If you purchased a Winix branded air purifier and/or replacement filter marketed with "True HEPA" and/or "HEPA" language in the United States between September 19, 2020 and October 7, 2026, you may be entitled to an award from a class action settlement.

A state court has authorized this Notice. This is not a solicitation from a lawyer.

This Notice may affect your rights. Please read this Notice carefully.

A Settlement has been reached to resolve a class action lawsuit against Winix America, Inc. ("Winix" or "Defendant"), challenging certain "True HEPA" and/or "HEPA" claims made about Winix branded air purifiers and/or replacement filters purchased in the United States between September 19, 2020 and October 7, 2026.

Winix unequivocally denies all allegations and denies any wrongdoing. The Court has not decided who is right. Instead, to avoid the costs and risks of further litigation, the parties have agreed to the Settlement. Plaintiffs and their counsel believe the proposed Settlement is fair, reasonable, adequate, and in the best interests of the Settlement Class.

You are a Settlement Class Member if you purchased a Winix branded air purifier and/or replacement filter marketed with "True HEPA" and/or "HEPA" language in the United States between September 19, 2020 and **October 7, 2026**. Settlement Class Members who submit a valid Claim are eligible to receive a Settlement Award in the form of a digital payment of up to $12.00 USD.

Your legal rights will be affected whether you act or do not act. Please read this Notice carefully to understand your rights and options.

YOUR RIGHTS AND CHOICES		DEADLINE
Submit a Claim Form	The only way to get a Settlement Award in the form of a digital payment of up to $12.00 USD is to submit a valid Claim Form. If you submit a Claim Form, you will give up the right to sue Winix in a separate lawsuit about the legal claims this Settlement resolves.	Submit a Claim Form: **February 4, 2027**
Exclude Yourself	If you exclude yourself, you will not receive a Settlement Award, but you will retain the right to pursue your own claims against Winix relating to the issues in this lawsuit.	Submit an Exclusion: **February 4, 2027**

Object	Tell the Court why you object to the Settlement. You will still be bound by the Settlement if the Court approves it, and you may still file a Claim Form to receive a Settlement Award (and will receive a Settlement Award if the Claim is valid).	File an Objection: **February 4, 2027**
Attend a Hearing	Ask to speak at the Fairness Hearing about whether the Settlement is fair.	File a Notice of Appearance: **February 4, 2027**
Do Nothing	Receive no Settlement Award and give up your right to sue Winix for the claims resolved by this Settlement.	

This Notice explains your rights and options, as well as the deadlines to exercise them.

The Court must decide whether to approve the Settlement. Settlement Awards will be sent only if the Court approves the Settlement and after any appeals are resolved.

The final amount of your Settlement Award may be reduced depending on the total number of valid claims filed.

BASIC INFORMATION

1. Why did I get this Notice?

You received this notice because you may have purchased a Winix branded air purifier and/or replacement filter in the United States marketed with "True HEPA" and/or "HEPA" language **between September 19, 2020 and October 7, 2026**. If so, you are a Settlement Class Member and may be eligible to receive a Settlement Award in the form of a digital payment of up to $12.00 USD by submitting a valid Claim.

A Court authorized this Notice to inform you of a proposed Settlement of a class action lawsuit and of your rights and options before the Court decides whether to give final approval. This Notice explains the nature of the lawsuit, the terms of the Settlement, and your legal rights and options.

The lawsuit is titled *Larrabee, et al. v. Winix America, Inc.* and is pending in the Kings County Supreme Court in the State of New York, Index No. 528114/2026, before Judge Gina Abadi. The people who filed the lawsuit are referred to as the "Plaintiffs," and Winix America, Inc. ("Winix") is referred to as the Defendant. The Plaintiffs and the Defendant have agreed to resolve the lawsuit through this Settlement.

2. What is this lawsuit about?

The lawsuit alleges that Winix made false or misleading "True HEPA" and/or "HEPA" claims about certain Winix branded air purifiers and/or replacement filters sold in the United States between September 19, 2020 and October 7, 2026. More information about these allegations is available in the Class Action Complaint, which can be found on the settlement website at **www.HEPAAirFilterSettlement.com**. Winix unequivocally denies all allegations and maintains that it did not engage in any wrongdoing. The Court has not decided who is right. To avoid the costs and risks of further litigation, the Parties have agreed to a Settlement.

