

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KAREN LARSON, an individual,
Plaintiff,

v.

JOHN PAUL MITCHELL SYSTEMS; L'ORÉAL USA, INC.;
L'ORÉAL USA PRODUCTS, INC.; HENKEL a/k/a HENKEL
AG & Co. KGaA; SCHWARZKOPF; JOICO; WELLA
OPERATIONS US, LLC; WELLA PROFESSIONALS;
COTY, INC.; KOHLBERG KRAVIS ROBERT & CO. a/k/a
KKR & CO., INC.; BRISTOL-MYERS SQUIBB; PROCTER
& GAMBLE HAIR CARE, LLC; CLAIROL; GOLDWELL;
KAO USA, INC.; GOLDWELL NEW YORK; COSMOPROF
SERVICES USA, LLC; SALLY BEAUTY HOLDINGS, INC.;
and JOHN DOE CORPORATIONS 1-100, inclusive,

Defendants.

Case No.

NOTICE OF REMOVAL

TO: **THE JUDGES FOR THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PLEASE TAKE NOTICE, that Defendant Henkel Corporation (“Henkel”), improperly named herein as “Henkel a/k/a Henkel AG & Co. KGaA” pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, by and through its undersigned counsel, hereby removes the action entitled *Larson v. John Paul Mitchell Systems, et al.*, filed in the Supreme Court of the State of New York, County of New York, Index No. 165754/2025, to the United States District Court for the Southern District of New York.¹ As required by 28 U.S.C. § 1446(a), Defendant sets forth below a short and plain statement of the grounds for removal:

I. PROCEDURAL HISTORY

¹ By removing this action to this Court, Defendant does not waive any defenses, objections, or responsive pleadings available under State or Federal law. Defendant expressly reserves the right to move for dismissal of some or all of Plaintiff’s claims and/or seek dismissal for lack of personal jurisdiction, improper venue, forum non conveniens, res judicata or on any other applicable grounds.

9. Removal is timely in that Henkel filed this Notice of Removal within 30 days of receipt, through service or otherwise, of a copy of the initial pleading setting forth the claims for relief upon which Plaintiff's action is based. *See* 28 U.S.C. § 1446(b)(1). This Notice of Removal is filed within 30 days of the filing of the Summons with Notice. In fact, since it has been less than 30 days since the action was commenced, the removal is timely as to all defendants.

10. In the Second Circuit, removal of a Summons with Notice is proper because it "generally provides information from which a defendant can ascertain removability." *See Whitaker v. Am. Telecasting, Inc.*, 261 F.3d 196, 204 (2d Cir. 2001) (holding a summons with notice may constitute an initial pleading for purposes of the federal removal statute).

11. Plaintiff filed the State Court Action in the Supreme Court of the State of New York, County of New York. Thus, pursuant to 28 U.S.C. § 1441(a), venue properly lies in the United States District Court for the Southern District of New York, the district embracing New York County.

A. There is Complete Diversity of Citizenship

12. This Court has original jurisdiction of this action under 28 U.S.C. § 1332(a) because the Parties are diverse and the amount in controversy exceeds \$75,000. Diversity of citizenship between Plaintiff and Defendants existed at the time Plaintiff filed the Summons with Notice and continues to exist as of this removal.

1. Plaintiff's Citizenship

13. Upon information and belief, Plaintiff resides in Illinois and therefore is a citizen of Illinois. *See Smith Decl.*, ¶ 7. For purposes of this Notice, Plaintiff's residence is sufficient to establish that Plaintiff is a citizen of Illinois. *See, e.g., Diego Beekman Mut. Hous. Ass'n Hous. Dev. Fund Corp. Hdfc. v. Dish Network, L.L.C.*, No. 15 Civ. 1094, 2016 WL 1060328, at *7

(S.D.N.Y. Mar. 15, 2016) (“[A]n individual’s residence at the time a lawsuit is commenced provides *prima facie* evidence of his domicile – which in turn determines citizenship.”) (citation and internal quotation omitted).

2. Defendants’ Citizenships

14. For the purposes of diversity, a corporation is deemed to be a citizen of the state in which it has been incorporated and where it has its principal place of business. 28 U.S.C. § 1332(c)(1).

15. John Paul Mitchell Systems is incorporated in California and has a principal place of business in California. Thus, for diversity purposes, John Paul Mitchell Systems is a citizen of California and is completely diverse from Plaintiff. *See*, Smith Decl. ¶ 9.

16. L’Oréal USA, Inc., is incorporated in Delaware and maintains a principal place of business in New York, New York. *See*, Smith Decl. ¶ 10.

17. L’Oréal USA Products, Inc., is incorporated in Delaware and maintains a principal place of business in New York, New York. *See*, Smith Decl. ¶ 11

18. Thus, for diversity purposes, L’Oréal USA, Inc. and L’Oréal USA Products, Inc. are citizens of Delaware and New York and are completely diverse from Plaintiff.

19. The erroneously named defendant Wella Professionals is correctly named Wella Operations US LLC. The erroneously named defendant Clairol is not a separate entity, but a brand name under Wella Operations US LLC. Wella Operations US LLC is formed in Delaware and maintains a principal place of business in California. Its sole member is Waves UK DivestCo Ltd, which is a UK company. Thus, for diversity purposes, the erroneously named Clairol and Wella Operations US LLC are citizens of Delaware, California, and the UK and are completely diverse from Plaintiff. *See*, Smith Decl. ¶ 14.

20. Coty, Inc. is incorporated in Delaware and maintains a principal place of business in New York, New York. Thus, for diversity purposes Coty, Inc. is a citizen of Delaware and New York and is completely diverse from Plaintiff. *See*, Smith Decl. ¶ 15.

21. Kohlberg Kravis Robert & Co. a/k/a KKR & Co., Inc. is incorporated in Delaware and maintains a principal place of business in New York, New York. Thus, for diversity purposes KKR & Co., Inc. is a citizen of Delaware and New York and is completely diverse from Plaintiff. *See*, Smith Decl. ¶17.

22. The erroneously named Goldwell New York and Cosmoprof Services US LLC are not separate entities, but brand names under Sally Beauty Holdings, Inc. Sally Beauty Holdings Inc. is incorporated in Delaware and maintains a principal place of business in Texas. Thus, for diversity purposes the erroneously named Goldwell New York, Cosmoprof Services US LLC, and Sally Beauty Holdings Inc. are citizens of Delaware and Texas and are completely diverse from Plaintiff. *See*, Smith Decl. ¶18.

