

Legal Notice

If you bought paint for use (not resale) at your home or business between January 1, 2002, and December 13, 2017, please read this notice carefully. Your legal rights may be affected by the proposed settlement of a class action lawsuit. You may also qualify for cash and other benefits from the proposed settlement.

This Notice provides information about a settlement that has been proposed in a class action lawsuit involving architectural paint purchased **for personal use** between January 1, 2002, and December 13, 2017, which contained, in some form, titanium dioxide, manufactured by E.I. DuPont de Nemours and Company, Huntsman International LLC, Kronos Worldwide, Inc., and Cristal USA Inc., f/k/a Millennium Inorganic Chemicals Inc. (the "Defendants"). This paint is referred to throughout this Notice as the "Architectural Paint." For clarity, as an example, Architectural Paint would include any paint you would have used to paint something around your home or business such as walls, floors, ceilings, or some other surface either inside or outside. For settlement purposes, Architectural Paint purchased in the United States between January 1, 2002 and December 13, 2017 is presumed to contain Titanium Dioxide manufactured by the Defendants.

The proposed settlement provides cash compensation and other benefits to those who bought Architectural Paint for use. If the paint was bought for resale, the paint is not included in the settlement.

How do I know if I am a Class Member?

You are a Class Member and, thus, affected by the proposed settlement and eligible for benefits under the proposed settlement if one of the two definitions below describes you:

Injunctive Relief Settlement Class: All purchasers, in the United States, of Architectural Paint for personal use and not for resale containing, in some form, Titanium Dioxide manufactured by one or more of the Defendants or co-conspirators, or any predecessors, parents, subsidiaries, or affiliates thereof from January 1, 2002 until December 13, 2017.

Damages Settlement Class: All purchasers who either: (1) purchased Architectural Paint from a seller in a Damages State, or (ii) who reside in a Damages State and purchased Architectural Paint in the United States, provided that in either case the Architectural Paint purchased was for personal use and not for resale containing, in some form, Titanium Dioxide manufactured by one or more of the Defendants or co-conspirators, or any predecessors, parents, subsidiaries, or affiliates thereof from January 1, 2002 until December 13, 2017.

The Damages States include: Arizona, Arkansas, California, District of Columbia, Florida, Hawaii, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin.

For more information:

www.TitaniumPaintSettlement.com

1-877-388-5623

What does the proposed settlement provide?

The total settlement amount provides for Defendants to pay \$3,500,000.00. This amount will be used to compensate Damages Settlement Class Members who submit eligible claims for the purchase of Architectural Paint. The proposed settlement also provides additional non-monetary benefits to the Injunctive Relief Settlement Class.

How can I get a Payment?

If you are a member of the Damages Settlement Class, you may fill out and submit a Claim Form to ask for the benefits provided by the settlement for which you can prove you are eligible. You may submit a claim form and any required supporting documents online at www.TitaniumPaintSettlement.com. You may also submit your claim form by mail to Harrison Paint Settlement Administrator, P.O. Box 1571, West Palm Beach, FL 33402. You can get additional Claim Forms at www.TitaniumPaintSettlement.com or by calling 1-877-388-5623.

The Claim Form asks you for information about your purchase of Architectural Paint. Follow the instructions on the Claim Form closely. You must sign the Claim Form under penalty of perjury either in ink or electronically and either submit it online or mail it to the Settlement Administrator. Submitting a fraudulent claim is against the law.

Your Claim Form must be postmarked by June 15, 2018 if submitted via mail or actually received by the Settlement Administrator no later than June 15, 2018 if submitted electronically. If you miss the deadline, you will lose your right to participate in the monetary benefits of the proposed settlement.

What Are Your Rights?

If you do nothing, and if you do **not** file a Claim Form by June 15, 2018, you will not get a payment from this settlement. You will still be part of the Injunctive Relief Settlement Class. If you do **not** exclude yourself or opt-out from the Settlement Class by June 15, 2018, you will be legally bound by the settlement and release and cannot sue the Defendants about the legal claims in this case. If you opt out, you will not be eligible to participate in any aspect of the settlement. You may pursue any legal remedies available to you at your own expense.

The Court has scheduled a Fairness Hearing on August 16, 2018, at 1:30 p.m. at the U.S. District Court Northern District of California, San Jose Division located at 280 South 1st Street, San Jose, California 95113. At this hearing the Court will consider whether the settlement is fair, adequate, and reasonable. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. After the hearing, the Court will make its decisions.

Si usted desea obtener una copia de este documento legal en Español, favor de actuar inmediatamente y visite la página web www.TitaniumPaintSettlement.com o escriba al Administrador de Reclamaciones: Titanium Dioxide Paint Settlement Administrator, P.O. Box 1571, West Palm Beach, FL 33402.