

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court, Eastern District of New York

Rabinowitz et al. v. Colgate-Palmolive Company et al., No. 2:25-cv-6996 (JMW) (E.D.N.Y.)
Denny v. Colgate-Palmolive Co., Case No. 24-cv-02129 (M.D. Fla.)
Rabinowitz v. Colgate-Palmolive Co., Index No. 622019/2024 (N.Y. Sup. Ct.)
Pitre v. Colgate-Palmolive Co., Case No. 4:24-cv-09318 (N.D. Cal.)
Foreman v. Colgate-Palmolive Company., Case No. 3:25-cv-00314 (S.D. Cal.)
Zetterstrom v. Colgate-Palmolive Co., Case No. 25-cv-02151 (S.D.N.Y.)

If you purchased one or more Tom’s of Maine® toothpaste products, within the United States, between November 21, 2020, and March 6, 2026, you may be eligible to receive a payment from a class action settlement.

*A federal court authorized this notice (the “Notice”). You are not being sued.
 This is not a solicitation from a lawyer.*

- A settlement has been reached with Tom’s of Maine, Inc. (“Tom’s”), a subsidiary of Colgate-Palmolive Company (“Colgate”), and Colgate (collectively, with Tom’s, “Defendants”) in a class action lawsuit about alleged deceptive and misleading business practices with respect to the manufacturing, marketing, and sale of certain Tom’s toothpaste products sold by the Defendants that were manufactured at Tom’s’ manufacturing facility in Sanford, Maine.
- The lawsuits involved are *Denny v. Colgate-Palmolive Co.*, Case No. 24-cv-02129 (M.D. Fla.); *Rabinowitz v. Colgate-Palmolive Co.*, Index No. 622019/2024 (N.Y. Sup. Ct.); *Pitre v. Colgate-Palmolive Co.*, Case No. 4:24-cv-09318 (N.D. Cal.); *Foreman v. Colgate-Palmolive Co.*, Case No. 3:25-cv-00314 (S.D. Cal.); *Zetterstrom v. Colgate-Palmolive Co.*, Case No. 25-cv-02151 (S.D.N.Y.); and *Rabinowitz et al. v. Colgate-Palmolive Company et al.*, No. 2:25-cv-6996 (JMW) (E.D.N.Y.)
- The Defendants deny any and all allegations of wrongdoing or liability, including that they violated any law or made any misrepresentation, but have agreed to the Settlement to avoid the costs and risks associated with litigation.¹
- Your rights are affected whether you act or don’t act. Please read this Notice carefully.

¹ Unless otherwise defined herein, all capitalized terms shall have the meaning set forth in the Settlement Agreement, which can be viewed at www.ToothpasteSettlement.com.

Questions? Call 1-877-315-6779 Toll-Free or Visit www.ToothpasteSettlement.com

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	<p>The only way to receive a cash payment from this Settlement is by submitting a valid and timely Claim Form.</p> <p>You can submit your Claim Form online at www.ToothpasteSettlement.com or download the Claim Form from the Settlement Website and mail it to the Class Administrator. You may also call or email the Class Administrator to receive a paper copy of the Claim Form.</p> <p>For more information see Question 10.</p>	July 6, 2026
OPT OUT OF THE SETTLEMENT	<p>You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You can elect your own legal counsel at your own expense.</p> <p>For more information see Question 16.</p>	July 6, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	<p>If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also speak about your Objection at the Final Approval Hearing. If you object, you may also file a Claim for payment.</p> <p>For more information see Question 17.</p>	July 6, 2026
DO NOTHING	<p>Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not get a payment from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement.</p>	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

Questions? Call 1-877-315-6779 Toll-Free or Visit www.ToothpasteSettlement.com

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BASIC INFORMATION

1. Why was this Notice issued?

A federal court authorized this Notice because you have a right to know about the proposed Settlement of this class action lawsuit and about all your options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The Honorable James M. Wicks of the United States District Court for the Eastern District of New York is overseeing this class action. The people that filed this lawsuit are called the “Class Representatives” and the companies they sued, Tom’s and Colgate, are called the “Defendants.”

2. What is this lawsuit about?

Tom’s, a subsidiary of Colgate, manufactures oral care and personal care products, including toothpaste products, which are sold to consumers through third-party retailers. During a May 2024 inspection of Tom’s’ manufacturing facility in Sanford, Maine, the FDA raised concerns that certain conditions at the facility were not in compliance with the FDA’s Current Good Manufacturing Processes. Following the inspection, the Defendants completed a review of pre-release testing data for approximately 4,900 finished toothpastes manufactured over a three-year period, and found that no batch showed a safety risk to consumers.