23. The erroneously named Goldwell is not a separate entity, but a brand name under Kao Corporation. Kao Corporation is a Japanese company. Its U.S. subsidiary is Kao USA Inc. Kao USA Inc. is incorporated in Delaware and maintains a principal place of business in Ohio. Thus, for diversity purposes, the erroneously named Goldwell and Kao Corporation is a citizen of Delaware and Ohio and is completely diverse from Plaintiff. *See*, Smith Decl. ¶ 19.

24. Bristol-Myers Squibb is incorporated in Delaware and maintains a principal place of business in New Jersey. Thus, for diversity purposes Bristol-Myers Squibb is a citizen of Delaware and New Jersey and is completely diverse from Plaintiff. *See*, Smith Decl. ¶ 20.

25. Procter & Gamble Hair Care, LLC is formed in Delaware and maintains a principal place of business in Ohio. Procter & Gamble Hair Care LLC is a wholly owned subsidiary of P&G

Hair Care Holding, Inc., which is incorporated in Delaware and maintains a principal place of business in Ohio. Thus, for diversity purposes, Procter & Gamble Hair Care, LLC is a citizen of Delaware and Ohio and is completely diverse from Plaintiff. *See*, Smith Decl. ¶ 21.

26. The erroneously named defendants Joico and Schwarzkopf are not separate entities, but are brand names under Henkel Corporation. Henkel is incorporated in Delaware and maintains a principal place of business in Connecticut. Thus, for diversity purposes the erroneously named Joico and Schwarzkopf, and Henkel, are citizens of Delaware and Connecticut and completely diverse from Plaintiff. *See*, Smith Decl. ¶ 8.

B. The Amount in Controversy Exceeds \$75,000

28. The amount in controversy requirement is satisfied in this case because it is clear from the face of Plaintiff's Summons with Notice that the "matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs." 28 U.S.C. § 1332(a).²

29. "To determine the amount in controversy, the Court first looks to the initial pleading." *Kurland & Assocs., P.C. v. Glassdoor, Inc.*, No. 19-CV-8070, 2020 U.S. Dist. LEXIS 125941, at *3 (S.D.N.Y. July 16, 2020); *see also* 28 U.S.C. § 1446(c)(2) ("If removal of a civil action is sought on the basis of the jurisdiction conferred by section 1332(a), the sum demanded in good faith in the initial pleading shall be deemed to be the amount in controversy."). "It is well settled that the sum claimed by the plaintiff controls if the claim is apparently made in good faith." *Schapira v. Netbase Sols., Inc.*, No. 25-CV-01730, 2025 U.S. Dist. LEXIS 41892, at *1-2 (S.D.N.Y. Mar. 3, 2025) (citation omitted).

² Henkel acknowledges only that the amount Plaintiff puts in controversy in the complaint exceeds \$75,000, but neither admits nor concedes the truth of any of Plaintiff's allegations or that Plaintiff is entitled to relief in that amount or any amount whatsoever. Henkel expressly denies all of Plaintiff's allegations, contentions, causes of actions, claims, and damages, and reserve all defenses and rights.

30. Here, Plaintiff states in his Summons with Notice that Plaintiff suffered bladder cancer as a result of using Defendants' products and seeks, among other things, "(a) past and future general damages; (b) past and future economic and special damages; (c) past and future medical expenses; (d) past and future pain and suffering; (e) punitive or exemplary damages; (f) attorney's fees; (g) costs and disbursements; and (h) prejudgment interest all in amounts to be determined at trial. *See*, Smith Decl., Ex. A. The Summons with Notice states that "[s]hould Defendant(s) fail to appear herein, judgment will be entered by default for the sum of \$10 million with interest from the date of and the costs of this action." *See*, Smith Decl., Ex. A. Plaintiff's claimed default judgment value of the case in the amount of \$10 million easily exceeds the \$75,000 amount in controversy threshold.

31. Therefore, because the parties are diverse and the amount in controversy has been met, the State Court Action should proceed in federal court.

C. Additional Procedural Requirements

32. On information and belief, only Defendants L'Oreal USA, Inc., L'Oreal USA Products, Inc., Coty, Inc., Wella Professionals, and Goldwell New York ("Served Defendants") have been served to date. *See*, Smith Decl. Ex. D.

33. Service upon the Served Defendants was procedurally defective pursuant to state law. New York CPLR §305(a) provides that the Summons shall bear the index number:

(a) Summons; supplemental summons. **A summons** shall specify the basis of the venue designated and if based upon the residence of the plaintiff it shall specify the plaintiff's address, and also **shall bear the index number assigned** and the date of filing with the clerk of the court. []

NY CPLR §305(a) (2025).

34. Copies of the defective Summons with Notice that were sent to the Served Defendants are attached to the Smith Declaration as Exhibits "B" and "C." The subject Summons

with Notice states that an Index No. is “UNASSIGNED” and notes “CAUTION: THIS DOCUMENT HAS NOT YET BEEN REVIEWED BY THE COUNTY CLERK.” With the further caution that:

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

See, Smith Declaration Exhs. “B” and “C”.

35. There has been no process, pleadings, or orders properly served upon Henkel in this action. 28 U.S.C. § 1446(a). However, Henkel concurrently files herewith true and correct copies of all process, pleadings, and orders found on the docket of the New York County Supreme Court for this matter. Smith Decl., Exhs. A-D.

36. Pursuant to 28 U.S.C. § 1446(d), Defendant will promptly provide written notice of the filing of this Notice of Removal to Plaintiff and shall file a copy of this Notice along with a Notice of Removal to Federal Court with the Clerk of the Supreme Court of the State of New York, County of New York, where this action currently is pending.

WHEREFORE, Henkel Corporation gives notice that the matter bearing Index No. 165754/2025 in the Supreme Court of the State of New York, County of New York, is hereby removed to the United States District Court for the Southern District of New York.

GREENBERG TRAURIG, LLP

Dated: New York, New York
December 11, 2025

By: 

Keith E. Smith, Esq.
One Vanderbilt Avenue
New York, NY 10017
Tel: (215) 988-7843
smithkei@gtlaw.com
Attorneys for Defendant Henkel Corporation.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KAREN LARSON, an individual,
Plaintiff,

v.

