the interrogatory, *see* ECF 421 at 74-77 (Jan. 25, 2024 transcript) (“If you’re giving documents in response to interrogatories, then you have to say ‘Document page 1 through 10 answers this interrogatory’”); *see also* ECF 416 (Minute Order Jan. 25, 2024) , certain Defendants have accepted this as carte blanche to not answer interrogatories at all. Instead, on very basic information like their product ingredients (chemical composition), Defendants have responded to interrogatories by directing Plaintiffs to documents across a range of Bates numbers, not matching information to products or time periods, and offering information which from the face of the identified documents lacks the information sought. This all leaves Plaintiffs no further ahead than they were a year ago when the Court ordered information to be produced, as Plaintiffs are spinning their wheels trying to discern the location of any answer, much less the details, about things like product ingredients and chemical compositions of products. Of course, even if documents could answer these questions (which Plaintiffs contest), this process of answering by document assumes Defendants have timely produced all of them, which is also untrue based on Defendants’ own statements as well as impossible since product identification continues and will be ongoing per the Defendants.

Likewise, Defendants repeatedly assert the Court’s document discovery deadline of February 28, 2025 as a shield to moving more quickly, offering that cut-off date as the date Defendants will complete the (overdue) priority discovery and related basic information. First, much of this information was due in February of 2024, and the new deadline did not alter Judge Rowland’s strict order on that discovery. Furthermore, to the extent that the information is requested in later sets of interrogatories, Defendants

were under an obligation to provide those answers months ago. Judge Rowland's final cutoff date did not relieve any Defendants of the obligation to act with all diligence and haste in producing critical information earlier, nor does it limit the Court now in setting additional interim deadlines when such are clearly needed.

At this point, Plaintiffs seek the most basic cure: an order requiring every Defendant to answer the served interrogatories *as drafted*, listing, among other things, their product names, the years each product was on the market, the components that comprised the Hair Relaxer product, the chemicals and chemical composition used in each product (including each component), and the warnings and instructions for each product over time (and changes thereto). In addition, the Defendants must be required to produce labels (artwork) for all products as requested in the original set of discovery served 18 months ago. Further, if a Defendant does not have the information requested, they must be required to state so clearly *as to each separate product and brand and year* in the discovery response itself. This should be done no later than December 20, 2024.

**Defendants' Position:**

Plaintiffs' first draft of this Joint Status Report ("JSR"), exchanged in accordance with the parties' agreed schedule, was nine (9) pages long and did not include any general issues or even a placeholder for later inclusion of a general issue. Nonetheless, upon the next agreed exchange two (2) days before the JSR was due, Plaintiffs sent a revised draft with a new two (2) page "General Issue" requesting a court order that *all* Defendants answer unidentified interrogatories within two (2) weeks and attaching an 88-page exhibit listing alleged discovery deficiencies for multiple defendants. Defendants responded to the revised JSR on December 5, 2024. Thereafter, Plaintiffs completely rewrote the General Issue (including revising the relief requested from the Court with an even shorter deadline). The once-again substantially revised JSR was circulated to Defendants a mere 4.5 hours before the December 6, 2024 filing deadline; the revised Ex. A (which now approaches 100 pages) was circulated two hours later. Defendants understand that discovery is an evolving issue and that it benefits all parties and the Court to have a clear understanding of areas of dispute. In this instance, however, Defendants simply have not been afforded a reasonable opportunity to properly engage with Plaintiffs on the issues now presented to this Court. Given the belated, extensive and ever-evolving nature of Plaintiffs' General Issue, if the Court requests a substantive response from Defendants, they request additional time to prepare that response. Defendants maintain, however, that no substantive response is needed because, as explained below, the General Issue that Plaintiffs present is inappropriate for inclusion in a joint status report.

First, Plaintiffs initially failed to identify any specific interrogatories or requests for production to which Defendants' responses are allegedly deficient. Although Plaintiffs have now, within the last 24 hours, referenced specific discovery requests that they maintain require Defendants to provide the requested information, Defendants have not had an opportunity to review those requests and their individual responses thereto to determine if they agree with the deficiencies alleged. Plaintiffs

have shifted from requesting "production of the most basic information in this lawsuit" with an emphasis on the Court's February 29, 2024 deadline for Defendants to respond to Plaintiffs' "first set of discovery" to seeking, as they state it, answers to "the served interrogatories as drafted." Defendants maintain, however, that not all of the supposedly "most basic information" that Plaintiffs seek in their General Issue was requested in the first set of discovery or even in the later-served discovery that they now reference in the JSR. To the extent information is subject to pending RFPs, the deadline for production of responsive documents is February 28, 2025. To the extent Plaintiffs believe that certain Defendants have not met their discovery obligations with regard to the first set of discovery and the Court's orders related thereto, Plaintiffs fail to explain why they waited until just 48 hours before this JSR was due, and nine (9) months after the February 2024 deadline, to raise Defendants' supposedly "unacceptably prejudicial" delays and purported violations of Court orders. For months, Defendants have operated on the understanding that Plaintiffs were satisfied with Defendants' discovery responses to Plaintiffs first set of discovery and have been working in good faith with Plaintiffs to respond to and, as appropriate, supplement responses to later-served discovery while also negotiating and implementing search terms for the review and production of electronically stored information. Discovery is on-going; Plaintiffs have an obligation under the rules to engage with the documents before seeking wholesale relief as they do, inappropriately, in this JSR.

Further to the above, Plaintiffs' request to the Court is essentially an attempt to write Federal Rule of Civil Procedure 33(d) out of existence. Plaintiffs ignore the fact that several Defendants have cited to their documents, with specific document references, in response to Plaintiffs' interrogatories that would otherwise require defendants to compile a summary from documents they produced. Where Defendants have properly relied on Rule 33(d), or supplement responses to rely upon that rule, Plaintiffs offer no basis for their position that this is improper. Rather, before accusing defendants of wrongdoing, Plaintiffs need to take the time to engage with defendants' responses and review the referenced documents, which in many (if not most) instances will contain the information Plaintiffs contend they do not have.

Finally, Plaintiffs have not raised a "general" issue applicable to all Defendants and no order could address the issue as to all Defendants. Each Defendant in this case is in a different position with regard to discovery issues.

- All Defendants have answered Plaintiffs' pending interrogatories and provided written responses to Plaintiffs' requests for production but only some are each engaged in discussions with Plaintiffs on requested amendments or supplements to those responses while others have not had any recent discussions with Plaintiffs because Plaintiffs have neither raised nor requested any amendments or supplements from those Defendants;
- some Defendants have completed or nearly completed document production and some still have a significant number of documents to review and, as appropriate, produce before the Court's February 28, 2025 deadline; and

- some Defendants are engaged with Plaintiffs on a subset of the issues raised in the JSR and some had no notice before seeing the draft JSR that Plaintiffs circulated on December 3, 2024 that Plaintiffs had any on-going concerns with their discovery responses.

These are defendant-specific issues and should be addressed as such. Indeed, even during the exchange of this JSR, defendants have appeared and fallen off of Ex. A as individual discovery conferences continue.

Plaintiffs' last minute addition to reference specific discovery requests in the JSR, many of which Defendants had no understanding were still at issue, does not negate the fact that there is no pending discovery that seeks all of the information that Plaintiffs set out in their General Issue and certainly no discovery that would require Defendants *within the next 14 days* to lay out that information in the manner Plaintiffs' request. Plaintiffs have discovery obligations of their own; they must engage with the documents produced (or to-be produced) in response to their discovery requests. They cannot, certainly through an informal request in a JSR, seek to move forward previously set discovery deadlines or compel Defendants to produce information in a form that does not exist.

## II. **Defendant Specific Discovery Status:**

### **Avlon Industries, Inc.:**

1. **Document Requests/Production Status:** As discussed at the November 14, 2024 status hearing and memorialized in the Court's November 19, 2024 Order (*see* ECF No. 956), Avlon provided an updated letter regarding its objections to Plaintiffs' request for production on November 20, 2024 and will provide a formal amendment to its written responses by December 20, 2024.
2. **Issues Requiring Intervention:**

#### **Plaintiffs' Position:**

Beyond the deficiencies noted above and in the attached Chart (Ex. A) as to all Defendants, following the meet and confer that took place on December 2, 2024, Plaintiffs seek court intervention for Avlon as it has refused to produce documents and materials related to (1) "net worth"; (2) "overall accounting"; (3) "documents and materials that exists after January 12, 2023, when Avlon was first named in this litigation"; (4) "foreign sales and marketing"; and (5) "the location of any foreign manufacturing plants". At this time, the PSC requests court intervention on these five issues.:

Firstly, Avlon has consistently refused to provide documents related to their net worth, as requested in the Plaintiffs' Requests for Production, including the Second Set of Requests, Nos. 1-4; Fourth Set, Nos. 5, 12, 13, 16, 17, 18; Fifth Set, No. 19; and Seventh Set, Nos. 1-2. This refusal obstructs the Plaintiffs' ability to assess Avlon's financial standing, which is crucial for the case.

Additionally, Avlon has declined to produce overall accounting documents, including those requested in Fourth Set, Nos. 5, 12, 13, 16, 17, 18; Fifth Set, No. 19; Seventh Set, Nos. 1-2. These documents are essential for a comprehensive understanding of Avlon's financial operations and transactions, which are pertinent to the litigation.

Moreover, Avlon has refused to provide materials that existed after January 12, 2023, the date they were first named in this litigation. This includes documents requested in the Second Set, Nos. 3 and 5 and Fifth Set, Nos. 7-9, and other similar requests. In addition to these specific instances that Avlon has stated in writing, Avlon has indicated orally during the meet and conferrals that this limitation applies to every response to all requests for production. This blanket refusal significantly hampers the Plaintiffs' ability to obtain relevant information.

Furthermore, Avlon has refused to produce documents related to foreign sales and marketing, specifically in the Seventh Set of Requests, No. 2. This information is vital for understanding Avlon's international business practices and their impact on the case.

Lastly, Avlon has declined to identify the location of any foreign manufacturing plants, as requested in the Second Set of Requests, No. 6. Avlon asserts that it is not required to provide any foreign information besides "foreign regulatory" information. This refusal limits the Plaintiffs' ability to investigate Avlon's manufacturing processes and potential regulatory compliance issues.

These refusals by Avlon to produce responsive documents in these key areas are at the heart of the dispute between the Plaintiffs and the Defendant, and they significantly impede the Plaintiffs' ability to build a comprehensive case.

Avlon is scheduled to complete its rolling production of ESI documents responsive to the PSC's general discovery requests and custodial file requests by December 11, 2024. Assuming Avlon meets this deadline, the PSC will continue to review these produced documents and determine if there are any additional issues with Avlon's production. If so, the PSC will meet and confer with Avlon at that time, in order to determine if any additional court intervention will be necessary.

**Avlon's Position:**

Avlon and Plaintiffs met on December 2, 2024, to discuss Avlon's proposed new search terms and questions that Plaintiffs had about Avlon's November 20, 2024 letter regarding the updates it intends to make regarding Requests for Production Sets 2-8. Avlon and Plaintiffs are close to a resolution on the new search terms and expect that the issues will be resolved by their next meet and confer on December 5, 2024. The parties are in agreement about the parameters for what ESI will be searched with the new terms. Avlon is generally in agreement with Plaintiffs' proposed changes to its new list of search terms but is examining about 12 proposed search term changes from the Plaintiffs in more depth to determine if they require more refinement. Avlon anticipates producing a hit list along with minor term revisions, if any, by December 5, 2024. Avlon anticipates that an agreement on the terms will be reached before the discovery hearing.

Avlon intends to stand on its objections to the production of net worth and accounting methods and records as premature and not relevant to the issues of causation and liability

in this case. *See Lanigan v. Babush*, 2011 U.S. Dist. LEXIS 124416, 2011 WL 5118301, at \*4 (N.D. Ill. Oct. 27, 2011); *also Makowski v. Smith Amundsen, LLC*, 2010 U.S. Dist. LEXIS 81388, 2010 WL 3172476, at \*3 (N.D. Ill. Aug. 11, 2010). Avlon has produced and continues to produce sales numbers, sales invoices, and unit movement where it has located such information.

Magistrate Finnegan has already ordered that the Defendants are not required to produce documentation and information following its inclusion in this litigation unless Plaintiffs have specifically laid out why such information, other than we want it, is required. [See Docket Entry 644]. Plaintiffs have not engaged in such discussions with Avlon.

Like the time scope issue, Judge Rowland has already ruled on the issues related to the production of foreign sales, foreign marketing, and foreign manufacturing, and Defendants do not have to produce such information. [See Docket Entry 353 at pp. 10-11]. This case does not involve plaintiffs from outside of the United States or its territories. Avlon has responded in Interrogatory No. 3 of Interrogatory Set 3 that the products sold in the United States and its territories are manufactured in the United States and identified all facilities where they have been manufactured and developed since Avlon began selling hair relaxers. Avlon has likewise, in accordance with Docket Entry 353, provided information and materials regarding what countries it sells its U.S. manufactured products, the labels used for those products both foreign and domestic, the instructions for those products both foreign and domestic, and its efforts to comply with foreign and domestic regulatory requirements for those products manufactured in the United States. Avlon has produced and continues to produce such documentation.

Plaintiffs' complaints and assertions in Exhibit A regarding Avlon are a minute-by-minute evolution of Plaintiffs' dissatisfaction with what Avlon has produced to date and a premature assessment of what they have found. Avlon is continuing to roll out its ESI materials and anticipates that it will be substantially complete by December 11, 2024. Avlon likewise expects to roll out more information based on a secondary set of search terms and a quality control analysis of what it has produced and reviewed. This discovery is to be completed by February 28, 2025, but Plaintiffs by this evolving exhibit want discovery done now while Avlon continues to review and evaluate what it has found and how it is or is not responsive to Plaintiffs' discovery requests.

Plaintiffs originally submitted a version of Exhibit A to Defendants on December 3, 2024. This exhibit referred to an alleged undisclosed hair relaxer line from Avlon. Plaintiffs first raised questions about this line on December 2, 2024, and Counsel for Avlon reported that it would discuss it with Avlon and provide clarification. Plaintiffs did not give Avlon a chance to respond before including it the original Exhibit A, and only withdrew that section when Avlon in another draft of this insert explained that the particular line in question was a derivative of an existing line that never went to market.

With respect to the remainder of Exhibit A dedicated to Avlon about formulas, ingredients, raw materials, and hair relaxer system products, Plaintiffs originally demanded a certification about that nature and extent of that information. However, Avlon had already provided a certification about Avlon's current understanding of the extent of that

information and noted that it in its original response to the original Exhibit A. Plaintiffs in the current iteration of Exhibit A now demand a new certification and new updates by Avlon to its interrogatory responses without actually discussing this with Avlon save for a passing swipe on December 2, 2024, while in the midst of discussing other specifically designated topics. Avlon continues to roll out ESI materials and will continue to do so through January 2025 based on the newly agreed search terms and quality control review of the materials generated by the original set of search terms.

Avlon noted in its most recent set of supplemental interrogatory responses, demanded by Plaintiffs, in October 2024, and in meet and confers that Avlon's investigation is not complete and that Avlon intends and expects to update its interrogatory responses with more information, including responsive bates numbers as ESI production comes to an end. The same holds true now. Avlon has identified its hair relaxer lines (including name changes and alternate internal names) over time as well as its recommended system products over time in Interrogatory Nos. 3 and 4 of Interrogatory Set 1 most recently supplemented on October 4, 2024, and in Interrogatory No. 6 of Interrogatory Set 3 most recently supplemented on October 16, 2024. If there is an inconsistency in understanding, it is up to the Plaintiffs to request clarification. Since Avlon's most recent supplements to its interrogatories in October 2024, Plaintiffs have not specifically identified and/or sought clarification of inconsistencies prior to their release of both versions of Exhibit A, including claims about missing formularies.

**Beauty Bell Enterprises and House of Cheatham, LLC:**

**Plaintiffs' Position:**

Beyond the deficiencies noted above and in the attached Chart (Ex. A) as to all Defendants, Plaintiffs do not currently seek anything further, and Bell Beauty and House of Cheatham, LLC seek nothing further. However, the parties wish to provide an update from the discussions at the November 14, 2024 status hearing and memorialized in the Court's November 19, 2024 Order (*see* ECF No. 956), which required the parties to meet and confer "to determine whether Defendants have the responsive information regarding components/ingredient/formularies for the relevant products that Plaintiffs seek, or whether Defendants will certify that they do not have any further information" by the close of business on December 2, 2024. (Id.) House of Cheatham served supplemental interrogatory responses on November 22, 2024; many of the pertinent supplemental responses referred to a contemporaneous document production. Plaintiffs continue to meet and confer with Defendants as to whether Plaintiffs assert any remaining deficiencies on the issues addressed in the Court's November 19, 2024 Order and will address at the December 12, 2024 Conference, if necessary.

House of Cheatham produced its first rolling production of ESI on September 9, 2024. The parties reached agreement on search terms on October 14, 2024. Following that agreement, House of Cheatham produced its second rolling production on October 31, 2024. House of Cheatham represented that it anticipated completing its ESI productions in November 2024. On December 4, 2024, House of Cheatham represented it will make its final ESI production by Wednesday, December 11, 2024.

**House of Cheatham's Position:**

House Cheatham, LLC denies that it seeks nothing further from plaintiffs. House of Cheatham, LLC seeks compliance with plaintiff fact sheets pursuant to the agreed upon processes for plaintiff fact sheets. House of Cheatham, LLC timely submitted the supplemental and amended discovery answers that it was ordered to by November 22, 2024. (Dkt. No. 956 at p. 2.) The parties were to meet and confer “to determine whether Defendants have the responsive information regarding components/ingredient/formularies for the relevant products that Plaintiffs seek, or whether Defendants will certify that they do not have any further information” by the close of business on December 2, 2024. (*Id.*) Plaintiffs did not seek any such meet and confers by December 2, or up to the time of this report, so this issue is resolved as far as House of Cheatham, LLC is concerned. While House of Cheatham represented that it intended to complete its rolling ESI productions by the end of November, this was not possible, and House of Cheatham, LLC intends to complete its rolling ESI productions within the next two weeks. House of Cheatham, LLC defers to the defendants’ joint statement with respect to “Exhibit A.”

**L’Oréal USA:**

**Plaintiffs' Position:**

1. Interrogatories: Regarding the Interrogatories served on December 2, 2023, the PSC raised concerns with several responses, including but not limited to Interrogatory set 3, numbers 3 and 5; Interrogatory set 5, numbers 4, 7, 8, 9; Interrogatory set 6, numbers 2, 3, and 4; and Interrogatory set 7, numbers 5, 6, and 9. The PSC met and conferred with L’Oréal USA concerning these issues. On November 21, 2024, L’Oréal USA served their second supplementary responses, however they still contain deficiencies.
2. Document Requests/Production Status: The PSC has identified gaps in what has been produced to date. As discussed at the November 14, 2024 status hearing and memorialized in the Court’s November 19, 2024 Order (*see* ECF No. 956), this issue was referred to Special Master Grossman for resolution of this and any related issues. Per Special Master Grossman’s instructions, the parties submitted three-page letters on November 27, 2024 as to their respective positions on the matter. The parties met with Special Master Grossman on December 4, 2024 and are in the process of drafting and exchanging certification language.
3. ESI Status: Plaintiffs have raised concerns regarding L’Oréal USA’s production of electronically stored information. The most urgent issue pertains to a database called ESKO. In accordance with CMO 4, Plaintiffs met with a technical expert at L’Oréal USA on November 21, 2024 regarding the ESKO database, which revealed information concerning reports and documents that the PSC requested but have not been produced in written discovery thus far. The PSC requested an update to responses to written discovery requests and production based on this new information. Plaintiffs have also requested a follow up call with the technical expert, Ms. Yang, however L’Oréal USA has refused this request.

Additionally, Plaintiffs have requested that L'Oréal USA disclose any foreseeable issues related to the collection from various relevant non-custodial sources. It remains unclear whether L'Oréal USA anticipates any upcoming issues in this regard. Plaintiffs continue to engage in discussions on this matter. To date, L'Oréal USA has not clarified which custodial or non-custodial sources are affected by this issue, nor have they explained the alternative methods they will employ to locate those documents.

4. Issues Requiring Intervention: Beyond the deficiencies noted above and in the attached Chart (Ex. A) as to all Defendants, Plaintiffs request a follow-up meeting with Ms. Yang, the technical expert for the ESKO database, as well as supplementation of L'Oréal USA's discovery responses.

The PSC also requests that L'Oréal USA provide information about any other database which triggers the CMO 4 meet and confer and respectfully requests that the Court issue an Order requiring L'Oréal USA to search their backup data for documents they have stated have been destroyed in accordance with their retention policy per CMO 4.

#### **L'Oréal USA's Position:**

**On Interrogatories:** L'Oréal USA served supplemental interrogatory responses on November 21, 2024, in response to Plaintiffs' deficiency letter. Plaintiffs purport to complain that L'Oréal USA's responses "still contain deficiencies," but have failed to identify a single specific deficiency in the responses.

**On the Requested Document Production Certification:** As L'Oréal USA has explained to this Court, there are no "gaps" in its production to its knowledge related to the legacy documents or any others (though L'Oréal USA's review and production of custodial documents is ongoing. On December 4, 2024, Plaintiffs and L'Oréal USA participated in a conference with Special Master Grossman to discuss the document certification issue. Using the certification language proposed by L'Oréal USA, Special Master Grossman suggested revised certification language which the parties agreed to. The parties are in the process of drafting and exchanging the certification.

**On ESI Status/ESKO:** With respect to ESKO, which is a software program used to store product artwork, L'Oréal USA has more than satisfied its obligations. CMO No. 4 states: "to the extent relevant ESI cannot be rendered or reviewed without the use of proprietary software (whether created by the Party or not), the Parties shall meet and confer to minimize any expense or burden associated with the production of such documents in an acceptable format... During the meet and conferral, the Producing Party shall have available a subject matter or technical expert to address questions regarding the capabilities and potential production formats for information retrieved from any such proprietary software." (ECF No. 109 at ¶ IX(A), p. 22). The ESI that relates to ESKO—product artwork—was produced by L'Oréal USA *over a year ago*, in advance of the Rule 30(b)(6) deposition of L'Oréal USA. L'Oréal USA also identified the ESKO software in its interrogatory responses served on October 19, 2023. Nevertheless, several months after this production, Plaintiffs demanded to speak with someone at L'Oréal USA relating to ESKO. Thus, on November 21, 2024, L'Oréal USA scheduled a 30-minute call between Plaintiffs and L'Oréal USA's expert for Plaintiffs to ask relevant questions. Well in advance of this call, L'Oréal USA

provided Plaintiffs with an exemplar Action History Report that was exported from ESKO; this is the primary ESKO artwork tracking output used by L'Oréal USA that identifies changes made to product artwork. L'Oréal USA offered to produce all of the Action History Reports it had available for the artwork it had produced, but Plaintiffs refused, demanding to first speak to a L'Oréal USA employee.