3. Why is the lawsuit a class action?

In a class action, one or more people called "Class Representatives" (in this case, Plaintiffs Jeffrey Larrabee, Cory DeBari, Julian Nava, and Taylor-Anne Harris) bring a lawsuit on behalf of themselves and other people with similar legal claims. All individuals who have similar legal claims and do not exclude themselves are referred to as the "Settlement Class".

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Winix. The Parties have agreed to the Settlement to avoid the costs and uncertainty of a trial. If the Court approves the Settlement, eligible Settlement Class Members who submit valid Claims will receive the benefits described in this Notice. The proposed Settlement does not mean that Winix did anything wrong. Winix unequivocally denies all allegations in this case and maintains that it did not engage in any wrongdoing. Plaintiffs and their counsel believe the proposed Settlement is fair, reasonable, and adequate and in the best interests of the Settlement Class.

WHO IS INCLUDED IN THE SETTLEMENT?

To see if you are eligible for benefits, you must first determine if you are a Settlement Class Member.

5. Am I part of the Settlement?

You are included in the Settlement if you purchased a Winix branded air purifier and/or replacement filter marketed with "True HEPA" and/or "HEPA" language in the United States between September 19, 2020 and October 7, 2026, including but not limited to Winix model nos. 6300, P300, 5300, 5500, 5500-2, 5300-2, 6300-2, AM90, C909, 9800, C535, C545, and C610, or Winix replacement filter packages identified as Filter A, Filter C, Filter H, Filter I, Filter Q, Filter S, and Filter Z.

Excluded from the Settlement Class are government entities; counsel of record (and their respective law firms) for the Parties; Defendant Winix America, Inc. ("Defendant" or "Winix") and any of its parents, affiliates, subsidiaries, and all of its respective employees, officers, and directors; the presiding judge(s) and mediators in this Action and the Prior Litigation (the putative class action lawsuits styled *DeBari, et al. v. Winix America, Inc.*, No. 3:24-cv-06596 (N.D. Cal.)), and all of their immediate families and judicial staff; persons who purchased the above-referenced products directly from Defendant's website or mobile application and are accordingly bound by an arbitration agreement and class-action waiver; and Settlement Class Members who submit a valid request for exclusion prior to the expiration of the Objection/Exclusion Deadline.

THE SETTLEMENT BENEFITS – WHAT YOU GET

6. What does the Settlement provide?

Settlement Class Members who submit a valid Claim are eligible to receive up to a $12.00 USD digital payment.

The total amount available for Settlement Awards is capped at $11,000,000.00. If the total value of valid Claims exceeds this amount, the Settlement Awards will be reduced on a proportional basis.

HOW TO GET BENEFITS FROM THE SETTLEMENT

7. How can I get my Settlement Award?

To receive a Settlement Award, you must complete and submit a Claim Form. You may submit your claim form online at www.HEPAAirFilterSettlement.com. Your completed Claim Form must be submitted online by **February 4, 2027**. If you qualify as a class member and made your purchase via Amazon.com or Costco, you will receive a unique Login ID which you should put into the Claim Form.

After you submit a Claim Form, the Settlement Administrator will review it and determine whether it is valid. Only Settlement Class Members who submit timely and valid Claims will be eligible to receive a Settlement Award. If the Court approves the Settlement, eligible Settlement Class Members who submit valid Claims will receive a Settlement Award in the form of a digital payment of up to $12.00 USD.

8. When and how will I receive my Settlement Award?

The Court will hold a Fairness Hearing on **March 15, 2027, at 10am ET** (subject to change), to decide whether to approve the Settlement, including a request for attorneys' fees and litigation costs of up to $3,500,000.00, and service awards totaling $20,000.00 for all Class Representatives. If the Court approves the Settlement, there may still be appeals. Resolving any appeals can take time; potentially more than one year. You will not receive a Settlement Award until the Settlement becomes final and any appeals are resolved. Please be patient.

If you submit a valid Claim, you will receive your Settlement Award via digital payment using the email address and/or mobile phone number you provide on your Claim Form.