JOHN PAUL MITCHELL SYSTEMS; L'ORÉAL USA, INC.; L'ORÉAL USA PRODUCTS, INC.; HENKEL a/k/a HENKEL AG & Co. KGaA; SCHWARZKOPF; JOICO; WELLA OPERATIONS US, LLC; WELLA PROFESSIONALS; COTY, INC.; KOHLBERG KRAVIS ROBERT & CO. a/k/a KKR & CO., INC.; BRISTOL-MYERS SQUIBB; PROCTER & GAMBLE HAIR CARE, LLC; CLAIROL; GOLDWELL; KAO USA, INC.; GOLDWELL NEW YORK; COSMOPROF SERVICES USA, LLC; SALLY BEAUTY HOLDINGS, INC.; and JOHN DOE CORPORATIONS 1-100, inclusive,

Defendants.

Case No.

**DECLARATION OF KEITH E,
SMITH IN SUPPORT OF NOTICE
OF DEFENDANT HENKEL
CORPORATION OF REMOVAL
OF ACTION PURSUANT TO 2
U.S.C. 1 2, 1 1, AND 1**

*Filed concurrently with Notice of
emoval*

Complaint Filed: December 5, 2025

I, Keith E. Smith, declare as follows:

1. I am an attorney and Shareholder at the law firm Greenberg Traurig LLP and counsel for defendant Henkel Corporation in the above-captioned lawsuit. I am duly licensed to practice in the State of New York and the United States District Court for the Southern District of New York.

2. I submit this declaration in support of Defendant's Notice of Removal.

3. I am over the age of 18 years old, I have personal knowledge of the facts set forth in this Declaration, and, if called as a witness, could and would competently testify thereto.

4. Defendant Henkel Corporation, incorrectly named as "Henkel a/k/a Henkel AG & Co. KGaA" s has not been served in this action.

5. Attached hereto as **Exhibit A** is a true and correct copy of the Summons with Notice that has been filed with the clerk of the New York County Supreme Court, Index No. 165754/2025.

6. The Summons with Notice provides the Plaintiff's name and no further identifying information including the address or even state of residence of the Plaintiff.

7. Based upon an investigation done by and on behalf of defendants, Henkel has identified Plaintiff as a citizen of Illinois.

8. Henkel is incorporated in Delaware and maintains a principal place of business in Connecticut. The erroneously named defendants Pravana, Joico, and Schwarzkopf are not separate entities, but are brand names under Henkel Corporation. Thus, for diversity purposes the erroneously named Pravana, Joico, and Schwarzkopf, and Henkel, are citizens of Delaware and Connecticut and completely diverse from Plaintiff.

9. John Paul Mitchell Systems is incorporated in California and has a principal place of business in California. Thus, for diversity purposes, John Paul Mitchell Systems is a citizen of California and is completely diverse from Plaintiff.

10. L'Oréal USA, Inc., is incorporated in Delaware and maintains a principal place of business in New York, New York.

11. L'Oréal USA Products, Inc., is incorporated in Delaware and maintains a principal place of business in New York, New York.

12. Thus, for diversity purposes, L'Oréal USA, Inc. and L'Oréal USA Products, Inc. are citizens of Delaware and New York and are completely diverse from Plaintiff.

13. Attached hereto as **Exhibit B** is a true and correct copy of the defective Summons with Notice that were purportedly served on L'Oreal USA Inc. The subject Summons with Notice

states that an Index No. is “UNASSIGNED” and notes “CAUTION: THIS DOCUMENT HAS NOT YET BEEN REVIEWED BY THE COUNTY CLERK.” With the further caution that:

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

See, Exhibit B.

14. The erroneously named defendant Wella Professionals is correctly named Wella Operations US LLC. The erroneously named defendant Clairol is not a separate entity, but a brand name under Wella Operations US LLC. Wella Operations US LLC is formed in Delaware and maintains a principal place of business in California. Its sole member is Waves UK DivestCo Ltd, which is a UK company. Thus, for diversity purposes, the erroneously named Clairol and Wella Operations US LLC are citizens of Delaware, California, and the UK and are completely diverse from Plaintiff.

15. Coty, Inc. is incorporated in Delaware and maintains a principal place of business in New York, New York. Thus, for diversity purposes Coty, Inc. is a citizen of Delaware and New York and is completely diverse from Plaintiff.

16. Attached hereto as **Exhibit C** is a true and correct copy of the defective Summons with Notice that were purportedly served on Coty, Inc. The subject Summons with Notice states that an Index No. is “UNASSIGNED” and notes “CAUTION: THIS DOCUMENT HAS NOT YET BEEN REVIEWED BY THE COUNTY CLERK.” With the further caution that:

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

See, Exhibit C.

17. Kohlberg Kravis Robert & Co. a/k/a KKR & Co., Inc. is incorporated in Delaware and maintains a principal place of business in New York, New York. Thus, for diversity purposes KKR & Co., Inc. is a citizen of Delaware and New York and is completely diverse from Plaintiff.

18. The erroneously named Goldwell New York and Cosmoprof Services US LLC are not separate entities, but brand names under Sally Beauty Holdings, Inc. Sally Beauty Holdings Inc. is incorporated in Delaware and maintains a principal place of business in Texas. Thus, for diversity purposes the erroneously named Goldwell New York, Cosmoprof Services US LLC, and Sally Beauty Holdings Inc. are citizens of Delaware and Texas and are completely diverse from Plaintiff.

19. The erroneously named Goldwell is not a separate entity, but a brand name under Kao Corporation. Kao Corporation is a Japanese company. Its U.S. subsidiary is Kao USA Inc. Kao USA Inc. is incorporated in Delaware and maintains a principal place of business in Ohio. Thus, for diversity purposes, the erroneously named Goldwell and Kao Corporation is a citizen of Delaware and Ohio and is completely diverse from Plaintiff.

20. Bristol-Myers Squibb is incorporated in Delaware and maintains a principal place of business in New Jersey. Thus, for diversity purposes Bristol-Myers Squibb is a citizen of Delaware and New Jersey and is completely diverse from Plaintiff.

