

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MANDY and MATTHEW CLIBURN,
RANDI GURKA, DANA SWOYER,
LORI CIMONETTI, KHUSHBU
DIDWANIA, PRATIKUMAR PATEL,
BENJAMIN ADAMS, on behalf of
themselves and all others similarly situated,

Plaintiff,

vs.

ONE SOURCE TO MARKET, LLC d/b/a
HEXCLAD COOKWARE,

Defendant.

Case No. 23STCV28390

CLASS ACTION

**DECLARATION OF EDWARD DATTILO
REGARDING NOTICE AND
ADMINISTRATION**

1
2 I, Edward Dattilo, declare and state as follows:

3
4 1. I am a Senior Project Manager with Verita (formerly known as KCC), located at 222
5 Pacific Coast Highway, El Segundo, CA 90245. Pursuant to the Order Granting Motion for
6 Preliminary Approval of Class Action Settlement (the "Preliminary Approval Order"), the Court
7 appointed Verita as the Claims Administrator in connection with the proposed Settlement of the
8 above-captioned action. Verita has extensive experience in class action settlement administration.
9 I have personal knowledge of the matters stated herein and, if called upon, could and would testify
10 thereto.

11 2. This declaration updates and supplements the Declaration of Vanessa Santacruz Re:
12 Notice Procedures, which was filed with the Court on August 18, 2025.

13 **CLASS LIST**

14 3. On or around May 12, 2025, Verita received from counsel for Costco, HexClad and
15 Zola three lists containing 1,820,646 persons identified as the Class List. The Class Lists included
16 names, addresses, and e-mail addresses. These files also contained purchase information, such as
17 purchase date, purchase quantity and name of product purchased.

18 4. Verita formatted the list for mailing purposes, removed 266,663 duplicate records
19 along with 1,472 records with a bad or invalid address, and processed the names and addresses
20 through the National Change of Address Database ("NCOA") to update any addresses on file with
21 the United States Postal Service ("USPS"). A total of 132,547 addresses were found and updated
22 via NCOA. Verita updated its proprietary database with the Class List.

23 5. As a result of this process, 1,552,511 known Settlement Class Member records were
24 identified, of which 1,552,280 had an available email and/or physical address and were sent notice.

25 6. 231 Class Members were not sent notice as Verita did not have a valid email address
26 or postal address.

27 7. Separately, Amazon sent notice via email to 381,848 Class Members who were not
28 part of the Class List noticed by Verita.

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MAILING OF THE NOTICE

8. On or around June 6, 2025, Verita caused the postcard notice (the “Notice”) to be printed and mailed to the 1,549,472 names and mailing addresses in the Class List. A true and correct copy of the Notice is attached hereto as Exhibit A.

9. Since mailing the Notices to the Class Members, Verita has received 10,056 Notices returned by the USPS with forwarding addresses. Verita immediately caused these Notices to be re-mailed to the forwarding addresses supplied by the USPS.

10. Since mailing the Notices to the Class Members, Verita has received 86,058 Notices returned by the USPS with undeliverable addresses. Through credit bureau and/or other public source databases, Verita performed address searches for these undeliverable Notices and was able to find updated addresses for 16,120 Class Members. Verita promptly re-mailed Notices to the newfound addresses.

INDIVIDUAL NOTICE EMAIL

11. On June 6, 2025, Verita caused the Email Notice to be sent to 1,332,360 unique and valid email addresses in the Class List. Of the 1,332,360 emails sent, 121,310 emails returned as undeliverable. A true and correct copy of the Email Notice is attached hereto as Exhibit B.

12. Prior to distributing the Email Notice, the email addresses on the Class List underwent a cleansing and validation process to remove extra spaces, fix common typographical errors in domain names, and correct insufficient domain suffixes (e.g., gmal.com to gmail.com, etc.) and remove known bad email addresses. Email addresses not designated as a known bad address were then verified by contacting the Internet Service Provider (“ISP”) to determine if the email address existed.

