

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

In The Matter of
COOPERMAN et al. v. GALEOS, LLC, et al.
Case No. SACV 10-01815-JVS (FFMx)

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

To: All persons who purchased Galeos Salad Dressings during the period November 29, 2006 to May 3, 2011.

You may be entitled to receive a refund for your purchase(s) of Galeos products as a result of this proposed class action settlement. To apply for and receive your refund or replacement, ([“click here”](#) or “visit galeoscafe.com, click on the lawsuit settlement link, and submit a complete and accurate refund or replacement request.”)

You have until December 31, 2011 to submit your refund or replacement requests.

TO UNDERSTAND YOUR RIGHTS, READ THIS NOTICE CAREFULLY.

This Notice is Court approved. It is not a solicitation from an attorney.

Questions? CALL 1 (973) 228-6667
Please do not call the Court directly.

READ THIS NOTICE CAREFULLY. YOUR LEGAL RIGHTS WILL BE AFFECTED.

I. What Is This Case About?

This NOTICE OF PROPOSED CLASS ACTION SETTLEMENT (“NOTICE”) is to inform you that on July 25, 2011, the United States District Court for the Central District of California (“the Court”) preliminarily approved a class action settlement between Plaintiff Paige Cooperman and several other Plaintiffs (“Plaintiffs”), on behalf of themselves and all other similarly situated persons (“Class Members”), and Defendants Galeos, LLC, Galeos, Inc., Andrei Leontieff, and Gordana Samardzic (collectively “Galeos”).

A. Description Of The Litigation

On November 29, 2010, several Plaintiffs filed a class-action lawsuit against Galeos. They alleged that some of the nutritional information on Galeos Salad Dressings labels was deceptive or inaccurate, and that the dressings actually had a higher fat, calorie, carbohydrate, and sodium content than was stated on the labels. In the following months, additional class action lawsuits were filed against Galeos making identical claims. The Plaintiffs sought to recover damages, attorneys’ fees, and costs of litigation on behalf of themselves and Class Members.

Galeos denies all Plaintiffs’ claims and contends that the fat content of its products’ labels has been and remains accurate regarding fat content. Galeos also contends that it has never engaged in any deceptive conduct and that these lawsuits are not appropriate for class-action treatment.

This settlement is the result of extensive negotiations between Plaintiffs and Galeos. Both sides agree that, in light of the risks and expenses associated with continued litigation, this Settlement is fair, reasonable, and adequate under the circumstances. Please be advised that the United States District Court for the Central District of California has not ruled on the merits or accuracy of Plaintiffs’ claims or Galeos’ defenses to such claims.

II. Am I A Class Member?

You are a Class Member if you purchased Galeos Salad Dressings, for personal use and not for resale, during the period November 29, 2006 to May 3, 2011 (the “Class Period”).

III. What Are The Terms Of The Proposed Settlement?

Subject to Court approval, the essential terms of the Settlement are as follows:

1. Galeos will offer a full refund to Class Members who (i) provide proof(s) of purchase and (ii) affirm, under oath and penalty of perjury, that they personally purchased Galeos Products during the Class Period, that they have not already received a refund or replacement of the purchased products, and that they will not seek any further refund or replacement of the purchased products in the future.

2. Where Class Members lack proof(s) of purchase, Galeos will offer the lowest retail price in the market at the time of preliminary approval for up to three (3) bottles of Galeos Salad Dressings so long as the Class Member affirms under oath and penalty of perjury to have personally purchased the products.

3. Galeos will ensure continued accuracy and consistency of its various product labels by engaging a qualified food-testing laboratory, for a period of five (5) years, to test each of its products biannually as to calories, fat, carbohydrates, protein, and sodium.

4. Galeos will pay \$500 to each of the twelve Plaintiffs named in the lawsuits.

5. Galeos has added a “Lawsuit Settlement” link to the homepage of its website, <http://galeoscafe.com>, to inform Class Members of the Settlement and to provide instructions for obtaining refunds and/or replacement products.

IV. What Are My Options?

1. You May Participate In The Settlement: If you wish to receive a refund of Galeos products you purchased, you must visit <http://galeoscafe.com> and submit a complete and accurate refund request. To do so, click on the Lawsuit Settlement link at the top of the homepage. The Lawsuit Settlement webpage contains instructions for submitting your electronic request. You will be required to affirm, under oath, that you purchased the amount of Galeos Products you claim, that you have not previously received a refund or replacement for the purchased products, and that you agree to not seek further refund or replacement for the purchased products. In addition, you will be required to provide proof(s) of purchase, and product labels, when available. The deadline to submit a refund request is December 31, 2011.