21. Procter & Gamble Hair Care, LLC is formed in Delaware and maintains a principal place of business in Ohio. Procter & Gamble Hair Care LLC is a wholly owned subsidiary of P&G Hair Care Holding, Inc., which is incorporated in Delaware and maintains a principal place of business in Ohio. Thus, for diversity purposes, Procter & Gamble Hair Care, LLC is a citizen of Delaware and Ohio and is completely diverse from Plaintiff.

22. All real Defendant entities named in this lawsuit have not been served or have consented to removal.

23. A true and correct copy of all process, pleadings, and orders found on the docket of the New York County Supreme Court for this matter have been attached at **Exhibit D**.

24. There has been no process, pleadings, or orders properly served upon Henkel in this action. 28 U.S.C. § 1446(a).

I declare under penalty of perjury under the laws of the United States of America and the State of New York that the foregoing is true and correct.

December 11, 2025


Keith E. Smith

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

KAREN LARSON, an individual,

Plaintiff,

-against-

JOHN PAUL MITCHELL SYSTEMS; L'ORÉAL
USA, INC.; L'ORÉAL USA PRODUCTS, INC.;
HENKEL a/k/a HENKEL AG & Co. KGaA;
SCHWARZKOPF; JOICO; WELLA OPERATIONS
US, LLC; WELLA PROFESSIONALS; COTY, INC.;
KOHLBERG KRAVIS ROBERT & CO. a/k/a KKR &
CO., INC.; BRISTOL-MYERS SQUIBB; PROCTER &
GAMBLE HAIR CARE, LLC; CLAIROL;
GOLDWELL; KAO USA, INC.; GOLDWELL NEW
YORK; COSMOPROF SERVICES USA, LLC;
SALLY BEAUTY HOLDINGS, INC.; and
JOHN DOE CORPORATIONS 1-100, inclusive,

Defendants.

Index No.:
Date Filed:

SUMMONS WITH NOTICE

To the above-named defendants,

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on the Plaintiff's attorney at the address set forth below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after the service is complete if this summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT, should you fail to appear, a judgment will be taken against you by default for the relief demanded below.

Dated: December 5, 2025
New York, New York

Jonathan Sedgh
JONATHAN SEDGH, ESQ.
MORGAN & MORGAN NEW YORK, PLLC
199 Water Street, Suite 1500
New York, NY 10038

TO DEFENDANTS:

JOHN PAUL MITCHELL SYSTEMS
20705 Centre Pointe Parkway
Santa Clarita, CA 91350

L'ORÉAL USA, INC.
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

L'ORÉAL USA PRODUCTS, INC.
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

HENKEL a/k/a HENKEL AG & Co. KGaA
One Henkel Way, Rocky Hill, CT 06067
c/o Corporation Service Company
80 State Street, Albany, NY 12207

SCHWARZKOPF
5800 Bristol Parkway
Culver City, CA 90230
c/o Corporation Service Company
80 State Street, Albany, NY 12207

JOICO
5800 Bristol Parkway
Culver City, CA 90230
c/o Corporation Service Company
80 State Street, Albany, NY 12207

WELLA PROFESSIONALS
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

WELLA OPERATIONS US, LLC
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

COTY, INC.
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

KOHLBERG KRAVIS ROBERT & CO.
a/k/a KKR & Co., Inc.
30 Hudson Yards, Suite 7500
New York, NY 100019
c/o Corporate Creations Network
Maples Fiduciary Services (Delaware), Inc.
4001 Kennett Pike, Suite 302
Wilmington, DE 19807

BRISTOL-MYERS SQUIBB
Route 206 and Province Line Road
Princeton, NJ 08543
c/o CT Corporation System
28 Liberty Street, New York, NY 10005

PROCTER & GAMBLE
HAIR CARE, LLC
1 Procter & Gamble Plaza
Cincinnati, OH 45202
c/o CT Corporation System
28 Liberty Street, New York, NY 10005

CLAIROL
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

GOLDWELL
c/o Karen B. Frank
2535 Spring Grove Avenue
Cincinnati, OH 45214

KAO USA, INC.
2535 Spring Grove Avenue
Cincinnati, OH 45214
c/o Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

GOLDWELL NEW YORK
2117 Brighton Henrietta Town Line Road
Rochester, NY 14623
c/o Corporate Creations Network, Inc.
15 North Mill Street, Nyack, NY 10960

COSMOPROF SERVICES USA, LLC
4823 Promenade Parkway

Bessemer, AL 35022
c/o Corporate Creations Network, Inc.
15 North Mill Street, Nyack, NY 10960

SALLY BEAUTY HOLDINGS, INC.
3001 Colorado Blvd., Denton, TX 76210
c/o Corporate Creations Network, Inc.
15 North Mill Street, Nyack, NY 10960

NOTICE:

The nature of this action is as follows:

This is an action for recovery of damages resulting from Plaintiff’s bladder cancer, which was proximately caused by negligent, willful, and wrongful acts and/or omissions of Defendants and/or their affiliates, in connection with the design, development, manufacture, testing, packaging, promoting, marketing, distribution, labeling, and/or sale of unreasonably dangerous and defective hair dye products. Plaintiff alleges that the running of any statute of limitations has been equitably tolled by reason of Defendants’ fraudulent concealment of their products’ true risks, and that this action is timely under CPLR 214-c filed within one year after discovering the causal link between bladder cancer and exposure to Defendants’ products.

The relief sought is:

- a. Past and future general damages, the exact amount of which has yet to be ascertained, in an amount which will conform to proof at time of trial;
- b. Past and future economic and special damages according to proof at the time of trial;
- c. Past and future medical expenses according to proof at the time of trial;
- d. Past and future pain and suffering damages expenses according to proof at the time of trial;
- e. Punitive or exemplary damages according to proof at the time of trial;
- f. Attorney’s fees;
- g. Costs and disbursements incurred in this action;
- h. Prejudgment interest as provided by law; and
- i. Such other and further relief as the Court may deem just and proper.

Should Defendant(s) fail to appear herein, judgment will be entered by default for the sum of \$10 million with interest from the date of and the costs of this action.

Venue: Plaintiff designates NEW YORK County as the place of trial. The basis of this designation is Defendants’ residence therein and the convenience of witnesses pursuant to CPLR 503(a), (c).

