

LONG-FORM NOTICE

If you live in Oregon, are over the age of 21 and purchased in Oregon, Select Elite, Select Pax or other qualified Select products, including cartridges, disposable pens, or pods, during the period between August 15, 2018 and November 22, 2019, you may be eligible for a class action settlement.

This notice may affect your rights. Please read it carefully.

A court authorized this notice. This is not a solicitation from a lawyer.

- The notice concerns a case called *Pope, et al. v. Cura Partners, Inc.*, Case No. 20CV05932 (State of Oregon, Multnomah County Circuit Court).
- This class action settlement will completely resolve the lawsuit against Cura Partners, Inc. (“Cura” or “Defendant”).
- The suit alleges that Cura failed to disclose that 186,000 mislabeled units of its products contained botanical terpenes.
- Cura denies any wrongdoing, including that it made any misrepresentations about the contents in its products.
- Pursuant to the settlement defendant, directly or through their insurers shall pay \$500,000 to the settlement fund which will be used to pay attorney fees to class counsel, and to pay \$200 on each timely and approved claim from the class members, or less depending on how many claims are submitted, until the fund is fully exhausted.
- Your legal rights are affected whether you act or do not act. Read this notice carefully.
- This notice summarizes the proposed settlement. For the precise terms and conditions of the settlement, please see the settlement agreement available at www.OregonClassActionSettlement.com.

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

YOUR RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	This is the only way to get a payment. You can submit a valid and timely claim form online at www.OregonClassActionSettlement.com or by mail to Cura Settlement, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606. If you fail to submit a claim, you will not receive a settlement payment.	April 29, 2022
EXCLUDE YOURSELF FROM THE CLASS	Opt out of the lawsuit and the settlement. This is the only option that allows you to ever bring or join another lawsuit that raises the same legal claims against Cura released by this settlement.	April 29, 2022
OBJECT	Write to the Court about why you do not like the settlement, the amount of attorneys’ fees, or the payment to the Plaintiff.	April 29, 2022
GO TO A HEARING	Speak in Court about the settlement. (If you object to any aspect of the settlement, you must submit a written objection by the Objection Deadline.)	May 11, 2022 9:00 A.M. PST
DO NOTHING	You will have no right to sue later for the claims released by the settlement.	

- 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.

Final Approval Fairness Hearing

On May 11, 2022, at 9:00 AM PST, the Court will hold hearings to determine (1) whether the proposed settlement is fair, reasonable and adequate and should receive final approval; (2) whether to grant the applications for attorney’s fees and expenses brought by the Class Counsel; and (3) whether to grant the application for a class representatives’ payments to the Plaintiffs who brought the lawsuit. The hearing will be held in the courtroom of the Judge, Shelley D. Russell, Multnomah County Courthouse, 1200 SW First Avenue, Portland, OR 97204, Courtroom 15-C. This hearing date may change without further notice to you. Consult the settlement website at www.OregonClassActionSettlement.com for updated information on the hearing date and time.

NOTICE CONTENTS:	PAGE
How Do I Know If I Am Affected By The Litigation and Settlement?.....	2
What Is The Lawsuit About?.....	2
Why Is This Case Being Settled?.....	3
What Is The Settlement?.....	3
What Can I Get In The Settlement?.....	3
What Do Plaintiffs And The Lawyers Get?.....	3
What Claims Are Released By The Settlement?.....	3
How Do I File a Claim?.....	3
How Do I Exclude Myself From The Settlement And Litigation?.....	4
How Do I Object To The Settlement?.....	4
When Will The Court Decide If The Settlement Is Approved?.....	4
How Do I Get More Information?.....	4

How Do I Know If I Am Affected By The Litigation and Settlement?

This case involves Select brand cannabis oil products sold by Cura throughout 2019 (the “Products”).

Specifically, the “Settlement Class” includes Oregon resident over the age of 21 who purchased in Oregon cannabis/THC product from the Select Elite, Select Pax and/or Select Dabbables product lines, including cartridges, disposable pens, or pods (the “Product Lines”), during the period between August 15, 2018 and November 22, 2019 (the “Purchase Period”), with proof of residency or proof of purchase in Oregon (the “Purchase Location”), and where the packaging did not include the existence of botanically derived terpenes and/or medium-chain triglyceride (MCT) as an ingredient in the Product Lines (the “Product Packaging”).

The class does not include defendant, any non-individual corporate entity, any entity that has a controlling interest in defendant, defendant’s current or former directors, officers, counsel, or their immediate families. The class also does not include any individuals who opt out from the class. If the settlement does not become effective (for example, because it is not finally approved, or the approval is reversed on appeal), then this litigation will continue and any order preliminarily certifying the class for settlement purposes will be vacated.

What Is The Lawsuit About?

A lawsuit was originally brought against Cura Partners, Inc., (“Cura”). The lawsuit alleges that Cura misrepresented the qualities and characteristics of its cannabis oil products to plaintiffs and other class members, and as a result, plaintiffs and other class members received products worth less than they would have been worth had Cura’s advertisements been accurately represented. Cura denies that there is any factual or legal basis for the lawsuit. The Court has not determined whether Plaintiffs or Cura are correct.

Why Is This Case Being Settled?

This case has been pending since January 2020. Since then, Plaintiffs' Counsel has investigated the allegations, and labeling of the Products. Plaintiffs' Counsel have engaged in extensive discovery, including depositions and document review. In June 2020, the parties agreed to attend formal mediation with Eric English with Resolution Strategies, LLP, and after multiple months of continued arms-length negotiations, the parties were able to reach a settlement. After taking into account the risks and costs of further litigation, Plaintiffs and their counsel believe that the terms and conditions of the settlement are fair, reasonable, adequate, and equitable, and that the settlement is in the best interest of the Settlement Class members.

