

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

**If You Purchased Certain Clover Valley Ground Coffee Product(s) from Dollar General
Between January 1, 2015 And April 1, 2021,
A Class Action Settlement May Affect Your Rights.**

This is not a solicitation from a lawyer. A court authorized this notice.

- A proposed Settlement has been reached in a class action lawsuit (“Lawsuit”) known as *Mike Allen, et al. v. Dolgencorp, LLC, et al.*, Case No. SUCV2020000385, pending in the Superior Court of White County, Georgia.
- The lawsuit claims that Dollar General Corporation and Dolgencorp, LLP (“Dollar General”) deceptively and unlawfully labeled, packaged, and marketed Dollar General’s “Clover Valley” ground coffee Products by overstating the amount of coffee each container can actually make. Plaintiffs contend that Dollar General’s Clover Valley ground coffee Products do not contain enough ground coffee to make the stated number of cups when following the brewing instructions on the Product label. Dollar General has denied any wrongdoing.
- You are included in the class if you purchased any Clover Valley ground coffee Products from Dollar General in the United States between January 1, 2015 and April 1, 2021. The products include: Clover Valley Donut Shop Blend Ground Coffee (all sizes), Clover Valley Country Sunrise Dark Roast Ground Coffee (all sizes), Clover Valley Country Sunrise Blend Ground Coffee (all sizes), Clover Valley Classic Roast Ground Coffee (all sizes) and Clover Valley Decaffeinated Ground Coffee (all sizes).
- Dollar General has agreed to change its Labeling practices and will provide up to a maximum up to \$3,100,000 to pay Valid Claims, an Attorneys’ Fees and Costs Award, and Administrative Expenses. Settlement Class Members can get up to \$0.85 per Product purchased up to a maximum of 4 purchased Products per household, for a maximum of \$3.40 without Proof of Purchase, and up to \$0.85 per Product purchased up to a maximum of 20 for which a valid Proof of Purchase has been provided, up to a maximum of \$17.00 per household. *See* Question 6 for more details.

Your legal rights are affected if you do nothing. Read this Notice carefully.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT	
Submit a Claim	You must submit a Claim to get money from this Settlement. Claim Forms must be submitted online by July 6, 2021 by 11:59 p.m. ET. or received no later than July 6, 2021.
Do Nothing	If you do nothing (file a Claim or exclude yourself), you remain in the Settlement. You give up your rights to sue and you will not get any money.
Exclude Yourself	Get out of the Settlement. Get no money. Keep your rights. This is the only option that allows you to keep your right to sue about the claims in this lawsuit. You will not get any money from the Settlement. Your request to exclude yourself must be received no later than June 29, 2021.
File an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be submitted to the Clerk of the Court by First-Class Mail, received no later than June 29, 2021.
Go to a Hearing	You can ask to speak in Court about the fairness of the Settlement, at your own expense. <i>See</i> Question 18 for more details. The Final Approval Hearing is scheduled for July 1, 2021.

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BASIC INFORMATION

1. How do I know if I am affected by the Lawsuit and Settlement?

You may be a Class Member in the proposed Settlement regarding the alleged deceptive marketing, packaging, and labeling of Clover Valley ground coffee Products if you purchased any of the Products from Dollar General in the United States between January 1, 2015 and April 1, 2021. The Products include Clover Valley Donut Shop Blend Ground Coffee (all sizes), Clover Valley Country Sunrise Dark Roast Ground Coffee (all sizes), Clover Valley Country Sunrise Blend Ground Coffee (all sizes), Clover Valley Classic Roast Ground Coffee (all sizes) and Clover Valley Decaffeinated Ground Coffee (all sizes).

This Notice explains the nature of the lawsuit and claims being settled, your legal rights, and the Benefits to the Class.