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

KAREN LARSON, an individual,

Plaintiff,

-against-

JOHN PAUL MITCHELL SYSTEMS; L'ORÉAL USA, INC.; L'ORÉAL USA PRODUCTS, INC.; HENKEL a/k/a HENKEL AG & Co. KGaA; SCHWARZKOPF; JOICO; WELLA OPERATIONS US, LLC; WELLA PROFESSIONALS; COTY, INC.; KOHLBERG KRAVIS ROBERT & CO. a/k/a KKR & CO., INC.; BRISTOL-MYERS SQUIBB; PROCTER & GAMBLE HAIR CARE, LLC; CLAIROL; GOLDWELL; KAO USA, INC.; GOLDWELL NEW YORK; COSMOPROF SERVICES USA, LLC; SALLY BEAUTY HOLDINGS, INC.; and JOHN DOE CORPORATIONS 1-100, inclusive,

Defendants.

Index No.:
Date Filed:

SUMMONS WITH NOTICE

To the above-named defendants,

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on the Plaintiff's attorney at the address set forth below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after the service is complete if this summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT, should you fail to appear, a judgment will be taken against you by default for the relief demanded below.

Dated: December 5, 2025
New York, New York

Jonathan Sedgh
JONATHAN SEDGH, ESQ.
MORGAN & MORGAN NEW YORK, PLLC
199 Water Street, Suite 1500
New York, NY 10038

TO DEFENDANTS:

JOHN PAUL MITCHELL SYSTEMS
20705 Centre Pointe Parkway
Santa Clarita, CA 91350

L'ORÉAL USA, INC.
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

L'ORÉAL USA PRODUCTS, INC.
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

HENKEL a/k/a HENKEL AG & Co. KGaA
One Henkel Way, Rocky Hill, CT 06067
c/o Corporation Service Company
80 State Street, Albany, NY 12207

SCHWARZKOPF
5800 Bristol Parkway
Culver City, CA 90230
c/o Corporation Service Company
80 State Street, Albany, NY 12207

JOICO
5800 Bristol Parkway
Culver City, CA 90230
c/o Corporation Service Company
80 State Street, Albany, NY 12207

WELLA PROFESSIONALS
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

WELLA OPERATIONS US, LLC
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

COTY, INC.
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

KOHLBERG KRAVIS ROBERT & CO.
a/k/a KKR & Co., Inc.
30 Hudson Yards, Suite 7500
New York, NY 100019
c/o Corporate Creations Network
Maples Fiduciary Services (Delaware), Inc.
4001 Kennett Pike, Suite 302
Wilmington, DE 19807

BRISTOL-MYERS SQUIBB
Route 206 and Province Line Road
Princeton, NJ 08543
c/o CT Corporation System
28 Liberty Street, New York, NY 10005

PROCTER & GAMBLE
HAIR CARE, LLC
1 Procter & Gamble Plaza
Cincinnati, OH 45202
c/o CT Corporation System
28 Liberty Street, New York, NY 10005

CLAIROL
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

GOLDWELL
c/o Karen B. Frank
2535 Spring Grove Avenue
Cincinnati, OH 45214

KAO USA, INC.
2535 Spring Grove Avenue
Cincinnati, OH 45214
c/o Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

GOLDWELL NEW YORK
2117 Brighton Henrietta Town Line Road
Rochester, NY 14623
c/o Corporate Creations Network, Inc.
15 North Mill Street, Nyack, NY 10960

COSMOPROF SERVICES USA, LLC
4823 Promenade Parkway

Bessemer, AL 35022
c/o Corporate Creations Network, Inc.
15 North Mill Street, Nyack, NY 10960

SALLY BEAUTY HOLDINGS, INC.
3001 Colorado Blvd., Denton, TX 76210
c/o Corporate Creations Network, Inc.
15 North Mill Street, Nyack, NY 10960

NOTICE:

The nature of this action is as follows:

This is an action for recovery of damages resulting from Plaintiff's bladder cancer, which was proximately caused by negligent, willful, and wrongful acts and/or omissions of Defendants and/or their affiliates, in connection with the design, development, manufacture, testing, packaging, promoting, marketing, distribution, labeling, and/or sale of unreasonably dangerous and defective hair dye products. Plaintiff alleges that the running of any statute of limitations has been equitably tolled by reason of Defendants' fraudulent concealment of their products' true risks, and that this action is timely under CPLR 214-c filed within one year after discovering the causal link between bladder cancer and exposure to Defendants' products.

The relief sought is:

- a. Past and future general damages, the exact amount of which has yet to be ascertained, in an amount which will conform to proof at time of trial;
- b. Past and future economic and special damages according to proof at the time of trial;
- c. Past and future medical expenses according to proof at the time of trial;
- d. Past and future pain and suffering damages expenses according to proof at the time of trial;
- e. Punitive or exemplary damages according to proof at the time of trial;
- f. Attorney's fees;
- g. Costs and disbursements incurred in this action;
- h. Prejudgment interest as provided by law; and
- i. Such other and further relief as the Court may deem just and proper.

Should Defendant(s) fail to appear herein, judgment will be entered by default for the sum of \$10 million with interest from the date of and the costs of this action.

Venue: Plaintiff designates NEW YORK County as the place of trial. The basis of this designation is Defendants' residence therein and the convenience of witnesses pursuant to CPLR 503(a), (c).

EXHIBIT C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

KAREN LARSON, an individual,

Plaintiff,

-against-

JOHN PAUL MITCHELL SYSTEMS; L'ORÉAL USA, INC.; L'ORÉAL USA PRODUCTS, INC.; HENKEL a/k/a HENKEL AG & Co. KGaA; SCHWARZKOPF; JOICO; WELLA OPERATIONS US, LLC; WELLA PROFESSIONALS; COTY, INC.; KOHLBERG KRAVIS ROBERT & CO. a/k/a KKR & CO., INC.; BRISTOL-MYERS SQUIBB; PROCTER & GAMBLE HAIR CARE, LLC; CLAIROL; GOLDWELL; KAO USA, INC.; GOLDWELL NEW YORK; COSMOPROF SERVICES USA, LLC; SALLY BEAUTY HOLDINGS, INC.; and JOHN DOE CORPORATIONS 1-100, inclusive,

Defendants.