What Is The Settlement?

This settlement proposes to release the claims of Oregon consumers based on defendant's alleged failure to disclose that 186,000 mislabeled units of its products contained botanical terpenes, as alleged in the class action complaint filed January 31, 2020.

As part of the settlement agreement, defendant shall pay \$500,000 to the class common fund. Payment to the class common fund shall be made no later than January 1, 2022. Each approved claim shall be paid \$200, or less depending on how many claims are submitted. In addition to the \$500,000 payment to the class common fund, defendant shall be responsible for the following additional payments: payment of the costs of class notice and class administration, including costs associated with locating class members and paying settlement funds to them, and the costs of mediation, and payment of any approved incentive awards to the representative plaintiffs. As negotiated by Mr. English, class counsel will apply for an attorney fee of 25% of the common fund.

What Can I Get In The Settlement?

The settlement provides for up to a \$200 payment to each settlement class member who files a timely approved claim form, depending on how many claims are submitted, until the fund is fully exhausted.

What Do Plaintiffs And The Lawyers Get?

To date, Plaintiffs' lawyers have not been compensated for any of their work on this case. The Plaintiffs' lawyers ("Class Counsel") will petition the Court for a fee of 25% of the common fund.

The representative Plaintiffs in this case may apply to the Court for incentive awards to be paid separately from the common fund. This payment is designed to compensate the Plaintiffs for their time, effort, and risks they undertook in pursuing this litigation, and for the relief they helped obtain on behalf of the class members.

Plaintiff and their lawyers will file a motion with the Court on or before March 25, 2022, in support of their applications for attorneys' fees, costs, and expenses and payments to the Plaintiffs. A copy of that motion will be available on the settlement website. The Court will determine what amounts of fees, costs, expenses, and class representative payments to award. The award of attorneys' fees, costs and expenses will be paid to Plaintiff's lawyers within 14 days after an order granting final approval to the settlement becomes final.

What Claims Are Released By The Settlement?

Effective upon final approval, representative plaintiffs, for themselves and as the representatives of the class, and on behalf of each class member who has not timely opted out and each of their respective agents, successors, heirs, assigns, and any other person who can claim by or through them in any manner, shall have fully and finally released with prejudice all released claims against the released parties.

How Do I File a Claim?

You can file a claim form by visiting the settlement website at www.OregonClassActionSettlement.com. Your claim form must be submitted electronically via the website or printed from the website, completed and timely postmarked by April 29, 2022, and mailed to Cura Settlement, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606.

How Do I Exclude Myself From The Settlement And Litigation?

You can exclude yourself from the settlement class if you wish to retain the right to sue Cura separately for any monetary claims over the mislabeling of the Products. If you exclude yourself, you cannot object to the terms of the settlement.

To exclude yourself (or “Opt Out”), you must mail a written request to exclude yourself from the settlement to the claim administrator at Cura Settlement, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606. The exclusion request must contain your name, address, the words “I wish to be excluded from the Cura Class Action Settlement,” and your signature.

Exclusion requests must be postmarked by April 29, 2022.

How Do I Object To The Settlement?

If you are a Settlement Class Member and do not exclude yourself, you can object to the Settlement, or any part of the Settlement, for example if you do not think the Settlement is fair. You can state reasons why you think the Court should not approve it. The Court will consider your views. To object, you must mail a written statement to the Court saying that you object to the proposed Settlement in Pope, et al. v. Cura Partners, Inc., Case No. 20CV05932 (State of Oregon, Multnomah County Circuit Court). Be sure to include your full name, address, current phone number, cellular telephone number(s) Defendant called you on, the reasons you object to the Settlement, and whether you intend to appear at the fairness hearing on your own behalf or through counsel. **All objections shall identify any lawyer that represents you as to your objection and provide that lawyer’s address and telephone number, but you do not have to have a lawyer. Any documents that you wish for the Court to consider must also be attached to the objection. Your objection to the Settlement must be mailed no later than April 29, 2022, to the following address:**

Cura Settlement,
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

If you object to the settlement but still want to submit a claim in the event the Court approves the settlement, you must still submit a timely claim according to the instructions described above.

When Will The Court Decide If The Settlement Is Approved?

The Court will hold a hearing on May 11, 2022, at 9:00 AM PST to consider whether to approve the settlement. The hearing will be held in the courtroom of the Judge, Shelley D. Russell, Multnomah County Courthouse, 1200 SW First Avenue, Portland, OR 97204, Courtroom 15-C. This hearing date may change without further notice to you. Consult the settlement website at www.OregonClassActionSettlement.com, for updated information on the hearing date and time.

How Do I Get More Information?

You can contact the Claim Administrator at OregonClassActionSettlement@cptgroup.com, by calling 1-888-723-0618 or writing to Cura Settlement, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606. You can also obtain additional information by contacting Class Counsel: Michael Fuller, OlsenDaines, US Bancorp Tower 111 SW 5th Ave., Suite 3150 Portland, Oregon 97204, Direct: 503-222-2000, Email: michael@underdoglawyer.com.

Alternatively, you may visit the office of the Clerk of the Court for the State of Oregon, Multnomah County Circuit Court, 1200 SW First Avenue, Portland, OR 97204 from 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

Do not call or contact the Court concerning this notice, the settlement or the lawsuit.