PUBLICATION OF THE SUMMARY NOTICE

13. Verita caused the Summary Notice to be published as an eight-page ad unit in the June 6, 2025, June 13, 2025, June 20, 2025, and June 27, 2025, issues of the Los Angeles Daily News. True and correct copies of the Summary Notice as it appeared in the publication on each date is attached hereto as Exhibit C.

1 14. In addition, Verita purchased 10,500,000 impressions to be distributed
2 programmatically via various websites and mobile apps, as well as on Facebook and Instagram,
3 from June 6, 2025, through August 4, 2025. The impressions were targeted to adults 18 years of
4 age and older and, where available, appear alongside content related to cookware, cooking, recipes,
5 etc., as well as behaviorally targeted to cooking enthusiasts or aspiring chefs, users whose online
6 behavior indicated an interest in or likely purchase of HexClad, gourmet cooking equipment, or
7 non-stick cookware, and other related interests. A total of 11,011,521 impressions were delivered,
8 resulting in an additional 511,521 impressions at no extra charge. Notice is estimated to have
9 reached 85.86 % of Settlement Class Members. Confirmation of the Digital Media Notices as they
10 appeared on a variety of websites and on Facebook and Instagram is attached hereto as Exhibit D.
11

12 **SETTLEMENT WEBSITE**

13 15. On or about June 6, 2025, Verita established a website
14 (www.HexCladSettlement.com) to provide information to the potential Settlement Class Members
15 and to answer frequently asked questions. The website URL was set forth in the Notices. Visitors
16 to the website could download copies of the Notice, Claim Form, and other case-related documents.
17 Visitors could also submit claims online during the claim filing period. As of August 28, 2025,
18 there have been 976,292 users, 1,321,047 sessions/hits (active visits to the website), and 3,242,786
19 page views of the website.
20

21 **TELEPHONE HOTLINE**

22 16. Verita established and continues to maintain a toll-free telephone number dedicated
23 to providing automated information about the Settlement, important deadlines, Settlement Class
24 Member rights, and instructions on how Class Members can request a copy of the Long Form
25 Notice. As of August 28, 2025, there have been 19,636 calls to the telephone hotline.
26

27 **CLAIM FORMS**

28 17. The postmark deadline for Class Members to file claims in this matter is November

1 14, 2025. As of August 28, 2025, Verita has received 209,712 timely-filed claim forms, consisting
2 of 209,403 web submissions and 309 paper claims. This represents 9.22% of the total noticed
3 population. Verita expects additional timely-filed claim forms to be submitted during the claim
4 filing period. Verita's preliminary analysis indicated in the Carla A. Peak Declaration submitted in
5 support of Preliminary Approval on February 3, 2025, estimated that Class Members were to
6 receive 4-5% of the price they paid for pots and pans included in the Eligible Products list, based
7 on an estimated 5% claims rate. Based on the current analysis of the claims, Class Members are
8 estimated to receive approximately 2% of the price they paid for pots and pans included in the
9 Eligible Products list, based on an estimated 10.5% claims rate. This claims rate substantially
10 exceeds Verita's original projections and reflects a higher participation rate than was expected
11 before Preliminary Approval.
12

13
14 18. Verita has been monitoring the claim submissions on this matter to ensure the
15 integrity of the claims process. Of the 209,712 submissions received, 209,403 are web submissions
16 and 309 are paper claims. The settlement website is secured with multiple authentication layers that
17 require only class members with a valid claim ID and PIN or Amazon Order ID to file a claim,
18 making fraud extremely unlikely. Additionally, Verita has observed a decrease in the claims rate
19 since the case launched, which is consistent with normal settlement administration patterns. If fraud
20 were involved, we would typically see a high and rapid increase in claim submissions rather than
21 the declining trend we have observed.
22

23 19. Verita performs comprehensive claim review procedures as part of our standard
24 settlement administration protocols. Before any distribution occurs, we conduct a full review of all
25 claims to identify and investigate multiple or suspicious submissions by the same individual,
26 address, or IP address. Our review process includes cross-referencing personal information, mailing
27 addresses, email addresses, and digital footprints to detect potentially fraudulent or duplicate
28

1 submissions. Based on our monitoring and review procedures conducted to date, we do not see any
2 indicators of fraud in the claim submissions for this settlement.