Despite the 30 minutes allocated for this call—which was set via a calendar invite, without complaint, to Plaintiffs' counsel more than a week before the call—L'Oréal USA allowed the call to go for a full hour. During that hour, rather than focusing on production formats and capabilities, Plaintiffs attempted to conduct a quasi-deposition and complained that an hour was not enough time (though it was twice as long as what was scheduled). L'Oréal USA does not believe it is appropriate, under the circumstances, to make its technical expert available for further questioning, particularly since Plaintiffs have asserted in meet-and-confer discussions that there should be “no time limit” whatsoever for such questioning.

After the ESKO call, L'Oréal USA invited Plaintiffs to provide any necessary follow-up questions in writing. *Plaintiffs have not identified a single unanswered question.* Given that the purpose of this call is not to surprise the technical expert with unexpected questions but, rather, to streamline the e-discovery process relating to as-yet-unproduced documents, Plaintiffs should have no problem putting their questions in writing in order to get the best and most complete answers.

Plaintiffs also claim that L'Oréal USA should provide “an update to responses to written discovery requests and production based on” supposed new information discussed on the ESKO call. Yet, despite L'Oréal USA's request to Plaintiffs (made on November 25, 2024) to identify any responses to interrogatories or requests for production that somehow require supplementation or amendment due to information discussed on the ESKO call, *Plaintiffs have not identified a single such response.*

**With respect to non-custodial sources,** Plaintiffs write that “L'Oréal USA has not clarified which custodial or non-custodial sources are affected by this issue, nor have they explained the alternative methods they will employ to locate those documents.” L'Oréal USA does not know what Plaintiffs are referring to by “this issue” or what “those documents” are. In this statement and during the meet and confer process, Plaintiffs have made vague allusions to some sort of discovery shortcoming by L'Oréal USA with respect to databases, but have failed—despite repeated requests—to identify the supposed problem with any specificity. L'Oréal USA believes its ongoing document review and production efforts are sufficient and proper and has not identified any “foreseeable issues” (to use Plaintiffs' words) that presently require a meet and confer.

**On Issues Plaintiffs Claim Require Court Intervention:** With respect to ESKO, Plaintiffs should not be granted additional time to question L'Oréal USA's technical expert where they have refused to identify a single unanswered question or subject of further inquiry. Similarly, Plaintiffs cannot simply ask for Court intervention regarding “supplementation” of L'Oréal USA's discovery responses when they have refused to identify a single response that they contend should be supplemented. A motion to compel should be required if Plaintiffs truly believe there are deficient responses, so that the parties may brief the issue(s).

Plaintiffs provide no information about the “backup data” issue that they now claim requires Court intervention. Rather, Plaintiffs just demand “that the Court issue an Order requiring L’Oréal USA to search their backup data for documents they have stated have been destroyed in accordance with their retention policy per CMO 4.” This is a mischaracterization of CMO No. 4. Indeed, CMO No. 4 expressly states that backup data is generally deemed inaccessible and need not be searched. (*See* ECF No. 109 at ¶ VI(C), p. 8-9). An exception to this general rules exists where “a Party learns that potentially relevant and non-duplicative documents or information have been destroyed per a document retention policy, but that an archival/backup location contains an archival/backup copy of such documents.” (*Id.* at ¶ VI(E), p. 10). In those instances, “the Party will disclose the existence of this archival/backup data, regardless of whether such a location has been declared or deemed inaccessible.” (*Id.*) Here, L’Oréal USA is not aware of any archival/backup location to disclose pursuant to CMO No. 4, and Plaintiffs have not identified any. Yet, despite providing no basis for doing so, Plaintiffs ask the Court to order L’Oréal USA to search all of its backup data, which is in direct contravention of CMO No. 4. This request should be denied; no relief or Court intervention is required here.

#### **Luster Products, Inc.:**

##### **Plaintiffs' Position:**

Beyond the deficiencies noted above and in the attached Chart (Ex. A) as to all Defendants, Plaintiffs do not currently seek anything further, and Luster Products, Inc. seeks nothing further. However, the parties wish to provide an update from the discussions at the November 14, 2024 status hearing and memorialized in the Court’s November 19, 2024 Order (*see* ECF No. 956). The parties met and conferred on November 20, 2024 regarding ESI issues related to hard copy document productions. The parties provide the following update: Luster will supplement existing productions to provide appropriate metadata in conformance with the Court’s prior ESI order and on a rolling basis to be complete by December 31, 2024.

##### **Luster’s Position:**

On November 20, 2024, and again on December 3, 2024, Luster had a meet and confer with Plaintiffs’ counsel. On the evening of December 3, 2024, Luster received the draft JSR and Exhibit A to the JSR, containing issues that were not discussed during either meet and confer. Accordingly, these issues are not ripe for the Court, as the parties have not conferred on same. A further meet and confer is already set between the parties for January 7, 2025.

#### **McBride Research Laboratories, Inc.:**

##### **Plaintiffs' Position:**

Beyond the deficiencies noted above and in the attached Chart (Ex. A) as to all Defendants, Plaintiffs do not currently seek anything further, and McBride Research Laboratories, Inc. seeks nothing further. However, the parties wish to provide an update from the discussions at the November 14, 2024 status hearing and memorialized in the Court’s November 19,

2024 Order (*see* ECF No. 956). The parties met and conferred on November 25, 2024 regarding ESI search terms and discovery responses. McBride Research Laboratories, Inc. agreed to run the proposed search terms against its documents and will provide a hit count. McBride Research Laboratories, Inc. will also amend their Interrogatory responses by December 16, 2024.

**McBride's Position:**

On November 25, 2024, McBride and Plaintiffs had a meet and confer on search terms, during which Plaintiffs' counsel mentioned alleged deficiencies in Interrogatory Sets 1 and 3, and advised they'd follow up with the specifics of same via email. McBride agreed to amend the Interrogatory Set 1, No. 4 and Interrogatories Set 3, No. 6 based on the meet and confer by December 16, 2024.

On December 2, 2024, product names that Plaintiff inquired about were provided to McBride's counsel, and the following day, December 3, 2024, McBride received Exhibit A to the JSR, containing issues that were not discussed on the meet and confer. Accordingly, on December 5, 2024, McBride requested another meet and confer to discuss issues raised in the General Issues and Exhibit A. Accordingly, these issues are not ripe for the Court, as the parties have not conferred on same.

**Namasté Laboratories, LLC:**

Beyond the deficiencies noted above and in the attached Chart (Ex. A) as to all Defendants, Plaintiffs do not currently seek anything further. However, the parties wish to provide an update from the discussions at the November 14, 2024 status hearing and memorialized in the Court's November 19, 2024 Order (*see* ECF No. 956). Namaste amended its response to Plaintiffs' Third Set of Interrogatories, Question 6 on November 21, 2024. After review, the parties provide the following update:

**Plaintiffs' Position:**

Defendant Namaste's Second Amended Responses to Plaintiffs' Third Set of Interrogatories, Question 6, is still deficient. Of 18 products identified, Namaste only provided information on 8. On November 25, 2024 Plaintiff advised Namaste that the responses were deficient and asked for responses on the remaining 10 products not later than Friday, December 6, 2024.

**Namaste's Position:**

Namaste and Plaintiffs have conferred on Namaste's Second Amended Response to Plaintiffs' Third Set of Interrogatories, Question 6 and Namaste is investigating the claimed deficiencies. Namaste will further respond to Plaintiffs' regarding the claimed deficiencies by Friday, December 6, 2024. Plaintiffs' Position, above, is limited to this specific request because it is the only request on which Plaintiffs and Namaste have been conferring. Prior to Plaintiffs' circulation of a revised Discovery JSR on the evening of December 2, 2024, Namaste was not aware that Plaintiffs had any on-going concerns with the status of Namaste's discovery responses to date.

**Revlon:**

1. Document Requests/Production Status: Plaintiffs have met and conferred with Revlon regarding missing production due to a change in SAP systems and whether third-party discovery from the vendor is appropriate. As discussed at the November 14, 2024 status hearing and memorialized in the Court's November 19, 2024 Order (*see* ECF No. 956), this issue has been referred to Special Master Grossman for resolution. The parties have submitted letter briefs to Special Master Grossman and anticipate arguments will be heard prior to the December 12, 2024 Status Conference.
2. ESI Status: Plaintiffs have submitted a list of ten additional custodians to Revlon along with the original list of 600 search terms with preliminary limiters to generate a hit report that the parties can use to continue negotiations on reductions and limiters for Revlon's collection, review, and production of ESI documents. This is a continuation of the process that the parties used to negotiate preliminary terms with limiters for Revlon's recent production which was completed in August 2024. As discussed at the November 14, 2024 status hearing and memorialized in the Court's November 19, 2024 Order (*see* ECF No. 956), this matter was referred to Special Master Grossman for resolution. The parties have submitted letter briefs to Special Master Grossman and anticipate arguments will be heard prior to the December 12, 2024 Status Conference.
3. Issues Requiring Intervention:

**Plaintiffs' Position:**

Beyond the deficiencies noted above and in the attached Chart (Ex. A) as to all Defendants, Plaintiffs seek an order from the Court requiring Revlon to produce a comprehensive list of all products manufactured by Revlon that includes the components and timeframes of the hair relaxer products on the market. Revlon correctly asserts that they have provided various pieces of information as it relates to their hair relaxing products throughout their complicated corporate history. However, they fail to appreciate that without a comprehensive list for all years they have manufactured hair relaxer products, Plaintiffs are unable to match-up the referenced documents with the appropriate products, naming conventions, and date ranges. This behavior extends past just product identification to other interrogatory responses such as advertising, clinical testing, and financial information.

Examples of this can be seen in Revlon's responses to Interrogatories 3 & 10 in Set 6 (attached as Exhibit B) also do not meet the requirements of Rule 33(d) to justify shifting the burden to Plaintiffs to find the answer to these Interrogatories regarding Revlon's own advertising and clinical testing. Revlon's response to these Interrogatories provides a disorganized list of documents with no descriptors or specificity on how they respond to the question. These Interrogatory responses also demonstrate Revlon's failure to answer all subparts, as they once again the list various documents but fail to explain which subpart they correspond to – if they even answer the subpart at all. Plaintiffs are seeking the Court's assistance in obtaining clear and complete answers. As such, Plaintiffs request that the Court compel Revlon to provide updated, fulsome responses to these Interrogatories. Specifically, Plaintiffs request that the Court order Revlon to provide full and complete written responses that answer each subpart of the Interrogatory. To the extent Revlon

wants to supplement these full written responses with documents, the Court should require Revlon to do so with specificity to where Plaintiffs are able to identify which documents are responsive to the Interrogatory and their respective subpart and where the responsive information can be found within the document identified.

Plaintiffs' concerns as they were identified to Revlon in detailed letters transmitted in September and November after numerous meet and confers. Revlon has responded that no further meet and confers are necessary as they do not intend to take further action on these deficiencies. Plaintiffs requests that the Court order Revlon to complete a final supplementation with meet and confers, if necessary, prior to December 31, 2024 to resolve these issues.

### **Revlon's Position:**

#### **General Discovery Issues**

Plaintiffs' reduction of what should be specific and individualized discovery issues to one set of "general discovery issues" applicable to all defendants is inappropriate and counterproductive because it fails to take into account the individual efforts of each individual defendant and simultaneously ignores individual challenges faced by each individual defendant in their own document and information searches. Regardless, as described below, Plaintiffs' claims against Revlon as to its production of product identification, component, and ingredient charts are particularly erroneous in light of Revlon's efforts and successes at compiling Plaintiffs' sought information and producing same to Plaintiffs.

#### **Revlon Has Properly Referenced Documents Pursuant to Fed. R. Civ. P. 33(d)**

In response to certain interrogatories, Revlon, pursuant to Fed. R. Civ. P. 33(d), referred to documents in lieu of a written response. "Where the information is contained in business records and answering the question would require the responding party to engage in burdensome or expensive research, the responding party may answer by specifying the records from which the answer may be obtained and making them available for inspection by the party seeking discovery." *United States, ex rel. Englund v. Los Angeles County*, 235 F.R.D. 675, 680-81 (E.D. Cal. 2006). "Where an unequal burden does not exist between the parties, the court will allow the responding party to produce business records, even if the interrogating party must examine multiple documents to ascertain the answers to its interrogatories." *Sadofsky v. Fiesta Prods., LLC*, 252 F.R.D. 143, 2008 U.S. Dist. LEXIS 60214, \*148 (E.D.N.Y. 2008). "The rationale behind Rule 33(d) is to shift the burden of compiling the information and, accordingly, ascertaining the answer, from the producing party to the interrogating party." *Id.*

While not specifically stated, Plaintiffs' grievance ostensibly focuses almost entirely on Revlon's response to Interrogatory Set 3, No. 6, which requests the component and ingredient identification for each of Revlon's products. As noted above, Plaintiff claims that reference to documents, as identified by Revlon (and most defendants), is inappropriate. However, this is exactly the type of interrogatory where Revlon's best possible response is reference to its documents. To respond to Plaintiffs' request for the

identity of the components of Revlon's Hair Relaxer Products, various Revlon employees stepped away from their regular job responsibilities to instead spend considerable time sifting through old records and documents, to identify products and their component as completely as possible based on available information.<sup>1</sup> Revlon has gone **beyond** simply naming products and dates of manufacture / sale, (See Revlon Supplemental Answers To Interrogatories, Set 1, August 9, 2024) and instead, Revlon spent considerable time and money to create a comprehensive spreadsheet detailing each component ingredient of every hair relaxer product and kit product for which it was able to ascertain information. (See "Bill of Material Multilevel Report For Relaxers 08082024, produced August 9, 2024) and to create a comprehensive spreadsheet of every product change for which it is able to ascertain (See Bill of Material Change Report Relaxer 08082024, produced August 9, 2024). Additionally, Revlon's attorneys created an exhibit that explains how to read and use the spreadsheets. (See Revlon's Responses to Plaintiff's Third Set of Interrogatories, No. 6, Exhibits B & C, dated August 9, 2024). "If compilations and summaries exist, these should be made available." *United States, ex rel. Englund*, 235 F.R.D. at 680-81. This is *exactly* what Revlon has provided.

Revlon additionally referred Plaintiffs to various bates labeled documents, and a document production made on August 9, 2024. (See Revlon's Responses to Plaintiff's Third Set of Interrogatories, No. 6). The August 9<sup>th</sup> production is not a mass document dump, but rather a specific production of 661 SAP documents, collectively produced in Revlon Production Volume 23, targeted at responding to Plaintiffs' interrogatory and corresponding to the Bill of Materials spreadsheet. The documents almost entirely fall into one of three categories: Packing Component Specifications; Packing Standards; and Product Process Standards, all of which help to identify components of Revlon's Hair Relaxer Products. Revlon also identified various bates labeled documents by specific bates label, which again, fall into a limited category of documents, all of which serve to help identify to the best of Revlon's ability, the components<sup>2</sup> of its Hair Relaxer Products. R. 33(d) requires that the referring party specify the documents to be reviewed. Revlon could not have done more than to identify the specific bates labels for each document to be reviewed. Plaintiff simply needs to review the documents.<sup>3</sup> See *Sadofsky*, 252 F.R.D. 143, 2008 U.S. Dist. LEXIS 60214, \*148; *In re Sulfuric Acid Antitrust Litig.*, 231 F.R.D. 320, 2005-2 Trade Cas. (CCH) ¶ 74939, 2005 U.S. Dist. LEXIS 18265, at \*324 (N.D. Ill. 2005) ("[Attorneys] have no obligation to assist an opponent in establishing claims.")

Plaintiffs complain that they will be forced to examine these documents to ascertain the answers to their interrogatories, and instead seek to shift this burden onto Revlon. This is the type of equal burden contemplated by the Federal Rules and the direct purpose of R. 33(d). *Sadofsky*, 252 F.R.D. 143, 2008 U.S. Dist. LEXIS 60214, \*148. That Plaintiffs seek to have Revlon engage in the identical type of review and analysis of documents that

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<sup>1</sup> As Plaintiff is well aware, Revlon ceased the manufacture, sale, and distribution of any Hair Relaxer Products in 2023, with the cessation of the manufacture, sale, and distribution of most lines of those products occurring well before then. (See, e.g., Revlon Response to Interrogatory Set 3, No. 3).

<sup>2</sup> Plaintiffs did not define "Component" in its Interrogatory Demands.

<sup>3</sup> That Revlon did not title the documents in its answer to the interrogatory is not prejudicial. A simple review of the identified documents makes it apparent to the reader what they are.

Plaintiffs themselves refuse to do is in and of itself an implicit admission that the burdens upon both parties would be equal.

Revlon has turned over its documents, has compiled a spreadsheet delineating its products and their component ingredients, and has further created an exhibit to guide Plaintiff in interpreting the spreadsheet. Revlon has further pointed (by specific bates label document) to relevant responsive documents. Any efforts to conduct a further review of the documents and derive further meaning is equally burdensome to Plaintiff as it would be to Revlon and as such, Revlon has satisfied its obligations under R. 33(d).

Plaintiffs' complaints regarding Interrogatories Set 6, Nos. 3 and 10 are equally without merit. No. 3 requests the identification of warnings and instructions found on Revlon's Hair Relaxer products. Revlon responded by reference to numerous documents showing packaging, labeling, and advertising, from which Plaintiff could ascertain any applicable instructions and warnings. Plaintiff refuses to review these documents and instead requests that Revlon review them and then list out each warning and instruction to be found within the documents. Had Revlon a readymade list of warnings and instructions which it could turn over it surely would have done so. However, it does not and as such, the only way to discern any warnings or instructions from the identified documents is to review them. The burden upon Revlon and Plaintiff is equal and as such Revlon has properly referred to documents pursuant to R. 33(d).

Similarly, No. 10 requests information regarding each and every test or analysis performed by Revlon on its products. Revlon has stated explicitly that it cannot identify each and every test performed on its products; however, Revlon again, pursuant to R. 33(d) has pointed to specific bates labeled documents which demonstrate testing on Revlon's products. Plaintiffs simply need to review the documents. There is nothing that Revlon has readily available which would avoid the need to review the documents produced and as such, again as with No. 3 above, the burden upon Plaintiff is equal as it would be upon Revlon.

**Revlon Has Provided A List of Its Hair Relaxer Products and Identified Their Components to the Best of Its Ability Based Upon Information Within Its Possession**

Again, as noted above, Plaintiffs complain that Revlon has not provided a "final verified list of all of its hair relaxer products." However, Plaintiffs have already received a comprehensive listing of known hair relaxer products. On July 30, 2024, Revlon provided to Plaintiffs' counsel a product identification letter, that they requested; and then on August 9, 2024, Revlon provided supplemental responses to Interrogatory Set 1, No. 3 in the format requested by Plaintiffs' counsel. Both documents included, as requested, two separate charts – first a chart as to Revlon products, and second a chart as to Colomer<sup>4</sup> products. The charts identified brands, sub-brands, and types/categories/ names of products as well as the years of manufacture, by both companies, to the extent information

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<sup>4</sup> As Plaintiffs are well aware, between approximately 2000 and 2013, Revlon did not manufacture any Hair Relaxer products.

was known.<sup>5</sup> Revlon additionally provided information regarding third-party manufacturing.

As stated, Revlon also provided to Plaintiffs a Bill of Materials report<sup>6</sup> and a Bill of Materials Change report<sup>7</sup> which provide each component ingredient for the aforementioned hair relaxer products, and any changes, that Revlon has in its possession and was able to identify.<sup>8</sup>

Any complaint that Revlon has not sufficiently reduced its products to a chart identifying Steps 1-4 of the products and their components, relies on a misunderstanding of Revlon's burden under Rule 33(d). The distillation of information into Plaintiff's preferred format is clearly not Revlon's burden. As discussed at length above, "[w]here an unequal burden does not exist between the parties, the court will allow the responding party to produce business records, even if the interrogating party must examine multiple documents to ascertain the answers to its interrogatories." *Sadofsky*, 252 F.R.D. 143, 2008 U.S. Dist. LEXIS 60214, \*148 (E.D.N.Y. 2008). Again, as discussed above, the burden to Plaintiffs to organize the information produced by Revlon is equal to Plaintiff as it would be to Revlon. Revlon does not have a ready-made chart delineating the components of a 4-step hair relaxer product as contemplated by Plaintiff. If it did, it would have produced same in discovery. Setting aside the fact that only Plaintiffs can know what exactly they want to discern from this chart, its creation would require Revlon and its attorneys to conduct the same research and examination of the documents, that Plaintiff now refuses to do, and reduce same to Plaintiffs' contemplated chart. Plaintiffs are in no worse position to do this than Revlon is, and as such, this is the same type of equal burden as contemplated by R. 33(d).

**Revlon's Responses and Supplemental Responses to Interrogatories Are Sufficient**

Plaintiff also wrongly accuses Revlon of failing to respond to interrogatories. This presents a general example of a repeated pattern where Plaintiff vaguely accuses Revlon of failing to respond to interrogatories without providing specifics. As Plaintiffs, note, they did send letters to Revlon purporting to identify deficiencies with certain interrogatories. However, upon receipt of a response by Revlon that Plaintiffs' allegations were without merit, Plaintiff then backed off and identified new interrogatories which they for the first time claimed were deficient. As an example, when Plaintiffs initially submitted a draft of this JSR during the week of November 25<sup>th</sup>, they complained of deficiencies with Revlon's

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<sup>5</sup> There is no known preexisting chart of relaxer product names; the marketing names and packaging varied though the years. Variations could be dependent on terms such as: "Lye", "No Lye", "Base", "No Base", "Regular", "Mild", "Super", "Conditioning", "Oil", "Professional", "CNI", "Certified Natural Ingredients", "Miracle", "Sensitive", "Sodium", "Oil", "Brand Name" and "Sub-Brand Name". The variations as known by Revlon have been identified.

<sup>6</sup> The Bill of Materials excel report identifies the following: Brand, Sub-Brands, Product/Code Numbers, Material Description, Component Code Numbers, Component Descriptions, Data Validity, Date Created, Item Number, Base Quantity, Base Unit Of Measure, Component Quantity, Component Unit, Follow-Up Codes, Change Numbers" with the requested information, as available to Revlon.

<sup>7</sup> The Bill of Materials Change report identifies the following : material codes, modification types, components, descriptions, change numbers, modification fields, old and new values, and dates.

<sup>8</sup> As this Court is aware , the issue of The Colomer Group computer system change over in 2011 to SAP is an issue before Professor Grossman .

responses to Set 4, Nos. 2-3; Set 6, Nos. 8-9; and Set 7, Nos. 7 and 14. Now in Plaintiff's latest draft they make no complaints as to these interrogatories and instead focus on Set 6, Nos. 3 and 10. This makes it difficult to ascertain Plaintiffs' true issues with Revlon's responses.

By way example, Plaintiff in its initial draft of the JSR, complaint that Revlon had not properly answered Interrogatory Set 4, No. 2. This interrogatory asks whether Revlon has had any communications with other hair relaxer manufacturers regarding the design, development, or use of hair relaxer products. Revlon responded that it has not, and any claim that Revlon has not fully responded to this interrogatory is meritless. Revlon is not obligated to respond beyond the question posed to it. *See In re Sulfuric Acid Antitrust Litig.*, 231 F.R.D. 320, 2005-2 Trade Cas. (CCH) ¶ 74939, 2005 U.S. Dist. LEXIS 18265, at \*324 (N.D. Ill. 2005) ("Defendants [are] only obligated to answer the questions that were asked, and [are] not required to guess that information beyond that which was specified was being sought.")

