

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 0:21-md-03015-SINGHAL/Valle**

IN RE:

MDL CASE NO.: 3015

**JOHNSON & JOHNSON AEROSOL SUNSCREEN
MARKETING, SALES PRACTICES AND
PRODUCTS LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO: ALL CASES

JOINT NOTICE OF SETTLEMENT

The undersigned counsel for Defendants Johnson & Johnson Consumer Inc., Johnson & Johnson, and Costco Wholesale Corporation (“Defendants”), jointly with the undersigned counsel for Plaintiffs in the first-filed consolidated actions (“Plaintiffs”), *Serota v. Johnson & Johnson Consumer Inc.*, 0:21-cv-61103-AHS (S.D. Fla.) and *Brennan v. Johnson & Johnson Consumer Inc.*, 3:21-cv-04869-JD (N.D. Cal.), hereby notify the Court, pursuant to S.D. Fla. L.R. 16.4, that they have reached an agreement in principle to settle the litigated claims on a class-wide basis, including all claims asserted in these consolidated proceedings, subject to Court approval. Plaintiffs and Defendants are presently drafting a written Settlement Agreement and related documents. Counsel for Plaintiffs anticipate filing the Settlement Agreement and related documents with the Court as part of a Motion for Preliminary Approval on or before November 19, 2021.

Jointly Submitted: October 29, 2021

By: /s/ R. Jason Richards

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