

EXHIBIT “A”

	Product Identified by Plaintiffs in D.I. 88 Ex. A	Current Status of Production
Financial Data	<ul style="list-style-type: none"> Lancôme Absolue Revitalizing Eye Cream (2013 and later) 	L'Oréal USA produced records showing that this product was not launched until 2019. (LOUSA6014-19; 6029-34.)
	<ul style="list-style-type: none"> La Roche-Posay Redermic R (2011-2012) Vichy LiftActiv Retinol Anti-Wrinkle Cream (2011-12) Vichy LiftActiv Retinol HA Night (2011-2012) Vichy LiftActiv Retinol HA Eyes (2011-2012) Vichy Liftactiv Supreme Eyes (2011-2012) 	L'Oréal USA has produced financial records for these products from 2013 through 2018. L'Oréal USA has informed Plaintiffs that its financial database for these products does not go back earlier than 2013. L'Oréal USA is working to obtain the 2011 and 2012 data, if it exists, from other sources.
Technical Documents	<ul style="list-style-type: none"> Lancôme Absolue Revitalizing Eye Cream 	L'Oréal USA produced records showing that this product was not launched until 2019. (LOUSA6014-19; 6029-34.)
	<ul style="list-style-type: none"> Giorgio Armani Crema Nera Extrema High Recovery Elixir Giorgio Armani Regenessence 3.R High Lift Eyes L'Oréal Paris True Match Lumi Cushion Foundation Vichy Neovadiol Eye & Lip Contours 	Unable to locate.
Formulation/ Ingredient list	<ul style="list-style-type: none"> Lancôme Absolue Revitalizing Brightening Soft Cream Lancôme Absolue Rich Cream Lancôme Absolue Sublime Oleo-Serum Lancôme Renergie Lift Multi-Glow Rosy Skin Tone Reviving Cream 	L'Oréal USA produced records showing that these products were not launched until 2019. (LOUSA3056; LOUSA6014-19; LOUSA6029-34.)

	Product Identified by Plaintiffs in D.I. 88 Ex. A	Current Status of Production
Formulation/ Ingredient list	<ul style="list-style-type: none"> • Giorgio Armani Crema Nera Light Reviving Eye Cream • Giorgio Armani Crema Nera Supreme Recovery Balm • Giorgio Armani Designer Lift Smoothing Firming Foundation SPF 20 • Kiehl's BB Cream • Lancôme Advanced Genifique Sensitive • Lancôme Absolu Ultimate Elixir-Concentrate • Lancôme Absolu Ultimate Night BX Serum • Lancôme Renergie Eclat Multi-Lift • Lancôme Renergie Lift Multi-Action Day Cream • Lancôme Renergie Lift Multi-Action Light Cream • Lancôme Renergie Night • Lancôme Renergie Eye Anti-Wrinkle and Firming Eye Cream • Lancôme Teint Visionnaire • Vichy Liftactiv Supreme Eyes • Vichy Liftactiv Supreme Serum 10 Eyes & Lashes • Yves Saint Laurent Or Rouge Crème Riche • Yves Saint Laurent Or Rouge Serum • Yves Saint Laurent Top Secrets CC Cream Color Correcting Primer 	Unable to locate.
Product Packaging	<ul style="list-style-type: none"> • Lancôme Advanced Genifique Sensitive 	Produced on December 20, 2019 at LOUSA2872-73
	<ul style="list-style-type: none"> • Lancôme Visionnaire Advanced Skin Corrector 	Produced on December 6, 2019 at LOUSA1998 and on December 20, 2019 at LOUSA2870. L'Oréal USA also explained to Plaintiffs that this product was the same as Visionnaire Serum, which is listed separately on their accused products list. Plaintiffs acknowledged this in an email dated January 23, 2020.
	<ul style="list-style-type: none"> • Lancôme Advanced Genifique Hydrogel Melting Sheet Mask • Lancôme Advanced Genifique Yeux Light-Pearl Hydrogel Melting Eye Mask 	L'Oréal USA produced records showing that these products were not launched until 2019. (LOUSA6014-19; 6029-34.)
	<ul style="list-style-type: none"> • L'Oréal Paris RevitaLift Triple Power SPF 30 Day Lotion • L'Oréal Paris Youth Code Day Lotion SPF 30 • L'Oréal Paris Age Perfect Rosy Tone SPF 30 Sunscreen Face Moisturizer • L'Oréal Paris RevitaLift Volume Filler Night Cream 	Produced on Feb. 12, 2020, at LOUSA6658-6664.