In other instances, for example, in response to Interrogatory Set 4, Number 3, and Interrogatory Set 7, Number 7, Revlon responded that it had no responsive information in its possession. Plaintiff's disappointment in this fact is immaterial, and courts have ruled that a statement of no responsive information constitutes a sufficient response. *See, e.g., Alfaro v. AMTRAK*, 2012 U.S. Dist. LEXIS 10255, \*11 (E.D. La. 2012) ("The current responses stating that defendants have no responsive information or materials in their possession, custody or control are sufficient."); *Bumgarner v. Hart*, 2007 U.S. Dist. LEXIS 214, \*18 (D.N.J. 2007) (noting that a Court cannot order a party to answer an interrogatory about which it has no information).

These examples which are representative of the types of interrogatories and responses with which Plaintiff takes issue show that a further meet and confer would be unproductive and Revlon believes such further meetings are unnecessary.

**Sally Beauty Supply LLC:**

Issues Requiring Intervention: None at this time.

**Strength of Nature LLC:**

As discussed at the November 14, 2024 status hearing and memorialized in the Court's November 19, 2024 Order (*see* ECF No. 956), Strength of Nature was ordered to respond to the PSC's October 7, 2024 letter on or before November 29, 2024. Strength of Nature provided their response on November 29, 2024. The parties met and conferred on the November 29, 2024 response from SON on December 3 and December 4. The parties provide the following update:

**PSC’s Position:** Beyond the deficiencies noted above and in the attached Chart (Ex. A) as to all Defendants<sup>9</sup>, Plaintiffs seek (a) Supplemental Interrogatory Responses specifically identifying each hair relaxer product, its component parts and the dates marketed/sold, (b) as discussed at length with SON, the production documents identified alleging to provide the component parts do not match the product names provided for SON products and supplemental responses clarifying these discrepancies are needed, (c) a specific response to the lists provided in Plaintiffs October 7 letter for product labels, Cosmetic Product Safety Reports and Product Disclosure Forms which indicate missing documents for SON products or components. Specifically, Plaintiffs are requesting a deadline of December 27, 2024, by which SON will confirm that all product labels and production of “certain documents” as outlined in our July 2024 and October 7, 2024 letters relating to Cosmetic Product Safety Reports, Product Disclosure Forms, Standard Operating Procedures, Safety Data Sheets, Product Labels and Product Composition Reports (the various documents by which SON maintains its product, component and ingredient information) have been produced for all SON products and components identified.

**Strength of Nature’s Position:**

**Strength of Nature’s Position:** Strength of Nature has made significant efforts to address Plaintiffs’ concerns. In response to Plaintiffs’ October 7 letter, Strength of Nature responded on November 29 and produced documents on October 31, November 13, and November 29. After these productions, the parties held meet and confer sessions on December 3 and 4. At both meet and confer sessions, Strength of Nature stated its willingness to address any purported deficiencies or gaps identified by Plaintiffs and proposed a rolling process for addressing gaps as Plaintiffs reviewed the documents, provided that Plaintiffs could provide clear instruction about what they believed those gaps were. A rolling structure was necessary because Plaintiffs had not completed their review of documents, and therefore could not definitively state what was still outstanding. Despite initially expressing interest in that process (with the caveat that the details were to-be-negotiated), and scheduling a December 5 session to discuss requests for clarification from Plaintiffs’ October 7 letter, Plaintiffs abruptly called off the session two minutes before it was set to begin and sent, for the first time, a draft of the above statement and “Exhibit A.” Strength of Nature responds to each of the requests in Plaintiffs’ statement below.

**Plaintiffs’ Request to All Defendants and the Attached Exhibit A**

Strength of Nature incorporates Defendants’ position on Plaintiffs’ “omnibus interrogatory” in Section I, above, while highlighting the impropriety, burden, and

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<sup>9</sup> Plaintiffs note that, for many of the products listed in Ex. A for Defendant SON, at least one label and/or other type of ingredient document has been produced by Defendants including several thousand documents on November 29, 2024 which Plaintiffs are continuing to review; however, Plaintiff has been unable to identify labels and/or other types of ingredient documents for each product spanning the entire time that product was on the market and SON’s Interrogatory responses are insufficient. As an example, for SON’s African Pride Olive Miracle Deep Conditioning Crème-on-Crème No-Lye Relaxer 8 Salon Pack Touch-Ups (Regular), Plaintiffs have identified a label from April 21, 2023, but, as represented by SON in its Second Supplemental Responses to Plaintiff’s First Set of Interrogatories Nos. 1 and 4-11, this product has been on the market since 2009 and Plaintiffs are unable to ascertain whether this label has been in use since 2009 or if it was updated at any point given the discovery responses and documents produced to date. Plaintiff reserves the right to update this list additional information is confirmed within the November 29, 2024 production documents.

inefficiency of Plaintiffs’ approach as to Strength of Nature. Plaintiffs have not fulfilled their obligation under the Federal Rules and rules of this Court to review Strength of Nature’s productions and provide specific, actionable feedback. Exhibit A does not do that. It categorically lists scores of Strength of Nature products under vague categories of deficiencies. For example, it broadly claims ninety-seven products are “missing dates product was on the market” (*see* Ex. A at 82-85), but does not provide sufficient detail to allow Strength of Nature to address these claims effectively. As one example, Exhibit A lists “UltraSheen Ultra Moisturizing No-Lye Relaxer, Super with Keratin” as “missing dates product was on the market;” yet Strength of Nature’s prior interrogatory response clearly states that this product was sold from 2016 to 2018.

Brand	Product	Period of Sale
UltraSheen	UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular with Keratin	2016-2018

*Compare* Ex. A at 85 with Second Supplemental Response to Interrogatory Set One, No. 4. Plaintiffs’ failure to reconcile this response with their claims highlights that Exhibit A is outdated and unclear. Strength of Nature cannot address alleged deficiencies without clear, updated direction from Plaintiffs based on their review of the documents and information produced.

**Subsection (a): Supplemental Interrogatory Responses**

At the December 3 and 4 meet and confers, Plaintiffs acknowledged that they were still reviewing Strength of Nature’s October 31, November 13, and November 29 productions and could not confirm which gaps, if any, remained. Strength of Nature proposed a straightforward process: Plaintiffs should complete their review, update their list of purported deficiencies, and meet with Strength of Nature to address remaining issues. This approach achieves the same end as Plaintiffs’ request but ensures clarity and efficiency by avoiding guesswork.

Plaintiffs have not updated their October 7 list (of thirty-four potential products) to account for Strength of Nature’s recent productions, making it unclear which labels or component parts Plaintiffs still believe are missing. Further, Strength of Nature has already provided the dates when each product was sold in its Second Supplemental Response to Interrogatory Set One, No. 4. Strength of Nature requests that the Court require Plaintiffs to complete their review and identify specific deficiencies before seeking further supplementation.

**Subsection (b): Document Discrepancies**

During the December 3 and 4 meet and confers, Plaintiffs raised twenty-three specific questions in total from their October 7 letter. Here, Plaintiffs’ questions were based on their review of documents and were focused on specific issues or specific products, such that Strength of Nature had sufficient information about the issue to investigate and form an answer. Strength of Nature investigated these issues and was prepared to provide detailed responses during the December 5 meet and confer, which Plaintiffs cancelled. Given that

Plaintiffs cancelled the meet and confer where this information would have been shared, Strength of Nature will now provide written responses to these questions.

**Subsection (c): Purported Missing Consumer Product Safety Reports and Disclosure Forms**

Strength of Nature's position on purported missing labels is addressed in subsection (a). Regarding Consumer Product Safety Reports and Product Disclosure Forms, Plaintiffs have not identified specific information they believe is missing. Their October 7 letter predates Strength of Nature's recent productions, and Plaintiffs admit they are still reviewing these documents. *See* n.10, *supra*. Strength of Nature will investigate and address any purported deficiency once Plaintiffs provide an updated list of outstanding issues. Plaintiffs provided the last such list in July 2024, before custodial discovery began and thousands of documents were produced.

**Confirmation of Document Productions**

Plaintiffs' request for confirmation that all labels and composition documents be produced by a date certain is premature. Fact discovery does not close for another two-and-a-half months, and Strength of Nature has prioritized the production of custodial regulatory documents, and Go-gets (where they exist), likely to contain the requested information. Plaintiffs are still reviewing these documents and have not provided specific feedback to clarify what, if anything, is still outstanding. Strength of Nature cannot unequivocally confirm the completeness of these broad categories of documents before the close of fact discovery.

III. **Status of Pending Briefs/Motions/Orders:**

- a. **Plaintiffs' Motion to Enforce Orders Against L'Oréal USA:** On August 1, 2024, the PSC moved for an order enforcing the Court's December 27, 2023, Order and March 4, 2024, Order regarding the production, by L'Oréal USA of documents responsive to Plaintiffs' discovery requests in the control of L'Oréal USA's French parent, L'Oréal S.A (*see* ECF No. 784). L'Oréal USA filed its response on September 9, 2024 (*see* ECF No. 834). On September 16, 2024, the PSC filed its reply (*see* ECF No. 839) and the matter has been referred to Special Master Grossman pursuant to the Court's Minute Order dated September 18, 2024 (*see* ECF No. 841).

A conference was held before Special Master Grossman on October 8, 2024 with counsel for Plaintiffs and, L'Oréal USA in attendance. Counsel for L'Oréal S.A. was not in attendance. During this conference, Special Master Grossman requested that by October 15, 2024 Plaintiffs provide L'Oréal USA with an amended list of requests for production for which they believe L'Oréal USA should be producing documents from L'Oréal S.A. L'Oréal USA provided its position and/or objection on each request on October 22, 2024. At the request of Special Master Grossman and following an additional meet and confer between Plaintiffs and L'Oréal USA

to attempt resolution on disagreements, the list was sent to Special Master Grossman on October 30, 2024.

On November 11, 2024, Special Master Grossman requested that L’Oréal USA supplement their response to advise whether it is prepared to respond to any of the approximately 90 RFPs requested by the PSC and for any RFPs where an objection remains, to state what is disproportionate or unduly burdensome about that particular RFP. L’Oréal USA provided their supplemental response on November 22, 2024.

IV. **Class Discovery Status:** On November 13, 2024, Defendants L’Oréal USA, Inc., L’Oréal USA Products, Inc, and Softsheen-Carson, LLC served its First Set of Interrogatories and Requests for Production of Documents on all plaintiffs named in the Master Class Complaint. Plaintiffs requested and were granted an additional 45 days to respond to respond to these discovery requests.

V. **Plaintiff Discovery Issues: Plaintiff-Redacted Medical Records**

At the November 14, 2024 status hearing and in the JSR in advance of the hearing, Defendants raised the issue of alleged inappropriate redactions by plaintiffs to documents produced as part of their initial discovery responses. The Court’s November 19, 2024, Order (*see* ECF No. 956) required the Parties to continue to meet and confer on the issue to determine if they would be able to resolve the issue without Court intervention. The Parties continue to meet and confer and agree that additional time to meet and confer on this issue will be productive. The Parties will report on their progress in the January 2025 Joint Status Report and be prepared to address any outstanding issues at the January 2025 Discovery Hearing.

Dated: December 6, 2024

**FOR PLAINTIFFS:**  
Respectfully Submitted,

/s/Edward A. Wallace

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**EXHIBIT A**

**DEFENDANT AVLON**

## Defendant Avlon Missing Product Identification Information

### Product (kit/system) missing dates that product was on the market:

- As Plaintiffs review the document production that continues to come in on a rolling production, it occasionally appears that there may be additional products that were not identified in discovery. Plaintiffs have addressed similar concerns in the past, which previously led to the disclosure of additional products. Plaintiffs will address this with Avlon Counsel as those documents are discovered and these questions arise in this future. At this time, because documents are continuing to be produced by Avlon and then Plaintiffs need to review the documents, Plaintiffs cannot state with certainty as whether there are or will be additional missing products and/or dates. However, there are no products and/or dates to address at this point in time.

### Product (kit/system) missing ingredients for the relaxer in each product:

- 1985-1991 (Ingredient Lists and Formularies)

In Interrogatory Answers, Avlon states that it “**continues to search** for its formulations and ingredient lists from 1985-1991.” See Avlon’s Second Supplemental Answers and Objections to Plaintiffs’ Sixth Set of Interrogatories, page 12 (emphasis added).

However, in a meet-and-confer on 12/2/2024, Avlon counsel explained that it **does not know and will not know** the ingredients and/or formularies that were used from 1985-1991.

Plaintiffs are requesting that Avlon update its Interrogatory Answers to clearly admit that it does not know and will not be able to determine the ingredients and/or formularies used in any of its products from 1985-1991.

- 1991-1999 (Ingredient Lists and Formularies)

In Interrogatory Answers, Avlon states that “Avlon’s formulations and ingredient lists for its hair relaxer products from on or about 1991 to on or about 1999 **may** be located in Avlon lab books from that relevant time period.” See Avlon’s Second Supplemental Answers and Objections to Plaintiffs’ Sixth Set of Interrogatories, page 12 (emphasis added). In its Interrogatory Answer, it then cites to a large range of Bates numbers. It also states to “please see the attached Exhibit A identifying documents that **may** have information responsive to this Interrogatory.” *Id.* (emphasis added). It also cites a large Bates range of documents which “contain formulations and ingredients; however, Avlon cannot, **at this time**, attest to which formulations were actually manufactured and sold.” *Id.* Avlon lists the Bates Numbers to certain lab books or other documents that **may** include this information. The Interrogatory Answers further states that “Avlon cannot, **at this time**, attest to which formulations were actually manufactured and sold.” See Avlon’s Second Supplemental Answers and Objections to Plaintiffs’ Sixth Set of Interrogatories, page 12 (emphasis added).

## Defendant Avlon Missing Product Identification Information

During a meet-and-confer on 12/2/2024, Avlon counsel explained that for the time period of 1991-1999, it **does not know and will not know** which of the ingredient lists and formularies from those lab books actually represent the ingredient list/formulary manufactured and sold. Thus, Avlon's investigation is not still continuing, as suggested in written discovery.

Plaintiffs are requesting that Avlon update its Interrogatory Answers to clearly admit that it does not know and will not be able to determine which of the ingredient lists/formularies from the cited documents are the accurate depiction of the ingredients/formularies that went into production from 1991-1999.

In addition, Plaintiffs have discovered additional formularies and ingredient lists from lab books and similar documents which appear to be of similar integrity as the documents cited in Interrogatory Answers, but those documents were not specifically listed by Bates number in Avlon's Answers to Interrogatories. Plaintiffs request that Avlon update its discovery responses to also include a reference to these additional lab books and documents as representative of additional indications of the ingredient lists and formularies that may have gone into production from 1991-1999, but that it cannot state with certainty as to which ones actually went into production.

- 1999-Present (Ingredient Lists)

There are select products which have similar issues to those described above, but those issues extend beyond 1999. As such, Plaintiffs request that Avlon update its Interrogatory Answers to admit that it does not know which ingredients were used in the following products through the time frames noted below for each product:

- Affirm Crème Relaxer – Normal
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this product from the timeframe of 1999-2007.
- Affirm Crème Relaxer – Resistant
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this product from the timeframe of 1999-2007.
- Affirm Crème Relaxer – Control Formula Mild
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this

## Defendant Avlon Missing Product Identification Information

product after 1999, but that certain lab books may reflect the ingredient list that may have gone to market.

- Affirm Crème Relaxer – Control Formula Resistant
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this product from the timeframe of 1999-2007.
- Affirm Moisture Plus Crème Relaxer – Normal
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this during the year 1999.
- Affirm Moisture Plus Crème Relaxer – Resistant
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this product from the timeframe of 1999-2007.
- FiberGuard Crème Relaxer – Mild
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this during the year 1999.
- Affirm FiberGuard Normal Crème Relaxer
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this during the year 1999.
- Affirm FiberGuard Resistant Crème Relaxer
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this during the year 1999.
- Affirm FiberGuard Sensitive Scalp Crème Relaxer
  - In addition to the statements above regarding lack of knowledge of the ingredients up through 1999, Avlon should supplement its discovery response to indicate Avlon does not know the ingredient list for this during the year 1999.

## Defendant Avlon Missing Product Identification Information

### Product (kit/system) missing formularies for the relaxer in each product:

- 1985-1991 (Ingredient Lists and Formularies)

Plaintiffs incorporate their comments from the “Ingredients” section immediately above regarding the timeframe of 1985-1991. The same comments apply to formularies in the 1985-1991 timeframe.

- 1991-1999 (Ingredient Lists and Formularies) V

Plaintiffs incorporate their comments from the “Ingredients” section immediately above regarding the timeframe of 1985-1991. The same comments apply to formularies in the 1985-1991 timeframe.

- 1999-Present (Formularies)

In Avlon’s Interrogatory Answers, Avlon states it “also refers to the following [bates numbers] as containing **potentially** responsive information...about Avlon’s formulations and ingredients from about 1999 forward.” See Avlon’s Second Supplemental Answers and Objections to Plaintiffs’ Sixth Set of Interrogatories, page 12 (emphasis added).

Again, at a meet-and-confer on December 2, 2024, Avlon’s Counsel indicated that Avlon **cannot state with certainty and will not be able to state with certainty** as to which of those formularies actually went in to production for the time period of **1999-2006**. Thus, Avlon’s investigation is not still continuing, as suggested in written discovery.

Plaintiffs are requesting that Avlon update its Interrogatory Answers to clearly admit that it does not know and will not be able to determine which of the formularies are the accurate depiction of the formularies that went into production from 1999-2006.

In addition, plaintiffs have discovered additional formularies and ingredient lists from lab books and similar documents, but those were not specifically listed by Bates number in response to written Interrogatories. These appear to be additional potential ingredient lists and formularies which were omitted from Avlon’s Interrogatory Answers and which Plaintiffs should be able to point to as additional ingredient lists and formularies that may have been the versions manufactured and sold. Plaintiffs request that Avlon update its discovery responses to also include a reference to these additional lab books and documents as representative of additional indications of the ingredient lists and formularies that may have gone into production from 1999-Present, but that it cannot state with certainty as to which ones actually went into production.

## **Defendant Avlon Missing Product Identification Information**

- Additional Missing Information (Formularies)

Avlon has not produced any formularies for the following three products. It should be compelled to produce formularies and/or admit, in discovery responses, that it does not have any formularies for these products:

- Syntonics International Sensitive Scalp Conditioning Crème Relaxer Normal Strength (No Mix Formula)
- Syntonics International Sensitive Scalp Conditioning Crème Relaxer Mild Strength (No Mix Formula)
- Syntonics International Sensitive Scalp Conditioning Crème Relaxer - Resistant Strength (No Mix Formula)

### **Component parts within a product (kit/system) missing formularies:**

The same general issues described above (regarding 1985-1991, 1991-1999, and 1999-Present) are present as it relates to the companion products.

### **Product (kit/system) missing artwork and labels for a product:**

*Avlon has produced some documents including artwork and labels in their document production(s). Plaintiffs are still reviewing to determine whether the productions are sufficient in providing artwork and labels for each product and component part within each product for the duration the product was on the market.*

### **Product (kit/system) missing IFUs for a product:**

*Avlon has produced some documents including Instructions for Use (IFUs) in their document production(s). Plaintiffs are still reviewing to determine whether the productions are sufficient in providing IFUs for each product and component part within each product for the duration the product was on the market.*

**DEFENDANT HOUSE OF CHEATHAM**

## **Defendant House of Cheatham Missing Product Identification Information**

### **Product (kit/system) missing dates that product was on the market:**

- All Hair Relaxer Kits/Systems - House of Cheatham only provided brand-level data.

### **Product (kit/system) missing dates that each component part within a product was on the market:**

- All Hair Relaxer Kits/System Components - House of Cheatham only provided brand-level data.

### **Product (kit/system) missing ingredients for the relaxer in each product:**

\*\*House of Cheatham has produced some documents including ingredient lists in their document productions. Plaintiffs are still reviewing to determine whether the productions are sufficient in providing ingredients for each product and component part within each product for the duration the product was on the market.

### **Component parts within a product (kit/system) missing ingredients:**

\*\*House of Cheatham has produced some documents including ingredient lists in their document productions. Plaintiffs are still reviewing to determine whether the productions are sufficient in providing ingredients for each product and component part within each product for the duration the product was on the market.

### **Product (kit/system) missing comp for the relaxer in each product:**

House of Cheatham has not identified component parts for the following Products (kit/system):

- Originals by Africa's Best Coconut Crème Ultra-Conditioning Relaxer's System - Kit ID: 295
- Org Kit, Reg - Kit ID: 216
- Org Kit, Sup - Kit ID: 217

### **Component parts within a product (kit/system) missing formularies:**

Plaintiffs are missing master formulas for the following components in the identified Products (kit/system):

- AB Base – Component/Formula ID: 111
- Org Touch-Up Act, Reg - Component/Formula ID: 220
- Org Touch-Up Act, Sup - Component/Formula ID: 221
- Org Touch-Up Base - Component/Formula ID: 225
- Kids Act Reg - Component/Formula ID: 501

## **Defendant House of Cheatham Missing Product Identification Information**

- Kids Act Course - Component/Formula ID: 500
- KO Base - Component/Formula ID: 506
- KO Softening Creme - Component/Formula ID: 520
- KO Texture Control - Component/Formula ID: 518
- Originals Honey & Castor Softening Creme - Component/Formula ID: 2117
- Organics AB Conditioning Creme Relaxer - Component/Formula ID: 214
- TMW Easy Comb Softening Creme - Component/Formula ID: 269
- Natural Conditioning Olive Oil Hair Relaxer, Super - Component/Formula ID: 261
- Olive Oil Shine Spray/ Extra Virgin Hair Polish - Component/Formula ID: 245
- Olive & Shea Deep Conditioning Masque - Component/Formula ID: 248
- Originals Coconut Creme Conditioning Activator - Component/Formula ID: 2111
- Originals Coconut Milk Neutralizing Hair Wash - Component/Formula ID: 2112
- Originals Coconut Milk Rinse Out Conditioner - Component/Formula ID: 2113
- Originals Coconut Creme Moisture Intensive Relaxer Creme - Component/Formula ID: 2110
- Originals Coconut Shine Regen Dry Oil - Component/Formula ID: 299
- Originals Coconut Cuticle Stabilizer - Component/Formula ID: 2114
- Originals Coconut Scalpguard Protective Scalp Base - Component/Formula ID: 2115

### **Product (kit/system) missing artwork and labels for a product:**

\*\*House of Cheatham has produced some documents including artwork and labels in their document productions. Plaintiffs are still reviewing to determine whether the productions are sufficient in providing artwork and labels for each product and component part within each product for the duration the product was on the market.

### **Product (kit/system) missing IFUs for a product:**

\*\*House of Cheatham has produced some IFUs in their document productions. However, none of the documents were identified, either via narrative response or by reference to Bates numbers, in House of Cheatham's Interrogatory response. Plaintiffs are still reviewing to determine whether the productions are sufficient in providing IFUs for each product and component part within each product for the duration the product was on the market.