2. What is this case about?

Judge Joy R. Parks of the Superior Court of White County, Georgia is overseeing this class action. The case is known as *Mike Allen, et al. v. Dolgencorp, LLC, et al.*, Case No. SUCV2020000385. The people who sued are called the “Plaintiffs,” and the companies they sued, Dollar General Corporation and Dolgencorp, LLP, are known as the “Defendants” in this case. They will be called “Dollar General” in this Notice.

Plaintiffs filed a lawsuit against Dollar General, individually, and on behalf of anyone who purchased Clover Valley ground coffee Products, for personal use between January 1, 2015 and April 1, 2021.

The lawsuit alleges that Dollar General improperly labeled, marketed, advertised, and sold Clover Valley ground coffee Products and there was not enough ground coffee to make the stated number of cups when following the brewing instructions on the Product label.

3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. The Class Representatives, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, best for the Class Members. The Court did not decide in favor of the Plaintiffs or Dollar General. Full details about the proposed Settlement are found in the Settlement Agreement available at www.clovervalleycoffeessettlement.com.

4. Why is this a class action?

In a class action, one or more people called “Class Representatives” sue on behalf of all people who have similar claims. All of these people together are the “Class” or “Class Members.”

5. How do I know if I am included in the Settlement?

You are included in the Settlement if you purchased any Clover Valley ground coffee Products from Dollar General in the United States between January 1, 2015 and April 1, 2021. If you are not sure whether you are included or have any other questions about the Settlement, visit www.clovervalleycoffeessettlement.com, call toll free **833-326-0774**, or write questions to Allen v Dolgencorp, LLC c/o Settlement Administrator, PO Box 161, Warminster, PA 18974-0161.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

The proposed Settlement, if approved by the Court, will provide the following benefits:

1. **Business Practices:** Dollar General, as distributor of the Products, has agreed to work with its manufacturer to change its Labeling practices by either removing the allegedly misleading language about the number of cups of coffee that can be made by following the brewing instructions from the Labeling of the Products, or revising the allegedly misleading language consistent with verified testing results from a reputable third-party laboratory.
2. **Individual Claims:** Class Members are eligible for payments with or without Proof of Purchase:

Tier 1 – Claims without Proof of Purchase:

You can get up to \$0.85 per Product purchase up to a maximum of 4 total Product purchases per Household for, up to \$3.40 maximum per Household by submitting a Claim Form.

Tier 2 – Claims with Proof of Purchase:

You can get up to \$0.85 per Product purchase up to a maximum of 20 Products purchased for which a valid Proof of Purchase has been provided, up to a maximum reimbursement of \$17 per Household. Settlement Class Members seeking benefits under Tier 2 must also submit a Claim Form, signed under penalty of perjury, along with Proof(s) of Purchase, which the Settlement Administrator shall verify.

Only one Claim may be submitted per Household under either Tier 1 or Tier 2 and final amounts paid may be reduced based on total number of Valid Claims received.

You must file a Claim to get any money from the proposed Settlement. Claim Forms must be submitted online by July 6, 2021 at 11:59 p.m. Eastern Time or, if mailed, received no later than July 6, 2021.

7. How to submit a Claim?

You must submit a Claim Form, with or without Proof of Purchase, in order to be eligible to receive any payment from the Settlement, if it is approved. You can download a Claim Form at www.clovervalleycoffeesettlement.com or you can write to the Settlement Administrator to request a Claim Form at Allen v. Dolgencorp, LLC, c/o Settlement Administrator, PO Box 161 Warminster, PA 18974-0161.

Your Claim Form must be received, if returned via email, on or before **July 6, 2021**, or, if submitted online, no later than 11:59 p.m. Eastern Time on **July 6, 2021**.

8. What am I giving up as part of the Settlement?

Unless you exclude yourself, you will be included as part of the Settlement Class, if the Settlement is approved. By staying in the Class, you will be eligible to receive benefits included in the Settlement to which you are entitled, and with respect to the Products you will be releasing Dollar General and all Released Parties from any liability, cause of action, claim, right to damages or other relief, and any other legal rights to which you may otherwise be entitled under the law(s) of your state or any other applicable law.

