

**IN THE CIRCUIT COURT TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS**

NOTICE OF SETTLEMENT

**If you purchased Rainbow Light Vitamins, Multivitamins and/or Supplements
between December 1, 2015 and April 16, 2020,
you may be entitled to compensation.**

- Plaintiffs Erin Smid, Brandie Lee, Stacy Bowland have sued Nutranext, LLC; Nutranext Business, LLC; Nutranext eHealth, LLC; Rainbow Light Nutritional Systems, LLC; Renew Life Holdings Corporation; Renew Life Formulas LLC; Everest NeoCell LLC; Nutranext Direct, LLC; and Nature’s Products, Inc., alleging violations of state consumer fraud acts, breach of implied warranties, and unjust enrichment.
- The Parties have reached a settlement in this matter. The Court has granted preliminary approval of the Settlement Agreement.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

REGISTER AND MAKE A CLAIM	Collect your Portion of the Settlement. If you both register to submit a Claim and timely submit a Claim Form with or without any supporting paperwork (detailed below), you will be entitled to a portion of the Settlement upon final approval of the Court. In making a Claim, you waive your right to sue Defendants on your own for the claims alleged in the lawsuit.
REQUEST EXCLUSION	Request an Exclusion or Opt-Out of the Settlement. By requesting to be excluded from (or opting-out of) the Settlement, you will not recover any part of the Settlement Funds but will keep your right to sue Defendants on your own regarding the claims alleged in this lawsuit.
DO NOTHING	Ignore this Notice. By doing nothing, you are choosing to stay in the lawsuit, but will not be eligible for any compensation. You will receive no money from the Settlement and will give up your right to sue Defendants on your own regarding the claims alleged in the lawsuit.
OBJECT	Lodge an Objection. By lodging an objection, you are choosing to remain part of the Settlement Class but object to its terms. The Court will review your objection prior to deciding whether to grant final approval of the Settlement.

Questions? Call 1-833-930-2421 Toll Free—or—visit
www.NXTvitaminSettlement.com

- Your rights and options are explained in this Notice. To make a claim for your *pro rata* portion of the Settlement you must file between May 29, 2020 and July 29, 2020. To exclude yourself, or to object, you must act by June 29, 2020.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION PAGE 3

- Why was this notice issued?
- What is the lawsuit about?
- What is a class action?

THE CLAIMS IN THE LAWSUIT PAGE 4

- What does the lawsuit complain about?
- How do WestRock and West Point Chips answer?
- What are the Plaintiffs asking for on behalf of the Class?

THE SETTLEMENT TERMS PAGE 5

- What are the terms of the agreement?
- Is there any money available now?
- How much will I receive?

MEMBERS OF THE CLASS PAGE 5

- How do I know if I am part of the Class?

YOUR RIGHTS AND OPTIONS PAGE 6

- How do I collect my share of the Settlement?
- What happens if I do nothing at all?
- What happens if I exclude myself?
- How do I ask to be excluded?
- How do I object to the Settlement?

THE LAWYERS REPRESENTING YOU PAGE 8

- Do I have a lawyer in this case?
- Should I get my own lawyer?
- How will the lawyers be paid?
- How much will lawyers be paid?

GETTING MORE INFORMATION PAGE 8

- Is more information about the lawsuit available?

BASIC INFORMATION

1. WHY WAS THIS NOTICE ISSUED?

This Notice was issued because a Court has preliminarily approved a Settlement in this lawsuit and your rights may be affected. This Notice explains all of these things.

The group of affected individuals includes:

- (1) All individuals in the United States, except California residents, who purchased any Rainbow Light Prenatal or Rainbow Light Postnatal Vitamins between December 1, 2015 and April 16, 2020; and
- (2) All individuals in the United States who purchased any Rainbow Light Non-Prenatal Vitamins and Non-Postnatal Vitamins (i.e., all other Rainbow Light vitamins, multivitamins, and supplements not specifically labeled as suitable for prenatal or postnatal or lactating mothers) between December 1, 2015 and April 16, 2020.

Excluded from this group are Governmental entities; subsidiaries, affiliates, officers, employees or directors of Defendants; any Judge in the lawsuit, a member of the Judge's immediate family, or any member of the Court's staff; and any purchases made for the purpose of resale.

