

NOTICE OF CLASS ACTION SETTLEMENT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Sol Tan Tanning & Spa, LLC et al.,

Plaintiffs,

v.

Hydrafacial LLC dba The Hydrafacial
Company,

Defendant.

Case No. 1:24-cv-08073-VEC

IF YOU PURCHASED, LEASED, OR OTHERWISE ACQUIRED A SYNDEO WITHIN THE BORDERS OF NEW YORK STATE ON OR BEFORE JUNE 25, 2026 YOU MAY BE INCLUDED IN A CLASS ACTION LAWSUIT AND ENTITLED TO RECEIVE A CASH AWARD UNDER THE TERMS OF A PROPOSED SETTLEMENT.

A federal court authorized this Notice.

You are not being sued. This is not a solicitation from a lawyer.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	If you do nothing, you will receive a Cash Award as a check sent to you by mail and be bound by the Settlement Agreement, including the Release.
ELECT PAYMENT TYPE September 14, 2026	You may choose whether to receive your Cash Award by check or electronic payment by submitting an Election Form. If you do not submit an Election Form you will be mailed a check.
OPT-OUT September 14, 2026	You may exclude yourself from the Settlement Class by sending a timely written opt-out request to the Settlement Administrator. You will retain your legal rights but will not receive a Cash Award.
OBJECT September 14, 2026	You may object to the Settlement Agreement by filing a written objection with the Court. You can still receive a Cash Award.
APPEAR IN COURT December 4, 2026	If you file an objection, you can request to appear at the Final Approval Hearing on December 4, 2026 at 10:00 A.M. personally or through your own attorney to speak to the Court about your objection. Notice of your intent to appear must be included in your objection.

**These rights and options and the deadlines to exercise them are explained in this Notice.
Please read it carefully to understand your legal rights.**

BASIC INFORMATION

1. WHY DID YOU RECEIVE A NOTICE?

Defendant's records indicate that you purchased, leased, or otherwise acquired a Syndeo in the state of New York on or before June 25, 2026. The Notice was sent because you have a right to know about the proposed Settlement and your legal rights.

2. WHAT IS A CLASS ACTION?

A class action is a type of lawsuit where one or more people or entities called Class Representatives (in this case, "Spa Thirsty, Inc.") sue on behalf of people or entities who have similar claims. All these people are a Class or Class Members. One court resolves the issues for all Class Members, except for those who exclude themselves from the Settlement.

3. WHO IS INCLUDED IN THE SETTLEMENT CLASS?

You are a member of the "Settlement Class" if you purchased, leased, or otherwise acquired a Syndeo in the state of New York on or before June 25, 2026. If you meet the Settlement Class definition and do not timely opt out, you are a "Settlement Class Member" and will be bound by the terms of the Settlement Agreement.

4. WHAT IS THIS LAWSUIT ABOUT?

The case is titled *Sol Tan Tanning & Spa, LLC et al. v. Hydrafacial LLC dba The Hydrafacial Company and The Beauty Health Company*, Case No. 1:24-cv-08073-VEC C (S.D.N.Y.) (the "Action").

Plaintiffs allege the Syndeo device manufactured by Defendant includes defects or non-conformities in violation of law or duty. Defendant denies the allegations and that it did anything wrong.

5. WHY IS THERE A SETTLEMENT?

The Court has not decided who should win this case. Instead, both sides agreed to a settlement to avoid the uncertainties and expenses associated with litigation, and Class Members will get compensation soon rather than, if at all, years from now. The Class Representative believes that the Settlement is in the best interests of all Class Members.

THE SETTLEMENT BENEFITS – YOUR CASH AWARD

6. WHAT DOES THE SETTLEMENT PROVIDE?

Defendant will pay \$925,000.00 to settle this class action (“Settlement Fund”). Settlement Class Members who do not opt-out of the Settlement will receive an equal portion of the “Available Settlement Fund” after payment of Class Counsel’s Fee & Cost Award, Class Representative’s Service Award, Settlement Administration Expenses, and any other costs, fees or expenses approved by the Court. The exact Cash Award amount cannot be calculated at this time because it will depend on the total number of participating Settlement Class Members and the value of the other awards paid from the Settlement Fund.