Index No.:
Date Filed:

SUMMONS WITH NOTICE

To the above-named defendants,

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on the Plaintiff's attorney at the address set forth below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after the service is complete if this summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT, should you fail to appear, a judgment will be taken against you by default for the relief demanded below.

Dated: December 5, 2025
New York, New York

Jonathan Sedgh
JONATHAN SEDGH, ESQ.
MORGAN & MORGAN NEW YORK, PLLC
199 Water Street, Suite 1500
New York, NY 10038

TO DEFENDANTS:

JOHN PAUL MITCHELL SYSTEMS
20705 Centre Pointe Parkway
Santa Clarita, CA 91350

L'ORÉAL USA, INC.
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

L'ORÉAL USA PRODUCTS, INC.
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

HENKEL a/k/a HENKEL AG & Co. KGaA
One Henkel Way, Rocky Hill, CT 06067
c/o Corporation Service Company
80 State Street, Albany, NY 12207

SCHWARZKOPF
5800 Bristol Parkway
Culver City, CA 90230
c/o Corporation Service Company
80 State Street, Albany, NY 12207

JOICO
5800 Bristol Parkway
Culver City, CA 90230
c/o Corporation Service Company
80 State Street, Albany, NY 12207

WELLA PROFESSIONALS
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

WELLA OPERATIONS US, LLC
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

COTY, INC.
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

KOHLBERG KRAVIS ROBERT & CO.
a/k/a KKR & Co., Inc.
30 Hudson Yards, Suite 7500
New York, NY 100019
c/o Corporate Creations Network
Maples Fiduciary Services (Delaware), Inc.
4001 Kennett Pike, Suite 302
Wilmington, DE 19807

BRISTOL-MYERS SQUIBB
Route 206 and Province Line Road
Princeton, NJ 08543
c/o CT Corporation System
28 Liberty Street, New York, NY 10005

PROCTER & GAMBLE
HAIR CARE, LLC
1 Procter & Gamble Plaza
Cincinnati, OH 45202
c/o CT Corporation System
28 Liberty Street, New York, NY 10005

CLAIROL
350 Fifth Avenue, New York, NY 10118
c/o Corporation Service Company
80 State Street, Albany, NY 12207

GOLDWELL
c/o Karen B. Frank
2535 Spring Grove Avenue
Cincinnati, OH 45214

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SALLY BEAUTY HOLDINGS, INC.
3001 Colorado Blvd., Denton, TX 76210
c/o Corporate Creations Network, Inc.
15 North Mill Street, Nyack, NY 10960

NOTICE:

The nature of this action is as follows:

This is an action for recovery of damages resulting from Plaintiff's bladder cancer, which was proximately caused by negligent, willful, and wrongful acts and/or omissions of Defendants and/or their affiliates, in connection with the design, development, manufacture, testing, packaging, promoting, marketing, distribution, labeling, and/or sale of unreasonably dangerous and defective hair dye products. Plaintiff alleges that the running of any statute of limitations has been equitably tolled by reason of Defendants' fraudulent concealment of their products' true risks, and that this action is timely under CPLR 214-c filed within one year after discovering the causal link between bladder cancer and exposure to Defendants' products.

The relief sought is:

- a. Past and future general damages, the exact amount of which has yet to be ascertained, in an amount which will conform to proof at time of trial;
- b. Past and future economic and special damages according to proof at the time of trial;
- c. Past and future medical expenses according to proof at the time of trial;
- d. Past and future pain and suffering damages expenses according to proof at the time of trial;
- e. Punitive or exemplary damages according to proof at the time of trial;
- f. Attorney's fees;
- g. Costs and disbursements incurred in this action;
- h. Prejudgment interest as provided by law; and
- i. Such other and further relief as the Court may deem just and proper.

Should Defendant(s) fail to appear herein, judgment will be entered by default for the sum of \$10 million with interest from the date of and the costs of this action.

Venue: Plaintiff designates NEW YORK County as the place of trial. The basis of this designation is Defendants' residence therein and the convenience of witnesses pursuant to CPLR 503(a), (c).

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

KAREN LARSON, an individual,

Plaintiff,

-against-

JOHN PAUL MITCHELL SYSTEMS; L'ORÉAL
USA, INC.; L'ORÉAL USA PRODUCTS, INC.;
HENKEL a/k/a HENKEL AG & Co. KGaA;
SCHWARZKOPF; JOICO; WELLA OPERATIONS
US, LLC; WELLA PROFESSIONALS; COTY, INC.;
KOHLBERG KRAVIS ROBERT & CO. a/k/a KKR &
CO., INC.; BRISTOL-MYERS SQUIBB; PROCTER &
GAMBLE HAIR CARE, LLC; CLAIROL;
GOLDWELL; KAO USA, INC.; GOLDWELL NEW
YORK; COSMOPROF SERVICES USA, LLC;
SALLY BEAUTY HOLDINGS, INC.; and
JOHN DOE CORPORATIONS 1-100, inclusive,

Defendants.

Index No.:

Date Filed:

SUMMONS WITH NOTICE

To the above-named defendants,

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on the Plaintiff's attorney at the address set forth below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after the service is complete if this summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT, should you fail to appear, a judgment will be taken against you by default for the relief demanded below.

Dated: December 5, 2025
New York, New York

Jonathan Sedgh
JONATHAN SEDGH, ESQ.
MORGAN & MORGAN NEW YORK, PLLC
199 Water Street, Suite 1500
New York, NY 10038

TO DEFENDANTS:

JOHN PAUL MITCHELL SYSTEMS
20705 Centre Pointe Parkway
Santa Clarita, CA 91350

L'ORÉAL USA, INC.
10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
80 State Street, Albany, NY 12207

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c/o Corporation Service Company
80 State Street, Albany, NY 12207

HENKEL a/k/a HENKEL AG & Co. KGaA
One Henkel Way, Rocky Hill, CT 06067
c/o Corporation Service Company
80 State Street, Albany, NY 12207

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c/o Corporation Service Company
80 State Street, Albany, NY 12207

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15 North Mill Street, Nyack, NY 10960

COSMOPROF SERVICES USA, LLC
4823 Promenade Parkway

EXHIBIT D

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

KAREN LARSON, an individual,

Plaintiff,

-against-

JOHN PAUL MITCHELL SYSTEMS; L'ORÉAL
USA, INC.; L'ORÉAL USA PRODUCTS, INC.;
HENKEL a/k/a HENKEL AG & Co. KGaA;
SCHWARZKOPF; JOICO; WELLA OPERATIONS
US, LLC; WELLA PROFESSIONALS; COTY, INC.;
KOHLBERG KRAVIS ROBERT & CO. a/k/a KKR &
CO., INC.; BRISTOL-MYERS SQUIBB; PROCTER &
GAMBLE HAIR CARE, LLC; CLAIROL;
GOLDWELL; KAO USA, INC.; GOLDWELL NEW
YORK; COSMOPROF SERVICES USA, LLC;
SALLY BEAUTY HOLDINGS, INC.; and
JOHN DOE CORPORATIONS 1-100, inclusive,

Defendants.