3 **EXCLUSIONS TO THE SETTLEMENT**

4 20. The postmark deadline for Class Members to exclude themselves from the
5 Settlement was August 5, 2025. As of the date of this declaration, Verita has received 92 timely
6 requests for exclusion and 3 late exclusions requests. A list of the Class Members excluding from
7 the Settlement is attached hereto as Exhibit E. There does not appear to be any demographic or
8 geographic concentration in the opt-outs; the distribution appears to be random based upon my
9 experience in settlement administration.
10

11 **OBJECTIONS TO THE SETTLEMENT**

12 21. The postmark deadline for Class Members to object to the Settlement was August
13 5, 2025. As of the date of this declaration, Verita has received two objections to the Settlement.
14 The letters from the Class Member's objecting to the Settlement are attached hereto as Exhibit F.
15

16 **ADMINISTRATION COSTS**

17
18 22. Pursuant to Section IV.45(b) of the Settlement Agreement, Verita originally
19 estimated administration costs of approximately \$312,000, an estimate based on an assumed 5%
20 claim filing rate and an expected 50/50 distribution split between check and digital payments.
21 Actual results have materially exceeded those assumptions. The Settlement Class list ultimately
22 contained nearly 40% more records than originally estimated, which significantly increased the
23 Notice population. In addition, as of August 28, 2025, the claims rate is 9.22%, and is projected to
24 exceed 10.5% by the close of the claims period. This level of response is extraordinary and reflects
25 exceptionally strong class engagement. Importantly, despite the high volume, Verita has not
26 identified indicia of fraud in claims submitted to date. Finally, Claimant payment selections have
27 diverged significantly from expected patterns. Whereas the estimate assumed an equal 50/50 split
28

1 between check and digital payments, as of today approximately 70% of claimants have selected
2 payment by check, which materially increases printing and postage costs.

3 23. Collectively, these factors resulted in an increase of projected administration costs,
4 which will not exceed \$550,000.00 in total to complete the administration of the Settlement.
5

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct.

8 Executed on August 29, 2025, at Louisville, KY.

9 *Edward Dattilo*

10 _____
Edward Dattilo

EXHIBIT A

Cliburn v. One Source to Market d/b/a Hexclad Cookware
Settlement Administrator
P.O. Box 301172
Los Angeles, CA 90030-1172

LEGAL NOTICE

See other side for details.



Postal Service: Please Do Not Mark Barcode

HXK-«Claim8»-«CkDig»

PIN: «PIN»

«FirstNAME» «LastNAME»

«Addr1» «Addr2»

«City», «State»«FProv» «Zip»«FZip»

«FCountry»



VISIT THE
SETTLEMENT
WEBSITE BY
SCANNING
THE PROVIDED
QR CODE

HXK

If you purchased a HexClad product, you *may* be entitled to a payment from a class action settlement.

Visit www.HexCladSettlement.com to learn more or to file a Claim Form online.

A settlement has been proposed in a class action lawsuit against One Source to Market, LLC d/b/a Hexclad Cookware, Inc. (“HexClad”), which alleges HexClad falsely advertised, labeled, and marketed the non-stick coating of certain products, including that the products were “non-toxic,” “PFAS Free,” “PFOA Free,” or otherwise free from certain chemicals. HexClad has denied any and all allegations of wrongdoing, fault, liability, or damage of any kind.

Who is included?

Records indicate that you are included in the Settlement. The Settlement includes all persons and entities in the United States, its territories, and/or its possessions who purchased one or more of the Eligible Products (“Settlement Class Members”) between February 1, 2022 and March 31, 2024. A list of Eligible Products is available at the www.HexCladSettlement.com.