9. What am I giving up to receive the Settlement Award?

Unless you exclude yourself from the Settlement, you cannot sue or be part of any other proceeding against Winix concerning the legal claims that were or could have been raised in this case. If you do not exclude yourself, you will be bound by the orders and judgments of the Court. By submitting a Claim Form or doing nothing, you will release Winix from all claims described in the Settlement Agreement (the "Released Claims").

The Settlement Agreement is available at www.HEPAAirFilterSettlement.com. It contains detailed information about the Released Claims in precise legal terms, so you should read it carefully. Unless otherwise stated, initial capitalized terms in this Notice have the same meaning as those defined in the Settlement Agreement. You may contact Class Counsel (listed in Question 10) at no cost, or you may consult your own attorney at your own expense if you have questions about the Released Claims or what they mean.

THE LAWYERS REPRESENTING YOU

10. Do I have a lawyer in this case?

The Court has appointed lawyers from the following law firms as Class Counsel to represent you and the other Settlement Class Members: Bursor & Fisher, P.A. and Sinderbrand Law Group, P.C. These lawyers are called Class Counsel. They are experienced in handling similar class action cases. You will not be charged for their services. If you prefer, you may hire your own lawyer at your own expense.

You may contact Class Counsel if you have any questions about this Notice or the Settlement.

Please do not contact the Court with questions about the Settlement.

Class Counsel:

Bursor & Fisher, P.A.
1330 Avenue of the Americas
New York, NY 10019
925-300-4455

11. How will Class Counsel be paid?

Class Counsel will ask the Court to approve an award of attorneys' fees and costs not to exceed $3,500,000.00. If approved, these amounts will be paid separately by Winix and will not reduce Settlement Awards to Settlement Class Members.

Class Counsel will also request service awards not to exceed a combined $20,000.00 for the Class Representatives for their time, effort, and risks undertaken in pursuing this litigation. If approved, these service awards will also be paid separately by Winix.

Winix has agreed not to oppose Class Counsel's request for attorneys' fees and costs up to $3,500,000.00. The Court will determine the amount to award and may approve less than the amounts requested.

YOUR RIGHTS – EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to receive a Settlement Award and want to keep your right to sue Winix on your own regarding the claims in this lawsuit, you must exclude yourself from the Settlement. This is called "excluding yourself" or "opting out" of the Settlement Class.

12. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a written "Request for Exclusion" that includes the following:

- Your name, mailing address, email address, and telephone number;
- Your personal signature (a signature by your lawyer or anyone else acting on your behalf is not sufficient); and
- The statement "I hereby request to be excluded from the proposed Settlement Class in *Larrabee, et al. v. Winix America, Inc.*, Index No. 528114/2026."

Your Request for Exclusion must be **postmarked** no later than **February 4, 2027**, and mailed to the Settlement Administrator at the following address:

Winix Air Purifier Settlement
ATTN: Exclusion Requests
P.O. Box 25191
Santa Ana, CA 92799

You cannot exclude yourself by telephone or by email.

If you do not follow these procedures and meet the deadline, you will remain a Settlement Class Member and will not be able to exclude yourself. If that occurs, your rights will be determined by the Settlement Agreement if it receives final approval from the Court.

13. If I exclude myself, can I get anything from the Settlement?

No. If you exclude yourself, you cannot receive a Settlement Award. However, you will retain the right to sue or participate in another proceeding against Winix concerning the claims in this case.

YOUR RIGHTS – OBJECTING TO THE SETTLEMENT

You may tell the Court that you object to the Settlement or any part of it.

14. How do I tell the Court that I do not agree with the Settlement?

If you are a Settlement Class Member, you may object to the Settlement if you do not agree with any part of it. You may state the reasons why you believe the Court should not approve the Settlement. The Court will consider your views. You cannot ask the Court to change the terms of the Settlement; the Court may only approve or reject it. If the Court does not approve the Settlement, no Settlement Award will be distributed and the lawsuit may continue.

To object to the Settlement, you must do so in writing. Your written objection must be **postmarked** no later than **February 4, 2027**, and mailed to the Settlement Administrator at the following address:

Winix Air Purifier Settlement
ATTN: Objections
P.O. Box 25191
Santa Ana, CA 92799

Your written objection must include:

- The case name and number (*Larrabee, et al. v. Winix America, Inc.*, Kings County Supreme Court of the State of New York, Index No. 528114/2026);
- Your full name, mailing address, email address, and telephone number;

- A statement of the specific grounds for the objection, accompanied by any papers, briefs or other documents supporting the objection;
- The identity of any attorney(s) representing you;
- A list of any persons you intend to call to testify in support of your objection (if any);
- A statement indicating whether you intend to appear at the Fairness Hearing;
- A list of any objections you or your lawyer have filed to class action settlements in the last ten years; and
- Your signature and the signature of your lawyer, if any.

