

## **If You Purchased NIVEA Good-bye Cellulite or My Silhouette! Products You May Be Part of a Class Action Settlement**

If you purchased NIVEA Good-Bye Cellulite Gel Cream, NIVEA Good-Bye Cellulite Patches, NIVEA Good-Bye Cellulite Fast Acting Serum, the NIVEA Good-Bye Cellulite 30-Day Body Beauty Program, or NIVEA My Silhouette! Redefining Gel Cream you may be part of a class action settlement and may be able to file a claim for cash or a coupon. This notice is only a summary. For more complete information, please read the full notice at [www.gbcmssettlement.com](http://www.gbcmssettlement.com) or write to the address below.

### **What is the Class Action Lawsuit About?**

Plaintiffs say that the advertisements and packaging for NIVEA Good-Bye Cellulite and My Silhouette! products sold by Beiersdorf are misleading. Beiersdorf denies plaintiffs' allegations and contends that its conduct was lawful.

### **What Are the Terms of the Settlement?**

Under the terms of the proposed settlement, each class member who submits a valid claim may be entitled to cash or a coupon. For more details, visit the website or write to the address below.

### **Who Represents Me?**

The Court has appointed an attorney to represent the settlement class. Beiersdorf will pay that attorney's fees up to \$1,500,000 if the settlement is approved. You may hire your own attorney, if you wish, at your own expense.

### **What Are My Legal Rights?**

- **If you wish to remain a member of the settlement class**, you do not have to do anything. To receive money or a coupon, however, you must submit a claim. If the Court approves the proposed settlement, you will be bound by all Court orders. This means you will not be able to sue Beiersdorf for claims that are covered by the settlement.
- **If you wish to submit a claim for cash or coupon**, visit [www.gbcmssettlement.com](http://www.gbcmssettlement.com) and follow the instructions. All claims, and any required documentation, must be postmarked on or before **May 31, 2012**.
- **If you do not wish to be a member of the settlement class**, you must submit a letter to the Settlement Administrator at the address below, postmarked on or before **May 16, 2012**. If you request to be excluded from the settlement class you cannot submit a claim.
- **You can tell the Court if you do not like this proposed settlement** or some part of it if you (1) file the appropriate papers with the Clerk of Court, Circuit Court of Cook County, Richard J. Daley Center, Chicago, IL 60602, and (2) send a copy of those papers to settlement class counsel, Thomas A. Zimmerman, Jr., Zimmerman Law Offices, P.C., 77 West Washington Street, Suite 1220, Chicago, IL 60602 and to counsel for Beiersdorf, Michael W. Davis, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603. The papers must be filed with the Court and mailed to counsel no later than **May 16, 2012**.

### **Will the Court Approve the Proposed Settlement?**

The Court will hold a Fairness Hearing on June 15, 2012 at 10:00 a.m. to consider whether the proposed settlement is fair, reasonable, and adequate and to consider the motion for plaintiffs'

attorney's fees and expenses and an incentive award to the plaintiffs who represent the settlement class.

**For a copy of the full Notice of Proposed Class Action Settlement and a Claim Form, write to:**

GBC MS Settlement Administrator  
c/o Strategic Claims Services  
600 N Jackson Street – Suite 3  
Media, PA 19063

**or visit: [www.gbcmsettlemnt.com](http://www.gbcmsettlemnt.com)**