**DEFENDANT L'ORÉAL**

## **Defendant L'Oréal Missing Product Identification Information**

### **Product (kit/system) missing dates that product was on the market:**

- Optimum Advanced Keratin Whipped Crème Relaxer (*Missing for other strengths including Medium/Normal; Coarse/Resistant*)
- Optimum Care Bodifying Relaxer (*Date on box (2012) of Optimum Care Bodifying Relaxer (mild) referenced in the bates provided in the response to Interrogatory No. 3 response does not correspond with the market date provided in the Rogg responses (2009)*)

### **Product (kit/system) missing dates that each component part within a product was on the market:**

- Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer – For All Hair Types
- Dark and Lovely Beautiful Beginnings No Mistake Curl Softener – For All Curly Hair Types
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Regular
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Super
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – For Color Treated Hair
- Dark and Lovely Triple Nourished Silkening Relaxer – Regular
- Dark and Lovely Triple Nourished Silkening Relaxer – Super
- Optimum Advanced Keratin Whipped Crème Relaxer (*missing components for Coarse/Resistant strength*)
- Optimum Care Bodifying Relaxer (*missing component parts from 2009-2012*)
- Optimum Salon Haircare Defy Breakage No-Lye Relaxer – Regular
- Optimum Salon Haircare Amla Legend Relaxer
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (mild)
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (super) (*missing all component parts for Precise No Lye Liquid Activator (42223 SS) for 2010 – 2021*)
- Mizani Butter Blend Sensitive Scalp Relaxer (*missing Mizanie Butter Blend Sensitive Scalp No Lye Activator (42631 SS; 42631 SS1) for 2015-2016 and 2018-2022*)
- Mizani Sensitive Scalp Relaxer (*missing Mizani Sensitive Scalp Neutralizing Shampoo (42649 ss6; 42649 SS12) from 2017 – 2022 and Mizani Sensitive Scalp No Lye Activator (42207 SS2; 44207 SS3) from 2017 – 2022*)
- Roots of Nature Restorative Relaxer – Normal/Medium
- Roots of Nature Restorative Relaxer – Fine

### **Missing data to confirm if sold as Product (kit/system) or Component part:**

- Optimum Multi-Mineral Reduced pH Crème Relaxer Regular Strength
- Optimum Multi-Mineral Reduced pH Crème Relaxer Super Strength
- Optimum Multi-Mineral Reduced pH Crème Relaxer Mild Strength
- Mizani Butter Blend Relaxer (Fine/Color Treated)

## Defendant L'Oréal Missing Product Identification Information

- Mizani Butter Blend Relaxer (Medium/Normal)
- Mizani Butter Blend Relaxer (Coarse/Resistant)
- Mizani Butter Blend Sensitive Scalp Relaxer
- Mizani Butterblend Prosolvent Relaxer - Coarse/Resistant
- Mizani Butterblend Prosolvent Relaxer - Fine/Color Treated
- Mizani Classic Relaxer Medium/Normal
- Mizani Classic Relaxer – Coarse/Resistant
- Mizani Classic Relaxer – Fine/Color Treated Hair
- Alternatives No Lye Relaxer – Regular
- Alternatives No Lye Relaxer – Super
- Bantu Relaxer – Regular
- Bantu Relaxer – Mild
- Bantu Relaxer – Super
- Bantu No-Lye No Mix – Mild
- Bantu No-Lye No Mix – Regular
- Bantu No-Lye No Mix – Super
- Bantu No-Lye – Mild
- Bantu No-Lye – Regular
- Bantu No-Lye – Super
- Bantu Pretail
- Bantu Professional Relaxer
- Classy Curl Relaxer
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Fine
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Thick
- Dark & Lovely Diva Relaxer
- Dark & Lovely Excelle Relaxer Salon
- Dark & Lovely Relaxer - Regular
- D&L Relaxer - Plus
- Excelle Relaxer - Regular
- Excelle Relaxer - Plus
- Frizz Free No-Lye Relaxer - Regular
- Frizz Free No-Lye Relaxer - Super
- Gentle Treatment Relaxer - Regular
- Gentle Treatment Relaxer - Super
- Gentle Treatment Professional Relaxer
- Hairwerks Relaxer - Mild

## Defendant L'Oréal Missing Product Identification Information

- Hairwerks Relaxer - Regular
- Hairwerks Relaxer - Super
- Hairwerks Maximum Conditioning Relaxer
- Johnson Iman Cherrywood Relaxer
- Johnson Iman Ebonywood Relaxer
- L'Oréal Radiance Permanent Creme Relaxer
- Lets Jam Relaxer - Regular
- Lets Jam Relaxer - Super
- Mizani Professional Relaxer
- Mizani Relaxer Sensitive Scalp
- Mizani Relaxer
- Mizani Rhelaxer - Fine/Color Treated
- Mizani Rhelaxer - Coarse/Resistant
- Optimum Care No Lye Relaxer - Regular
- Optimum Care No Lye Relaxer - Super
- Optimum Conditioning Crème Relaxer - Regular
- Optimum Conditioning Crème Relaxer - Mild
- Optimum Conditioning Crème Relaxer - Super
- Optimum Conditioning Ultra Sensitive Scalp Relaxer
- Optimum Professional
- Optimum Relaxer - Super
- Optimum Relaxer - Regular
- Optimum Relaxer - Mild
- Optimum Sensitive Scalp Relaxer
- Optimum Rx Relaxer - Mild
- Optimum Rx Relaxer - Regular
- Precise Pretail
- Precise Relaxer - Regular
- Precise Relaxer - Mild
- Precise Relaxer - Super
- Precise Conditioning Relaxer - Regular
- Precise Conditioning Relaxer - Super
- Precise No-Lye Supreme Relaxer
- Sensitive by Nature Professional Relaxer
- Sensitive by Nature Relaxer
- Sensitive by Nature Silken Straight Relaxer - Regular

## **Defendant L'Oréal Missing Product Identification Information**

- Sensitive by Nature Silken Straight Relaxer - Super
- Sensitive by Nature Comfort Zone Relaxer
- Sof n' Free Cortical Relaxer - Mild
- Sof n' Free Cortical Relaxer - Regular
- Sof n' Free Cortical Relaxer - Super
- Sof n' Free No Lye Relaxer - Regular
- Sof n' Free No Lye Relaxer - Super
- Sportin Waves Relaxer
- Sportin Waves Relaxer - Coarse Hair
- Sportin Waves Texturizing Comb-Thru Relaxer
- Sportin Waves Professional Relaxer
- Tender Care No Lye Conditioning Relaxer
- Ultra Sheen No Base Relaxer - Mild
- Ultra Sheen No Base Relaxer - Regular
- Ultra Sheen No Base Relaxer - Super
- Ultra Sheen Creme Relaxer
- Ultra Sheen Relaxer – Perfect Professional
- Ultra Sheen Relaxer – Perfect Oil Moisture
- Ultra Sheen No Lye Relaxer
- Ultra Sheen Professional
- Ultra Star Relaxer

### **Product (kit/system) missing identity of component parts within a product:**

- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – For Color Treated Hair (*Missing information produced for 6 Week Anti-Reversion System Styling Cream (42980 SS1)*)
- Dark and Lovely Triple Nourished Silkening Relaxer – Super
- Optimum Advanced Keratin Whipped Crème Relaxer (*Missing component parts for the Coarse/Resistant strength*)
- Optimum Care Bodifying Relaxer (*Missing all component parts from 2009-2012*)

### **Product (kit/system) missing ingredients for the relaxer in each product:**

- Bantu No Base Relaxer Regular Strength
- Bantu No Base Relaxer Super Strength
- Bantu No Base Relaxer Mild Strength
- Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer – For All Hair Types
- Dark and Lovely Beautiful Beginnings No Mistake Curl Softener – For All Curly Hair Types

## Defendant L'Oréal Missing Product Identification Information

- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Regular
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Super
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – For Color Treated Hair
- Dark and Lovely Triple Nourished Silkening Relaxer – Regular
- Dark and Lovely Triple Nourished Silkening Relaxer – Super
- Optimum Advanced Keratin Whipped Crème Relaxer
- Optimum Care Bodifying Relaxer
- Optimum Multi-Mineral Reduced pH Crème Relaxer Regular Strength
- Optimum Multi-Mineral Reduced pH Crème Relaxer Super Strength
- Optimum Multi-Mineral Reduced pH Crème Relaxer Mild Strength
- Optimum Salon Haircare Defy Breakage No-Lye Relaxer – Regular
- Optimum Salon Haircare Amla Legend Relaxer
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (mild)
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (super)
- Mizani Butter Blend Relaxer (Fine/Color Treated)
- Mizani Butter Blend Relaxer (Medium/Normal)
- Mizani Butter Blend Relaxer (Coarse/Resistant)
- Mizani Butter Blend Sensitive Scalp Relaxer
- Mizani Butterblend Prosolvent Relaxer - Coarse/Resistant
- Mizani Butterblend Prosolvent Relaxer - Fine/Color Treated
- Mizani Classic Relaxer Medium/Normal
- Mizani Classic Relaxer – Coarse/Resistant
- Mizani Classic Relaxer – Fine/Color Treated Hair
- Mizani Sensitive Scalp Relaxer
- Roots of Nature Restorative Relaxer – Normal/Medium
- Roots of Nature Restorative Relaxer – Fine
- Alternatives No Lye Relaxer - Regular
- Alternatives No Lye Relaxer - Super
- Bantu Relaxer - Regular
- Bantu Relaxer - Mild
- Bantu Relaxer - Super
- Bantu No-Lye No Mix – Mild
- Bantu No-Lye No Mix – Regular
- Bantu No-Lye No Mix – Super
- Bantu No-Lye – Mild
- Bantu No-Lye – Regular

## Defendant L'Oréal Missing Product Identification Information

- Bantu No-Lye – Super
- Bantu Pretail
- Bantu Professional Relaxer
- Classy Curl Relaxer
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Fine
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Thick
- Dark & Lovely Diva Relaxer
- Dark & Lovely Excelle Relaxer Salon
- Dark & Lovely Relaxer - Regular
- D&L Relaxer - Plus
- Excelle Relaxer - Regular
- Excelle Relaxer - Plus
- Frizz Free No-Lye Relaxer - Regular
- Frizz Free No-Lye Relaxer - Super
- Gentle Treatment Relaxer - Regular
- Gentle Treatment Relaxer - Super
- Gentle Treatment Professional Relaxer
- Hairwerks Relaxer - Mild
- Hairwerks Relaxer - Regular
- Hairwerks Relaxer - Super
- Hairwerks Maxximum Conditioning Relaxer
- Johnson Iman Cherrywood Relaxer
- Johnson Iman Ebonywood Relaxer
- L'Oréal Radiance Permanent Creme Relaxer
- Lets Jam Relaxer - Regular
- Lets Jam Relaxer - Super
- Mizani Professional Relaxer
- Mizani Relaxer Sensitive Scalp
- Mizani Relaxer
- Mizani Rhelaxer - Fine/Color Treated
- Mizani Rhelaxer - Coarse/Resistant
- Optimum Care No Lye Relaxer - Regular
- Optimum Care No Lye Relaxer - Super
- Optimum Conditioning Crème Relaxer - Regular
- Optimum Conditioning Crème Relaxer - Mild
- Optimum Conditioning Crème Relaxer - Super

## Defendant L'Oréal Missing Product Identification Information

- Optimum Conditioning Ultra Sensitive Scalp Relaxer
- Optimum Professional
- Optimum Relaxer - Super
- Optimum Relaxer - Regular
- Optimum Relaxer - Mild
- Optimum Sensitive Scalp Relaxer
- Optimum Rx Relaxer - Mild
- Optimum Rx Relaxer - Regular
- Precise Pretail
- Precise Relaxer - Regular
- Precise Relaxer - Mild
- Precise Relaxer - Super
- Precise Conditioning Relaxer - Regular
- Precise Conditioning Relaxer - Super
- Precise No-Lye Supreme Relaxer
- Sensitive by Nature Professional Relaxer
- Sensitive by Nature Relaxer
- Sensitive by Nature Silken Straight Relaxer - Regular
- Sensitive by Nature Silken Straight Relaxer - Super
- Sensitive by Nature Comfort Zone Relaxer
- Sof n' Free Cortical Relaxer - Mild
- Sof n' Free Cortical Relaxer - Regular
- Sof n' Free Cortical Relaxer - Super
- Sof n' Free No Lye Relaxer - Regular
- Sof n' Free No Lye Relaxer - Super
- Sportin Waves Relaxer
- Sportin Waves Relaxer - Coarse Hair
- Sportin Waves Texturizing Comb-Thru Relaxer
- Sportin Waves Professional Relaxer
- Tender Care No Lye Conditioning Relaxer
- Ultra Sheen No Base Relaxer - Mild
- Ultra Sheen No Base Relaxer - Regular
- Ultra Sheen No Base Relaxer - Super
- Ultra Sheen Creme Relaxer
- Ultra Sheen Relaxer – Perfect Professional
- Ultra Sheen Relaxer – Perfect Oil Moisture

## **Defendant L'Oréal Missing Product Identification Information**

- Ultra Sheen No Lye Relaxer
- Ultra Sheen Professional
- Ultra Star Relaxer

### **Product (kit/system) missing formularies for the relaxer in each product:**

- Bantu No Base Relaxer Regular Strength
- Bantu No Base Relaxer Super Strength
- Bantu No Base Relaxer Mild Strength
- Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer – For All Hair Types
- Dark and Lovely Beautiful Beginnings No Mistake Curl Softener – For All Curly Hair Types
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Regular
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Super
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – For Color Treated Hair
- Dark and Lovely Triple Nourished Silkening Relaxer – Regular
- Dark and Lovely Triple Nourished Silkening Relaxer – Super
- Optimum Advanced Keratin Whipped Crème Relaxer
- Optimum Care Bodifying Relaxer
- Optimum Multi-Mineral Reduced pH Crème Relaxer Regular Strength
- Optimum Multi-Mineral Reduced pH Crème Relaxer Super Strength
- Optimum Multi-Mineral Reduced pH Crème Relaxer Mild Strength
- Optimum Salon Haircare Defy Breakage No-Lye Relaxer – Regular
- Optimum Salon Haircare Amla Legend Relaxer
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (mild)
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (super)
- Mizani Butter Blend Relaxer (Fine/Color Treated)
- Mizani Butter Blend Relaxer (Medium/Normal)
- Mizani Butter Blend Relaxer (Coarse/Resistant)
- Mizani Butter Blend Sensitive Scalp Relaxer
- Mizani Butterblend Prosolvent Relaxer - Coarse/Resistant
- Mizani Butterblend Prosolvent Relaxer - Fine/Color Treated
- Mizani Classic Relaxer Medium/Normal
- Mizani Classic Relaxer – Coarse/Resistant
- Mizani Classic Relaxer – Fine/Color Treated Hair
- Mizani Sensitive Scalp Relaxer
- Roots of Nature Restorative Relaxer – Normal/Medium
- Roots of Nature Restorative Relaxer – Fine
- Alternatives No Lye Relaxer - Regular

## Defendant L'Oréal Missing Product Identification Information

- Alternatives No Lye Relaxer - Super
- Bantu Relaxer - Regular
- Bantu Relaxer - Mild
- Bantu Relaxer - Super
- Bantu No-Lye No Mix – Mild
- Bantu No-Lye No Mix – Regular
- Bantu No-Lye No Mix – Super
- Bantu No-Lye – Mild
- Bantu No-Lye – Regular
- Bantu No-Lye – Super
- Bantu Pretail
- Bantu Professional Relaxer
- Classy Curl Relaxer
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Fine
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Thick
- Dark & Lovely Diva Relaxer
- Dark & Lovely Excelle Relaxer Salon
- Dark & Lovely Relaxer - Regular
- D&L Relaxer - Plus
- Excelle Relaxer - Regular
- Excelle Relaxer - Plus
- Frizz Free No-Lye Relaxer - Regular
- Frizz Free No-Lye Relaxer - Super
- Gentle Treatment Relaxer - Regular
- Gentle Treatment Relaxer - Super
- Gentle Treatment Professional Relaxer
- Hairwerks Relaxer - Mild
- Hairwerks Relaxer - Regular
- Hairwerks Relaxer - Super
- Hairwerks Maximum Conditioning Relaxer
- Johnson Iman Cherrywood Relaxer
- Johnson Iman Ebonywood Relaxer
- L'Oréal Radiance Permanent Creme Relaxer
- Lets Jam Relaxer - Regular
- Lets Jam Relaxer - Super
- Mizani Professional Relaxer

## Defendant L'Oréal Missing Product Identification Information

- Mizani Relaxer Sensitive Scalp
- Mizani Relaxer
- Mizani Rhelaxer - Fine/Color Treated
- Mizani Rhelaxer - Coarse/Resistant
- Optimum Care No Lye Relaxer - Regular
- Optimum Care No Lye Relaxer - Super
- Optimum Conditioning Crème Relaxer - Regular
- Optimum Conditioning Crème Relaxer - Mild
- Optimum Conditioning Crème Relaxer - Super
- Optimum Conditioning Ultra Sensitive Scalp Relaxer
- Optimum Professional
- Optimum Relaxer - Super
- Optimum Relaxer - Regular
- Optimum Relaxer - Mild
- Optimum Sensitive Scalp Relaxer
- Optimum Rx Relaxer - Mild
- Optimum Rx Relaxer - Regular
- Precise Pretail
- Precise Relaxer - Regular
- Precise Relaxer - Mild
- Precise Relaxer - Super
- Precise Conditioning Relaxer - Regular
- Precise Conditioning Relaxer - Super
- Precise No-Lye Supreme Relaxer
- Sensitive by Nature Professional Relaxer
- Sensitive by Nature Relaxer
- Sensitive by Nature Silken Straight Relaxer - Regular
- Sensitive by Nature Silken Straight Relaxer - Super
- Sensitive by Nature Comfort Zone Relaxer
- Sof n' Free Cortical Relaxer - Mild
- Sof n' Free Cortical Relaxer - Regular
- Sof n' Free Cortical Relaxer - Super
- Sof n' Free No Lye Relaxer - Regular
- Sof n' Free No Lye Relaxer - Super
- Sportin Waves Relaxer
- Sportin Waves Relaxer - Coarse Hair

## Defendant L'Oréal Missing Product Identification Information

- Sportin Waves Texturizing Comb-Thru Relaxer
- Sportin Waves Professional Relaxer
- Tender Care No Lye Conditioning Relaxer
- Ultra Sheen No Base Relaxer - Mild
- Ultra Sheen No Base Relaxer - Regular
- Ultra Sheen No Base Relaxer - Super
- Ultra Sheen Creme Relaxer
- Ultra Sheen Relaxer – Perfect Professional
- Ultra Sheen Relaxer – Perfect Oil Moisture
- Ultra Sheen No Lye Relaxer
- Ultra Sheen Professional
- Ultra Star Relaxer

### **Component parts within a product (kit/system) missing formularies:**

- Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer – For All Hair Types (*Missing D&L Beautiful Beginnings Scalp and Hair Protector Gel (42211 SS); D&L Beautiful Beginnings Neutralizing Shampoo (42453 SS6); D&L Beautiful Beginnings Deep Conditioner (42889 SS6); D&L Beautiful Beginnings Oil Moisturizer (42887 SS5)*)
- Dark and Lovely Beautiful Beginnings No Mistake Curl Softener – For All Curly Hair Types (*Missing D&L Beautiful Beginnings Scalp and Hair Protector Gel (42211 SS); D&L Beautiful Beginnings Softener Cream (42890 SS); D&L Beautiful Beginnings Neutralizing Shampoo (42453 SS6); D&L Beautiful Beginnings Deep Conditioner (42889 SS6); D&L Beautiful Beginnings Curl Cream (42888 SS9)*)
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Regular (*Missing formulary spreadsheet for Shea Butter Conditioning Relaxer Crème (42610 SS8); Missing formulary spreadsheet for 6 Week Anti-Reversion System Styling Cream (42980 SS1).*)
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – For Color Treated Hair (*Missing 6 Week Anti-Reversion System Styling Cream (42980 SS1).*)
- Optimum Salon Haircare Defy Breakage No-Lye Relaxer – Regular (*Missing formulary spreadsheets for Optimum Defy Breakage Strengthening Pre-Treatment (42443 SS2); Optimum Defy Breakage No-Lye Conditioning Relaxer Base (42660 SS)*)
- Roots of Nature Restorative Relaxer – Normal/Medium (*Missing formulary spreadsheet for Roots of Nature Strengthening Oil Moisturizer (42675 SS1)*)
- Roots of Nature Restorative Relaxer – Fine (*Missing formulary spreadsheet for Roots of Nature Strengthening Oil Moisturizer (42675 SS1)*)
- Alternatives No Lye Relaxer - Regular
- Alternatives No Lye Relaxer - Super

## Defendant L'Oréal Missing Product Identification Information

- Bantu Relaxer - Regular
- Bantu Relaxer - Mild
- Bantu Relaxer - Super
- Bantu No-Lye No Mix – Mild
- Bantu No-Lye No Mix – Regular
- Bantu No-Lye No Mix – Super
- Bantu No-Lye – Mild
- Bantu No-Lye – Regular
- Bantu No-Lye – Super
- Bantu Pretail
- Bantu Professional Relaxer
- Classy Curl Relaxer
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Fine
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Thick
- Dark & Lovely Diva Relaxer
- Dark & Lovely Excelle Relaxer Salon
- Dark & Lovely Relaxer - Regular
- D&L Relaxer - Plus
- Excelle Relaxer - Regular
- Excelle Relaxer - Plus
- Frizz Free No-Lye Relaxer - Regular
- Frizz Free No-Lye Relaxer - Super
- Gentle Treatment Relaxer - Regular
- Gentle Treatment Relaxer - Super
- Gentle Treatment Professional Relaxer
- Hairwerks Relaxer - Mild
- Hairwerks Relaxer - Regular
- Hairwerks Relaxer - Super
- Hairwerks Maxximum Conditioning Relaxer
- Johnson Iman Cherrywood Relaxer
- Johnson Iman Ebonywood Relaxer
- L'Oréal Radiance Permanent Creme Relaxer
- Lets Jam Relaxer - Regular
- Lets Jam Relaxer - Super
- Mizani Professional Relaxer
- Mizani Relaxer Sensitive Scalp

