

Corrective Action Plan for

CPSC File No. PI190034 - E & E Co., Ltd. (DBA JLA Home)

This Corrective Action Plan (“CAP”) applies to all RENU 3-drawer dressers sold from January 2017 to September 30, 2019 in the United States with the model numbers identified in Paragraph 1 (the “Subject Products” or “Dressers”). This CAP is voluntarily entered into by E & E Co., Ltd. (DBA JLA Home) (herein, “E & E” or the “Company”) pursuant to the Consumer Product Safety Act (“CPSA”), as amended, 15 U.S.C. §§ 2051, *et seq.*, and 16 C.F.R. § 1115.20(a).

1. The Subject Products: The Subject Products are all RENU 3-drawer dressers, sold from January 2017 through September 30, 2019 bearing the model numbers II137-0068. The Company imported the Subject Products and estimates there are approximately 1798 Subject Products distributed in commerce in the United States.
2. Nature of the Alleged Hazard: The Subject Product is unstable if it is not anchored to the wall, potentially posing serious tip-over and entrapment hazards that may result in death or injuries to children. The Company has received 0 (zero) reports of tip-over incidents involving the Subject Product.
3. Refund or Repair: Consumers who contact E & E pursuant to this CAP shall be provided a choice between a refund or repair, at the Company’s sole expense, as follows:
 - a. Customer may choose to receive a pre-paid packaging label to ship Item back to Company for a full refund check or a Designer Living gift card in the amount of \$400.00 redeemable at <https://www.designerliving.com/>.
 - b. Customer may choose to receive another tip-over restraint and request a one-time free in-home installation of the kit.

Consumers who contact E & E to request a full refund pursuant to this CAP shall receive a full refund of the amount paid or a \$400.00 gift card redeemable at <https://www.designerliving.com/>. If no amount paid can be determined, the refund amount will be paid based on the average sales price.

Consumers electing to receive a refund should schedule a free pick-up of their Dresser(s), which the Company shall promptly fulfill by arranging for pick-up by an appropriately licensed professional. The third-party professional may require the consumer to be home to effect the pick-up.

Consumers who contact E & E pursuant to this CAP may alternatively elect to request a free installation (of the tip-over restraint kit) approved for use with the Subject Product by U.S. Consumer Product Safety Commission (CPSC) staff. Consumers electing to receive the tip-over restraint kit shall have the option to request a one-time free in-home installation of the tip-over restraint kit, which the Company shall promptly fulfill by arranging installation of the tip-over restraint kit by an appropriately accredited professional.

4. Notice to Affected Consumers: CPSC may publicize the terms of this CAP to the extent necessary to inform the public of the nature and extent of the alleged hazard and of the actions being undertaken to correct the alleged hazard.

The Company shall describe the recall remedies set out in paragraph 3, above, in the following order using the exact language below in all written communications concerning the CAP, including but not limited to the Press Release, the recall notices to known customers with whom the company is authorized to communicate, dealers, and retailers, customer service scripts, and the Company's website and social media pages.

Customer service scripts shall use language agreed by E & E and CPSC.

E & E and CPSC staff have agreed upon the following Communications Plan concerning how and when the CAP will be publicized, using the following resources:

a. Media Outlets

The CPSC and the Company will publicize the terms of the CAP through issuance of an agreed upon Press Release announcing a recall. The Press Release shall be issued on a mutually agreeable date no later than 14 calendar days after the CAP Effective Date.

At CPSC staff's discretion, CPSC may further publicize the terms of the CAP by disseminating information to other media outlets, such as television, radio, print, or digital media, in a manner consistent with the terms of the CAP.

b. The Company's Website and Social Media Sites

The Company shall contemporaneously post the Press Release on the Company's website www.ee1994.com, including a prominent link titled "RECALL INFORMATION" at the top of the website's main landing page, for not less than **90** days from the date of announcement. After **90** days, E & E shall place a link titled "Recall Information" in another prominent location on the website's main landing page.