This means that with respect to the Products you will not be able to sue Dollar General Corporation and Dolgencorp, LLP, together with all manufacturers, distributors, retailers, sellers, and resellers of any Products, including Dollar General, together with each of its direct and indirect parent companies, predecessor entities, successor entities, related companies, direct and indirect subsidiaries, divisions, holding entities, past and present affiliates and banners, franchisees, distributors, wholesalers, suppliers, vendors, manufacturers,

retailers, advertising and production agencies, licensors, directors, and agents, including all current and former officers, managers, members, partners, owners, employees, shareholders, consultants, attorneys, legal representatives, insurers, agents, assigns, and other equity interest holders of any of the foregoing, and their heirs, executors, administrators, and assigns regarding the claims in this case.

The Settlement Agreement which includes all provisions about settled Claims, Releases, and Released Parties, is available at www.clovervalleycoffeessettlement.com.

The only way to keep the right to sue is to exclude yourself (*see* Question 9), otherwise you will be included in the Settlement Class, if the Settlement is approved, and you give up the right to sue for the claims in this case.

9. Will the Class Representatives receive compensation?

Yes. The Class Representatives will request a Service Award of up to a maximum total amount of \$3,250 each to compensate them for their services as Class Representatives and their efforts in bringing the lawsuit. The Court will make the final decision as to the amount, if any, to be paid to the Class Representatives.

EXCLUDE YOURSELF

10. How do I exclude myself from the Settlement?

If you do not want to be included in the Settlement, you must send a written request for exclusion, received no later than **June 29, 2021** to:

Allen v Dolgencorp, LLC
c/o Settlement Administrator
PO Box 161
Warminster, PA 18974-0161

Instructions on how to submit a request for exclusion are available at www.clovervalleycoffeessettlement.com or from the Settlement Administrator by calling **833-326-0774**.

If you exclude yourself, you will not be able to receive Benefits from the Settlement and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit and you will keep your right to sue Dollar General on your own for the claims that this Settlement resolves.

11. If I do not exclude myself, can I sue later?

No. If you do not exclude yourself from the Settlement, and the Settlement is approved by the Court, you forever give up the right to sue the Released Parties (listed in Question 8) for the claims this Settlement resolves.

12. What happens if I do nothing at all?

If you do nothing, you will be bound by the Settlement if the Court approves it, you will not get any money from the Settlement, you will not be able to start or proceed with a lawsuit, or be part of any other lawsuit against the Released Parties (listed in Question 8) about the settled claims in this case at any time.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed Irby Law, LLC; Lober & Dobson, LLC; and Law Office of Todd L. Lord (called “Class Counsel”) to represent the interests of all Class Members in this case. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Class Counsel will apply to the Court for an award of Attorneys' Fees and Litigation Expenses in an amount up to \$930,000. A copy of Class Counsel's Application for Attorneys' Fees and Expenses will be posted on the Settlement Website, www.clovervalleycoffeettlement.com, by June 15, 2021, which is fourteen (14) days before the Objection Deadline. The Court will make the final decisions as to the amount to be paid to Class Counsel, and may award less than the amount requested by Class Counsel.

OBJECTING TO THE SETTLEMENT

15. How do I tell the Court that I do not like the Settlement?

If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, you can submit an Objection telling them why you do not think the Settlement should be approved. Objections must be submitted in writing and must include all the following information:

- (i) The case name and number: *Mike Allen, et al. v. Dolgencorp, LLC, et al.*, Case No. SUCV2020000385, Superior Court, White County, Georgia.
- (ii) Your full name, address, telephone number and email address.
- (iii) The name and address of any lawyer(s) representing you or who may be entitled to compensation in connection with your Objection.
- (iv) A detailed statement of the Objection(s), including the grounds for the Objection(s).
- (v) Copies of any papers, briefs, or other documents upon which the Objection is based.
- (vi) Indicate if you intend to appear at the Final Approval Hearing, with or without counsel.
- (vii) Indicate any counsel who will appear on your behalf at the Final Approval Hearing and any person who will be called to testify to support your Objection.
- (viii) A statement that you are a Class Member in the proposed Settlement, including all information from the Claim Form.
- (ix) Your signature in addition to the signature of any attorney representing you in connection with the Objection.
- (x) A detailed list of any class action settlement objections made by you or your lawyer in the last five years.