Index No.:

Date Filed:

SUMMONS WITH NOTICE

To the above-named defendants,

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action by serving a notice of appearance on the Plaintiff's attorney at the address set forth below
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30 days after the service is complete if this summons is not delivered personally to you within the
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taken against you by default for the relief demanded below.

Dated: December 5, 2025
New York, New York

Jonathan Sedgh
JONATHAN SEDGH, ESQ.
MORGAN & MORGAN NEW YORK, PLLC
199 Water Street, Suite 1500
New York, NY 10038

TO DEFENDANTS:

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20705 Centre Pointe Parkway
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c/o Corporation Service Company
80 State Street, Albany, NY 12207

L'ORÉAL USA PRODUCTS, INC.
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10 Hudson Yards, New York, NY 10001
c/o Corporation Service Company
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WELLA OPERATIONS US, LLC
350 Fifth Avenue, New York, NY 10118
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3001 Colorado Blvd., Denton, TX 76210
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NOTICE:

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- b. Past and future economic and special damages according to proof at the time of trial;
- c. Past and future medical expenses according to proof at the time of trial;
- d. Past and future pain and suffering damages expenses according to proof at the time of trial;
- e. Punitive or exemplary damages according to proof at the time of trial;
- f. Attorney's fees;
- g. Costs and disbursements incurred in this action;
- h. Prejudgment interest as provided by law; and
- i. Such other and further relief as the Court may deem just and proper.

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Venue: Plaintiff designates NEW YORK County as the place of trial. The basis of this designation is Defendants' residence therein and the convenience of witnesses pursuant to CPLR 503(a), (c).

AFFIRMATION OF SERVICE

State of New York

County of New York

Supreme Court

Index Number: _____
Date Filed: 12/5/2025

Plaintiff:
KAREN LARSON, an individual

vs.

Defendant:
L'ORÉAL USA, INC., et al.

For:
Morgan & Morgan
201 N Franklin St, 7th Floor,
Tampa, FL 33602

Received by Nicoletti & Harris to be served on **COTY, INC., c/o Corporation Service Company, 80 State Street, Albany, NY 12207.**

I, Dylan Jones, do hereby affirm that on the **5th day of December, 2025** at **2:35 pm**, I:

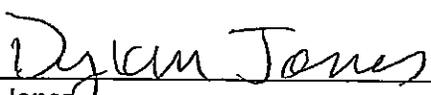
served a **REGISTERED AGENT** by delivering a true copy of the **Summons with Notice** to: **Minard Carkner**, Authorized to Accept Service, as **Litigation Management Specialist** of **Corporation Service Company, Registered Agent**, at the address of: **c/o Corporation Service Company, 80 State Street, Albany, NY 12207** on behalf of **COTY, INC.**

Said documents were conformed with index number and date of filing endorsed thereon.

Description of Person Served: Age: 39, Sex: M, Race/Skin Color: White, Height: 6'0", Weight: 220, Hair: Brown, Glasses: N

I certify that I am over the age of 18, have no interest in the above action.

I affirm on DEC 08 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



Dylan Jones
Process Server

Nicoletti & Harris
101 Avenue Of The Americas
9th Floor
New York, NY 10013

Our Job Serial Number: NHI-2025029852
Ref: 17015637



AFFIRMATION OF SERVICE

State of New York

County of New York

Supreme Court

Index Number: _____
Date Filed: 12/5/2025

Plaintiff:
KAREN LARSON, an individual

vs.

Defendant:
L'ORÉAL USA, INC., et al.

For:
Morgan & Morgan
201 N Franklin St, 7th Floor,
Tampa, FL 33602

Received by Nicoletti & Harris to be served on L'ORÉAL USA, INC., c/o Corporation Service Company, 80 State Street, Albany, NY 12207.

I, Dylan Jones, do hereby affirm that on the 5th day of December, 2025 at 2:35 pm, I:

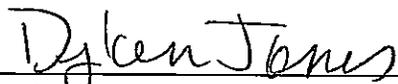
served a **REGISTERED AGENT** by delivering a true copy of the **Summons with Notice** to: **Minard Carkner**, Authorized to Accept Service, as **Litigation Management Specialist of Corporation Service Company, Registered Agent**, at the address of: **c/o Corporation Service Company, 80 State Street, Albany, NY 12207** on behalf of **L'ORÉAL USA, INC.**

Said documents were conformed with index number and date of filing endorsed thereon.

Description of Person Served: Age: 39, Sex: M, Race/Skin Color: White, Height: 6'0", Weight: 220, Hair: Brown, Glasses: N

I certify that I am over the age of 18, have no interest in the above action.

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Dylan Jones
Process Server

Nicoletti & Harris
101 Avenue Of The Americas
9th Floor
New York, NY 10013

Our Job Serial Number: NHI-2025029853
Ref: 17015637



AFFIRMATION OF SERVICE

State of New York County of New York Supreme Court

Index Number: _____
Date Filed: 12/5/2025

Plaintiff:
KAREN LARSON, an individual

vs.

Defendant:
L'ORÉAL USA, INC., et al.