## Defendant L'Oréal Missing Product Identification Information

- Mizani Relaxer
- Mizani Rhelaxer - Fine/Color Treated
- Mizani Rhelaxer - Coarse/Resistant
- Optimum Care No Lye Relaxer - Regular
- Optimum Care No Lye Relaxer - Super
- Optimum Conditioning Crème Relaxer - Regular
- Optimum Conditioning Crème Relaxer - Mild
- Optimum Conditioning Crème Relaxer - Super
- Optimum Conditioning Ultra Sensitive Scalp Relaxer
- Optimum Professional
- Optimum Relaxer - Super
- Optimum Relaxer - Regular
- Optimum Relaxer - Mild
- Optimum Sensitive Scalp Relaxer
- Optimum Rx Relaxer - Mild
- Optimum Rx Relaxer - Regular
- Precise Pretail
- Precise Relaxer - Regular
- Precise Relaxer - Mild
- Precise Relaxer - Super
- Precise Conditioning Relaxer - Regular
- Precise Conditioning Relaxer - Super
- Precise No-Lye Supreme Relaxer
- Sensitive by Nature Professional Relaxer
- Sensitive by Nature Relaxer
- Sensitive by Nature Silken Straight Relaxer - Regular
- Sensitive by Nature Silken Straight Relaxer - Super
- Sensitive by Nature Comfort Zone Relaxer
- Sof n' Free Cortical Relaxer - Mild
- Sof n' Free Cortical Relaxer - Regular
- Sof n' Free Cortical Relaxer - Super
- Sof n' Free No Lye Relaxer - Regular
- Sof n' Free No Lye Relaxer - Super
- Sportin Waves Relaxer
- Sportin Waves Relaxer - Coarse Hair
- Sportin Waves Texturizing Comb-Thru Relaxer

## Defendant L'Oréal Missing Product Identification Information

- Sportin Waves Professional Relaxer
- Tender Care No Lye Conditioning Relaxer
- Ultra Sheen No Base Relaxer - Mild
- Ultra Sheen No Base Relaxer - Regular
- Ultra Sheen No Base Relaxer - Super
- Ultra Sheen Creme Relaxer
- Ultra Sheen Relaxer – Perfect Professional
- Ultra Sheen Relaxer – Perfect Oil Moisture
- Ultra Sheen No Lye Relaxer
- Ultra Sheen Professional
- Ultra Star Relaxer

### Product (kit/system) missing artwork and labels for a product:

- Bantu No Base Relaxer Regular Strength (*Missing all box art for Bantu No Base Creme Relaxer (Regular) With Shea Butter (42391 SS) from 2009-2022; Missing box art covering for Bantu No Base Creme Relaxer (Regular) with Shea Butter (42391 SS3) from 2009-2012 and 2014-2022*)
- Bantu No Base Relaxer Super Strength (*Missing box art covering for Bantu No Base Creme Relaxer (Super) with Shea Butter (42390 SS1) for 2012, 2014-2015*)
- Bantu No Base Relaxer Mild Strength (*Missing all box art for Bantu No Base Creme Relaxer (Mild) With Shea Butter (42392 SS); Missing box art for Bantu No Base Creme Relaxer (mild) with Shea Butter (42392 SS1) 2009-2011, 2013-2015*)
- Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer – For All Hair Types (*Missing Box Art for 2009-2011, 2013-2014*)
- Dark and Lovely Beautiful Beginnings No Mistake Curl Softener – For All Curly Hair Types (*Missing Box Art for 2013-2014, 2016-2020*)
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Regular (*Missing box art covering 2010, 2012 and 2017-2020*)
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Super (*Missing box art covering 2009-2010 and 2012-2014 and 2017-2020*)
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – For Color Treated Hair (*Missing box art for 2010, 2012, 2013, and 2015-2020; Box art blurry for 2011 and 2014*)
- Dark and Lovely Triple Nourished Silkening Relaxer – Regular (*Missing box art from 2020-present*)
- Dark and Lovely Triple Nourished Silkening Relaxer – Super (*Missing box art from 2019-present*)

## Defendant L'Oréal Missing Product Identification Information

- Optimum Advanced Keratin Whipped Crème Relaxer (*Missing box art for Mild/Color treated for 2012; Missing all box art for Normal strength for 2012; Missing all box art for Coarse/resistant from 2011- 2012*)
- Optimum Care Bodifying Relaxer (*Missing box art from 2009-2012*)
- Optimum Multi-Mineral Reduced pH Crème Relaxer Regular Strength (*Missing "tub" art for 2009-2018 and 2020-2022*)
- Optimum Multi-Mineral Reduced pH Crème Relaxer Super Strength (*Missing "tub" art for 2009-2018 and 2020-2022*)
- Optimum Multi-Mineral Reduced pH Crème Relaxer Mild Strength
- Optimum Salon Haircare Defy Breakage No-Lye Relaxer – Regular (*Missing box art for 2015, 2017-2022; and box art blurry for 2012*)
- Optimum Salon Haircare Amla Legend Relaxer (*Missing Box Art for 2012, 2014, 2016-2018*)
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (mild) (*Missing box artwork for Precise No Lye Conditioning Relaxer (471129 1) for 2010 to 2017 and 2019 to 2021; Missing box artwork for Precise No Lye Liquid Activator (4223 SS) for 2010 to 2017 and 2019 to 2021*)
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (super) (*Missing box artwork covering for Precise No Lye Conditioning Relaxer (42293 SS9 and 42293 SS15) 2010 to 2017 and 2019 to 2021; Missing box artwork for Precise No Lye Liquid Activator (42223 SS) for 2010 to 2017 and 2019 to 2021*)
- Mizani Butter Blend Relaxer (Fine/Color Treated)
- Mizani Butter Blend Relaxer (Medium/Normal)
- Mizani Butter Blend Relaxer (Coarse/Resistant)
- Mizani Butter Blend Sensitive Scalp Rhelaxer (*Missing box art for relaxer and missing label for activator (42631 SS; 42631 SS1) for certain years – only produced dated 2/3/2020 and 9/2014*)
- Mizani Butterblend Prosolvent Relaxer - Coarse/Resistant
- Mizani Butterblend Prosolvent Relaxer - Fine/Color Treated
- Mizani Classic Rhelaxer Medium/Normal
- Mizani Classic Rhelaxer – Coarse/Resistant
- Mizani Classic Rhelaxer – Fine/Color Treated Hair
- Mizani Sensitive Scalp Rhelaxer (*Missing box art produced for rhelaxer kit; and missing box artwork for activator (42207 SS2; 42207 SS3) for 2018-2022*)
- Roots of Nature Restorative Relaxer – Normal/Medium (*Missing box artwork from 2011-2013*)
- Roots of Nature Restorative Relaxer – Fine (*Missing box artwork from 2011-2013*)

## Defendant L'Oréal Missing Product Identification Information

- Alternatives No Lye Relaxer – Regular (*Missing box art from 1997 – 2000*)
- Alternatives No Lye Relaxer – Super (*Missing box art from 1997 – 2000*)
- Bantu Relaxer – Regular (*Missing box art from 1992 to 2000*)
- Bantu Relaxer – Mild (*Missing box art from 1992 to 2000*)
- Bantu Relaxer – Super (*Missing box art from 1992 to 2000*)
- Bantu No-Lye No Mix – Mild (*Missing box art from 1999*)
- Bantu No-Lye No Mix – Regular (*Missing box art from 1999*)
- Bantu No-Lye No Mix – Super (*Missing box art from 1999*)
- Bantu No-Lye – Mild (*Missing box art from 1999*)
- Bantu No-Lye – Regular (*Missing box art from 1999*)
- Bantu No-Lye – Super (*Missing box art from 1999*)
- Bantu Pretail (*Missing box art from 1999*)
- Bantu Professional Relaxer (*Missing box art from 1999 to 2000*)
- Classy Curl Relaxer (*Missing box artwork from 1993 to 2000*)
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer – Fine (*Missing box artwork from 1993 to 2000*)
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer – Thick (*Missing box artwork from 1997 to 2000*)
- Dark & Lovely Diva Relaxer (*Missing box artwork from 1999 to 2000*)
- Dark & Lovely Excellence Relaxer Salon (*Missing box artwork from 1978 to 2000*)
- Dark & Lovely Relaxer – Regular (*Missing box artwork from 1978 to 2000*)
- D&L Relaxer – Plus (*Missing box artwork from 1984 to 2000*)
- Excellence Relaxer – Regular (*Missing box artwork from 1984 to 2000*)
- Excellence Relaxer – Plus (*Missing box artwork from 1984 to 2000*)
- Frizz Free No-Lye Relaxer – Regular (*Missing box artwork from 1997 to 2000*)
- Frizz Free No-Lye Relaxer – Super (*Missing box artwork from 1997 to 2000*)
- Gentle Treatment Relaxer – Regular (*Missing box artwork from 1981 to 2000*)
- Gentle Treatment Relaxer – Super (*Missing box artwork from 1981 to 2000*)
- Gentle Treatment Professional Relaxer (*Missing box artwork from 1998 to 2000*)
- Hairwerks Relaxer – Mild (*Missing box artwork from 1996 to 2000*)
- Hairwerks Relaxer – Regular (*Missing box artwork from 1996 to 2000*)
- Hairwerks Relaxer – Super (*Missing box artwork from 1996 to 2000*)
- Hairwerks Maximum Conditioning Relaxer (*Missing box artwork from 1997 to 1999*)
- Johnson Iman Cherrywood Relaxer (*Missing box artwork from 1997 to 2000*)
- Johnson Iman Ebonywood Relaxer (*Missing box artwork from 1997 to 2000*)
- L'Oréal Radiance Permanent Creme Relaxer (*Missing box artwork from 1978 to 1981*)
- Lets Jam Relaxer – Regular (*Missing box artwork from 1990 to 2000*)

## Defendant L'Oréal Missing Product Identification Information

- Lets Jam Relaxer - Super (*Missing box artwork from 1990 to 2000*)
- Mizani Professional Relaxer (*Missing box artwork from 1999*)
- Mizani Relaxer Sensitive Scalp (*Missing box artwork from 1996 to 1999*)
- Mizani Relaxer (*Missing box artwork from 1993 to 2000*)
- Mizani Rhelaxer - Fine/Color Treated (*Missing box artwork from 1990 to 1998*)
- Mizani Rhelaxer - Coarse/Resistant (*Missing box artwork from 1990 to 1998*)
- Optimum Care No Lye Relaxer - Regular (*Missing box artwork from 1991 to 2000*)
- Optimum Care No Lye Relaxer - Super (*Missing box artwork from 1991 to 2000*)
- Optimum Conditioning Crème Relaxer - Regular (*Missing box artwork from 1983 to 1998*)
- Optimum Conditioning Crème Relaxer - Mild (*Missing box artwork from 1983 to 1998*)
- Optimum Conditioning Crème Relaxer - Super (*Missing box artwork from 1983 to 1998*)
- Optimum Conditioning Ultra Sensitive Scalp Relaxer (*Missing box artwork from 1985 to 2000*)
- Optimum Professional (*Missing box artwork from 1990 to 1999*)
- Optimum Relaxer - Super (*Missing box artwork from 1985 to 2000*)
- Optimum Relaxer - Regular (*Missing box artwork from 1985 to 2000*)
- Optimum Relaxer - Mild (*Missing box artwork from 1985 to 2000*)
- Optimum Sensitive Scalp Relaxer (*Missing box artwork from 1993 to 1999*)
- Optimum Rx Relaxer - Mild (*Missing box artwork from 1998 to 2000*)
- Optimum Rx Relaxer - Regular (*Missing box artwork from 1998 to 2000*)
- Precise Pretail (*Missing box artwork from 1999*)
- Precise Relaxer - Regular (*Missing box artwork from 1992 to 2000*)
- Precise Relaxer - Mild (*Missing box artwork from 1992 to 2000*)
- Precise Relaxer - Super (*Missing box artwork from 1992 to 2000*)
- Precise Conditioning Relaxer - Regular (*Missing box artwork from 1980 to 1999*)
- Precise Conditioning Relaxer - Super (*Missing box artwork from 1980 to 1999*)
- Precise No-Lye Supreme Relaxer (*Missing box artwork from 1999*)
- Sensitive by Nature Professional Relaxer (*Missing box artwork from 1998 to 1999*)
- Sensitive by Nature Relaxer (*Missing box artwork from 1998 to 1999*)
- Sensitive by Nature Silken Straight Relaxer - Regular (*Missing box artwork from 1999 to 2000*)
- Sensitive by Nature Silken Straight Relaxer - Super (*Missing box artwork from 1999 to 2000*)
- Sensitive by Nature Comfort Zone Relaxer (*Missing box artwork from 1999 to 2000*)
- Sof n' Free Cortical Relaxer - Mild (*Missing box artwork from 1988 to 1999*)
- Sof n' Free Cortical Relaxer - Regular (*Missing box artwork from 1988 to 1999*)
- Sof n' Free Cortical Relaxer - Super (*Missing box artwork from 1988 to 1999*)

## **Defendant L'Oréal Missing Product Identification Information**

- Sof n' Free No Lye Relaxer - Regular (*Missing box artwork from 1981 to 1999*)
- Sof n' Free No Lye Relaxer - Super (*Missing box artwork from 1988 to 1999*)
- Sportin Waves Relaxer (*Missing box artwork from 1991 to 1999*)
- Sportin Waves Relaxer - Coarse Hair (*Missing box artwork from 1991 to 1999*)
- Sportin Waves Texturizing Comb-Thru Relaxer (*Missing box artwork from 1986 to 1999*)
- Sportin Waves Professional Relaxer (*Missing box artwork from 1992 to 1999*)
- Tender Care No Lye Conditioning Relaxer (*Missing box artwork from 1993 to 1999*)
- Ultra Sheen No Base Relaxer - Mild (*Missing box artwork from 1998 to 2000*)
- Ultra Sheen No Base Relaxer - Regular (*Missing box artwork from 1998 to 2000*)
- Ultra Sheen No Base Relaxer - Super (*Missing box artwork from 1998 to 2000*)
- Ultra Sheen Creme Relaxer (*Missing box artwork from 1967 to 2000*)
- Ultra Sheen Relaxer – Perfect Professional (*Missing box artwork from around 2000*)
- Ultra Sheen Relaxer – Perfect Oil Moisture (*Missing box artwork from around 2000*)
- Ultra Sheen No Lye Relaxer (*Missing box artwork from 1984 to 2000*)
- Ultra Sheen Professional (*Missing box artwork from 1998 to 2000*)
- Ultra Star Relaxer (*Missing box artwork from 1998 to 2000*)

### **Product (kit/system) missing IFUs for a product:**

- Bantu No Base Relaxer Regular Strength
- Bantu No Base Relaxer Super Strength
- Bantu No Base Relaxer Mild Strength
- Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer – For All Hair Types
- Dark and Lovely Beautiful Beginnings No Mistake Curl Softener – For All Curly Hair Types (*Missing IFUS for 2012-2020*)
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Regular (*Missing IFUs for 2011-2012 and 2015-2020*)
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – Super (*Missing IFUs for 2011-2012 and 2015-2020*)
- Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer – For Color Treated Hair (*Missing IFUs for 2011-2012 and 2015-2020*)
- Dark and Lovely Triple Nourished Silkening Relaxer – Regular
- Dark and Lovely Triple Nourished Silkening Relaxer – Super
- Optimum Advanced Keratin Whipped Crème Relaxer
- Optimum Care Bodifying Relaxer
- Optimum Multi-Mineral Reduced pH Crème Relaxer Regular Strength
- Optimum Multi-Mineral Reduced pH Crème Relaxer Super Strength
- Optimum Multi-Mineral Reduced pH Crème Relaxer Mild Strength

## Defendant L'Oréal Missing Product Identification Information

- Optimum Salon Haircare Defy Breakage No-Lye Relaxer – Regular
- Optimum Salon Haircare Amla Legend Relaxer (*Missing IFUs for 2012, 2014-2018*)
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (mild)
- Ultra Precise No-Lye Conditioning Relaxer Supreme Formula (super)
- Mizani Butter Blend Relaxer (Fine/Color Treated)
- Mizani Butter Blend Relaxer (Medium/Normal)
- Mizani Butter Blend Relaxer (Coarse/Resistant)
- Mizani Butter Blend Sensitive Scalp Relaxer
- Mizani Butterblend Prosolvent Relaxer - Coarse/Resistant
- Mizani Butterblend Prosolvent Relaxer - Fine/Color Treated
- Mizani Classic Relaxer Medium/Normal
- Mizani Classic Relaxer – Coarse/Resistant
- Mizani Classic Relaxer – Fine/Color Treated Hair
- Mizani Sensitive Scalp Relaxer
- Roots of Nature Restorative Relaxer – Normal/Medium
- Roots of Nature Restorative Relaxer – Fine
- Alternatives No Lye Relaxer - Regular
- Alternatives No Lye Relaxer - Super
- Bantu Relaxer - Regular
- Bantu Relaxer - Mild
- Bantu Relaxer - Super
- Bantu No-Lye No Mix – Mild
- Bantu No-Lye No Mix – Regular
- Bantu No-Lye No Mix – Super
- Bantu No-Lye – Mild
- Bantu No-Lye – Regular
- Bantu No-Lye – Super
- Bantu Pretail
- Bantu Professional Relaxer
- Classy Curl Relaxer
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Fine
- Dark & Lovely Beautiful Beginnings No Mistake Relaxer - Thick
- Dark & Lovely Diva Relaxer
- Dark & Lovely Excelle Relaxer Salon
- Dark & Lovely Relaxer - Regular
- D&L Relaxer - Plus

## Defendant L'Oréal Missing Product Identification Information

- Excelle Relaxer - Regular
- Excelle Relaxer - Plus
- Frizz Free No-Lye Relaxer - Regular
- Frizz Free No-Lye Relaxer - Super
- Gentle Treatment Relaxer - Regular
- Gentle Treatment Relaxer - Super
- Gentle Treatment Professional Relaxer
- Hairwerks Relaxer - Mild
- Hairwerks Relaxer - Regular
- Hairwerks Relaxer - Super
- Hairwerks Maxximum Conditioning Relaxer
- Johnson Iman Cherrywood Relaxer
- Johnson Iman Ebonywood Relaxer
- L'Oréal Radiance Permanent Creme Relaxer
- Lets Jam Relaxer - Regular
- Lets Jam Relaxer - Super
- Mizani Professional Relaxer
- Mizani Relaxer Sensitive Scalp
- Mizani Relaxer
- Mizani Rhelaxer - Fine/Color Treated
- Mizani Rhelaxer - Coarse/Resistant
- Optimum Care No Lye Relaxer - Regular
- Optimum Care No Lye Relaxer - Super
- Optimum Conditioning Crème Relaxer - Regular
- Optimum Conditioning Crème Relaxer - Mild
- Optimum Conditioning Crème Relaxer - Super
- Optimum Conditioning Ultra Sensitive Scalp Relaxer
- Optimum Professional
- Optimum Relaxer - Super
- Optimum Relaxer - Regular
- Optimum Relaxer - Mild
- Optimum Sensitive Scalp Relaxer
- Optimum Rx Relaxer - Mild
- Optimum Rx Relaxer - Regular
- Precise Pretail
- Precise Relaxer - Regular

## **Defendant L'Oréal Missing Product Identification Information**

- Precise Relaxer - Mild
- Precise Relaxer - Super
- Precise Conditioning Relaxer - Regular
- Precise Conditioning Relaxer - Super
- Precise No-Lye Supreme Relaxer
- Sensitive by Nature Professional Relaxer
- Sensitive by Nature Relaxer
- Sensitive by Nature Silken Straight Relaxer - Regular
- Sensitive by Nature Silken Straight Relaxer - Super
- Sensitive by Nature Comfort Zone Relaxer
- Sof n' Free Cortical Relaxer - Mild
- Sof n' Free Cortical Relaxer - Regular
- Sof n' Free Cortical Relaxer - Super
- Sof n' Free No Lye Relaxer - Regular
- Sof n' Free No Lye Relaxer - Super
- Sportin Waves Relaxer
- Sportin Waves Relaxer - Coarse Hair
- Sportin Waves Texturizing Comb-Thru Relaxer
- Sportin Waves Professional Relaxer
- Tender Care No Lye Conditioning Relaxer
- Ultra Sheen No Base Relaxer - Mild
- Ultra Sheen No Base Relaxer - Regular
- Ultra Sheen No Base Relaxer - Super
- Ultra Sheen Creme Relaxer
- Ultra Sheen Relaxer – Perfect Professional
- Ultra Sheen Relaxer – Perfect Oil Moisture
- Ultra Sheen No Lye Relaxer
- Ultra Sheen Professional
- Ultra Star Relaxer

**DEFENDANT LUSTER**

## **Defendant Luster Missing Product Identification Information**

### **Product (kit/system) missing dates that product was on the market:**

- Not applicable

### **Product (kit/system) missing dates that each component part within a product was on the market:**

- Luster's Pink Conditioning No-Lye Relaxer Regular, One Complete Application
- Luster's Pink Conditioning No-Lye Relaxer Regular, One New Growth/Retouch Application
- Luster's Pink Conditioning No-Lye Relaxer Super (Super strength), One Complete Application
- Luster's Pink Conditioning No-Lye Relaxer Super (Super strength), One New Growth/Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Adults Formula, One Complete Application (Or Two Retouches)
- PCJ No-Lye Conditioning Crème Relaxer Children's Regular, One Complete Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Regular, One Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Complete Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Original
- PCJ Smooth Roots Children's (Preteen) Coarse, One Retouch Application
- PCJ Smooth Roots Children's (Preteen) Regular, One Retouch Application
- Luster's Smooth Touch Olive Oil No-Lye Relaxer Regular, One Complete New Growth Application
- Luster's Smooth Touch Olive Oil No-Lye Relaxer Super, One Complete New Growth Application
- Luster's Shortlooks Colorlaxer Passion Red (Rouge, Pasion Roja)
- Luster's Shortlooks Colorlaxer Sable Brown (Brun, Castano)
- Luster's Shortlooks Colorlaxer Diamond Blank [sic] (Nior, Diamante Negro)
- Designer Touch Texturizing Relaxer, Regular
- Designer Touch Texturizing Relaxer, Super
- Designer Touch Strait FX
- Designer Touch Strait Shades Colorlaxer
- Luster's Renutrients Salon Formula Conditioning Relaxer

### **Product (kit/system) missing identity of component parts within a product:**

- Designer Touch Texturizing Relaxer, Regular
- Designer Touch Texturizing Relaxer, Super

### **Defendant Luster Missing Product Identification Information**

- Designer Touch Strait FX
- Luster's Renutrients Salon Formula Conditioning Relaxer

### **Product (kit/system) missing ingredients for the relaxer in each product:**

- Luster's Pink Conditioning No-Lye Relaxer Regular, One New Growth/Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Retouch Application

### **Component parts within a product (kit/system) missing ingredients:**

- Designer Touch Texturizing Relaxer, Regular
- Designer Touch Texturizing Relaxer, Super
- Designer Touch Strait FX
- Luster's Renutrients Salon Formula Conditioning Relaxer

### **Product (kit/system) missing formularies for the relaxer in each product:**

- Luster's Pink Conditioning No-Lye Relaxer Regular, One New Growth/Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Regular, One Complete Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Regular, One Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Complete Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Retouch Application

### **Component parts within a product (kit/system) missing formularies:**

- Luster's Pink Conditioning No-Lye Relaxer Regular, One Complete Application
- Luster's Pink Conditioning No-Lye Relaxer Regular, One New Growth/Retouch Application
- Luster's Pink Conditioning No-Lye Relaxer Super (Super strength), One Complete Application
- Luster's Pink Conditioning No-Lye Relaxer Super (Super strength), One New Growth/Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Adults Formula, One Complete Application (Or Two Retouches)
- PCJ No-Lye Conditioning Crème Relaxer Children's Regular, One Complete Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Regular, One Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Complete Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Original
- PCJ Smooth Roots Children's (Preteen) Coarse, One Retouch Application
- PCJ Smooth Roots Children's (Preteen) Regular, One Retouch Application