What does the Settlement provide?

HexClad has agreed to create a \$2,500,000 Settlement Fund to provide cash payments to Settlement Class Members who submit a valid Claim Form. Defendant has also agreed to stop advertising any product containing PTFE or any chemical in the PFAS family as “PFAS free” or “PFOA free” or as “non-toxic.”

How do I get benefits?

You must complete and submit a Claim Form by **November 14, 2025**. Claim Forms are available and may be filed online at www.HexCladSettlement.com.

What are my other options?

If you do not want to be legally bound by the Settlement, you must exclude yourself by **August 5, 2025**. Unless you exclude yourself from the Settlement, you will not be able to sue Defendant or its related parties for any claim released by the Settlement Agreement. If you do not exclude yourself from the Settlement, you may participate in the Settlement’s benefits or you may object and notify the Court that you or your lawyer intend to appear at the Court’s Final Fairness Hearing. Objections are due **August 5, 2025**.

The Court’s Final Fairness Hearing.

The Court will hold a Final Fairness Hearing in this case (*Cliburn, et al. v. One Source to Market, LLC*, No. 23STCV28390) on September 15, 2025 at 10:00 a.m. At this hearing, the Court will decide whether to grant final approval to: (1) the Settlement; (2) Class Counsel’s request for up to 33 1/3% of the Settlement Fund in attorneys’ fees and expenses; and (3) \$2,500.00 Service Awards to each representative Plaintiff. You may appear at the hearing, but you do not have to. You also may hire your own attorney, at your own expense, to appear or speak for you at the hearing.

Want More Information?

Visit www.HexCladSettlement.com, call 1-866-507-0323 or write to: *Cliburn v. One Source to Market d/b/a Hexclad Cookware* Settlement Administrator, P.O. Box 301172, Los Angeles, CA 90030-1172.

EXHIBIT B

Claim ID: <<ClaimNumber>>

PIN code: <<PIN>>

Dear: <<FirstName>> <<LastName>>,

NOTICE REGARDING CLASS ACTION SETTLEMENT

This is not a notice of a lawsuit against you.

If you purchased a HexClad product, you *may* be entitled to a payment from a class action settlement.

[CLICK HERE TO FILE YOUR
CLAIM FORM](#)

YOUR CLAIM ID	<<ClaimID>>
YOUR PIN	<<PIN>>
USE THESE UNIQUE NUMBERS WHEN FILING YOUR CLAIM FORM TO RECEIVE A CLASS PAYMENT	

Visit www.HexCladSettlement.com to learn more or to file a Claim Form online.

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EXHIBIT C

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WANT MORE INFORMATION?

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EXHIBIT D

Digital Creatives

Khuschbu Didwania, et al. v. HexClad Cookware, Inc. | Notice of Settlement

May 30, 2025



NOTE: All creatives displayed herein are for representative purposes only and may not be to scale. Some ads are built on responsive platforms and may not display all text in view based on placement, screen size, etc.

Display

Display Text If you purchased a HexClad product, you may be entitled to a payment from a class action settlement.

LEARN MORE

HexCladSettlement.com

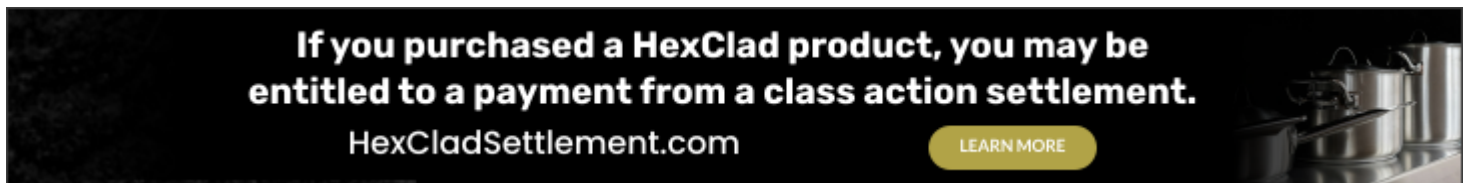
Click-Through URL <https://hexcladsettlement.com/>

300x600

300x250



728x90



Facebook & Instagram

Image Text HexClad Product Class Action Settlement
LEARN MORE
HexCladSettlement.com

Headline HexClad Product Class Action Settlement

Description If you purchased a HexClad product, you may be entitled to a payment from a class action settlement.