This lawsuit alleges that Defendants engaged in deceptive and misleading business practices with respect to the manufacturing, marketing, and sale of Tom’s toothpaste. The Defendants deny the allegations in the *Rabinowitz et al. v. Colgate-Palmolive Company et al.*, No. 2:25-cv-6996 (JMW) (E.D.N.Y.), the *Denny* Action, the *Rabinowitz* Action, the *Pitre* Action, the *Foreman* Action, and the *Zetterstrom* Action, (collectively, the “Actions”) and deny any liability to the Class Representatives or any member of the putative classes the Class Representatives seek to represent in the Actions.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are known as “class representatives.” Together, the people included in the class action are called a “class” or “class members.” One court resolves the lawsuit for all class members, except for those who opt out from a settlement. In this Settlement, the Class Representatives are Shana Denny, Jana Rabinowitz, and Yolanda Pitre.

Questions? Call 1-877-315-6779 Toll-Free or Visit www.ToothpasteSettlement.com

4. Why is there a Settlement?

The Court did not decide in favor of the Class Representatives or the Defendants. Instead, the Class Representatives and the Defendants agreed to the Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive payments from the Settlement. The Class Representatives and their attorneys think the Settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is in the Settlement?

The Settlement Class includes all purchasers within the United States who, between November 21, 2020, and March 6, 2026, (the “Class Period”), purchased for use and not for resale or distribution purposes one or more Class Products.

Class Products means any Tom’s toothpaste product purchased during the Class Period.

6. Are there exceptions to being included?

Yes. The Settlement Class does not include: (1) the Honorable James M. Wicks and members of his immediate family; (2) Colgate; (3) Tom’s; (4) any entity in which Colgate or Tom’s has a controlling interest; (5) any of Colgate’s and Tom’s’ subsidiaries, parents, affiliates, and officers, directors, employees, legal representatives, heirs, successors, or assigns; and (6) any Persons who timely exclude themselves from the Settlement Class.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by emailing or writing to Class Administrator at: info@ToothpasteSettlement.com, or by U.S. Mail at:

Rabinowitz et al. v. Colgate-Palmolive Company, et al.

Class Administrator

P.O. Box 2897

Portland, OR 97208-2897

You may also view the Settlement Agreement at www.ToothpasteSettlement.com.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

If the Settlement is approved by the Court, the Defendants will pay \$2,900,000 into a Settlement Fund, which shall be used to pay all Settlement expenses, including Notice and Other Administrative Costs; CAFA Notice; the Fee Award; Service Awards; and Class Members’ Claims.

8. How much will my payment be?

All members of the Settlement Class who submit an Approved Claim are eligible to receive monetary relief as set forth below. No payments will be made to any members of the Settlement Class who do not submit an Approved Claim.

Cash Award without Proof of Purchase. Each Class Member who submits an Approved Claim that is not accompanied by Proof of Purchase may receive the total of the average manufacturer’s suggested retail price for up to one (1) Class Product claimed per household, with Defendants to provide the average manufacturer’s suggested retail price of the Class Products during the Class Period to the Class Administrator.

Cash Award with Proof of Purchase of Class Product. Each Class Member who submits an Approved Claim that is accompanied by Proof of Purchase of Class Products may be entitled to receive a full refund of the amount of money he or she spent on the Class Products that is documented by Proof of Purchase, capped at three (3) Class Products.

If the total value of all Approved Claims exceeds the funds available for distribution to Class Members, then the amounts of the cash payments will be reduced pro rata, as necessary, to use all funds available for distribution to Class Members. If the total value of all Approved Claims is less than the funds available to Class Members,

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then the remaining funds will be donated to Equal Justice Works, a 501(c)(3) nonprofit organization that brings together an extensive network of law students, lawyers, advocates, legal services organizations, and supports to promote a lifelong commitment to public service and equal justice. *See About Us, Equal Justice Works, <https://www.equaljusticeworks.org/about/>.*

9. What claims am I releasing if I stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendants with respect to any of the legal claims released and resolved in this Settlement. The “Releases” section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.ToothpasteSettlement.com.

HOW TO GET A PAYMENT - MAKING A CLAIM

10. How do I submit a claim and get a cash payment?

You may file a claim if you are a Class Member (*see Questions 5 and 6* above).

Claim Forms may be submitted online at www.ToothpasteSettlement.com or printed from the website and mailed to the Class Administrator at:

Rabinowitz et al. v. Colgate-Palmolive Company, et al.
Class Administrator
P.O. Box 2897
Portland, OR 97208-2897

You may also contact the Class Administrator to request a Claim Form by telephone at 1-877-315-6779, by email at info@ToothpasteSettlement.com, or by U.S. Mail at:

Rabinowitz et al. v. Colgate-Palmolive Company, et al.
Class Administrator
P.O. Box 2897
Portland, OR 97208-2897

11. What is the deadline for submitting a claim?

If you submit a claim by U.S. Mail, the completed and signed Claim Form must be postmarked **no later than July 6, 2026**. If submitting a Claim Form online, you must do so **no later than July 6, 2026**.

12. When will I get my payment?

The Court has scheduled a Final Approval Hearing for the Settlement of this case on **September 10, 2026**, to consider: (1) whether to approve the Settlement; (2) any Objections; (3) the requests for Service Awards for individuals who brought lawsuits; and (4) the request for a Fee Award for Class Counsel for their work in this litigation. If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement payments will be distributed if the Court grants Final Approval of the Settlement and after any appeals are resolved.