7. HOW AND WHEN WILL CASH AWARDS BE PAID?

The Court will hold a hearing on December 4, 2026 to decide whether to approve the Settlement. Payments cannot be distributed until after the Settlement becomes final. If the Court approves the Settlement, there may be appeals afterwards. It is uncertain whether there will be any appeals or how long an appeal might take to resolve.

Cash Awards are expected to be paid within 60 days after the Settlement has received final approval and any appeals have been resolved in favor of the Settlement. All payments will expire and become void 180 days after they are issued.

You may complete and submit an online Election Form to choose to receive a Cash Award by check or electronic payment. Election Forms must be submitted on or before September 14, 2026. You are not required to submit an Election Form to receive a Class Award. Settlement Class Members who do not submit Election Forms will receive a Cash Award in the form of a check sent by mail.

8. DO I HAVE TO SUBMIT AN ELECTION FORM?

No. If you do not timely submit an Election Form you will receive a Cash Award in the form of a check sent by mail to your last known address. If your address has changed or you received Notice of the settlement by mail and the address was incorrect, you must notify the Settlement Administrator’s office of your new or correct address.

9. WHAT ELECTRONIC PAYMENT OPTIONS ARE THERE?

If you complete and timely submit an Election Form by September 14, 2026, you can choose to receive your Cash Award by Venmo, PayPal, Zelle, Direct Deposit, or a virtual e-Mastercard.

YOUR RIGHTS AND OPTIONS

10. WHAT HAPPENS IF I DO NOTHING?

If you do nothing, you will remain a Settlement Class Member and you will be eligible to receive a Cash Award if/when the Settlement is approved and becomes final. You will also be bound by the terms of the Settlement Agreement and be barred from bringing or maintaining any action of any kind against any of the Released Parties concerning the Released Claims.

11. CAN I BE EXCLUDED FROM THE SETTLEMENT? HOW DO I OPT-OUT?

If you do not want to participate, receive a Cash Award, or be bound by the terms of the Settlement Agreement you may request exclusion or “opt-out” of the Settlement Class by sending a written request to the Settlement Administrator, postmarked on or before September 14, 2026.

Your written request to opt out must include: (1) your name and address, (2) a signature, (3) the name and number of the Action - *Sol Tan Tanning & Spa, LLC et al. v. Hydrafacial LLC dba The Hydrafacial Company*, Case No. 1:24-cv-08073-VEC; and (4) a statement that you wish to opt out of (i.e., be excluded from) the Settlement Class.

To be valid, the opt-out request must be postmarked or otherwise received by the Settlement Administrator’s office by September 14, 2026:

Hydrafacial Company Settlement
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
HydrafacialCompanySettlement@atticusadmin.com

12. IF I EXCLUDE MYSELF, CAN I OBJECT?

No. A Settlement Class Member is not entitled to submit an opt out request and an objection.

13. WHAT IS THE DIFFERENCE BETWEEN OPTING OUT AND OBJECTING?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you remain a Settlement Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself from the Settlement, you have no basis to object because the Settlement no longer affects you.

14. IF I EXCLUDE MYSELF, CAN I GET A CASH AWARD?

No. If you exclude yourself, you will not receive a Cash Award because you will no longer be a Settlement Class Member.

15. HOW DO I OBJECT TO THE SETTLEMENT?

If you are a Settlement Class Member you may object to the Settlement or any part of it that you don't like. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views. If you object, you will still receive a Cash Award. Your objection must be filed with the Court on or before September 14, 2026. Copies of your objection must also be sent to Class Counsel and Defendant's Counsel at the addresses below.

The objection must be personally signed and include the following: (1) your name and address, (2) an explanation of the basis upon which you claim to be a Settlement Class Member, (3) all grounds for the objection, including all citations to legal authority and evidence supporting the objection, (4) the name and contact information of any and all attorneys representing, advising, or assisting the you in connection with the objection or who may profit from the pursuit of the objection ("Objecting Attorneys"), (5) a statement indicating whether the you intend to appear at the Final Approval Hearing personally or through counsel, and (6) a statement sufficiently showing that the person submitting and signing the objection on behalf of the objector has the legal power and authority to do so, if the objector is not a natural person.