2. You May Opt Out Of The Settlement: If you do not wish to be bound by the Settlement, you may send a letter requesting exclusion to Class Counsel (whose address is listed below) postmarked no later than December 31, 2011. If you opt out of the Settlement, (a) you will not receive any refund or replacement bottles as part of the Settlement of this case; (b) you will not be bound by any judgment in this case; and (c)

you will not lose the right to assert against Galeos any claims you may have for potential violation of laws related to the claims asserted against Galeos in the lawsuits.

3. You May Object To The Settlement: If you believe the proposed Settlement is unreasonable or inadequate in any respect, you may object to the Settlement, either personally or through an attorney of your selection, by filing a formal written objection with the Court and mailing a copy of your formal written objection to Class Counsel and Counsel for Galeos. The addresses for Class Counsel and Galeos Counsel are as follows:

The attorneys for the Plaintiffs and Class Members are:

PARIS ACKERMAN & SCHMIERER
101 Eisenhower Parkway
Roseland, New Jersey 07068
Telephone: (973) 228-6667
Fax: (973) 629-1246

The attorneys for Galeos are:

CALL & JENSEN
610 Newport Center Drive, Suite 700
Newport Beach, CA 92660
Telephone: (949) 717-3000
Fax: (949) 717-3100

All objections must be signed and accurately set forth your complete address, telephone number, identify the case (*Cooperman et al. v. Galeos, LLC, et. al.*, United States District Court for the Central District, Case No. SACV 10-01815 (FFMx), and fully and completely state your basis for objecting to the settlement. All objections must be appropriately filed with the Court and postmarked to Class Counsel and Galeos Counsel no later than October 26, 2011. If you properly submit a timely objection, you may appear, either personally or through an attorney of your own selection and at your own expense, at the Final Approval Hearing. The Final Approval Hearing is discussed below. Your objection should clearly explain why you object to the proposed Settlement and must state whether you or someone on your behalf intend to appear at the Final Approval Hearing.

Any Class Member who does not object in the manner described above shall be deemed to have waived any and all objections, and shall forever be foreclosed from objecting to the fairness or adequacy of the proposed Settlement, the payment of attorneys' fees, litigation costs, the award to named Plaintiffs, the claims, refund process, as well as any and all other aspects of the Settlement. If the Settlement is not approved by the Court, the Litigation will continue to be prepared for trial or other judicial resolution.

V. Further Information

The summary of the proposed Settlement Agreement in this Notice does not include all of the terms and conditions of the Settlement. The only complete statement of the terms of the proposed Settlement is in the actual Stipulation of Class Action Settlement (the "Settlement Agreement") that has been preliminarily approved by the Court. The proposed Settlement Agreement is available for inspection at the Office of the Clerk of the United States District Court for the Central District, which is located at 411 W. 4th Street, Santa Ana, California 92701; it can also be found on the Galeos website at www.galeoscafe.com. Please do not call the Court or the Judge.

VI. Final Approval Hearing and Your Options

The Court will hold a Final Approval Hearing on November 18, 2011, at 1:30 p.m., to consider whether to give final approval to the settlement and payment to the named Plaintiffs. If comments or objections have been received, the Court will consider them at that time. The hearing will take place before the Honorable James V. Selna in Department 10C of the United States District Court for the Central District, located at 411 W. 4th Street, Santa Ana, California 92701.

VII. If Settlement Is Not Approved

If the Court does not approved the Settlement Agreement, or if any of the conditions of the Agreement are not satisfied, the conditional settlement will be voided, no money will be paid, and the case will continue to be pursued in Court. If the Court does not approve the Settlement Agreement, there is no assurance that: (a) any decision at trial would be in favor of Class Members; (b) any favorable trial decision or verdict would be issued in favor of either party; (c) any trial decision or verdict for Class Members would be as favorable as the terms of this Settlement Agreement; or (d) any favorable trial decision for either party would be upheld if an appeal was filed.

VIII. Contact Information

Any inquiries concerning this Notice should be addressed to Class Counsel (see address above). Any correspondence should include your name, full and complete address and phone number, the specific case name, and the specific case number.