For:
Morgan & Morgan
201 N Franklin St, 7th Floor,
Tampa, FL 33602

Received by Nicoletti & Harris to be served on **L'ORÉAL USA PRODUCTS, INC., c/o Corporation Service Company, 80 State Street, Albany, NY 12207.**

I, Dylan Jones, do hereby affirm that on the **5th day of December, 2025** at **2:35 pm**, I:

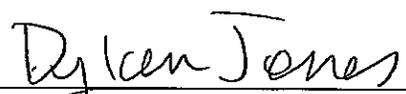
served a **REGISTERED AGENT** by delivering a true copy of the **Summons with Notice** to: **Minard Carkner**, Authorized to Accept Service, as **Litigation Management Specialist of Corporation Service Company, Registered Agent**, at the address of: **c/o Corporation Service Company, 80 State Street, Albany, NY 12207** on behalf of **L'ORÉAL USA PRODUCTS, INC.**

Said documents were conformed with index number and date of filing endorsed thereon.

Description of Person Served: Age: 39, Sex: M, Race/Skin Color: White, Height: 6'0", Weight: 220, Hair: Brown, Glasses: N

I certify that I am over the age of 18, have no interest in the above action.

I affirm on DEC 08 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



Dylan Jones
Process Server

Nicoletti & Harris
101 Avenue Of The Americas
9th Floor
New York, NY 10013

Our Job Serial Number: NHI-2025029854
Ref: 17015637



AFFIRMATION OF SERVICE

State of New York

County of New York

Supreme Court

Index Number: _____
Date Filed: 12/5/2025

Plaintiff:
KAREN LARSON, an individual

vs.

Defendant:
L'ORÉAL USA, INC., et al.

For:
Morgan & Morgan
201 N Franklin St, 7th Floor,
Tampa, FL 33602

Received by Nicoletti & Harris to be served on **WELLA PROFESSIONALS, c/o Corporation Service Company, 80 State Street, Albany, NY 12207.**

I, Dylan Jones, do hereby affirm that on the 5th day of December, 2025 at 2:35 pm, I:

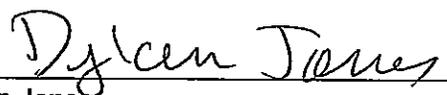
served a **REGISTERED AGENT** by delivering a true copy of the **Summons with Notice** to: **Minard Carkner**, Authorized to Accept Service, as **Litigation Management Specialist of Corporation Service Company, Registered Agent**, at the address of: **c/o Corporation Service Company, 80 State Street, Albany, NY 12207** on behalf of **WELLA PROFESSIONALS**

Said documents were conformed with index number and date of filing endorsed thereon.

Description of Person Served: Age: 39, Sex: M, Race/Skin Color: White, Height: 6'0", Weight: 220, Hair: Brown, Glasses: N

I certify that I am over the age of 18, have no interest in the above action.

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Dylan Jones
Process Server

Nicoletti & Harris
101 Avenue Of The Americas
9th Floor
New York, NY 10013

Our Job Serial Number: NHI-2025029855
Ref: 17015637



STATE OF NEW YORK SUPREME COURT NEW YORK COUNTY
DOCUMENTS SERVED WITH INDEX#: AND FILED ON 12/5/2025

KAREN LARSON, AN INDIVIDUAL
Vs.
JOHN PAUL MITCHELL SYSTEMS, ET AL

Plaintiff(s)/Petitioner(s)
Defendant(s)/Respondent(s)

STATE OF: NEW YORK)
COUNTY OF WESTCHESTER) SS

The undersigned deponent, being duly sworn deposes and says: Deponent is not a party herein, is over 18 years of age and resides in the State of New York. On 12/5/2025 at 3:36PM, deponent did serve the within process as follows:

Process Served: SUMMONS WITH NOTICE
Party Served: GOLDWELL NEW YORK
At Location: C/O CORPORATE CREATIONS NETWORK, INC.
600 MAMARONECK AVENUE #400
HARRISON NY 10528

(herein called recipient) therein named.

By delivering to and leaving with KATE DILORENZO and that deponent knew the person so served to be the GENERAL MANAGER on behalf of the Corporation/Government Agency/Entity. The deponent inquired if that individual was authorized to accept service and received an affirmative response.

The Process Server's perception of the description of the person served is as follows:
Gender FM Race WH Color of Hair BROWN
Age 50/55 Height 5'5"-5'6"
Weight 140/145 Other Features

Sworn to before me on 12/5/2025
Gail Williams

Zoe Williams
Server's License#: N/A
Job # 126356
NICOLETTI & HARRIS INC.

GAIL WILLIAMS
NOTARY PUBLIC STATE OF NEW YORK
Registration No 01W14665052
Qualified in Westchester County
Commission Expires 9/30/2026

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----Index No. UNASSIGNED

KAREN LARSON, an individual,

Plaintiff(s),

-against-

JOHN PAUL MITCHELL SYSTEMS; L'ORÉAL USA, INC.; L'ORÉAL USA PRODUCTS, INC.; WELLA OPERATIONS US, LLC; WELLA PROFESSIONALS; COTY, INC.; KOHLBERG KRAVIS ROBERT & CO. a/k/a KKR & CO., INC.; GOLDWELL; GOLDWELL NEW YORK; KAO USA, INC.; BRISTOL-MYERS SQUIBB; PROCTER & GAMBLE HAIR CARE, LLC; HENKEL a/k/a HENKEL AG & Co. KGaA; SCHWARZKOPF; JOICO; PRAVANA; CLAIROL; AVEDA CORPORATION; FRAMESI SpA; FRAMKAT L.P. d/b/a FRAMESI NORTH AMERICA; FT PITT FRAMESI, LTD.; COSMOPROF SERVICES USA, LLC; SALLY BEAUTY HOLDINGS, INC.; and JOHN DOE CORPORATIONS 1-100, inclusive,

Defendant(s).

-----X

I, Leah Sammak, of the State of Delaware, County of New Castle, being duly sworn, says that on the 5th day of December 2025 at 3:56 p.m., I personally served a copy of a SUMMONS WITH NOTICE on **Kohlberg Kravis Robert & Co.**, (on behalf of Karen Larson) by serving the registered agent, Maples Fiduciary Services (Delaware) Inc., 4001 Kennett Pike, Wilmington DE 19807.

Name of individual accepting service: Neisha Jenkins-Receptionist, authorized to accept
Description of individual: African American, 30-35 yrs. old, 130 lbs., 5'3" with black hair.



Leah Sammak

Subscribed and sworn before me
this 8th day of December 2025


Notary Public

LISA M. JOYNER
NOTARY PUBLIC
STATE OF DELAWARE
My Commission Expires May 20, 2028

My commission expires: _____