The briefs and declarations in support of the final approval of the Settlement and the requests described above will be posted on the Settlement Website, www.ToothpasteSettlement.com, after they are filed. You may ask to appear at the hearing, but you do not have to appear. The date and time of the Final Approval Hearing is also subject to modification by the Court. Please review the Settlement Website for any updated information regarding the final hearing.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed the following law firms to represent the Settlement Class as Class Counsel: The Wright Law Office, P.A., Denlea & Carton LLP, and Wilshire Law Firm PLC. You will not be charged for their services.

Questions? Call 1-877-315-6779 Toll-Free or Visit www.ToothpasteSettlement.com

14. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Class Counsel will ask the Court for a Fee Award, not to exceed 33% of the Settlement Fund, as well as Service Award payments for each of the individuals who brought lawsuits, not to exceed \$1,000 each. The Court may award less than these amounts. If approved, these fees, costs and awards will be paid from the Settlement Fund.

EXCLUDING YOURSELF FROM THE SETTLEMENT

16. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right, if any, to separately sue the Defendants about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called “opting out” of the Settlement Class. The deadline for requesting exclusion from the Settlement is **July 6, 2026** (the “Opt-Out Deadline”).

To exclude yourself from the Settlement, you must mail a Request for Exclusion to the Class Administrator, postmarked no later than the Opt-Out Deadline. The Request for Exclusion must be personally completed and submitted by you or your attorney, but if you are represented by an attorney, you must either personally sign the Request for Exclusion or execute a separate declaration stating that you authorize the filing of the Request for Exclusion.

Your Request for Exclusion must be mailed to the following address:

Rabinowitz et al. v. Colgate-Palmolive Company, et al.
Class Administrator
P.O. Box 2897
Portland, OR 97208-2897

If you exclude yourself, you are stating to the Court that you do not want to be part of the Settlement. You will not be eligible to receive a payment if you exclude yourself. You may only exclude yourself—not any other Person.

The Request for Exclusion must be postmarked no later than July 6, 2026.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I like or do not like the Settlement?

If you are a Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve it. The Court will consider your views.

Your Objection must contain: (i) a caption or title that clearly identifies the proceeding and that the document is an Objection, (ii) information sufficient to identify and contact the objecting Class Member or his or her attorney if represented, (iii) information sufficient to establish the Person’s standing as a Class Member, (iv) a clear and concise statement of the Class Member’s Objection, as well as any facts and law supporting the Objection, (v) the objector’s signature, and (vi) the signature of the objector’s counsel, if any.

Class Members must electronically file via the Court’s ECF system or deliver to the Clerk of the Court a written notice of Objection no later than **July 6, 2026**.

Alphonse M. D’Amato U.S. Courthouse
100 Federal Plaza
2nd Floor, West Wing, Rm. 200
Central Islip, New York 11722

You or your attorney may speak at the Final Approval Hearing about your Objection. Should you intend to do so, you are requested, but not required, in advance of the Final Approval Hearing, to file with the Court a notice of intent to appear, as well as a description of any evidence you may offer at the Final Approval Hearing and copies of any exhibits you may introduce at the Final Approval Hearing.

18. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

19. When is the Court's Final Approval Hearing?

The Court has scheduled a Final Approval Hearing on September 10, 2026. The hearing will be located at Central Islip Courthouse in Courtroom 1020.

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider whether to approve Class Counsel's request for a Fee Award, as well as Service Awards for the individuals who brought lawsuits. If there are Objections, the Court will consider them. The Honorable James M. Wicks will listen to people who have asked to speak at the hearing (see **Question 17** above). After the hearing, the Court will decide whether to approve the Settlement.

The date and time of the Final Approval Hearing may change. Please check the Settlement Website, www.ToothpasteSettlement.com for any updates.

20. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you file an Objection, you do not have to come to the Final Approval Hearing to talk about it. If you file your written Objection on time, the Court will consider it. You may also pay for your own lawyer to attend, but such attendance is not necessary for the Court to consider an Objection that was filed on time.

IF I DO NOTHING

21. What happens if I do nothing at all?

If you are a Class Member and you do nothing, you will give up the rights explained in response to **Question 9**, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendants and the Released Colgate and Tom's Persons, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will not receive a payment from this Settlement.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement, available on the Settlement Website, www.ToothpasteSettlement.com.

If you have additional questions, you may contact the Class Administrator by email, phone, or mail:

Email: info@ToothpasteSettlement.com

Toll-Free: 1-877-315-6779

Questions? Call 1-877-315-6779 Toll-Free or Visit www.ToothpasteSettlement.com

Mail:
Rabinowitz et al. v. Colgate-Palmolive Company et al.
Class Administrator
PO Box 2897
Portland, OR 97208-2897

Publicly filed documents can also be obtained by visiting the office of the Clerk of the United States District Court for the Eastern District of New York or reviewing the Court's online docket.

Please do not contact the Court, its Clerks, or the Defendants to inquire about the Settlement or the Claims Process.