Judge Christopher J. Kolker of the Circuit Court for the 20th Judicial Circuit for the County of St. Clair, Illinois is overseeing this action. The case is known as *Erin Smid et al. v. Renew Life Holdings Corporation et al.*, Case No. 20L0190. The persons who sued, Erin Smid, Brandie Lee, and Stacy Bowland are called the Plaintiffs. The companies they are suing, Nutranext, LLC; Nutranext Business, LLC; Nutranext eHealth, LLC; Rainbow Light Nutritional Systems, LLC; Renew Life Holdings Corporation; Renew Life Formulas LLC; Everest NeoCell LLC; Nutranext Direct, LLC; and Nature's Products, Inc., are called the Defendants.

2. WHAT IS THIS LAWSUIT ABOUT?

The lawsuit claims that despite a Website claim that the products were “free of heavy metals,” Rainbow Light Vitamins, Multivitamins and Supplements, (including both prenatal and postnatal vitamins and Non-prenatal and Non-postnatal vitamins) may contain small amounts of naturally occurring heavy metals, including lead, mercury, cadmium, and arsenic.

Defendants deny Plaintiffs' allegations.

No decision about whether the Plaintiffs or Defendants are right has been made. Both parties have, however, agreed to a settlement of all claims.

More information about this lawsuit, including pleadings filed by the Plaintiffs and Defendants, is available at www.NXTvitaminSettlement.com.

3. WHAT IS A CLASS ACTION?

In a class action, one or more people, called Class Representatives, sue on behalf of all people who have similar claims. Together these people are called a Class or Class Members. In this case the Class Representatives are Erin Smid, Brandie Lee, Stacy Bowland.

THE CLAIMS IN THE LAWSUIT

4. WHAT DOES THE LAWSUIT COMPLAIN ABOUT?

The lawsuit claims that despite a Website claim that the products were “free of heavy metals,” Rainbow Light Vitamins, Multivitamins and Supplements, (including both prenatal and postnatal vitamins and Non-prenatal and Non-postnatal vitamins) may contain small amounts of naturally occurring heavy metals, including lead, mercury, cadmium, and arsenic. More information on what the lawsuit complains about can be found at www.NXTvitaminSettlement.com.

5. HOW DO THE DEFENDANTS ANSWER?

Defendants deny the claims and allegations in the lawsuit.

6. WHAT ARE THE PLAINTIFFS ASKING FOR ON BEHALF OF THE CLASS?

Plaintiffs seek compensation for Defendants’ misrepresentation of the ingredients of its prenatal, postnatal, non-prenatal, and non-postnatal vitamins, multivitamins, and supplements.

THE SETTLEMENT TERMS

7. WHAT ARE THE TERMS OF THE SETTLEMENT?

Defendants have agreed to settle this litigation with Plaintiffs and the Settlement Class for up to \$6,750,000, inclusive of Attorneys’ Fees and Costs, in consideration for a release of all claims and of all requests for relief brought or that could have been brought in the lawsuit against Defendants. Individuals who remain a part of the Settlement Class, by either making a Claim or doing nothing, will completely resolve, release, and forever discharge all claims and requests for relief that are or could have been alleged by Plaintiffs concerning the misrepresentation claims alleged in the lawsuit. The full Settlement Agreement can be found at www.NXTvitaminSettlement.com.

Distributions to Settlement Class Members will be made on a claims-made basis. What this means is that each Settlement Class Member who wishes to receive funds from the Settlement must make a Claim by

submitting a claim form available at www.NXTvitaminSettlement.com. Settlement Class Members may also request that a Claim Form be sent to them by calling 1-833-930-2421.

8. IS THERE ANY MONEY AVAILABLE NOW?

Yes. The Court has preliminarily approved the Parties' Settlement Agreement. You must first register to file a Claim and obtain a Class Member ID. You must then submit a completed Claim Form using the Class Member ID between May 29, 2020 and July 29, 2020 to Claim your portion of the Settlement. If you do not submit a Claim Form and the requested supporting documentation, you will not be able to collect a portion of the Settlement. Funds will be distributed only if and after the Court has granted Final Approval of the Settlement.