If a member of the Settlement Class or any of the Objecting Attorneys has objected to any other class action settlement where the objector or the Objecting Attorneys asked for or received any payment in exchange for dismissal of the objection, or any related appeal, without any modification to the settlement, then the objection must include a statement identifying each such case by full case caption and amount of payment received.

Your objection must be filed with the Clerk of the Court and sent to Class Counsel and Defendant's Counsel at the addresses below or via the Court's electronic filing system if an attorney represents you.

CLERK OF THE COURT	CLASS COUNSEL	DEFENDANT'S COUNSEL
United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007	Roy A. Katriel The Katriel Law Firm, PC 2262 Carmel Valley Rd Suite 201 Del Mar, CA 92014 Ralph B. Kalfayan The Kalfayan Firm, APC 2262 Carmel Valley Rd Suite 200 Del Mar, CA 92014	John C. Scalzo Zachary B. Kaye Reed Smith LLP 599 Lexington Ave 22 ND Floor New York, NY 10022

THE LAWYERS REPRESENTING YOU

16. DO I HAVE A LAWYER IN THIS CASE?

Yes. The Court appointed Roy A. Katriel of The Katriel Law Firm, and Ralph B. Kalfayan of The Kalfayan Firm to represent the best interests of the Settlement Class. These attorneys are called "Class Counsel."

17. SHOULD I GET MY OWN LAWYER?

You do not need to hire your own attorney because Class Counsel is working on your behalf and represents the best interests of the Settlement Class. If you want to hire your own attorney, you may do so at your own expense.

18. HOW WILL CLASS COUNSEL BE PAID?

Class Counsel will ask the Court to approve a "Fee & Cost Award of not more than thirty percent (30%) of the Settlement Fund (i.e., \$277,500), plus actual costs and expenses. Defendant and Defendant's Counsel have agreed not to oppose such a request. Class Representative Spa Thirsty, Inc. will also ask the Court to consider a Service Award in the amount of \$10,000.00 in recognition of its service to the Settlement Class. The Court may award less than these amounts. Defendant and Defendant's Counsel have agreed not to oppose these requests.

Class Counsel must file papers supporting the Fee & Cost Award and Service Award in advance of the Final Approval Hearing. Those papers will be posted on the Settlement Website at www.hydrafacialcompanysettlement.com after they are filed.

FINAL APPROVAL HEARING

19. WHEN AND WHERE IS THE FINAL APPROVAL HEARING?

The Court will hold a Final Approval Hearing to decide whether the Settlement is fair, reasonable, and adequate and whether to approve the Class Counsel's Fee & Cost Award and the Class Representative's Service Award. The Final Approval Hearing will be held on December 4, 2026 at 10:00 A.M. in Courtroom 20C of the Daniel Patrick Maynihan Courthouse located at 500 Pearl Street, New York, New York, 10007.

The hearing date and time may change without further notice to the Settlement Class. You may check the Settlement Website at www.hydrafacialcompanysettlement.com for updates.

20. DO I HAVE TO ATTEND THE HEARING?

No. Class Counsel will answer any questions the Court may have. You are welcome to come at your own expense, but you are not required to do so. If you file an objection, you do not have to

attend the hearing to talk to the Court about it. If your written objection was submitted on time and meets the other criteria described above, the Court will consider it.

MORE INFORMATION

21. WHERE CAN I GET MORE INFORMATION?

You can visit the Settlement Website at www.hydrafacialcompanysettlement.com for access to Court documents and further details. You may also contact the Settlement Administrator for additional information by email at HydrafacialCompanySettlement@atticusadmin.com, by toll-free telephone at 1-800-216-0810, or by mail at Hydrafacial Company Settlement, c/o Atticus Administration, PO Box 64053, St. Paul, MN 55164.

You may also contact Class Counsel listed above for additional information.

PLEASE DO NOT CONTACT THE COURT.