Call to Action Learn more

Website URL <https://hexcladsettlement.com/>

URL as displayed hexcladsettlement.com

Facebook Page

If you purchased a HexClad product, you may be entitled to a payment from a class action settlement.

HexCladSettlement.com

LEARN MORE

HexClad Product Class Action Settlement

0 likes • 0 followers

Like Search

Posts About Mentions Followers Photos Videos More

Intro

If you purchased a HexClad product, you may be entitled to a payment from a class action settlement.

Page • Legal service

HexCladSettlement.com

Posts

Filters

No posts available

Facebook Desktop Feed Ad



This is a desktop-sized Facebook feed advertisement. At the top, it features a profile picture of a black circle, the name 'HexClad Product Class Action Settlement', and a 'Sponsored' label. Below this is a short introductory text: 'If you purchased a HexClad product, you may be entitled to a payment from a class action settlement.' The main body of the ad has a black background with the title 'HexClad Product Class Action Settlement' in large white font. Below the title is a yellow 'LEARN MORE' button and the website 'HexCladSettlement.com'. The bottom section shows a close-up of several stainless steel HexClad pots. At the very bottom, there is a white bar containing the website 'HEXCLADSETTLEMENT.COM', the title 'HexClad Product Class Action Settlement', a 'Learn more' button, and a 'Share' icon.

Facebook Mobile Feed Ad



This is a mobile-sized Facebook feed advertisement. It follows a similar layout to the desktop version but is scaled for a smaller screen. It includes the same header information, introductory text, main title, 'LEARN MORE' button, and website. The image of the pots is also present. The bottom section features a 'hexcladsettlement.com' link, the title 'HexClad Product Class Action Settlement', a 'Learn more' button, and social media interaction icons for 'Like', 'Comment', and 'Share'.

Facebook Stories Ad



This is a Facebook story advertisement, which is a vertical rectangle. It contains the same header, introductory text, main title, 'LEARN MORE' button, and website as the other ads. The image of the pots is also included. At the bottom, there is a line of text: 'If you purchased a HexClad product, you may be entitled to a payment from... [More](#)'. Below this text is a white button with a blue link icon and the text 'Learn more'.

