

If you purchased a Joy/JM-branded brand My Little Steamer from January 1, 2002 through December 31, 2020, you may be entitled to a financial award as part of a class action settlement.

SI DESEA RECIBIR ESTA NOTIFICACIÓN EN ESPAÑOL, LLÁMENOS O VISITE NUESTRA PÁGINA WEB
A federal court has authorized this Notice. This is not a solicitation from a lawyer.

- A Settlement has been reached in a class action lawsuit against Ingenious Designs, LLC (“IDL”) and HSN, Inc. (“HSN”) (collectively “Defendants”). The case involves alleged safety concerns with portable clothing steamers sold under the name “Joy/JM-branded My Little Steamer.” The parties to the class action lawsuit have agreed that the proposed Settlement is fair, reasonable, and adequate.
- The Settlement includes all individuals who purchased any Joy/JM-branded My Little Steamer (“Steamer” or “Steamers”) from January 1, 2002 through December 31, 2020. Class Members who file a valid claim can receive a refund, cash payment or an HSN voucher depending on the product purchased and documentation provided.
- In addition to the proposed Settlement in the class action lawsuit, the Defendants have reached a separate but related settlement with the United States Consumer Product Safety Commission (“CPSC”) regarding the same alleged safety concerns with the Steamers. Although the benefits to consumers under the class action Settlement and the CPSC settlement are identical, consumers have specific legal rights under the class action Settlement. These rights are affected whether or not you act. ***Please read this notice carefully.***

| YOUR RIGHTS AND CHOICES | | DEADLINE |
|----------------------------|--|--|
| Submit a Claim Form | The only way to get a Payment is to submit a Claim Form. | No Deadline to file a Claim |
| Exclude Yourself | Get no Payment under the Settlement, but keep any right to file your own lawsuit against Defendants about the legal claims in this case. | Submit an Exclusion: August 4, 2021 |
| Object | Tell the Court why you don’t like the Settlement. You will still be bound by the Settlement if the Court approves it and you may still file a Claim Form for a Cash Payment. | Deadline to file an Objection: August 4, 2021 |
| Attend A Hearing | You have the right to ask to speak to the Court about the fairness of the Settlement. You are not, however required to do so nor are you required to appear in Court. | Deadline to file a Notice of Appearance: August 4, 2021 |
| Do Nothing | Get no Payment. Give up legal rights. | |

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case has not yet decided whether to approve the Settlement. Payments to valid claimants will be sent if the Court approves the Settlement and after any appeals are resolved. Please be patient.

Questions? Call 1-855-654-0942, or Visit www.SteamerRecallSettlement.com

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BASIC INFORMATION

1. Why should I read this Notice?

If you purchased any Joy/JM-branded My Little Steamer from January 1, 2002 through December 31, 2020, you are a member of the Settlement Class.

This Notice explains the class action lawsuit, the proposed Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to get the benefits.

The Court in charge of this case is the United States District Court for the Eastern District of New York. The lawsuit is known as *Melissa Fiore, et al. v. Ingenious Designs, LLC*, Case No. 1:18-cv-07124-ENV-ST. The persons who sued are called “Plaintiffs,” and entities who were sued, Ingenious Designs, LLC (“IDL”) and HSN, Inc. (“HSN”), are called the “Defendants.”

2. What is this lawsuit about?

This lawsuit includes claims for alleged violation of consumer protections statutes, as well as a claim for unjust enrichment. Each of the asserted claims involve alleged safety concerns with portable clothing steamers sold under the name “Joy/JM-branded My Little Steamer.” Defendants have not admitted any liability and deny the claims in the lawsuit. The Court has not decided who is right.

3. Why is the lawsuit a class action?

In a class action lawsuit, one or more people called “Class Representatives” sue on behalf of other people who may have similar claims. This group of people are referred to as a “Class” or “Class Members.” The people who sue – and all the Class Members like them – are called the “Plaintiffs.” The companies the Plaintiffs sued (Ingenious Designs, LLC (“IDL”) and HSN, Inc. (“HSN”) are called the “Defendants.” One court resolves the issues for everyone in the Class – except for those people who choose to exclude themselves from the Class. U.S. Magistrate Judge Steven Tiscione is in charge of this class action.

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or Defendants. Instead, both sides agreed to a settlement. Plaintiffs and the Defendants have engaged in extensive arm’s-length negotiations, both through numerous conferences between the Parties’ counsel, and with the assistance of several independent mediators. The Parties reached a tentative settlement agreement. By agreeing to settle, both sides avoid the cost and risk of a trial, and people who submit valid claims will get compensation. The Class Representatives and their attorneys believe the Settlement is best for the Settlement Class and its members.

WHO IS IN THE SETTLEMENT?