The Court has scheduled a hearing to review the Settlement process and the number of claims that have been made, as well as the number of people who have opted out of or excluded themselves from the Settlement. The Final Approval Hearing is set for July 29, 2020 at 10:00 a.m., Courtroom 401, St. Clair County Building, 10 Public Sq., Belleville, IL 62220. At this time the Court will also consider any objections to the Settlement Agreement.

9. HOW MUCH WILL I RECEIVE?

Claimants who do not have Proof of Purchase can recover \$4 per bottle for pre-natal and post-natal products and \$1 per bottle for non-prenatal and non-postnatal products, subject to a cap of \$9.50 per Household.

Claimants who have and provide Proof of Purchase can recover \$7 per bottle for pre-natal and post-natal products and \$2 per bottle for non-prenatal and non-postnatal products, subject to a cap of \$18 per Household.

In the event that the total Claims made exceed the aggregate benefit after paying the Notice and Administrative Costs, Attorneys' Fees and Expenses, and Service Awards, then the individual class benefit will be reduced *pro rata*.

MEMBERS OF THE CLASS

10. HOW DO I KNOW IF I AM A PART OF THE CLASS?

The Class includes:

- (1) all individuals in the United States, except California residents, who purchased any Rainbow Light Prenatal or Rainbow Light Postnatal Vitamins between December 1, 2015 and April 16, 2020; and

- (2) all individuals in the United States who purchased any Rainbow Light Non-Prenatal Vitamins and Non-Postnatal Vitamins (i.e., all other Rainbow Light vitamins, multivitamins, and supplements not specifically labeled as suitable for prenatal or postnatal or lactating mothers) between December 1, 2015 and April 16, 2020.

If you are a Governmental entity; subsidiary, affiliate, officer, employee or director of Defendants; any Judge in the lawsuit, a member of the Judge's immediate family, or any member of the Court's staff; or made purchases for the purpose of resale, you are excluded from the Settlement Class.

YOUR RIGHTS AND OPTIONS

11. HOW DO I COLLECT MY SHARE OF THE SETTLEMENT?

To collect your share of the Settlement, you must first register to obtain a Class Member ID at www.NXTvitaminSettlement.com. After registering you will receive an email with your Class Member ID. After receiving your Class Member ID, making a claim is easy and you have two options:

First, you can complete Claim Forms online at www.NXTvitaminSettlement.com, between May 29, 2020 and July 29, 2020 with or without any Proof of Purchase; **or**

Second, simply print out the form from the Website, fill out the form and, if you have it, provide proof that you purchased Rainbow Light Vitamins, Multivitamins and/or Supplements from December 1, 2015 through April 16, 2020. Claim Forms printed out from the Website, completed by hand and mailed must be postmarked by July 29, 2020.

If you submit a Claim Form, whether electronically or by United States mail, you will be legally bound by the terms of the Settlement and will be unable to sue Defendants in a different case over the same legal claims that are included in this lawsuit.

12. WHAT HAPPENS IF I DO NOTHING AT ALL?

If you do nothing, you are choosing to stay in the Class, but will not receive any portion of the Settlement. This means that you will be legally bound by the terms of the Settlement Agreement, and you will not be able to sue or continue to sue Defendants in a different case over the same legal claims that are included in this lawsuit.

13. WHAT HAPPENS IF I EXCLUDE MYSELF?

If you exclude yourself, or “opt-out” from the Class, you will not be legally bound by the Settlement or entitled to take any portion of the Settlement Funds. You will however retain your right to sue Defendants on your own regarding the claims at issue in this lawsuit.

Questions? Call 1-833-930-2421 Toll Free—or—visit
www.NXTvitaminSettlement.com

14. HOW DO I ASK TO BE EXCLUDED?

To opt-out or exclude yourself from the lawsuit, you must complete and send to Rainbow Light Settlement, c/o Administrator, PO Box 58264, Philadelphia, PA 19102-8264 Philadelphia, PA 19102-8264, a Request for Exclusion that is postmarked no later than June 29, 2020.

Your Request for Exclusion must: (a) identify the case name; (b) identify your name, address, and telephone number; (c) identify the Rainbow Light product(s) purchased by you; (d) be personally signed by you; and (e) contain a statement that indicates a desire to be excluded from the Settlement Class in the Action, such as: “I hereby request that I be excluded from the proposed Settlement Class.”