Instagram Feed Ad



Instagram Stories Ad





EXHIBIT E



CASE NAME: Cliburn v. One Source to Market, LLC d/b/a Hexclad Cookware, Inc

ID	Claim number	Last Name	First Name	Postmark Date	Status
1	HXX-109600401	LATA	HEM	6/2/2025	Timely
2	HXX-104762993	GIARDINA	STEVEN	6/8/2025	Timely
3	HXX-108515052	PRIEGO	ARMANDO	6/9/2025	Timely
4	HXX-114373540	KUBIAK	JOSEPH	6/9/2025	Timely
5	HXX-900000139	LAFLEUR	JOHN	6/9/2025	Timely
6	HXX-112396615	HOWEN	MARK	6/10/2025	Timely
7	HXX-112618448	WEBSTER	LAUDESS	6/10/2025	Timely
8	HXX-900000120	KINAS	DALE & BARBARA	6/10/2025	Timely
9	HXX-109321383	ALFONSO	DIANIA	6/11/2025	Timely
10	HXX-100583539	NGUYEN	SUSAN	6/12/2025	Timely
11	HXX-103829989	JOHNSON	MACK	6/12/2025	Timely
12	HXX-111152674	WHITEHEAD	LAYLA	6/12/2025	Timely
13	HXX-113615981	OCAMPO	IRMA	6/12/2025	Timely
14	HXX-113757417	LODEN	KIERA	6/12/2025	Timely
15	HXX-114798796	DESAI	PARTH	6/12/2025	Timely
16	HXX-900000112	REIS	BRENDALL	6/12/2025	Timely
17	HXX-102998850	GURULE	CAROL	6/13/2025	Timely
18	HXX-109713672	MCCUNE	DEBBIE	6/13/2025	Timely
19	HXX-110466179	WHITLEY	SUZANNE	6/13/2025	Timely
20	HXX-111680131	ZACCARIA	DAVID	6/13/2025	Timely
21	HXX-112029310	KOEHLER	KURT	6/13/2025	Timely
22	HXX-112447651	JACKSON	TI LAR	6/13/2025	Timely
23	HXX-113218966	CIRRINCIONE	MARISA	6/13/2025	Timely
24	HXX-103771972	THOMAS	SUSAN	6/14/2025	Timely
25	HXX-104216360	CHASTEEN	JAMIE	6/14/2025	Timely
26	HXX-108148335	TOMINAGA	BRENDA	6/14/2025	Timely
27	HXX-113156146	KRAUSE	LINDA	6/14/2025	Timely
28	HXX-112358829	CHIESA	JOHN	6/16/2025	Timely
29	HXX-115391746	BUONVINO	AULBREE	6/16/2025	Timely
30	HXX-103335110	ASHIOTES	CHRIS	6/17/2025	Timely
31	HXX-107129876	GODYCKI	ROSITA	6/17/2025	Timely
32	HXX-113113110	SCHRYER	SAMANTHA	6/17/2025	Timely
33	HXX-110232020	LARA	GLORIA	6/18/2025	Timely
34	HXX-111929245	FRY	SARA	6/18/2025	Timely
35	HXX-113133448	KUNISCH	KATHY	6/19/2025	Timely
36	HXX-106646478	BONOMO	HEATHER	6/20/2025	Timely

37	HXX-107885271	EDWARDS	ANGIE	6/20/2025	Timely
38	HXX-115360239	MCLEAN	DONALD	6/20/2025	Timely
39	HXX-115452346	PECK	NICHOLI	6/20/2025	Timely
40	HXX-104658657	EARLY	KAREN	6/21/2025	Timely
41	HXX-103774238	MARTINI	THERESA	6/23/2025	Timely
42	HXX-104984198	BLAUER	ANN	6/23/2025	Timely
43	HXX-112481027	GUILLEN	ALFONSO	6/23/2025	Timely
44	HXX-100238998	LITTLE	GERALDINA	6/24/2025	Timely
45	HXX-107226499	HESTER	LORI	6/24/2025	Timely
46	HXX-106639803	DAVIA	GINA	6/25/2025	Timely
47	HXX-111915643	WANG	ANNE	6/26/2025	Timely
48	HXX-100390978	DAVIDSON	JEREMY	6/30/2025	Timely
49	HXX-107262444	FERRER	JESUS PEREZ	6/30/2025	Timely
50	HXX-108917061	ALDAVE	DULCE	7/1/2025	Timely
51	HXX-105361879	COLE	ANDREW	7/5/2025	Timely
52	HXX-109134419	MACDONELL	AMANDA	7/5/2025	Timely
53	HXX-103952900	PACHECO	ASHLEY	7/7/2025	Timely
54	HXX-113109970	MILLER	KALYN	7/7/2025	Timely
55	HXX-106874845	RHAME	DAVID	7/8/2025	Timely
56	HXX-104930551	JOHNSON	LISA	7/9/2025	Timely
57	HXX-105932930	GERACE	JOSEPH	7/9/2025	Timely
58	HXX-100947123	LIU	QUE	7/12/2025	Timely
59	HXX-101838034	JACOBSEN	DANIELA	7/12/2025	Timely
60	HXX-100128173	JOTEVA-IVANOVA	MONICA	7/15/2025	Timely
61	HXX-112218202	CLAYBURN	JAMES	7/15/2025	Timely
62	HXX-108291243	FERRIS	GEORGE	7/17/2025	Timely
63	HXX-102890110	SANTA MARIA	CATHERINE	7/21/2025	Timely
64	HXX-109298535	GRICE	CALEB	7/21/2025	Timely
65	HXX-106710842	STOMAKHINA	EKATERINA	7/23/2025	Timely
66	HXX-106918907	YOON	ALICE	7/24/2025	Timely
67	HXX-108539229	SMITH	YVONNE	7/24/2025	Timely
68	HXX-107558203	CHAO	YUNG-HSUAN	7/26/2025	Timely
69	HXX-113328494	BROWN	COLEEN	7/26/2025	Timely
70	HXX-900000104	THOMPSON	LOUISE & TODD	7/26/2025	Timely
71	HXX-103889140	KING	PHILIP	7/28/2025	Timely
72	HXX-105266515	BACKES	CHRISTINA	7/29/2025	Timely
73	HXX-109830911	FERNAL	GLAYCE	7/30/2025	Timely
74	HXX-111142407	DETIENNE	C	7/30/2025	Timely
75	HXX-112866883	NELMS	SYDNEY	7/30/2025	Timely
76	HXX-114866635	PIETRYKA	PAWEL	7/30/2025	Timely
77	HXX-114961514	CARPENTER	JANICE	8/2/2025	Timely
78	HXX-400299658	KERN	BRIAN	8/2/2025	Timely
79	HXX-105890731	ACEVEDO	YARIXA RIVERA	8/4/2025	Timely