To see if you are eligible for benefits, you first must determine if you are a Class Member.

5. Am I part of the Settlement?

You are a Class Member if you purchased any Joy/JM-branded My Little Steamer from January 1, 2002 through December 31, 2020. Excluded from the Settlement Class are the Judge to whom the Action is assigned and any member of the Court’s staff and immediate family.

Questions? Call 1-855-654-0942, or Visit www.SteamerRecallSettlement.com

If you are not sure if you are a member of the Settlement Class, please visit the settlement website at www.SteamerRecallSettlement.com to see a more in-depth description of the Steamer products included in the settlement, including pictures and other descriptive information.

6. Am I also part of a Consumer Product Safety Commission Recall?

If you are member of the Settlement Class you are also covered by a voluntary recall (called a “CPSC Corrective Action Plan” or “CAP”) involving the Steamers. The Defendants reached this agreement separately with the CPSC, and the voluntary recall is proceeding at the same time as the class action Settlement covered by this Notice. The benefits available to you are identical under both agreements and you only need to file your claim one time. You may only file one claim for each Steamer you have purchased (you cannot recover twice for the same Steamer).

THE SETTLEMENT BENEFITS – WHAT YOU GET

7. What does the Settlement provide?

The Settlement provides cash payments or HSN vouchers to valid claimants depending on the Steamer product purchased, the date of purchase, and the sales documentation that you provide.

- For all Steamers purchased new from January 2018 through December 2020, Class Members who submit a valid claim will receive a full cash refund of the purchase price for each unit with proof of purchase and proof of ownership and destruction.
- For My Little Steamer Go Mini model steamers purchased new from January 2015 through December 2017, Class Members who submit a valid claim will receive an \$8.00 cash refund for each unit with proof of purchase and proof of ownership and destruction.
- For My Little Steamer Deluxe model steamers purchased new from January 2015 through December 2017, Class Members who submit a valid claim will receive a \$12.00 cash refund for each unit with proof of purchase and proof of ownership and destruction.
- For all Steamers purchased new prior to January 2015 or for Steamers where Class Members’ lack proof of purchase, Class Members who submit a valid claim will receive an \$8.00 HSN voucher for each unit with proof of ownership and destruction.

If you were sent notice by mail or email, you were provided a unique identifying number in your notice that you can use to file your claim. This will serve as your proof of purchase. You can also establish proof of purchase by providing the Claims Administrator a valid receipt.

Proof of ownership and destruction may be established by providing the Claims Administrator a photo of the Steamer with the body defaced (with permanent and prominent marking) and the electrical cord severed. If you file your claim online there will be an easy way to upload this picture. Visit the Settlement Website at www.SteamerRecallSettlement.com for directions on how to deface your Steamer and cut the cord.

After you file your claim, you should dispose of the Steamer in your household trash after a photograph of the body of the Steamer and the severed electrical cord is sent to the Claims Administrator, and you receive your payment or voucher that you are entitled to under the Settlement.

If you are claiming a refund for more than 10 units of the Steamer, you may be asked to show proof of the price you paid for the Steamers through a valid receipt. Upon providing such a receipt and proof of ownership and destruction of the Steamers, valid claimants for more than 10 Steamers will get the lesser of the full refund amount provided in the Settlement and the actual amount paid for the Steamers.

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The payments set forth in this Agreement are the same payments set forth in the separate but related CPSC Corrective Action Plan. Class Members are only entitled to recover once for each Steamer unit.

8. What else does the Settlement Provide?

Subject to the terms and conditions of the Agreement, the Defendants have ceased all manufacture, importation, distribution, and sale of the Steamers to/in the United States. On June 7, 2019, Defendants provided a notice to all distributors and retailers to whom Defendants sold the Steamers to stop sale of the Steamers. Defendants shall notify all such distributors and retailers of the Steamers to take immediate steps to quarantine, segregate, and conspicuously identify as recalled all Steamers. Defendants shall further instruct each such distributor and retailer of the Steamers to return to HSN all units of the Steamers in the possession of the distributor/retailer or destroy the units by rendering them unusable.

HOW TO GET BENEFITS FROM THE SETTLEMENT

9. How can I get my Cash Payment or HSN Voucher?

If you are a Class Member, you must fill out and submit a Claim Form to get your refund or HSN voucher. You can easily file your Claim online at www.SteamerRecallSettlement.com. You can also download a paper Claim Form from the website or get one by calling the Claims Administrator at 1-855-654-0942. The completed Claim Form must be submitted online or by mail at the address below.

My Little Steamer Claims Administrator
P.O. Box 3698
Portland, OR 97208- 3698

Upon receiving a completed claim form, the Claims Administrator will review the documentation and confirm or deny your eligibility for an award.