You must also file your objection with the Court, either by filing it in person or mailing it to the Court Clerk, at 360 Adams Street, Brooklyn, New York 11201, **postmarked** no later than **February 4, 2027**.

If you submit a timely and proper objection, it will be considered by the Court at the Fairness Hearing. You do not need to attend the Fairness Hearing for the Court to consider your objection.

If you do not submit a written objection in accordance with these procedures and deadlines, you will waive your right to be heard at the Fairness Hearing.

15. What is the difference between objecting and asking to be excluded?

Objecting means telling the Court that you do not agree with something about the Settlement. You may object only if you remain in the Settlement Class. Excluding yourself (or opting out) means that you do not want to be part of the Settlement Class. If you exclude yourself, you cannot object to the Settlement because you are no longer part of the lawsuit.

YOUR RIGHTS – APPEARING AT THE FAIRNESS HEARING

The Court will hold a Fairness Hearing to decide whether to approve the Settlement. You may attend the Fairness hearing and request permission to speak, but you are not required to do so.

16. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing at 10:00 a.m. ET, on March 15, 2027, at the Kings County Supreme Court of the State of New York, located at 360 Adams Street, Brooklyn, New York 11201, before the Honorable Gina Abadi.

At the hearing, the Court will consider any comments, objections, and arguments concerning the fairness, reasonableness, and adequacy of the proposed Settlement, including the amounts requested by Class Counsel for attorneys' fees, costs, and service awards. If proper objections are submitted, the Court will consider them. You do not need to attend this hearing to have your comments or objections considered by the Court. After the hearing, the Court will decide whether to approve the Settlement. It is not known how long this decision will take.

Please note: The date and time of the Fairness Hearing may change by Court Order. Any changes will be posted at www.HEPAAirFilterSettlement.com. You should check this website to confirm that the date and/or time have not changed.

17. Do I have to attend the Fairness Hearing?

No. Class Counsel will represent the interests of the Settlement Class at the hearing. But you are welcome to attend the hearing at your own expense. If you submit a written objection, you do not need to attend the hearing for the Court to consider it. As long as your written objection is timely and properly submitted, the Court will consider it. You may also hire your own lawyer to attend on your behalf at your own expense, but this is not required.

18. May I speak at the Fairness Hearing?

If you do not exclude yourself, you may (but are not required to) speak at the Fairness Hearing about the Settlement. This is called making an appearance. You may also have your own lawyer speak on your behalf, at your own expense.

If you wish to appear at the Fairness Hearing, or have your own lawyer speak for you, you must state in your written objection that you intend to appear at the Fairness Hearing. You must also provide all other information required for a valid objection (Question 14 above).

YOUR RIGHTS – DO NOTHING

19. What happens if I do nothing at all?

If you do nothing, you will remain a member of the Settlement Class and will not receive a Settlement Award. Unless you exclude yourself, you will give up your right to pursue the Released Claims in any other proceeding against Winix.

GETTING MORE INFORMATION

20. Are there more details available about the Settlement?

This Notice provides a summary of the proposed Settlement. More details are contained in the Settlement Agreement. You may obtain a copy of the Settlement Agreement at www.HEPAAirFilterSettlement.com or by contacting Class Counsel at the address listed in response to Question 10 above. Please do not contact the Court with questions about the Settlement.

21. How do I get more information?

You may call toll-free 1-833-360-6898; write to Winix Air Purifier Settlement, P.O. Box 25191, Santa Ana, CA 92799; or visit www.HEPAAirFilterSettlement.com, where you can find answers to frequently asked questions about the Settlement, the Settlement Agreement, the Motion for Preliminary Approval and Class Counsel's request for attorneys' fees and costs (once it is filed), and other important case documents.

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE REGARDING THIS NOTICE OR THE SETTLEMENT.

	For complete information and to file a claim, scan this QR code to go directly to the Settlement website, **www.HEPAAirFilterSettlement.com**