### **Defendant Luster Missing Product Identification Information**

- Luster's Smooth Touch Olive Oil No-Lye Relaxer Regular, One Complete New Growth Application
- Luster's Smooth Touch Olive Oil No-Lye Relaxer Super, One Complete New Growth Application
- Luster's Shortlooks Colorlaxer Passion Red (Rouge, Pasion Roja)
- Luster's Shortlooks Colorlaxer Sable Brown (Brun, Castano)
- Luster's Shortlooks Colorlaxer Diamond Blank [sic] (Nior, Diamante Negro)
- Designer Touch Texturizing Relaxer, Regular
- Designer Touch Texturizing Relaxer, Super
- Designer Touch Strait FX
- Designer Touch Strait Shades Colorlaxer
- Luster's Renutrients Salon Formula Conditioning Relaxer

### **Product (kit/system) missing artwork and labels for a product:**

- Designer Touch Texturizing Relaxer, Regular
- Designer Touch Texturizing Relaxer, Super
- Designer Touch Strait FX (*packaging provided for this product does not contain components*)
- Luster's Renutrients Salon Formula Conditioning Relaxer (*packaging provided for this product does not contain components*)

### **Product (kit/system) missing IFUs for a product:**

- Luster's Pink Conditioning No-Lye Relaxer Regular, One Complete Application
- Luster's Pink Conditioning No-Lye Relaxer Regular, One New Growth/Retouch Application
- Luster's Pink Conditioning No-Lye Relaxer Super (Super strength), One Complete Application
- Luster's Pink Conditioning No-Lye Relaxer Super (Super strength), One New Growth/Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Adults Formula, One Complete Application (Or Two Retouches)
- PCJ No-Lye Conditioning Crème Relaxer Children's Regular, One Complete Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Regular, One Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Complete Application
- PCJ No-Lye Conditioning Crème Relaxer Children's Coarse, One Retouch Application
- PCJ No-Lye Conditioning Crème Relaxer Original
- PCJ Smooth Roots Children's (Preteen) Coarse, One Retouch Application
- PCJ Smooth Roots Children's (Preteen) Regular, One Retouch Application

### **Defendant Luster Missing Product Identification Information**

- Luster's Smooth Touch Olive Oil No-Lye Relaxer Regular, One Complete New Growth Application
- Luster's Smooth Touch Olive Oil No-Lye Relaxer Super, One Complete New Growth Application
- Luster's Shortlooks Colorlaxer Passion Red (Rouge, Pasion Roja)
- Luster's Shortlooks Colorlaxer Sable Brown (Brun, Castano)
- Luster's Shortlooks Colorlaxer Diamond Blank [sic] (Nior, Diamante Negro)
- Designer Touch Texturizing Relaxer, Regular
- Designer Touch Texturizing Relaxer, Super
- Designer Touch Strait FX
- Designer Touch Strait Shades Colorlaxer
- Luster's Renutrients Salon Formula Conditioning Relaxer

**DEFENDANT MCBRIDE**

**Defendant McBride Missing Product Identification Information**

**Product (kit/system) missing dates that product was on the market:**

- Not applicable

**Product (kit/system) missing dates that each component part within a product was on the market:**

- Design Essentials Conditioning Regular Relaxer
- Design Essentials Honey Nectar Relaxer
- Design Sensitive Scalp Relaxer
- Design Essentials Texturizer
- Design Essentials Lo-Lye Relaxer
- Design Essentials Super Conditioning Crème relaxer
- Regular Conditioning Relaxer with Olive Oil and Shea Butter
- Olive Oil Shea Relaxer

**Product (kit/system) missing identity of component parts within a product:**

- Design Essentials Conditioning Regular Relaxer
- Design Essentials Honey Nectar Relaxer
- Design Sensitive Scalp Relaxer
- Design Essentials Texturizer
- Design Essentials Lo-Lye Relaxer
- Design Essentials Super Conditioning Crème relaxer
- Regular Conditioning Relaxer with Olive Oil and Shea Butter
- Olive Oil Shea Relaxer

**Product (kit/system) missing ingredients for the relaxer in each product:**

- Design Essentials Conditioning Regular Relaxer
- Design Essentials Honey Nectar Relaxer
- Design Sensitive Scalp Relaxer
- Design Essentials Texturizer
- Design Essentials Lo-Lye Relaxer
- Design Essentials Super Conditioning Crème relaxer
- Regular Conditioning Relaxer with Olive Oil and Shea Butter
- Olive Oil Shea Relaxer

**Component parts within a product (kit/system) missing ingredients:**

- Design Essentials Conditioning Regular Relaxer
- Design Essentials Honey Nectar Relaxer

**Defendant McBride Missing Product Identification Information**

- Design Sensitive Scalp Relaxer
- Design Essentials Texturizer
- Design Essentials Lo-Lye Relaxer
- Design Essentials Super Conditioning Crème relaxer
- Regular Conditioning Relaxer with Olive Oil and Shea Butter
- Olive Oil Shea Relaxer

**Product (kit/system) missing formularies for the relaxer in each product:**

- Design Essentials Conditioning Regular Relaxer
- Design Essentials Honey Nectar Relaxer
- Design Sensitive Scalp Relaxer
- Design Essentials Texturizer
- Design Essentials Lo-Lye Relaxer
- Design Essentials Super Conditioning Crème relaxer
- Regular Conditioning Relaxer with Olive Oil and Shea Butter
- Olive Oil Shea Relaxer

**Component parts within a product (kit/system) missing formularies:**

- Design Essentials Conditioning Regular Relaxer
- Design Essentials Honey Nectar Relaxer
- Design Sensitive Scalp Relaxer
- Design Essentials Texturizer
- Design Essentials Lo-Lye Relaxer
- Design Essentials Super Conditioning Crème relaxer
- Regular Conditioning Relaxer with Olive Oil and Shea Butter
- Olive Oil Shea Relaxer

**Product (kit/system) missing artwork and labels for a product:**

- Design Essentials Texturizer
- Design Essentials Lo-Lye Relaxer
- Design Essentials Super Conditioning Crème relaxer

**Product (kit/system) missing IFUs for a product:**

- Design Essentials Texturizer
- Design Essentials Lo-Lye Relaxer
- Design Essentials Super Conditioning Crème relaxer
- Regular Conditioning Relaxer with Olive Oil and Shea Butter

**Defendant McBride Missing Product Identification Information**

- Olive Oil Shea Relaxer

**DEFENDANT NAMASTE**

**Defendant Namaste Missing Product Identification Information**

**Product (kit/system) missing dates that product was on the market:**

- Not applicable

**Product (kit/system) missing dates that each component part within a product was on the market:**

- Not applicable

**Product (kit/system) missing identity of component parts within a product:**

- ORS Olive Oil No-Mix Salon Formula Crème Relaxer
- ORS Olive Oil Ultra Nourish Crème Hair Relaxer
- ORS Olive Oil Crème on Crème Touch Up No Lye Hair Relaxer
- ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Sheild
- ORS Olive Oil Professional No-Lye Relaxer Kit
- ORS Olive Oil Professional Crème Relaxer
- Namaste Salon System Triple Emulsion Relaxer
- Namaste Salon System Crème Relaxer
- Namaste Salon System Conditioning Sensitive Scalp No Lye-Relaxer
- Namaste Salon System Crème Relaxer Salon Trial Pack

**Product (kit/system) missing ingredients for the relaxer in each product:**

- ORS Olive Oil Built-In Protection No Lye Relaxer (Full Application)
- ORS Olive Oil No-Mix Salon Formula Crème Relaxer
- ORS Olive Oil Ultra Nourish Crème Hair Relaxer
- ORS Olive Oil Built-In Protection No Lye Relaxer (New Growth)
- ORS Olive Oil Zone Relaxer - Targeted Touch Up No Lye Hair Relaxer
- ORS Olive Oil Curl Stretching Texturizer
- ORS Olive Oil Crème on Crème Touch Up No Lye Hair Relaxer
- ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical
- ORS Olive Oil Texlax and Stretch Semi-Straightening System
- ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System
- ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System
- ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Sheild
- ORS Olive Oil Professional No-Lye Relaxer Kit
- ORS Olive Oil Professional Crème Relaxer
- Namaste Salon System Triple Emulsion Relaxer
- Namaste Salon System Crème Relaxer

**Defendant Namaste Missing Product Identification Information**

- Namaste Salon System Conditioning Sensitive Scalp No Lye-Relaxer
- Namaste Salon System Crème Relaxer Salon Trial Pack

*\*\*Namaste has produced a list of ingredients, but Namaste has failed to provide an ingredient list for each product and each component part within a product for the duration that the product was on the market. (See Namaste's First Amended Response to Rog Set 1, Question 6)*

**Component parts within a product (kit/system) missing ingredients:**

- ORS Olive Oil Built-In Protection No Lye Relaxer (Full Application)
- ORS Olive Oil No-Mix Salon Formula Crème Relaxer
- ORS Olive Oil Ultra Nourish Crème Hair Relaxer
- ORS Olive Oil Built-In Protection No Lye Relaxer (New Growth)
- ORS Olive Oil Zone Relaxer - Targeted Touch Up No Lye Hair Relaxer
- ORS Olive Oil Curl Stretching Texturizer
- ORS Olive Oil Crème on Crème Touch Up No Lye Hair Relaxer
- ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical
- ORS Olive Oil Texlax and Stretch Semi-Straightening System
- ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System
- ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System
- ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Shield
- ORS Olive Oil Professional No-Lye Relaxer Kit
- ORS Olive Oil Professional Crème Relaxer
- Namaste Salon System Triple Emulsion Relaxer
- Namaste Salon System Crème Relaxer
- Namaste Salon System Conditioning Sensitive Scalp No Lye-Relaxer
- Namaste Salon System Crème Relaxer Salon Trial Pack

*\*\*Namaste has produced a list of ingredients, but Namaste has failed to provide an ingredient list for each product and each component part within a product for the duration that the product was on the market. (See Namaste's First Amended Response to Rog Set 1, Question 6)*

**Product (kit/system) missing formularies for the relaxer in each product:**

- ORS Olive Oil Built-In Protection No Lye Relaxer (Full Application)
- ORS Olive Oil No-Mix Salon Formula Crème Relaxer
- ORS Olive Oil Ultra Nourish Crème Hair Relaxer
- ORS Olive Oil Built-In Protection No Lye Relaxer (New Growth)
- ORS Olive Oil Zone Relaxer - Targeted Touch Up No Lye Hair Relaxer
- ORS Olive Oil Curl Stretching Texturizer

## **Defendant Namaste Missing Product Identification Information**

- ORS Olive Oil Crème on Crème Touch Up No Lye Hair Relaxer
- ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical
- ORS Olive Oil Texlax and Stretch Semi-Straightening System
- ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System
- ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System
- ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Sheild
- ORS Olive Oil Professional No-Lye Relaxer Kit
- ORS Olive Oil Professional Crème Relaxer
- Namaste Salon System Triple Emulsion Relaxer
- Namaste Salon System Crème Relaxer
- Namaste Salon System Conditioning Sensitive Scalp No Lye-Relaxer
- Namaste Salon System Crème Relaxer Salon Trial Pack

*\*\*Namaste has produced some formulary documents in their document production(s), however, Namaste has failed to identify the responsive documents by bates number for each product and/or component part.*

### **Component parts within a product (kit/system) missing formularies:**

- ORS Olive Oil Built-In Protection No Lye Relaxer (Full Application)
- ORS Olive Oil No-Mix Salon Formula Crème Relaxer
- ORS Olive Oil Ultra Nourish Crème Hair Relaxer
- ORS Olive Oil Built-In Protection No Lye Relaxer (New Growth)
- ORS Olive Oil Zone Relaxer - Targeted Touch Up No Lye Hair Relaxer
- ORS Olive Oil Curl Stretching Texturizer
- ORS Olive Oil Crème on Crème Touch Up No Lye Hair Relaxer
- ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical
- ORS Olive Oil Texlax and Stretch Semi-Straightening System
- ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System
- ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System
- ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Sheild
- ORS Olive Oil Professional No-Lye Relaxer Kit
- ORS Olive Oil Professional Crème Relaxer
- Namaste Salon System Triple Emulsion Relaxer
- Namaste Salon System Crème Relaxer
- Namaste Salon System Conditioning Sensitive Scalp No Lye-Relaxer
- Namaste Salon System Crème Relaxer Salon Trial Pack

## **Defendant Namaste Missing Product Identification Information**

*\*\*Namaste has produced some formulary documents in their document production(s), however, Namaste has failed to identify the responsive documents by bates number for each product and/or component part.*

### **Product (kit/system) missing artwork and labels for a product:**

- ORS Olive Oil Built-In Protection No Lye Relaxer (Full Application)
- ORS Olive Oil No-Mix Salon Formula Crème Relaxer
- ORS Olive Oil Ultra Nourish Crème Hair Relaxer
- ORS Olive Oil Built-In Protection No Lye Relaxer (New Growth)
- ORS Olive Oil Zone Relaxer - Targeted Touch Up No Lye Hair Relaxer
- ORS Olive Oil Curl Stretching Texturizer
- ORS Olive Oil Crème on Crème Touch Up No Lye Hair Relaxer
- ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical
- ORS Olive Oil Texlax and Stretch Semi-Straightening System
- ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System
- ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System
- ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Sheild
- ORS Olive Oil Professional No-Lye Relaxer Kit
- ORS Olive Oil Professional Crème Relaxer
- Namaste Salon System Triple Emulsion Relaxer
- Namaste Salon System Crème Relaxer
- Namaste Salon System Conditioning Sensitive Scalp No Lye-Relaxer
- Namaste Salon System Crème Relaxer Salon Trial Pack

*\*\*Namaste has produced some documents containing artwork and/or labels for some products in their document production(s), however, Namaste has failed to identify the responsive documents by bates number for the artwork and/or label for each product.*

### **Product (kit/system) missing IFUs for a product:**

- ORS Olive Oil Built-In Protection No Lye Relaxer (Full Application)
- ORS Olive Oil No-Mix Salon Formula Crème Relaxer
- ORS Olive Oil Ultra Nourish Crème Hair Relaxer
- ORS Olive Oil Built-In Protection No Lye Relaxer (New Growth)
- ORS Olive Oil Zone Relaxer - Targeted Touch Up No Lye Hair Relaxer
- ORS Olive Oil Curl Stretching Texturizer
- ORS Olive Oil Crème on Crème Touch Up No Lye Hair Relaxer
- ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical

### **Defendant Namaste Missing Product Identification Information**

- ORS Olive Oil Texlax and Stretch Semi-Straightening System
- ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System
- ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System
- ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Sheild
- ORS Olive Oil Professional No-Lye Relaxer Kit
- ORS Olive Oil Professional Crème Relaxer
- Namaste Salon System Triple Emulsion Relaxer
- Namaste Salon System Crème Relaxer
- Namaste Salon System Conditioning Sensitive Scalp No Lye-Relaxer
- Namaste Salon System Crème Relaxer Salon Trial Pack

*\*\*Namaste has produced some documents containing instructions for use (IFUs) for some products in their document production(s), however, Namaste has failed to identify the responsive documents by bates number for the IFUs for each product.*

**DEFENDANT REVLON**

## **Defendant Revlon Missing Product Identification Information**

### **Product (kit/system) missing dates that product was on the market:**

- All products (kit(s)/system(s) included herein

### **Product (kit/system) missing dates that each component part within a product was on the market:**

- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular) - 1998 - 2000
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super) - 1998 - 2000
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 1998 - 2000
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 1998 - 2000
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 1998 - 2000
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 1998 - 2000
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 1998 - 2000
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - 1998 - 2000
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - 1998 - 2000
- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - at least 1988 - 2000
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - at least 1988 - 2000
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - at least 1988 - 2000
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - at least 1988 - 2000
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - at least 1988 - 2000
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Regular) - 1989 - 2000
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Super) - 1989 - 2000
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - 2013 (approximately Fall) - 2023

## Defendant Revlon Missing Product Identification Information

- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - 2013 (approximately Fall) – 2023
- Argan Plex - No Lye (Kit) (aka CON Relaxer Kit Argan Oil - with Plex Treatment - Regular/CON Argan with Oil from Morocco - Plex Strengthening Relaxer System with Plex Treatment - No Lye Relaxer Regular) - 2019 - 2022
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular/CON Professional Oil Infusion Moisturizing No Lye Relaxer System with Certified Organic Sunflower & Coconut Oil) - 2013 (approximately Fall) - 2015
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - 2013 (approximately Fall) – 2015
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - 2013 (approximately Fall) – 2018
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Regular - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Regular/CON CNI No Base Relaxer with Organics - Regular/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Regular) - 2013 (approximately Fall) - 2018
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013 (approximately Fall) - 2015
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013 (approximately Fall) - 2018
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 1995 - 2000
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 1995 - 2000 (?)
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 1995 - 2000
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - At least 1988 - 2000 and 2013 (approximately Fall) - 2015

## Defendant Revlon Missing Product Identification Information

- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - At least 1988 - 2000 and 2013 (approximately Fall)
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013 (approximately Fall) - 2016
- Revlon Realistic Mild - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000
- Revlon Realistic Professional Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - 1989 - 2000
- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 2000 - Approximately 2009

## Defendant Revlon Missing Product Identification Information

- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 2000 - Approximately 2009
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 2000 - Approximately 2009
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 2000 - Approximately 2009
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 2000 - Approximately 2009
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - Approximately 2000 - Early 2000s
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - Approximately 2000 - Early 2000s
- Aroschi Aromaphoric Relaxer Relaxer - Lye? (Jar) - Approximately 2001 - 2002
- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - 2000 - 2007 (Approximately)
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka CON Sodium Relaxer - Regular/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Regular) - Unknown if this product was manufactured and sold by Colomer.
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka CON Sodium Relaxer - Super/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Super) - Unknown if this product was manufactured and sold by Colomer.
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - Approximately 2010 - 2013
- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - Approximately 2010 - 2013

## Defendant Revlon Missing Product Identification Information

- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular) - Approximately 2007 - 2013
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - Approximately 2007 - 2013
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - Approximately 2007 - 2013
- Certified Natural Ingredients - No Lye (Kit) (aka CON Professional Oil Infused Moisturizing No Lye System with Certified Organic Sunflower & Coconut Oil) - Approximately 2007 - 2013
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 2000 - ?
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 2000 - ?
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 2000 - ?
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - 2000 - 2013
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - 2000 - 2013
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) – 2013
- Revlon Realistic Mild - Lye ( Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012

## **Defendant Revlon Missing Product Identification Information**

- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - 2000 - Possibly Up Until December 2012
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - 2000 - Possibly Up Until December 2012
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - Unknown if this product was manufactured and sold by Colomer.

### **Product (kit/system) missing identity of component parts within a product:**

- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular) - 1998 - 2000
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super) - 1998 - 2000
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 1998 - 2000
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 1998 - 2000
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 1998 - 2000
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - 1998 - 2000
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - 1998 - 2000
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - at least 1988 - 2000

## Defendant Revlon Missing Product Identification Information

- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - at least 1988 - 2000
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Regular) - 1989 - 2000
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Super) - 1989 - 2000
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - 2013 (approximately Fall) - 2023
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular/CON Professional Oil Infusion Moisturizing No Lye Relaxer System with Certified Organic Sunflower & Coconut Oil) - 2013 (approximately Fall) - 2015
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - 2013 (approximately Fall) - 2015
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013 (approximately Fall) - 2015
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013 (approximately Fall) - 2018
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 1995 - 2000
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 1995 - 2000 (?)
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 1995 - 2000
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - At least 1988 - 2000 and 2013 (approximately Fall) - 2015
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - At least 1988 - 2000 and 2013 (approximately Fall)
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013 (approximately Fall) - 2016

## Defendant Revlon Missing Product Identification Information

- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - 1989 - 2000
- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 2000 - Approximately 2009
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 2000 - Approximately 2009
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 2000 - Approximately 2009
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - Approximately 2000 - Early 2000s
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - Approximately 2000 - Early 2000s
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka CON Sodium Relaxer - Regular/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Regular) - Unknown if this product was manufactured and sold by Colomer.
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka CON Sodium Relaxer - Super/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Super) - Unknown if this product was manufactured and sold by Colomer.

## Defendant Revlon Missing Product Identification Information

- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - Approximately 2010 - 2013
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular) - Approximately 2007 - 2013
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - Approximately 2007 - 2013
- Certified Natural Ingredients - No Lye (Kit) (aka CON Professional Oil Infused Moisturizing No Lye System with Certified Organic Sunflower & Coconut Oil) - Approximately 2007 - 2013
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 2000 - ?
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 2000 - ?
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 2000 - ?
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - 2000 - 2013
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - 2000 - 2013
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012

## **Defendant Revlon Missing Product Identification Information**

- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - Unknown if this product was manufactured and sold by Colomer.

### **Product (kit/system) missing ingredients for the relaxer in each product:**

- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular) - 1998 – 2000
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super) - 1998 - 2000
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 1998 - 2000
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 1998 - 2000
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 1998 – 2000
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 1998 - 2000
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 1998 - 2000
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - 1998 - 2000
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - 1998 – 2000
- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 2000 - Approximately 2009
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 2000 - Approximately 2009
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 2000 - Approximately 2009
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 2000 - Approximately 2009

## Defendant Revlon Missing Product Identification Information

- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - Approximately 2000 - Early 2000s
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - Approximately 2000 - Early 2000s
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - 2013 (approximately Fall) – 2023
- Revlon Realistic Mild - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 – 2000
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - Sometime Prior To And/Or Up To 2000
- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 2000 - Approximately 2009
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 2000 - Approximately 2009
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 2000 - Approximately 2009
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 2000 - Approximately 2009

## **Defendant Revlon Missing Product Identification Information**

- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - Approximately 2000 - Early 2000s
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - Approximately 2000 - Early 2000s
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - Approximately 2010 – 2013
- Revlon Realistic Mild - Lye ( Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012

### **Product (kit/system) missing unknown data re ingredients for the relaxer in each product:**

- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - at least 1988 - 2000
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - at least 1988 – 2000
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - at least 1988 - 2000
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - at least 1988 - 2000
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - at least 1988 - 2000

## Defendant Revlon Missing Product Identification Information

- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Regular) - 1989 - 2000
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Super) - 1989 – 2000
- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - 2013 (approximately Fall) – 2023
- Argan Plex - No Lye (Kit) (aka CON Relaxer Kit Argan Oil - with Plex Treatment - Regular/CON Argan with Oil from Morocco - Plex Strengthening Relaxer System with Plex Treatment - No Lye Relaxer Regular) - 2019 - 2022
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular/CON Professional Oil Infusion Moisturizing No Lye Relaxer System with Certified Organic Sunflower & Coconut Oil) - 2013 (approximately Fall) - 2015
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - 2013 (approximately Fall) – 2015
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - 2013 (approximately Fall) – 2018
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Regular - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Regular/CON CNI No Base Relaxer with Organics - Regular/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Regular) - 2013 (approximately Fall) – 2018
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013 (approximately Fall) - 2015
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013 (approximately Fall) - 2018
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 1995 - 2000
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 1995 - 2000 (?)
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 1995 - 2000
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate

## Defendant Revlon Missing Product Identification Information

Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - At least 1988 - 2000 and 2013 (approximately Fall) - 2015

- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - At least 1988 - 2000 and 2013 (approximately Fall)
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013 (approximately Fall) – 2016
- Revlon Realistic Professional Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - 1989 - 2000
- Aroschi Aromaphoric Relaxer Relaxer - Lye? (Jar) - Approximately 2001 – 2002
- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - 2000 - 2007 (Approximately)
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka CON Sodium Relaxer - Regular/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Regular) - Unknown if this product was manufactured and sold by Colomer.
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka CON Sodium Relaxer - Super/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Super) - Unknown if this product was manufactured and sold by Colomer.