10. When will I receive my Cash Payment or Voucher?

The Court will hold a hearing by telephone on **September 10, 2021 at 11:00 a.m. Eastern Time** (which is subject to change), to decide whether to approve the Settlement. Even if the Court approves the Settlement, there may be appeals. The appeal process can take time, perhaps more than a year. You will not receive your refund or voucher until any appeals are resolved. Please be patient.

11. What am I giving up in order to receive these Settlement benefits?

If the Settlement becomes final, members of the Settlement Class who submit a claim or do nothing at all will be releasing the Defendants from the Released Claims described and identified in Section X of the Settlement Agreement. This means you will no longer be able to sue the Defendants regarding any of the Released Claims described in the Settlement Agreement.

The Settlement Agreement is available at www.SteamerRecallSettlement.com. The Settlement Agreement provides details regarding the Released Claims with specific descriptions in necessary, accurate, legal terminology, so read it carefully. You can talk to the law firms representing the Settlement Class listed in the section “The Lawyers Representing You” for free or you can, at your own expense, talk to your own lawyer if you have any questions about the released claims or what they mean.

Questions? Call 1-855-654-0942, or Visit www.SteamerRecallSettlement.com

THE LAWYERS REPRESENTING YOU

12. Do I have lawyers in this case?

The Court has appointed attorney Christa L. Collins from the law firm Collins Law PL as Lead Class Counsel along with other attorneys that appeared on behalf of Plaintiffs in the case to represent you and the other Class Members. Together the lawyers are called Class Counsel. They are experienced in handling similar class action cases. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

You may contact Lead Class Counsel if you have any questions about this Notice or the Settlement. ***Please do not contact the Court.***

Lead Class Counsel:

Christa L. Collins

Tel: (727) 218-1763

Email: christa@clcclassactionlaw.com

13. How will the lawyers be paid?

Class Counsel will ask the Court for an award of attorneys' fees and costs up to \$975,000. Class Plaintiffs will make application to the Court for an Incentive Award in the amount of \$5,000 each for the time and effort they have invested in this Action, and for the benefits their efforts have provided to the Settlement Class. Any award of attorneys' fees and costs and the Incentive Award to Class Plaintiffs will be paid separately by the Defendants and will not reduce the amounts paid to any Class Member who files a valid claim.

YOUR RIGHTS – EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a refund or a voucher, but want to keep the right to sue or continue to sue the Defendants, on your own, about the legal issues in this case, then you must take steps to exclude yourself from the Settlement (get out of the Settlement). This is called "excluding yourself" or is sometimes referred to as "opting out" of the settlement class.

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a "Request for Exclusion" in the form of a letter that (i) is signed by you; (ii) includes your full name and address; and (iii) includes the following statement: "I/we request to be excluded from the settlement in the *Fiore v. IDL lawsuit*." You must mail your Request for Exclusion **postmarked by August 4, 2021** to: My Little Steamer Claims Administrator, Exclusions, P.O. Box 3698, Portland, OR 97208-3698.

If you do not follow these procedures and deadlines, you will remain a Class Member and lose any opportunity to exclude yourself from the Settlement. This means that your rights will be determined in this lawsuit by the Settlement Agreement if it receives final approval from the Court.

15. If I exclude myself, can I get any monetary relief from this Settlement?

No. If you exclude yourself, you cannot ask for a refund or a voucher.

YOUR RIGHTS – OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or some part of it.

16. How do I tell the Court that I don't like the Settlement?

If you're a Class Member, you can object to the Settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. Note: You cannot ask the Court to require a different Settlement; the Court can only approve or reject the proposed Settlement. If the Court denies approval, no settlement awards will be sent out and the lawsuit will continue. If that is what you want to happen, you should object.

To object, you must send a letter. Be sure to include the following information:

- All documents establishing, or provide information sufficient to allow the Parties to confirm, that you are a Settlement Class Member, including providing your full name, address, and whether you intend to appear at the fairness hearing on your own behalf or through counsel;
- Include a statement of your specific objections;
- State the grounds for each objection and attach any documents supporting the objection; and
- A heading which includes the name of the case and the case number.

Your objection must be submitted to the Court either by mailing (or by filing it at any location of the United States District Court for the Eastern District of New York) and served on Class Counsel and Defendant's Counsel so it is **received** no later than **August 4, 2021**, to the following addresses:

| | | |
|--|--|---|
| <p style="text-align: center;"><u>Court:</u> United States District Court, Eastern District of NY 225 Cadman Plaza East, Rm 118S Brooklyn, NY 11201</p> | <p style="text-align: center;"><u>Class Counsel:</u> Christa Lianne Collins Collins Law PL 433 Central Ave., 4th Floor St. Petersburg, FL 33701</p> | <p style="text-align: center;"><u>Defense Counsel:</u> Daniel Blouin Winston & Strawn LLP 35 West Wacker Drive Chicago, IL 60601</p> |
|--|--|---|

If you timely file an objection it will be considered by the Court at the Final Approval Hearing. You do not need to attend the Final Approval Hearing for the Court to consider your objection.