80	HXK-107628570	JABER	MILO	8/4/2025	Timely
81	HXK-107840723	WALIGORA	NADETTE	8/4/2025	Timely
82	HXK-110546296	KARBOWSKI	TONY	8/4/2025	Timely
83	HXK-900000171	RAJENDRAN	KARTHI	8/4/2025	Timely
84	HXK-103298444	GARCIA	RACHEL	8/5/2025	Timely
85	HXK-107676397	DECELLE	KIMBERLY	8/5/2025	Timely
86	HXK-111555442	GARCIA	LORENZO	8/5/2025	Timely
87	HXK-113019980	KRONE	CHEYENNA	8/5/2025	Timely
88	HXK-113714696	SIMPKINS	TIM	8/5/2025	Timely
89	HXK-900000147	BRYANT	DANITA	8/5/2025	Timely
90	HXK-900000155	IN DEN BERKEN	GREGORY	8/5/2025	Timely
91	HXK-900000163	FULLER	EMILY	8/5/2025	Timely
92	HXK-900000180	VILLON GILBERT	VIVIANA	8/5/2025	Timely
93	HXK-101909624	TOM	JEFFREY	8/6/2025	Late
94	HXK-113581785	CUELLAR	YURIRIA	8/6/2025	Late
95	HXK-100153550	LEON	TANIA	8/11/2025	Late

EXHIBIT F

Barnes & Thornburg, LLP

2029 Century Park East, Suite 300, Los Angeles, CA 90067
c/o Kevin D. Rising & Garret S Llewellyn

Dunning Rievman & MacDonald LLP

1350 Broadway, Suite 220, New York, NY 10018
c/o Joshua D. Rievman

Zimmerman Reed LLP

1100 IDS Center 80 South 8th Street, Minneapolis, MN 55402
c/o Brian C. Gudmundson

Jennings & Earley PLLC

500 President Clinton Ave, Little Rock, AR 72201
c/o Christopher D. Jennings

Almeida Law Group LLC

3550 Watt Avenue, Suite 140, Sacramento, CA 95821
c/o John R. Parker Jr.

Date: June 13, 2025

RE: Settlement in Cliburn v. One Source to Market, LLC d/b/a Hexclad Cookware, Inc.
No. 23STCV28390 (L.A. Super. Ct.)
Claim ID: HXK-11132180-8