## Defendant Revlon Missing Product Identification Information

- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - Approximately 2010 - 2013
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular) - Approximately 2007 - 2013
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - Approximately 2007 - 2013
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - Approximately 2007 - 2013
- Certified Natural Ingredients - No Lye (Kit) (aka CON Professional Oil Infused Moisturizing No Lye System with Certified Organic Sunflower & Coconut Oil) - Approximately 2007 - 2013
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 2000 - ?
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 2000 - ?
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 2000 - ?
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - 2000 - 2013
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - 2000 - 2013
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) – 2013
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - 2000 - Possibly Up Until December 2012

### **Defendant Revlon Missing Product Identification Information**

- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - 2000 - Possibly Up Until December 2012
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - Unknown if this product was manufactured and sold by Colomer.

### **Product (kit/system) missing formularies for the relaxer in each product:**

- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular) - 1998 – 2000
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super) - 1998 - 2000
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 1998 - 2000
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 1998 - 2000
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 1998 – 2000
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 1998 - 2000
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 1998 - 2000
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - 1998 - 2000
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - 1998 – 2000
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - at least 1988 - 2000
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - 2013 (approximately Fall) – 2023
- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - 2013 (approximately Fall) – 2023
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular/CON Professional Oil Infusion Moisturizing No Lye Relaxer System with Certified Organic Sunflower & Coconut Oil) - 2013 (approximately Fall) – 2015

## Defendant Revlon Missing Product Identification Information

- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - 2013 (approximately Fall) - 2018
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Regular - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Regular/CON CNI No Base Relaxer with Organics - Regular/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Regular) - 2013 (approximately Fall) – 2018
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013 (approximately Fall) – 2015
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 1995 - 2000 (?)
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - At least 1988 - 2000 and 2013 (approximately Fall) - 2015
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - At least 1988 - 2000 and 2013 (approximately Fall)
- Revlon Realistic Mild - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 – 2000

## Defendant Revlon Missing Product Identification Information

- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - Sometime Prior To And/Or Up To 2000
- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 2000 - Approximately 2009
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 2000 - Approximately 2009
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 2000 - Approximately 2009
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 2000 - Approximately 2009
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - Approximately 2000 - Early 2000s
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - Approximately 2000 - Early 2000s
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - 2000 - 2007 (Approximately)
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - Approximately 2010 - 2013
- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - Approximately 2010 – 2013
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular) - Approximately 2007 - 2013
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - Approximately 2007 - 2013
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - Approximately 2007 - 2013

## Defendant Revlon Missing Product Identification Information

- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Regular - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Regular/CON CNI No Base Relaxer with Organics - Regular/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Regular) - Approximately 2007 – 2013
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) – 2013
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 2000 - ?
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - 2000 - 2013
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - 2000 – 2013
- Revlon Realistic Mild - Lye ( Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - 2000 - Possibly Up Until December 2012

## Defendant Revlon Missing Product Identification Information

### Product (kit/system) missing unknown data re formularies for the relaxer in each product:

- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - at least 1988 - 2000
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - at least 1988 – 2000
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - at least 1988 - 2000
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - at least 1988 - 2000
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Regular) - 1989 - 2000
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Super) - 1989 – 2000
- Argan Plex - No Lye (Kit) (aka CON Relaxer Kit Argan Oil - with Plex Treatment - Regular/CON Argan with Oil from Morocco - Plex Strengthening Relaxer System with Plex Treatment - No Lye Relaxer Regular) - 2019 - 2022
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - 2013 (approximately Fall) – 2015
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013 (approximately Fall) - 2018
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 1995 - 2000
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 1995 - 2000
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013 (approximately Fall) – 2016
- Revlon Realistic Professional Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000

## **Defendant Revlon Missing Product Identification Information**

- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - 1989 - 2000
- Aroschi Aromaphoric Relaxer Relaxer - Lye? (Jar) - Approximately 2001 – 2002
- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - 2000 - 2007 (Approximately)
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka CON Sodium Relaxer - Regular/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Regular) - Unknown if this product was manufactured and sold by Colomer.
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka CON Sodium Relaxer - Super/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Super) - Unknown if this product was manufactured and sold by Colomer.
- Certified Natural Ingredients - No Lye (Kit) (aka CON Professional Oil Infused Moisturizing No Lye System with Certified Organic Sunflower & Coconut Oil) - Approximately 2007 - 2013
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 2000 - ?
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 2000 - ?
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) – 2013
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - 2000 - Possibly Up Until December 2012
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - Unknown if this product was manufactured and sold by Colomer.

### **Product (kit/system) missing artwork and labels for a product:**

## Defendant Revlon Missing Product Identification Information

- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular) - 1998 - 2000
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super) - 1998 - 2000
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 1998 - 2000
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 1998 - 2000
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 1998 - 2000
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 1998 - 2000
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 1998 - 2000
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - 1998 - 2000
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - 1998 - 2000
- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - at least 1988 - 2000
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - at least 1988 - 2000
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - at least 1988 - 2000
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - at least 1988 - 2000
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - at least 1988 - 2000
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Regular) - 1989 - 2000
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Super) - 1989 - 2000
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - 2013 (approximately Fall) - 2023
- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - 2013 (approximately Fall) - 2023
- Argan Plex - No Lye (Kit) (aka CON Relaxer Kit Argan Oil - with Plex Treatment - Regular/CON Argan with Oil from Morocco - Plex Strengthening Relaxer System with Plex Treatment - No Lye Relaxer Regular) - 2019 - 2022

## Defendant Revlon Missing Product Identification Information

- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular/CON Professional Oil Infusion Moisturizing No Lye Relaxer System with Certified Organic Sunflower & Coconut Oil) - 2013 (approximately Fall) - 2015
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - 2013 (approximately Fall) - 2015
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - 2013 (approximately Fall) - 2018
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Regular - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Regular/CON CNI No Base Relaxer with Organics - Regular/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Regular) - 2013 (approximately Fall) - 2018
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013 (approximately Fall) - 2015
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013 (approximately Fall) - 2018
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 1995 - 2000
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 1995 - 2000 (?)
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 1995 - 2000
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - At least 1988 - 2000 and 2013 (approximately Fall) - 2015
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - At least 1988 - 2000 and 2013 (approximately Fall)
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013 (approximately Fall) - 2016

## Defendant Revlon Missing Product Identification Information

- Revlon Realistic Mild - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000
- Revlon Realistic Professional Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - 1989 - 2000
- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 2000 - Approximately 2009
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 2000 - Approximately 2009

## Defendant Revlon Missing Product Identification Information

- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 2000 - Approximately 2009
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 2000 - Approximately 2009
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - Approximately 2000 - Early 2000s
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - Approximately 2000 - Early 2000s
- Aroschi Aromaphoric Relaxer Relaxer - Lye? (Jar) - Approximately 2001 - 2002
- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - 2000 - 2007 (Approximately)
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka CON Sodium Relaxer - Regular/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Regular) - Unknown if this product was manufactured and sold by Colomer.
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka CON Sodium Relaxer - Super/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Super) - Unknown if this product was manufactured and sold by Colomer.
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - Approximately 2010 - 2013
- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - Approximately 2010 - 2013
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular) - Approximately 2007 - 2013
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - Approximately 2007 - 2013

## Defendant Revlon Missing Product Identification Information

- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - Approximately 2007 - 2013
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Regular - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Regular/CON CNI No Base Relaxer with Organics - Regular/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Regular) - Approximately 2007 - 2013
- Certified Natural Ingredients - No Lye (Kit) (aka CON Professional Oil Infused Moisturizing No Lye System with Certified Organic Sunflower & Coconut Oil) - Approximately 2007 - 2013
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 2000 - ?
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 2000 - ?
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 2000 - ?
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - 2000 - 2013
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - 2000 - 2013
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013
- Revlon Realistic Mild - Lye ( Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012

## **Defendant Revlon Missing Product Identification Information**

- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - 2000 - Possibly Up Until December 2012
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - 2000 - Possibly Up Until December 2012
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - Unknown if this product was manufactured and sold by Colomer.

### **Product (kit/system) missing IFUs for a product:**

- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular) - 1998 - 2000
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super) - 1998 - 2000
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 1998 - 2000
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 1998 - 2000
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 1998 - 2000
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 1998 - 2000
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 1998 - 2000
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - 1998 - 2000

## Defendant Revlon Missing Product Identification Information

- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - 1998 - 2000
- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - at least 1988 - 2000
- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - at least 1988 - 2000
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - at least 1988 - 2000
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - at least 1988 - 2000
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - at least 1988 - 2000
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Regular) - 1989 - 2000
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka Creme Relaxer System - Sodium Hydroxide Salon Performance Super) - 1989 - 2000
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - 2013 (approximately Fall) - 2023
- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - 2013 (approximately Fall) - 2023
- Argan Plex - No Lye (Kit) (aka CON Relaxer Kit Argan Oil - with Plex Treatment - Regular/CON Argan with Oil from Morocco - Plex Strengthening Relaxer System with Plex Treatment - No Lye Relaxer Regular) - 2019 - 2022
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular/CON Professional Oil Infusion Moisturizing No Lye Relaxer System with Certified Organic Sunflower & Coconut Oil) - 2013 (approximately Fall) - 2015
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - 2013 (approximately Fall) - 2015
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - 2013 (approximately Fall) - 2018

## Defendant Revlon Missing Product Identification Information

- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Regular - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Regular/CON CNI No Base Relaxer with Organics - Regular/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Regular) - 2013 (approximately Fall) - 2018
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013 (approximately Fall) - 2015
- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013 (approximately Fall) - 2018
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 1995 - 2000
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 1995 - 2000 (?)
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 1995 - 2000
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - At least 1988 - 2000 and 2013 (approximately Fall) - 2015
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - At least 1988 - 2000 and 2013 (approximately Fall)
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013 (approximately Fall) - 2016
- Revlon Realistic Mild - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 1974 - 2000
- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 1974 - 2000
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000

## Defendant Revlon Missing Product Identification Information

- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 1974 - 2000
- Revlon Realistic Professional Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - Sometime Prior To And/Or Up To 2000
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - 1989 - 2000
- African Pride Regular - No Lye (Kit) (aka No Lye Relaxer Regular/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - No Lye (Kit) (aka No Lye Relaxer Super/Miracle Deep Conditioning No Lye Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Sensitive - No Lye (Kit) (aka No Lye Relaxer Sensitive) - 2000 - Approximately 2009
- African Pride Regular - Lye (Jar) (aka No Base Relaxer Regular/No Base Conditioning Relaxer System - Regular) - 2000 - Approximately 2009
- African Pride Super - Lye (Jar) (aka No Base Relaxer Super/No Base Conditioning Relaxer System - Super) - 2000 - Approximately 2009
- African Pride Texturizer - No Lye (Kit) (aka Multi Length Texturizer No Lye) - 2000 - Approximately 2009
- African Pride Dream Kids - No Lye (Kit) (aka Dream Kids No Lye Relaxer System) - 2000 - Approximately 2009
- All Ways Natural Regular - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Regular) - Approximately 2000 - Early 2000s
- All Ways Natural Super - No Lye (Kit) (aka No Lye Conditioning Creme Relaxer - Super) - Approximately 2000 - Early 2000s
- Aroschi Aromaphoric Relaxer Relaxer - Lye? (Jar) - Approximately 2001 - 2002
- Creme of Nature Mild - Lye (Jar) (aka No Base Relaxer - Mild/Professional Strength Relaxer - Mild) - 2000 - 2007 (Approximately)

## Defendant Revlon Missing Product Identification Information

- Creme of Nature Regular - Lye (Jar) (aka No Base Relaxer - Regular/Professional Strength Relaxer - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - Lye (Jar) (aka No Base Relaxer - Super/Professional Strength Relaxer - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Regular - No Lye (Kit) (aka No Lye Relaxer - Regular/No Lye Relaxer System - Regular) - 2000 - 2007 (Approximately)
- Creme of Nature Super - No Lye (Kit) (aka No Lye Relaxer - Super/No Lye Relaxer System - Super) - 2000 - 2007 (Approximately)
- Creme of Nature Sodium Relaxer Regular - Lye (Kit) (aka CON Sodium Relaxer - Regular/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Regular) - Unknown if this product was manufactured and sold by Colomer.
- Creme of Nature Sodium Relaxer Super - Lye (Kit) (aka CON Sodium Relaxer - Super/CON Creme Relaxer System - Sodium Hydroxide Salon Performance - Super) - Unknown if this product was manufactured and sold by Colomer.
- Argan Regular - No Lye (Kit) (aka CON Argan Relaxer Regular/CON with Argan Oil from Morocco - No Lye Relaxer - Regular/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Regular) - Approximately 2010 - 2013
- Argan Super - No Lye (Kit) (aka CON Argan Relaxer Super/CON with Argan Oil from Morocco - No Lye Relaxer - Super/CON with Argan Oil Advanced Straightening with Exotic Shine - No Lye Relaxer - Super) - Approximately 2010 - 2013
- Certified Natural Ingredients Regular - No Lye (Kit) (aka CNI No Lye Relaxer Regular/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Regular) - Approximately 2007 - 2013
- Certified Natural Ingredients Super - No Lye (Kit) (aka CNI No Lye Relaxer Super/CON Nourishing No Lye Relaxer with Sunflower & Coconut - Super) - Approximately 2007 - 2013
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Mild - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Mild/CON CNI No Base Relaxer with Organics - Mild/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Mild) - Approximately 2007 - 2013
- Certified Natural Ingredients/Professional Sunflower & Coconut Oil Regular - Lye (Jar) (aka Sunflower & Coconut No Base Relaxer - Regular/CON CNI No Base Relaxer with Organics - Regular/Professional Sunflower & Coconut Oil Conditioning Creme Relaxer - Regular) - Approximately 2007 - 2013
- Certified Natural Ingredients - No Lye (Kit) (aka CON Professional Oil Infused Moisturizing No Lye System with Certified Organic Sunflower & Coconut Oil) - Approximately 2007 - 2013
- Eden Mild - Type A - No Lye (Kit) (aka CON Eden Relaxer - Type A - Mild No Lye) - 2013

## Defendant Revlon Missing Product Identification Information

- Eden Regular - Type B - No Lye (Kit) (aka CON Eden Relaxer - Type B - Regular/CON Eden Relaxer N/OI - No Lye) - 2013
- Herbarich Regular - No Lye (Kit) (aka Herbarich No Lye Relaxer Creme Conditioning/Ultra Conditioning No Lye Relaxer System Olive Oil - Regular) - 2000 - ?
- Herbarich Super (?) - No Lye (Kit) (aka Herbarich Ultra Conditioning No Lye Relaxer System Oils & African Herbs - Super) - 2000 - ?
- Texturizer - No Lye (Kit) (aka Herbarich Conditioning Creme Relaxer and Texturizer System No Lye) - 2000 - ?
- Fabulaxer Regular - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Regular Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Regular/Fabulaxer Ultimate Conditioning No Lye - Regular/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Regular/Fabulaxer Advanced Conditioning Creme Relaxer- Regular) - 2000 - 2013
- Fabulaxer Super - No Lye (Kit) (aka Fabulaxer No Lye Relaxer Super Kit/Revlon Realistic Fabulaxer - Multiple Conditioning No Lye Relaxer - Super/Fabulaxer Ultimate Conditioning No Lye - Super/Fabulaxer Professional Formula Double Conditioning Creme Relaxer System - Super/Fabulaxer Advanced Conditioning Creme Relaxer- Super) - 2000 - 2013
- Fab-Gro-7 - No Lye (Kit) (aka Fabulaxer Gro-7 No Lye) - 2013
- Revlon Realistic Mild - Lye ( Jar) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Mild - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Mild/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Mild) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Regular - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Regular/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Regular) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Jar) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012
- Revlon Realistic Super - Lye (Kit) (aka Revlon Realistic No Base Relaxer - Super/Revlon Realistic Professional Conditioning Cream Relaxer - No Base Formula - Super) - 2000 - Approximately December 2012

### **Defendant Revlon Missing Product Identification Information**

- Revlon Realistic Professional Conditioning Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - 2000 - Possibly Up Until December 2012
- Revlon Professional Realistic Creme Relaxer - Lye (Jar) (aka Revlon Realistic Professional Relaxer/Revlon Realistic Professional Conditioning Cream Relaxer/Revlon Professional Realistic Creme Relaxer) - Sometime Prior To And/Or Up To 2000
- Nice Change - Lye (Jar) (aka Nice Change No Base Relaxer Mild) - 2000 - Possibly Up Until December 2012
- Revlon Realistic Creme - No Lye (Kit) (aka Revlon Realistic No Lye Creme Relaxer/Revlon Realistic Conditioning Creme Relaxer) - Unknown if this product was manufactured and sold by Colomer.

**DEFENDANT STRENGTH OF NATURE**

## **Defendant SON Missing Product Identification Information**

### **Product (kit/system) missing dates that product was on the market:**

- African Pride Olive Miracle Deep Conditioning Crème-on-Creme No-Lye Relaxer 8 Salon Pack Touch-Ups, Regular
- African Pride Olive Miracle Deep Conditioning Crème-on-Creme No-Lye Relaxer 8 Salon Pack Touch-Ups, Super
- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer
- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Oil Moisturizer Lotion
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Oil Moisturizer Lotion
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One Complete Touch-Up, Regular
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One Complete Touch-Up, Super
- African Pride Shea Miracle Texture Softening Elongating System
- African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit, Coarse
- African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit, Regular
- African Pride Dream Kids Olive Miracle Relaxer Coarse
- African Pride Dream Kids Olive Miracle Relaxer Regular
- African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit, Coarse
- African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit, Regular
- Elasta QP Normal Relaxer Kit

## Defendant SON Missing Product Identification Information

- Elasta QP Normal Relaxer Kit 2 Applications
- Elasta QP Resistant Relaxer Kit
- Elasta QP Sensitive Scalp Kit 12 Application Economy Pack
- Elasta QP Sensitive Scalp Kit - 4 Applications
- Elasta QP SOY OYL No-Base Relaxer Regular
- Elasta QP SOY OYL No-Base Relaxer Super
- Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit
- Elasta QP No-Base Relaxer Mild
- Elasta QP No-Base Relaxer Regular
- Elasta QP No-Base Relaxer Super
- Elasta QP Extra Body No-Base Regular Relaxer
- Elasta QP Extra Body No-Base Super Relaxer
- Elasta QP for Men Texturizer Kit
- Just For Me 1 Complete Touch Up Relaxer, Super
- Just For Me 4 Application Salon Pack Relaxer, Regular
- Just For Me 4 Application Salon Pack Relaxer, Super
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular)
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular) with Coil & Curl Cream
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Super)
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturizer Lotion
- Just For Me No-Lye Texture Softener System
- Just For Me No-Lye Texture Softener System with Hair & Scalp Butter
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up Application, Regular
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up Application, Super
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application, Regular
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application, Super
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer Quatro Value Pack Regular
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer Quatro Value Pack Super
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer, 6 Salon Packs Regular
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer, 6 Salon Packs Super
- Profectiv Procision One-Touch Relaxer Regular
- Profectiv Procision One-Touch Relaxer Super
- Profectiv Procision Relaxer Kit Regular
- Profectiv Procision Relaxer Kit Super
- Profectiv Relax and Refresh Kit Auburn Spice

## Defendant SON Missing Product Identification Information

- Profectiv Relax and Refresh Kit Cherry Fusion
- Profectiv Relax and Refresh Kit Jet Black
- Profectiv Relax and Refresh Kit Mahogany Brown
- Profectiv Relax and Refresh Kit Silky Black
- SmartPerm No-Lye Anti-Breakage Relaxer System, Regular
- SmartPerm No-Lye Anti-Breakage Relaxer System, Super
- SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit 4 Applications, Regular
- SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit 4 Applications, Super
- SmartPerm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications, Regular
- SmartPerm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications, Super
- S&B® Botanicals 2 Application Relaxer Coarse
- S&B® Botanicals 2 Application Relaxer Regular
- S&B® Botanicals No-Lye Sensitive Scalp Relaxer 1-App, Coarse
- S&B® Botanicals No-Lye Sensitive Scalp Relaxer 1-App, Regular
- S&B® Botanicals Conditioner No-Mix Texturizer 2-App, Coarse with Deep Conditioner
- S&B® Botanicals Relaxer 8-Touch Up Regular
- S&B® Botanicals Relaxer 8-Touch Up Coarse
- Soft & Beautiful No-Lye Crème Relaxer, Regular Twin Pack
- Soft & Beautiful No-Lye Crème Relaxer, Super Twin Pack
- Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System, Regular
- Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System, Super
- TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, Regular
- TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, Regular 2 Applications
- TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, Super
- TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, Super 2 Applications
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Mild 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 18 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 7.5 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 9 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 18 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 7.5 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 9 oz

## **Defendant SON Missing Product Identification Information**

- UltraSheen Supreme Conditioning No-Lye Relaxer, Regular
- UltraSheen Supreme Conditioning No-Lye Relaxer, Super
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Super
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Super with Keratin
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular with Keratin

## **Product (kit/system) missing dates that each component part within a product was on the market:**

- African Pride Olive Miracle Deep Conditioning Crème-on-Creme No-Lye Relaxer 8 Salon Pack Touch-Ups, Regular
- African Pride Olive Miracle Deep Conditioning Crème-on-Creme No-Lye Relaxer 8 Salon Pack Touch-Ups, Super
- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One Complete Touch-Up, Regular
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One Complete Touch-Up, Super
- African Pride Shea Miracle Texture Softening Elongating System
- African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit, Coarse
- African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit, Regular
- African Pride Dream Kids Olive Miracle Relaxer Coarse
- African Pride Dream Kids Olive Miracle Relaxer Regular
- African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit, Coarse
- African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit, Regular
- Elasta QP Normal Relaxer Kit
- Elasta QP Normal Relaxer Kit 2 Applications
- Elasta QP Resistant Relaxer Kit
- Elasta QP Sensitive Scalp Kit 12 Application Economy Pack
- Elasta QP Sensitive Scalp Kit - 4 Applications
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular)