15. HOW DO I OBJECT TO THE SETTLEMENT?

You can tell the Court that you do not agree with the Settlement or some part of it. To have your objection considered you must not exclude yourself from the lawsuit. You must also provide, in writing: (a) the name of the Action; (b) the objector’s full name, address, and telephone number; (c) an explanation of the basis on which the objector claims to be a Settlement Class Member; (d) all grounds for the Objection, accompanied by any legal support for the Objection known to the objector or her counsel; (e) the number of times in which the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such an objection, and a copy of any orders related to or ruling on the objector’s prior such objections that were issued by the trial and appellate courts in each listed case; (f) the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement or fee application; (g) a copy of any orders related to or ruling on counsel’s or the counsel’s law firm’s prior objections made by individuals or organizations represented by the objector’s counsel that were issued by the trial and appellate courts in each listed case in which the objector’s counsel and/or counsel’s law firm have objected to a class action settlement within the preceding five (5) years; (h) any and all agreements that relate to the objection or the process of objecting—whether written or oral—between objector or objector’s counsel and any other person or entity; (i) the identity of all counsel (if any) representing the objector who will appear at the Final Approval Hearing; (j) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; (k) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection; and (l) the objector’s signature (an attorney’s signature is not sufficient).

In order to object to the Settlement Agreement, you must file your written objection with the court, mail your written objection to Class Counsel, and mail your written objection to Counsel for Defendants. The addresses for the Court, Class Counsel, and Counsel for Defendants are below:

Class Counsel:

Gary M. Klinger
GMK LAW, LTD.
227 W. Monroe Street, Ste. 2100
Chicago, IL 60606

Class Counsel:

Gary E. Mason
MASON, LLP
5101 Wisconsin Ave. NW, Ste 305
Washington, DC 20016

Questions? Call 1-833-930-2421 Toll Free—or—visit
www.NXTvitaminSettlement.com

Defendants' Counsel:

Dean N. Panos
Jenner & Block, LLP
353 N. Clark Street
Chicago, IL 60654

Clerk of Court:

Clerk of the Circuit Court of St. Clair County
10 Public Sq.
Belleville, IL 62220

In order for your objection to be considered, you must mail it so that it is postmarked by June 29, 2020.

The Final Approval Hearing is scheduled for 10:00 a.m. CT on July 29, 2020 in Courtroom 401 of the St. Clair County Building, at 10 Public Square in Belleville, Illinois 62220.

LAWYERS REPRESENTING YOU

16. DO I HAVE A LAWYER IN THIS CASE?

Yes. The Court has preliminarily approved the appointment of Gary E. Mason, Esquire of MASON, LLP, and Gary M. Klinger, Esquire of GMK LAW, Ltd. to represent Class Members who are a part of the Settlement Class. Complete contact information for these law firms can be found above and at www.NXTvitaminSettlement.com.

17. SHOULD I GET MY OWN LAWYER?

You do not need to hire your own lawyer because Class Counsel is representing you and all the other members of the Class. However, you are allowed to hire your own lawyer, even if you remain a member of the Class. He or she may ask to appear in Court for you in this case, if you want someone other than Class Counsel to speak for you, but you will have to pay that lawyer.

18. HOW WILL THE LAWYERS BE PAID?

If the Court approves the Settlement, Class Counsel will ask the Court for approval of fees and expenses. You will not personally have to pay any of these fees and expenses.

19. HOW MUCH WILL THE LAWYERS BE PAID?

If the Court grants approval of the Settlement, including approval of attorneys' costs and fees, Class Counsel will take an amount not to exceed \$1,800,000 of the \$6,750,000 total settlement amount as payment for prosecuting the case and reimbursement for costs. The attorneys will ask the Court for approval of fees and expenses. You will not personally have to pay any of these fees and expenses.

YOUR RIGHTS AND OPTIONS

Questions? Call 1-833-930-2421 Toll Free—or—visit
www.NXTvitaminSettlement.com

20. IS MORE INFORMATION ABOUT THE LAWSUIT AVAILABLE?

More information about the lawsuit is available by visiting www.NXTvitaminSettlement.com calling toll-free 1-833-930-2421, or writing to Rainbow Light Settlement, c/o Administrator, PO Box 58264, Philadelphia, PA 19102-8264. You can view a copy of the Court's Memorandum Opinion and Order, the Plaintiffs' Complaint, and the Settlement Agreement at the Website.