17. What's the difference between objecting and asking to be excluded?

"Objecting" refers to the opportunity you have to tell the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. "Excluding yourself" means that you are telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because you are no longer part of the case.

YOUR RIGHTS – APPEARING AT THE FINAL APPROVAL HEARING

The Court will hold a "Final Approval Hearing" to decide whether to approve the Settlement. You may attend and you may ask to speak, but you don't have to do so.

18. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing by telephone at 11:00 a.m. Eastern Time on September 10, 2021. Individuals who wish to attend the Final Approval Hearing may connect to the conference by dialing 1-888-557-8511 and entering access code 3152145.

At the hearing, the Court will hear any comments, objections, and arguments concerning the fairness of the proposed Settlement, including the amount requested by Class Counsel for attorneys' fees and expenses. If there are objections, the Court will consider them. You do not need to attend this hearing. You also do not need to attend to have a comment or objection considered by the Court. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long the Court will take to make its decision regarding whether or not to approve the Settlement.

Note: The date and time of the Final Approval Hearing are subject to change by Court Order. Any change will be posted at www.SteamerRecallSettlement.com. You should check this website or the Court's PACER website to confirm that the date and/or time have not changed.

19. Do I have to attend the Final Approval Hearing?

No. Class Counsel will answer all questions the judge may have. You are, however, welcome to attend the hearing at your own expense. If you submit an objection, you do not have to attend the hearing to have your objection considered by the Court. The judge will consider your objection as long as you file it by the objection deadline referenced above. You may also pay your own lawyer to attend the court hearing, but it is not necessary to do so.

20. May I speak at the Final Approval Hearing?

As long as you do not exclude yourself, you can (but do not have to) participate and speak for yourself at the Final Approval Hearing. This is called making an appearance. You also can have your own lawyer speak for you, but you will have to pay him or her yourself. To be heard at the Final Approval Hearing, the Settlement Class Member must make any objection in writing and file it with the Court by the Objection Deadline

If you want to appear, you must: (i) file a notice of appearance with the Clerk of Court to the address in Question 16 above no later than twenty (20) days prior to the Final Approval Hearing, or as the Court may otherwise direct; and (ii) serve a copy of such notice of appearance on all counsel for all Parties. If you hire an attorney to represent you individually, the attorney must (i) file a notice of appearance with the Court no later than twenty (20) days prior to the Final Approval Hearing, or as the Court may otherwise direct; and (ii) include with the notice of appearance a statement identifying all other class action cases in which the attorney has appeared either as counsel on behalf of an objecting class member or as lead counsel on behalf of a class, including the case style, case number, and court, (iii) include with the notice of appearance, a statement detailing the ultimate disposition of any objection filed by the attorney in any class action case and describe whether the objection was resolved for a payment of fees with no alteration to the underlying class action settlement agreement or, in the event the objection was resolved with an enhancement to the underlying class action settlement agreement, describe those enhancements and how the class action settlement was modified and (iv) serve a copy of the notice and statements on Class Counsel and Defendant's Counsel, by fax and first-class mail, no later than (20) days prior to the Final Approval Hearing.

Any Settlement Class Member who fails to comply with these requirements, and the requirements to object in general, will waive and forfeit any and all rights to appear separately and/or to object, and will be bound by all the terms of this Settlement, and by all proceedings, orders, and judgments in the litigation.

YOUR RIGHTS – DO NOTHING

21. What happens if I do nothing at all?

If you do nothing, you'll be part of the Settlement Class, but you will not get any cash payment or voucher from the Settlement. Unless you exclude yourself, you will not be permitted to continue to assert Released Claims in any other lawsuit against the Defendants about the legal issues in this case, ever again.

GETTING MORE INFORMATION

22. Are there more details about the Settlement?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.SteamerRecallSettlement.com, or by contacting Class Counsel by email or telephone at the address or number listed in response to Question 12 above.

23. How do I get more information?

You can call toll-free 1-855-654-0942, write to My Little Steamer Settlement, P.O. Box 3698, Portland, OR 97208-3698; or go to www.SteamerRecallSettlement.com, where you will find answers to common questions about the Settlement, be able to file an online claim, download a paper Claim Form, motions for approval of the Settlement and Class Counsel's request for attorneys' fees and expenses, and other important documents in the case. You may also seek advice and guidance from your own private attorney at your own expense.

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