

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**In re: Procter & Gamble Aerosol Products
Marketing and Sales Practices Litigation**

Case No. 2:22-md-3025
Judge Michael H. Watson
Magistrate Judge Chelsey Vascura

This document relates to: ALL CASES

NOTICE OF SETTLEMENT

Plaintiffs Norma Bernsee, Abby Nelson, Shirley Thiele, Lindsey Labella, Erica Esquivel, Joshua Wallace, Tyler Baker, Brian Stanfield, Eileen Aviles, Shelby Cooper, Tanya Cooper, Jacob Cooper, Patricia Donadio, James Dethrow, Gregory Pickens, Ryan Rinz, Patricia Kelley, Jeremy Wilson, Dante Melendez, Darrell Stewart, Beth Blake, Angela Hernandez, Lynn Balsler Mills, Matthew Lopez, Erik Velasques, Frank Ortega, Nancy Martinez, Evan Clarke, and Lagregory Bonner (collectively “Plaintiffs”) and Defendant The Procter & Gamble Company (“Defendant” or “P&G”) jointly notify this Court that they have reached an agreement in principle to settle the claims asserted in Plaintiffs’ complaints against P&G on a nationwide, class-wide basis. The intention of the settlement is that, if the settlement is approved by this Court, the settlement will resolve all of the claims in all of the actions that have been centralized into MDL No. 3025.¹

Counsel for these Plaintiffs and Defendant intend to discuss the next steps in the settlement process with the Court at the May 3, 2022 telephonic status conference. Counsel for

¹ This includes a putative class action filed in the Southern District of Ohio on May 2, 2022 that has not yet been assigned to this Court. *See Casolari v. The Procter & Gamble Co.*, No. 22-cv-00235-SJD (S.D. Ohio).

the parties are working on executing a comprehensive settlement agreement. They anticipate that the settlement and a motion for preliminary approval of the settlement will be filed on or before June 2, 2022.

Dated: May 3, 2022

Respectfully submitted,

/s/ Richard S. Wayne

Richard S. Wayne (Ohio Bar No. 0022390)

Joseph J. Braun (Ohio Bar No. 0069757)

STRAUSS TROY

150 East 4th Street, 4th Floor

Cincinnati, Ohio 45202

Telephone: 513-621-2120

Facsimile: 513-241-8259

E-mail: rswayne@strausstroy.com

E-mail: jjbraun@strausstroy.com

Counsel for Plaintiffs Tyler Baker and Brian Stanfield, Patricia Kelley, Jeremy Wilson, Dante Melendez, and Darrell Stewart

Baker et al. v. Procter & Gamble Co., Case No. 1:21-cv-00734

Kelley et al. v. Procter & Gamble Co., Case No. 1:21-cv-00785

/s/ Gary M. Klinger

Gary M. Klinger (Illinois Bar No. 6303726)

MILBERG COLEMAN BRYSON PHILLIPS

GROSSMAN, PLLC

227 W. Monroe Street, Suite 2100

Chicago, IL 60606

Telephone: 866-252-0878

E-mail: gklinger@milberg.com

Nick Suciu III*

MILBERG COLEMAN BRYSON PHILLIPS

GROSSMAN PLLC

6905 Telegraph Rd., Suite 115

Bloomfield Hills, MI 48301

Telephone: (313) 303-3472

Facsimile: (865) 522-0049

Email: nsuciu@milberg.com

Katrina Carroll
LYNCH CARPENTER, LLP
111 W. Washington Street, Suite 1240
Chicago, IL 60602
Telephone: (312) 750-1265
katrina@lcllp.com

Jonathan M. Jagher
**FREED KANNER LONDON &
MILLEN LLC**
923 Fayette St.
Conshohocken, PA 19428
Tel.: (610) 234-6487
Fax: (224) 632-4521
jjagher@fkmlaw.com

*Counsel for Plaintiffs Norma Bernsee, Abby
Nelson, Shirley Thiele and Eileen Aviles*

*Bernsee et al. v. Procter & Gamble Co., Case
No. 2:22-cv-2015
Aviles et al. v. Procter & Gamble Co., Case No.
2:22-cv-01950*

**Subject to Pro Hac Vice admission*

/s/ Kevin Laukaitis
Kevin Laukaitis
SHUB LAW FIRM LLC
134 Kings Hwy E., 2nd Fl.
Haddonfield, NJ 08033
T: (856) 772-7200
klaukaitis@shublawyers.com