Dear Settlement Administrators:

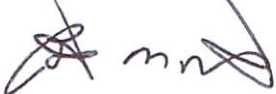
I am writing you today to object to the proposed Hexclad cash only settlement in the above referenced Class Action Suit. I purchased multiple pieces sets of Hexclad between June and December 2023. Being very health conscious, the sole reason I purchased this product was the advertised claims that the non-stick element was indeed PTFE/PFAS free. Finding out that this may not be the case is extremely disturbing me and that is why I am participating in the settlement.

However, it has also come to my attention that Hexclad has since changed their product in 2024 to a high-grade proprietary ceramic nonstick called TerraBond which is PTFE/PFAS free. Taking a cash settlement is not an appropriate remedy in that I would have to replace my cookware entirely or continue to choose to cook with a PTFE/PFAS product, jeopardizing the health of me and my family.

It is anticipated that a cash settlement, by the time all distributions are made, will most likely not make me whole by providing the funds needed to replace my cookware set with a Hexclad equivalent. As such, I feel that a better settlement for all involved would be for Hexclad to offer the opportunity to replace my cookware set with the new generation ceramic PTFE-free cookware, which I would gladly accept.

I have not retained an attorney and do not plan on appearing or having an attorney to appear at the Final Fairness Hearing. However, I would appreciate if the Settlement Administrators and the Court would take my objections seriously on my behalf and the other claimants and include an option for the replacement of new next-gen PTFE/PFAS free cookware from Hexclad.

Sincerely,



Bret M. Martin
2001 Madeira Circle, Waxhaw, NC 28173
704-780-5817
Email: bretski2@gmail.com

David W. Kamps

22 Pine Manor Dr.
Little Rock, Arkansas 72207
davidwkamps@icloud.com

July 29, 2025

Settlement Administrator
Cliburn v. One Source to Market, LLC d/b/a Hexclad Cookware
P.O. Box 301172
Los Angeles, CA 90030-1172

RE: Settlement Objection
Cliburn v. One Source to Market, LLC d/b/a Hexclad Cookware, Inc.
Case No. 23STCV28390 (L.A. Super. Ct.)
My Claim ID: HXK-11446012-4

To Whom It May Concern:

My name is David Kamps, a Class Member in the above referenced class action lawsuit. I am writing to express my objection to the settlement amount of \$2.5 million. In my opinion, this amount is grossly inadequate when considering the fraudulent actions of HexClad and the substantial financial gains realized as a direct result.

According to a July 2025 article published by Shopify, HexClad has reached over \$550 million in annual revenue, and is described as a \$1 billion brand built on direct-to-consumer marketing and celebrity partnerships, including one with Gordon Ramsay.¹ The company's exponential growth, brand value, and massive sales volume place it in a fundamentally different category from the average consumer product company facing false advertising claims. The lawsuit alleged serious and widespread misrepresentations, including claims that the cookware was "non-toxic," "PFAS Free," and "PFOA Free." HexClad engaged in a massive marketing campaign that amplified these claims across national media and digital platforms, despite knowing that its core selling point, the safety and composition of its nonstick coating, was misleading and materially false.

A \$2.5 million non-reversionary settlement fund, after deduction of attorneys' fees and costs, leaves Class Members with a fractional recovery. For a company generating nine-figure annual revenue, this amount is negligible and does not meaningfully deter deceptive advertising practices or reflect the magnitude of consumer harm. The settlement, as proposed, fails to serve the principles of accountability or adequate compensation. For these reasons, I respectfully object to the settlement terms.

I have not retained an attorney for the purpose of objecting to any term or aspect of the Settlement.
I do not intend to appear at the Final Fairness Hearing.

Respectfully submitted,



David W. Kamps

¹ <https://www.shopify.com/blog/hexclad-cookware-success-story>