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Product Packaging	<ul style="list-style-type: none"> L'Oréal Paris RevitaLift Triple Power Intensive Anti-Aging Day Cream Moisturizer Fragrance Free L'Oréal Paris Visible Lift Radiance Booster 	
	<ul style="list-style-type: none"> Biotherm Blue Therapy Eye Biotherm Blue Therapy Night Biotherm Blue Therapy Serum in Oil Biotherm Blue Therapy Eye-Opening Serum Biotherm Blue Therapy Accelerated Serum 	As L'Oréal USA informed Plaintiffs during discovery, Biotherm is not a L'Oréal USA brand. L'Oréal USA has requested responsive documents from Canada so that Plaintiffs do not need to pursue through the Hague.
	<ul style="list-style-type: none"> Decleor Orexcellence Energy Concentrate Youth Cream Decleor Orexcellence Energy Concentrate Youth Mask Decleor Orexcellence Energy Concentrate Youth Eye Care 	As L'Oréal USA informed Plaintiffs during discovery, Decleor is not a L'Oréal USA brand, but is working to obtain responsive documents.
	<ul style="list-style-type: none"> Lancôme Teint Visionnaire 	This product is not a skincare product and has been discontinued. L'Oréal USA is working to obtain responsive documents.
	<ul style="list-style-type: none"> Vichy LiftActiv Retinol HA Night Vichy LiftActiv Retinol HA Eyes Vichy Neovadiol Compensating Complex Vichy ProEven Daily Dark Spot Serum Corrector 	Unable to locate. L'Oréal USA has requested responsive documents from L'Oréal SA in France so that Plaintiffs do not need to pursue through the Hague.
Additional Marketing Materials	<ul style="list-style-type: none"> Garnier Ultra-Lift Anti-Wrinkle Night Cream 	Produced on Jan. 31, 2020 at LOUSA4264-76.
	<ul style="list-style-type: none"> Lancôme Absolu Premium BX Eye 	Produced on Dec. 20, 2019 at LOUSA2986-87, on Feb. 7, 2020 at LOUSA5012-5103; LOUSA5280-5347; LOUSA5441-5558 and LOUSA5559-5738 and on Feb. 10, 2020 at LOUSA6434-6581 and LOUSA6582-6645.
	<ul style="list-style-type: none"> Lancôme Absolu Premium BX Lotion SPF 15 	Produced on Feb. 7, 2020 at LOUSA4831-5011; LOUSA5012-5103 and LOUSA5559-5738 and on Feb. 10, 2010 at LOUSA6308-6341.
	<ul style="list-style-type: none"> Lancôme High Resolution Eye Refill 3X 	Produced on Feb. 7, 2020 at LOUSA4661-4830 and LOUSA5280-5347 and on Feb. 10, 2020 at LOUSA6342-6387; LOUSA6434-6581 and LOUSA6582.

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Additional Marketing Materials	<ul style="list-style-type: none"> Lancôme High Resolution Night Refill 3X 	Produced on Feb. 7, 2020 at LOUSA4661-4830 and LOUSA5280-5347 and on Feb. 10, 2020 at LOUSA6434-6581.
	<ul style="list-style-type: none"> Lancôme Renergie Day Cream Double Performance Treatment Anti-Wrinkle-Firming 	Produced on Feb. 7, 2020 at LOUSA5242-5279.
	<ul style="list-style-type: none"> Lancôme Renergie Lift Multi-Action Light Cream 	Produced on Feb. 7, 2020 at LOUSA4831-5011; LOUSA5012-5103; LOUSA5559-5738 and LOUSA5739-5864.
	<ul style="list-style-type: none"> Lancôme Renergie Night 	Produced on Feb. 7, 2020 at LOUSA5242-5279 and LOUSA5280-5347.
	<ul style="list-style-type: none"> Lancôme Absolué Revitalizing Oleo Serum Lancôme Absolué Rich Cream 	L'Oréal USA produced records showing that these products were not launched until 2019. (LOUSA6014-19; 6029-34.) L'Oréal USA also produced marketing materials for these products on Feb. 10, 2020 at LOUSA6295-6307.
	<ul style="list-style-type: none"> Lancôme Renergie Yeux Multi-Glow Glow Awakening and Reinforcing Eye Cream Lancôme Advanced Genifique Yeux Light-Pearl Hydrogel Melting Eye Mask Lancôme Renergie Lift Multi-Glow Rosy Skin Tone Reviving Cream Yves Saint Laurent Top Secrets Instant Matte Pore Refiner 	L'Oréal USA produced records showing that these products were not launched until 2019. (LOUSA3056; LOUSA3059; LOUSA6014-19; 6023-24; 6029-34.)
	<ul style="list-style-type: none"> Biotherm Blue Therapy Eye Biotherm Blue Therapy Night Biotherm Blue Therapy Serum in Oil Biotherm Blue Therapy Eye-Opening Serum Biotherm Blue Therapy Accelerated Serum 	As L'Oréal USA informed Plaintiffs during discovery, Biotherm is not a L'Oréal USA brand. L'Oréal USA has requested responsive documents from Canada so that Plaintiffs do not need to pursue through the Hague.
	<ul style="list-style-type: none"> Decleor Orexcellence Energy Concentrate Youth Cream Decleor Orexcellence Energy Concentrate Youth Mask Decleor Orexcellence Energy Concentrate Youth Eye Care 	As L'Oréal USA informed Plaintiffs during discovery, Decleor is not a L'Oréal USA brand, but L'Oréal USA is working to obtain responsive documents.
	<ul style="list-style-type: none"> Lancôme Renergie Lift Multi-Action Firming Mask 	Unable to locate. L'Oréal USA has requested responsive documents from

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