## Defendant SON Missing Product Identification Information

- Just For Me No-Lye Conditioning Crème Relaxer Kit (Super)
- Just For Me No-Lye Texture Softener System
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up Application, Regular
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up Application, Super
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application, Regular
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application, Super
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer Quatro Value Pack Regular
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer Quatro Value Pack Super
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer, 6 Salon Packs Regular
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer, 6 Salon Packs Super
- SmartPerm No-Lye Anti-Breakage Relaxer System, Regular
- SmartPerm No-Lye Anti-Breakage Relaxer System, Super
- SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit 4 Applications, Regular
- SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit 4 Applications, Super
- SmartPerm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications, Regular
- SmartPerm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications, Super
- S&B® Botanicals No-Lye Sensitive Scalp Relaxer 1-App, Coarse
- S&B® Botanicals No-Lye Sensitive Scalp Relaxer 1-App, Regular
- S&B® Botanicals Conditioner No-Mix Texturizer 2-App, Coarse with Deep Conditioner
- S&B® Botanicals Relaxer 8-Touch Up Regular
- S&B® Botanicals Relaxer 8-Touch Up Coarse
- Soft & Beautiful No-Lye Crème Relaxer, Regular Twin Pack
- Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System, Regular
- Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System, Super
- TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, Regular
- TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, Regular 2 Applications
- TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, Super
- TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, Super 2 Applications
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Mild 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 18 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 7.5 oz

## Defendant SON Missing Product Identification Information

- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 9 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 18 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 7.5 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 9 oz
- UltraSheen Supreme Conditioning No-Lye Relaxer, Regular
- UltraSheen Supreme Conditioning No-Lye Relaxer, Super
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Super
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Super with Keratin
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular with Keratin
- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Oil Moisturizer Lotion
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Oil Moisturizer Lotion
- Elasta QP SOY OYL No-Base Relaxer Regular
- Elasta QP SOY OYL No-Base Relaxer Super
- Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit
- Elasta QP No-Base Relaxer Mild
- Elasta QP No-Base Relaxer Regular
- Elasta QP No-Base Relaxer Super
- Elasta QP Extra Body No-Base Regular Relaxer
- Elasta QP Extra Body No-Base Super Relaxer
- Elasta QP for Men Texturizer Kit
- Just For Me 1 Complete Touch Up Relaxer, Super
- Just For Me 4 Application Salon Pack Relaxer, Regular
- Just For Me 4 Application Salon Pack Relaxer, Super
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular) with Coil & Curl Cream
- Just For Me No-Lye Texture Softener System with Hair & Scalp Butter

## **Defendant SON Missing Product Identification Information**

- Profectiv Procision One-Touch Relaxer Regular
- Profectiv Procision One-Touch Relaxer Super
- Profectiv Procision Relaxer Kit Regular
- Profectiv Procision Relaxer Kit Super
- S&B® Botanicals 2 Application Relaxer Coarse
- S&B® Botanicals 2 Application Relaxer Regular
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular with Keratin

## **Product (kit/system) missing identity of component parts within a product:**

- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Oil Moisturizer Lotion
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Oil Moisturizer Lotion
- Elasta QP SOY OYL No-Base Relaxer Regular
- Elasta QP SOY OYL No-Base Relaxer Super
- Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit
- Elasta QP No-Base Relaxer Mild
- Elasta QP No-Base Relaxer Regular
- Elasta QP No-Base Relaxer Super
- Elasta QP Extra Body No-Base Regular Relaxer
- Elasta QP Extra Body No-Base Super Relaxer
- Elasta QP for Men Texturizer Kit
- Just For Me 1 Complete Touch Up Relaxer, Super
- Just For Me 4 Application Salon Pack Relaxer, Regular
- Just For Me 4 Application Salon Pack Relaxer, Super
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular) with Coil & Curl Cream
- Just For Me No-Lye Texture Softener System with Hair & Scalp Butter
- Profectiv Procision One-Touch Relaxer Regular
- Profectiv Procision One-Touch Relaxer Super

## **Defendant SON Missing Product Identification Information**

- Profectiv Procision Relaxer Kit Regular
- Profectiv Procision Relaxer Kit Super
- S&B® Botanicals 2 Application Relaxer Coarse
- S&B® Botanicals 2 Application Relaxer Regular
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular with Keratin

### **Product (kit/system) missing ingredients for the relaxer in each product:**

- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Oil Moisturizer Lotion
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Oil Moisturizer Lotion
- Elasta QP SOY OYL No-Base Relaxer Regular
- Elasta QP SOY OYL No-Base Relaxer Super
- Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit
- Elasta QP No-Base Relaxer Mild
- Elasta QP No-Base Relaxer Regular
- Elasta QP No-Base Relaxer Super
- Elasta QP Extra Body No-Base Regular Relaxer
- Elasta QP Extra Body No-Base Super Relaxer
- Elasta QP for Men Texturizer Kit
- Just For Me 1 Complete Touch Up Relaxer, Super
- Just For Me 4 Application Salon Pack Relaxer, Regular
- Just For Me 4 Application Salon Pack Relaxer, Super
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular) with Coil & Curl Cream
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturizer Lotion
- Just For Me No-Lye Texture Softener System with Hair & Scalp Butter

## **Defendant SON Missing Product Identification Information**

### **Product (kit/system) missing formularies for the relaxer in each product:**

- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Oil Moisturizer Lotion
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Oil Moisturizer Lotion
- Elasta QP SOY OYL No-Base Relaxer Regular
- Elasta QP SOY OYL No-Base Relaxer Super
- Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit
- Elasta QP No-Base Relaxer Mild
- Elasta QP No-Base Relaxer Regular
- Elasta QP No-Base Relaxer Super
- Elasta QP Extra Body No-Base Regular Relaxer
- Elasta QP Extra Body No-Base Super Relaxer
- Elasta QP for Men Texturizer Kit
- Just For Me 1 Complete Touch Up Relaxer, Super
- Just For Me 4 Application Salon Pack Relaxer, Regular
- Just For Me 4 Application Salon Pack Relaxer, Super
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular) with Coil & Curl Cream
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturizer Lotion
- Just For Me No-Lye Texture Softener System with Hair & Scalp Butter
- Profectiv Precision One-Touch Relaxer Regular
- Profectiv Precision One-Touch Relaxer Super

### **Product (kit/system) missing artwork and labels for a product:**

- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular

## Defendant SON Missing Product Identification Information

- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Oil Moisturizer Lotion
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner and Silky Smooth Edges
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Oil Moisturizer Lotion
- Elasta QP SOY OYL No-Base Relaxer Regular
- Elasta QP SOY OYL No-Base Relaxer Super
- Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit
- Elasta QP No-Base Relaxer Mild
- Elasta QP No-Base Relaxer Regular
- Elasta QP No-Base Relaxer Super
- Elasta QP Extra Body No-Base Regular Relaxer
- Elasta QP Extra Body No-Base Super Relaxer
- Elasta QP for Men Texturizer Kit
- Just For Me 1 Complete Touch Up Relaxer, Super
- Just For Me 4 Application Salon Pack Relaxer, Regular
- Just For Me 4 Application Salon Pack Relaxer, Super
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular) with Coil & Curl Cream
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturizer Lotion
- Just For Me No-Lye Texture Softener System with Hair & Scalp Butter
- Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application, Super
- Profectiv Procision One-Touch Relaxer Regular
- Profectiv Procision One-Touch Relaxer Super
- Profectiv Procision Relaxer Kit Regular
- Profectiv Procision Relaxer Kit Super
- SmartPerm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications, Regular
- SmartPerm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications, Super
- S&B® Botanicals 2 Application Relaxer Coarse
- S&B® Botanicals 2 Application Relaxer Regular
- S&B® Botanicals Conditioner No-Mix Texturizer 2-App, Coarse with Deep Conditioner
- Soft & Beautiful No-Lye Crème Relaxer, Super Twin Pack

## Defendant SON Missing Product Identification Information

- UltraSheen Supreme Conditioning No-Lye Relaxer, Super
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular with Keratin

### Product (kit/system) missing IFUs for a product:

- African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular (*Missing dates for IFUs*)
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Aloe Deep Conditioner and Silky Smooth Edges (*Missing dates for IFUs*)
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Regular With Oil Moisturizer Lotion (*Missing dates for IFUs*)
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Aloe Deep Conditioner and Silky Smooth Edges (*Missing dates for IFUs*)
- African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application, Super With Oil Moisturizer Lotion (*Missing dates for IFUs*)
- African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit, Coarse
- African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit, Regular
- African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit, Coarse
- African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit, Regular
- Elasta QP SOY OYL No-Base Relaxer Regular
- Elasta QP SOY OYL No-Base Relaxer Super
- Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit
- Elasta QP No-Base Relaxer Mild
- Elasta QP No-Base Relaxer Regular
- Elasta QP No-Base Relaxer Super
- Elasta QP Extra Body No-Base Regular Relaxer
- Elasta QP Extra Body No-Base Super Relaxer
- Elasta QP for Men Texturizer Kit
- Just For Me 1 Complete Touch Up Relaxer, Super
- Just For Me 4 Application Salon Pack Relaxer, Regular
- Just For Me 4 Application Salon Pack Relaxer, Super
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Regular) with Coil & Curl Cream
- Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturizer Lotion
- Just For Me No-Lye Texture Softener System with Hair & Scalp Butter
- Profectiv Precision One-Touch Relaxer Regular
- Profectiv Precision One-Touch Relaxer Super

## Defendant SON Missing Product Identification Information

- Profectiv Procision Relaxer Kit Regular
- Profectiv Procision Relaxer Kit Super
- SmartPerm No-Lye Anti-Breakage Relaxer System, Regular
- SmartPerm No-Lye Anti-Breakage Relaxer System, Super
- SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit 4 Applications, Regular
- SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit 4 Applications, Super
- S&B® Botanicals 2 Application Relaxer Coarse
- S&B® Botanicals 2 Application Relaxer Regular
- S&B® Botanicals No-Lye Sensitive Scalp Relaxer 1-App, Coarse
- S&B® Botanicals No-Lye Sensitive Scalp Relaxer 1-App, Regular
- S&B® Botanicals Relaxer 8-Touch Up Regular
- S&B® Botanicals Relaxer 8-Touch Up Coarse
- Soft & Beautiful No-Lye Crème Relaxer, Regular Twin Pack
- Soft & Beautiful No-Lye Crème Relaxer, Super Twin Pack
- Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System, Regular
- Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System, Super
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Mild 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 18 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 7.5 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Regular 9 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 15 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 18 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 7.5 oz
- TCB No-Base Crème Hair Relaxer with Protein & DNA, Super 9 oz
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Super
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Super with Keratin
- UltraSheen Ultra Moisturizing No-Lye Relaxer, Regular with Keratin

**EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: HAIR RELAXER MARKETING SALES  
PRACTICES AND PRODUCTS LIABILITY  
LITIGATION

Case No. 1:23-cv-00818

MDL No. 3060

Judge Mary M. Rowland

**REVLON’S OMNIBUS AMENDED & SUPPLEMENTAL RESPONSES  
AND OBJECTIONS TO PLAINTIFFS’ SIXTH SET OF INTERROGATORIES**

Pursuant to the applicable Federal Rules of Civil Procedure, and the Local Rules of the United States District Court for the Northern District of Illinois (the “Local Rules”), Defendant Revlon Inc., Revlon Consumer Products Corp., Revlon Group Holdings LLC, and Roux Laboratories, Inc. (together “Revlon”) respectfully submit the following amended responses and objections to Plaintiffs’ Sixth Set of Interrogatories served on December 1, 2023 (the “Interrogatories”). Revlon served its initial responses and objections to Plaintiffs’ Interrogatories on January 23, 2024. Revlon subsequently served amended responses and objections on or about April 22, 2024, and then again on or about August 9, 2024. Revlon now provides additional amended responses and objections in response to purported deficiencies in Revlon’s previous responses and objections, identified by correspondence from Plaintiffs’ counsel on or about June 13, 2024, and again on September 27, 2024. Revlon’s submission of these amended responses and objections should not be construed as an admission and/or acknowledgement of the merit of any of Plaintiff’s purported deficiencies.

Revlon is submitting omnibus responses and objections to the Interrogatories because it has recently emerged from bankruptcy proceedings and, at least for the purposes of this set of Interrogatories and for the ultimate liquidation of any judgment(s) obtained against Revlon in these civil cases, the distinctions and differences between and among the knowledge of the various

- HAIR RELAXER PRODUCT(S);
- c. identify the name(s) of the person(s) responsible for creating each such instruction and/or warning and/or draft of such instruction and/or warning, and state whether he/she/they is/are still employed by YOU, and if not, then provide his/her/their last known address and phone number;
  - d. the name(s) of the person(s) who approved each such instruction and/or warning, and state whether he/she/they is/are still employed by Defendants, and if not, then provide his/her/their last known address and phone number; and
  - e. the purpose of each such warning and instruction. PLEASE EXPLAIN ANY ADDITIONAL CRITERIA YOUR COMPANY USES IN DETERMINING TO PLACE A WARNING ON ITS PRODUCTS.

**RESPONSE TO INTERROGATORY NO. 3:**

Revlon incorporates by reference, as though fully set forth herein, each of its General Objections, including its objections to the definitions of “You(r)” and “Hair Relaxer Product(s)” and, in responding, has interpreted those terms as set forth by Revlon above. Revlon objects to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of the cases as it seeks information irrelevant to the civil actions on the grounds that the information requested has no bearing on any party’s claim or defense in these cases. Revlon further objects to this Interrogatory to the extent that it is cumulative and duplicative of Revlon’s Response to Request No. 7 in Revlon’s Omnibus Responses and Objections to Plaintiffs’ First Set of Requests for Production.

Subject to and without waiving any of the foregoing objections, instructions and/or warnings associated with Revlon’s hair relaxer products would have been found on the product packaging, and or product instructions. As the burden of deriving a further response would be the same to Plaintiff as it would be to Revlon, pursuant to Rule 33(d), Revlon refers to documents bates labeled as

Revlon-MDL-00013353 – 00013358  
Revlon-MDL-00013361  
Revlon-MDL-00013362  
Revlon-MDL-00000026  
Revlon-MDL-00013363  
Revlon-MDL-00012000  
Revlon-MDL-00000027  
Revlon-MDL-00000028

Revlon-MDL-00012001  
Revlon-MDL-00013603  
Revlon-MDL-00000029  
Revlon-MDL-00000030  
Revlon-MDL-00000031  
Revlon-MDL-00000032  
Revlon-MDL-00000033  
Revlon-MDL-00013604  
Revlon-MDL-00000034  
Revlon-MDL-00000035  
Revlon-MDL-00013605  
Revlon-MDL-00000036  
Revlon-MDL-00000037  
Revlon-MDL-00013364  
Revlon-MDL-00013370  
Revlon-MDL-00013616  
Revlon-MDL-00013371  
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Revlon-MDL-00012042 - 00012048  
Revlon-MDL-00013634 – 00013640  
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Revlon-MDL-00012103 - 00012104  
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Revlon-MDL-00012107 - 00012108  
Revlon-MDL-00012109 - 00012110  
Revlon-MDL-00012111 - 00012112  
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Revlon-MDL-00017000 – 00017005  
Revlon-MDL-00017006  
Revlon-MDL-00017008  
Revlon-MDL-00017020  
Revlon-MDL-00017022  
Revlon-MDL-00017483  
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Revlon-MDL-00017992  
Revlon-MDL-00017564  
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Revlon-MDL-00013490  
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Revlon-MDL-00016934  
Revlon-MDL-00013487  
Revlon-MDL-00013488  
Revlon-MDL-00013390  
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Revlon-MDL-00017954  
Revlon-MDL-00017963  
Revlon-MDL-00017989  
Revlon-MDL-00018002  
Revlon-MDL-00013393  
Revlon-MDL-00017544  
Revlon-MDL-00013383  
Revlon-MDL-00013499  
Revlon-MDL-00016992  
Revlon-MDL-00013603  
Revlon-MDL-00017550  
Revlon-MDL-00013519  
Revlon-MDL-00013379  
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Revlon-MDL-00013431  
Revlon-MDL-00013430  
Revlon-MDL-00013363  
Revlon-MDL-00013375  
Revlon-MDL-00013377  
Revlon-MDL-00013380  
Revlon-MDL-00017008  
Revlon-MDL-00013504  
Revlon-MDL-00013506  
Revlon-MDL-00013505  
Revlon-MDL-00013503  
Revlon-MDL-00017548  
Revlon-MDL-00013618  
Revlon-MDL-00013657  
Revlon-MDL-00012000  
Revlon-MDL-00017022  
Revlon-MDL-00013619  
Revlon-MDL-00012083 - 00012096  
Revlon-MDL-00013603  
Revlon-MDL-00013383

Revlon-MDL-00013384  
Revlon-MDL-00013434  
Revlon-MDL-00013486

See also, Revlon's document production dated August 9, 2024.

Revlon is engaged in a continuing investigation; therefore, Revlon reserves the right to amend, modify, or further respond or object to this Interrogatory to the extent required and in accordance with the Federal Rules of Civil Procedure, the Local Rules, or any applicable court order.

**INTERROGATORY NO. 4:** Identify each and every change in the instructions and/or warnings associated with YOUR HAIR RELAXER PRODUCT(S) and for each such change identified by YOU, please indicate the following:

- a. The specific changes that were implemented; The reason behind the changes being put forth;
- b. The names(s) of the person(s) who initiated the changes and state whether he/she/they is/are still employed by YOU and, if not, provide his/her/their last known address and phone number;
- c. Dates that all the changes were put forth;
- d. Attach copies of all documents pertaining to the instructions and/or warnings as well as copies of all communications (written or otherwise) concerning any change(s), revision(s) and/or modification(s) concerning HAIR RELAXER PRODUCT(S).
- e. Any and all studies performed supporting and/or prompting the changes;
- f. Any and all other information that supported and/or prompted the changes.

**RESPONSE TO INTERROGATORY NO. 4:**

Revlon incorporates by reference, as though fully set forth herein, each of its General Objections, including its objections to the definitions of "Communications," "You(r)" and "Hair Relaxer Product(s)" and, in responding, has interpreted those terms as set forth by Revlon above. Revlon objects to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of the cases as it seeks information irrelevant to the civil actions on the grounds that the information requested has no bearing on any party's claim or defense in these cases. Revlon further objects to this Interrogatory to the extent that it is cumulative and duplicative of Revlon's Response

**INTERROGATORY NO. 10:** Identify and describe in complete detail all tests or analyses performed by YOU on YOUR HAIR RELAXER PRODUCT(S) identified in your Response to Interrogatory Number 7 (or any ingredients therein). Include in your response:

- a. a description of the nature of the tests or analyses;
- b. the date(s) upon which such tests or analyses were conducted;
- c. the identity of the persons who performed the tests or analyses;
- d. the findings and conclusions of the tests or analyses; and
- e. the identity of any reports or documents relating to such tests or analyses.

**RESPONSE TO INTERROGATORY NO. 10:**

Revlon incorporates by reference, as though fully set forth herein, each of its General Objections, including its objections to the definitions of “You(r)” and “Hair Relaxer Product(s)” and, in responding, has interpreted those terms as set forth by Revlon above. Revlon objects to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of the cases as it seeks information irrelevant to the civil actions on the grounds that the information requested has no bearing on any party’s claim or defense in these cases. Revlon further objects to this Interrogatory as vague and ambiguous as to the terms “tests” and “analyses.” Revlon also objects to this Interrogatory to the extent that it is cumulative and duplicative of Revlon’s Response to Request No. 10 in Revlon’s Omnibus Responses and Objections to Plaintiffs’ First Set of Requests for Production.

Subject to and without waiving the foregoing, Revlon refers to its responses to Interrogatories Nos. 8 and 9. Revlon cannot specify each and every “test” and/or “analysis” ever performed on its hair relaxer products. As the burden of deriving a further response to this interrogatory, would be the same to Revlon as it would be to Plaintiff, pursuant to Rule 33(d), Revlon refers to documents bates labeled

Revlon-MDL-00013340  
Revlon-MDL-00012099  
Revlon-MDL-00017940  
Revlon-MDL-00017943  
Revlon-MDL-00017952  
Revlon-MDL-00017955

Revlon-MDL-00017960  
Revlon-MDL-00017983  
Revlon-MDL-00018003 - 00018007  
Revlon-MDL-00018008 - 00018012  
Revlon-MDL-00018013 - 00018017  
Revlon-MDL-00018018 - 00018022  
Revlon-MDL-00018023 - 00018027  
Revlon-MDL-00018035 - 00018039  
Revlon-MDL-00018042 - 00018046  
Revlon-MDL-00018047 – 00018051 Revlon-MDL-00013340  
Revlon-MDL-00011994 - 00011996  
Revlon-MDL-00013341 - 00013352  
Revlon-MDL-00013408  
Revlon-MDL-00013412  
Revlon-MDL-00013413  
Revlon-MDL-00012007 - 00012009  
Revlon-MDL-00012050 - 00012052  
Revlon-MDL-00018088  
Revlon-MDL-00013467  
Revlon-MDL-00012082  
Revlon-MDL-00012099  
Revlon-MDL-00013650 - 00013652  
Revlon-MDL-00012100 - 00012102  
Revlon-MDL-00013533  
Revlon-MDL-00013537  
Revlon-MDL-00013114 - 00013133  
Revlon-MDL-00013559  
Revlon-MDL-00017940  
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Revlon-MDL-00017952  
Revlon-MDL-00017955  
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Revlon-MDL-00018042 - 00018046  
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Revlon-MDL-00018042 - 00018046  
Revlon-MDL-00018047 – 00018051  
Revlon-MDL-00011994 – 00011996

Revlon-MDL-00013317 - 00013328  
Revlon-MDL-00011994 - 00011996  
Revlon-MDL-00011997 - 00011999  
Revlon-MDL-00013341 - 00013352  
Revlon-MDL-00012050 - 00012052  
Revlon-MDL-00012072 - 00012081  
Revlon-MDL-00013650 - 00013652  
Revlon-MDL-00012100 - 00012102  
Revlon-MDL-00017488 - 00017499  
Revlon-MDL-00017970 - 00017981  
Revlon-MDL-00018003 - 00018007  
Revlon-MDL-00018008 - 00018012  
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Revlon-MDL-00018035 - 00018039  
Revlon-MDL-00018040  
Revlon-MDL-00018041  
Revlon-MDL-00018042 - 00018046  
Revlon-MDL-00018047 - 00018051  
Revlon-MDL-00012218 - 00012226

Revlon is engaged in a continuing investigation; therefore, Revlon reserves the right to amend, modify, or further respond or object to this Interrogatory to the extent required and in accordance with the Federal Rules of Civil Procedure, the Local Rules, or any applicable court order.

**INTERROGATORY NO. 11:** Identify whether in investigating, testing, and/or otherwise researching HAIR RELAXER PRODUCT(S) at any time, YOU performed or had performed on YOUR behalf any animal study(ies) in which HAIR RELAXER PRODUCT(S)' safety was tested. If YOUR answer is in the affirmative, please identify or state the following:

- a. When the first time such a study was made by or for YOU;
- b. How many studies were done by or for YOU, and the inclusive dates of each and/or all study(ies);
- c. State why the study(ies) was/were done;
- d. Identify the type(s) of animal(s), tested, state the number of animals involved in the study(ies);
- e. State whether the study(ies) was/were ever concluded, state whether the data was ever published, and if so the date(s) of publication(s) and the name(s) of the publication(s),