Your Objection must be filed with the Clerk of the Court no later than **June 29, 2021**, to:

Clerk of Court
White County Superior Court
59 S Main St Suite B
Cleveland, GA 30528

In addition, you must mail a copy of your Objection to Settlement Administrator, Class Counsel, Defense Counsel, to be received no later than **June 29, 2021**:

CLASS COUNSEL	DEFENSE COUNSEL	SETTLEMENT ADMINISTRATOR
R. Brent Irby Irby Law, LLC 2201 Arlington Avenue South Birmingham, AL 35205 Email: brent@irbylaw.net	Dollar General c/o McGuireWoods LLP Gateway Plaza, 800 East Canal Street Richmond, VA 23219 Attn: R. Trent Taylor Email: rtaylor@mcguirewoods.com	Allen v Dolgencorp, LLC PO Box 161 Warminster, PA 18974-0161

If you do not submit your Objection with all requirements, or if your Objection is not filed and received by **June 29, 2021** as outlined above, you will be considered to have waived all Objections and will not be entitled to speak at the Final Approval Hearing.

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

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the Settlement no longer affects you.

THE FINAL APPROVAL HEARING

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

The Court will hold the Final Approval Hearing at 9:00 a.m. EST on **July 1, 2021**, in the Superior Court of White County, Georgia, 59 Main Street B, Cleveland, GA 30528 in the courtroom of the Honorable Joy R. Parks . The hearing may be moved to a different date, time or location without additional notice, so it is recommended that you periodically check www.cloveralleycoffe settlement.com for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Class Members, and if it should be approved. If there are valid, timely Objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider the award of Attorneys' Fees and Expenses to Class Counsel and the request for Service Awards to the Class Representatives.

18. Do I have to come to the hearing?

No, you are not required to come to the Final Approval Hearing. However, you are welcome to attend the hearing at your own expense.

If you submit an Objection, you do not have to come to the hearing to talk about it. If your Objection was submitted properly and on time, the Court will consider it. You also may pay your own lawyer to attend the Final Approval Hearing, but that is not necessary.

19. May I speak at the hearing?

Yes, you can speak at the Final Approval Hearing but you must ask the Court for permission. To request permission to speak, you must file an Objection according to the instructions in Question 15, including all the information required.

You cannot speak at the hearing if you exclude yourself from the Settlement.

DO NOTHING

20. What happens if I do nothing?

If you do nothing, you will not get any money from the Settlement, you will not be able to sue for the claims in this case and you release the claims against Defendants listed in Question 8.

GET MORE INFORMATION

21. How do I get more information about the Settlement?

This is only a summary of the proposed Settlement. If you want additional information about this lawsuit, including a copy of the Settlement Agreement, the complaints, the Court's Preliminary Approval Order, Class Counsel's Application for Attorneys' Fees and Expenses, and more, please visit www.clovervalleycoffeessettlement.com or call 833-326-0774.

You may also contact the Settlement Administrator in writing at Allen v Dolgencorp, LLC c/o Settlement Administrator, PO Box 161, Warminster, PA 18974-0161.

You may also visit or call the Clerk's office at the White County Clerk of Court, 59 S Main St, Suite B, Cleveland, GA 30528; (706) 865-2613. The Clerk will tell you how to obtain the complete file for inspection and copying at your own expense.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT
OR LITIGATION TO THE CLERK OF THE COURT OR THE JUDGE.**