Counsel for Plaintiff Beth Blake

*Blake v. Procter & Gamble Co., Case No. 1:21-
cv-00794*

/s/ Steven L. Bloch
Steven L. Bloch
Ian W. Sloss*
SILVER GOLUB & TEITELL, LLP

One Landmark Square, 15th Floor
Stamford, CT 06901
Telephone: (203) 325-4491
E-mail: sbloch@sgtlaw.com
E-mail: isloss@sgtlaw.com

Counsel for Plaintiffs Erik Velasques, Matthew Lopez, Frank Ortega, Erica Esquivel and Joshua Wallace

Velasques et al. v. Procter & Gamble Co., Case No. 1:21-cv-00723
Esquivel et al. v. Procter & Gamble Co., Case No. 1:21-cv-00762

**Subject to Pro Hac Vice admission*

/s/ Mark S. Reich

Mark S. Reich
Courtney E. Maccarone
LEVI & KORSINSKY, LLP
55 Broadway, 10th Floor
New York, NY 10006
Telephone: 212-363-7500
Facsimile: 212-363-7171
E-mail: mreich@zlk.com
E-mail: cmaccarone@zlk.com

Counsel for Plaintiffs Tyler Baker and Brian Stanfield

Baker et al. v. Procter & Gamble Co., Case No. 1:21-cv-00734

/s/ Rick Paul

Rick Paul*
Paul LLP
601 Walnut Street, Suite 300
Kansas City, Missouri 64106
T: (816) 984-8100
F: (816) 984-8101
Rick@PaulLLP.com

Terrence R. Coates (Ohio Bar No. 0085579)
MARKOVITS STOCK & DEMARCO, LLC
119 East Court Street, Suite 530
Cincinnati, Ohio 45202

Telephone: 513-665-0204
Facsimile: 513-665-0219
E-mail: tcoates@msdlegal.com

*Counsel for Plaintiffs Gregory Pickens and
Ryan Rinz*

*Pickens et al. v. Procter & Gamble Co., Case
No. 1:21-cv-00786*

**Subject to Pro Hac Vice admission*

/s/ Paul Doolittle
Paul Doolittle*
Anastopoulo Law Firm LLC
32 Ann Street
Charleston, SC 29403
(843) 614-8888
pauld@akimlawfirm.com

*Counsel for Angela Hernandez and Lynn Balsler
Mills*

*Hernandez v. Procter & Gamble Co., Case No
3:22-cv-00080 (D.S.C.)
Mills v. Procter & Gamble Co., Case No 2:22-
cv-00044*

**Subject to Pro Hac Vice admission*

/s/ R. Jason Richards
AYLSTOCK, WITKIN, KREIS &
OVERHOLTZ, PLLC
R. JASON RICHARDS (FL Bar # 18207)
17 East Main Street, Suite 200
Pensacola, FL 32502
Telephone: 850-202-1010
Facsimile: 850-916-7449
E-mail: jrichards@awkolaw.com

*Attorneys for Plaintiffs Nancy Martinez, Evan
Clarke, Lagregory Bonner*

*Martinez et al. v. Procter & Gamble Co., Case
No. 2:22-cv-1993*

/s/ Henry Liu

Henry Liu (0082917)
Andrew Soukup
COVINGTON & BURLING LLP
One CityCenter, 850 Tenth Street NW
Washington, DC 20001
Telephone: +1 202 662 6000
Email: asoukup@cov.com
Email: hliu@cov.com

Amy Heath
COVINGTON & BURLING LLP
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
Telephone: +1 415 591 6000
Email: aheath@cov.com

Keith Shumate (0056190)
Kathryn M. Brown (0100426)
SQUIRE PATTON BOGGS (US) LLP
2000 Huntington Center
41 South High Street
Columbus, Ohio 43215
Telephone: +1 614 365 2700
E-mail: keith.shumate@squirepb.com
E-mail: kathryn.brown@squirepb.com

Scott A. Kane (0068839)
Jennifer L. Dollard-Smith (0093624)
SQUIRE PATTON BOGGS (US) LLP
201 E. Fourth St., Suite 1900
Cincinnati, Ohio 45202
Telephone: +1 513 361 1200
E-mail: scott.kane@squirepb.com
E-mail: jennifer.dollard-smith@squirepb.com

*Counsel for Defendant The Procter & Gamble
Co.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing document was served via the Court's CM/ECF system on May 3, 2022, and has thus been served automatically on all counsel of record that have entered an appearance in Case No. 2:22-md-3025.

/s/ Richard S. Wayne
Richard S. Wayne (Ohio Bar No. 0022390)