E & E shall include on the webpage available through the previously described link instructions on how consumers may contact E & E regarding the CAP, including for the refund and repair options described in paragraph 3, above. The Company will not be required to post on their social media accounts if they qualify for a Recall Alert announcement.

c. The CPSC's Website, Listserv, and Social Media Sites

CPSC may publicize the terms of the CAP by disseminating information, including to persons subscribed to recall information through listserv@cpsc.gov or other email distribution channels, and by posting information on CPSC's Twitter, Facebook, and Instagram accounts at the time the Press Release is issued or at other times at CPSC staff's discretion.

d. Social Media Outlets

The Company shall publicize the CAP by disseminating a link to the Press Release in response to inquiries from third party social media outlets, including blogs. The Company may, at its discretion, provide additional information about the CAP.

At CPSC staff's discretion, CPSC also may further publicize the terms of the CAP by disseminating information to such third party social media outlets.

e. Outreach to Public Interest Groups and Government Partners

The Company shall publicize the CAP by disseminating a link to the Press Release in response to inquiries from public interest groups or government partners. The Company may, at its discretion, provide additional information about the CAP.

At CPSC staff's discretion, CPSC also may further publicize the terms of the CAP by disseminating information to such public interest groups or government partners.

f. Other Additional Outreach

The Company shall conduct other additional outreach, as appropriate, by publicizing the CAP and disseminating a link to the Press Release in a manner consistent with the promotion of this recall. The Company may, at its discretion, provide additional information about the CAP.

The Company shall also prepare a video showing how to install the free tip-over restraint kit. This video shall be made available to consumers through the Company's website at the time the Press Release is issued.

g. Additional forms of Notice to Affected Consumers

The Company shall also engage in the following additional forms of Notice to Affected Consumers:

i. Direct Notice to Known Purchasers

The Company shall provide direct notification to known purchasers of the Subject Products recall. To that end, promptly following the CAP Effective Date, the Company will provide CPSC-approved notice of the CAP to all known consumers that purchased the Subject Product directly from the Company for whom E & E has contact information. In addition, the Company will provide CPSC-approved notice of the CAP to all distributors, dealers, and retailers for whom E & E has contact information.

ii. Toll-Free Consumer Number

The Company established a toll-free number, 844-701-5979, for consumers to contact E & E regarding the CAP, including for the refund and repair options described in paragraph 3, above. The customer service script and "Q&As" used by the call center staffing the toll-free number shall be approved by CPSC staff.

5. Stop Sale and Future Production: The Company has ceased all manufacture, distribution, and sale of the Subject Products.

Prior to the sale of any existing inventory, the Company will provide advance notice to CPSC staff and sufficient time to allow staff to review any modifications to the inventory. The Company will submit documentation that the subject product complies with the performance elements of ASTM 2057-17. If accepted by CPSC staff, these units will be sold under a different model number outside the scope of the recall. If units in inventory are to be destroyed, the Company will first coordinate with the CPSC as set out in paragraph 6 below.

6. Destruction of Subject Products: The Company shall immediately quarantine all Subject Products in its possession, custody, or control. The Company shall notify CPSC's Office of Compliance and Field Operations by email at GFCollins@cpsc.gov and recalledproductdisposal@cpsc.gov prior to the disposal or destruction of Subject Products in the Company's distribution chain or inventory (including transfer for disposal or destruction by a third party). Such notice shall include the case number, items being destroyed, company name, quantity being destroyed, location of destruction, and the planned method of destruction. The method of destruction employed by the Company shall comply with all federal, state, and local regulations and shall ensure that the Subject Products are completely destroyed so that they cannot be reused.

CPSC staff may witness or verify such disposal, destruction or transfer of the Subject Products at staff's discretion, and may request that the Company verify such destruction through sworn affidavit or other means.

7. Recall Monitoring: The Company agrees to submit monthly progress reports on the CAP in a CPSC approved format. The Company shall submit its monthly progress reports on the CAP by the first of each month using the Monthly Progress Report Business Portal (<https://www.cpsc.gov/content/monthly-progress-report-system>).
8. Reservation of Rights: The submission of this CAP does not constitute an admission by E & E that either reportable information or a substantial product hazard exists. CPSC reserves the right to seek broader corrective action if it becomes aware of new facts or if this CAP does not sufficiently protect the public.
9. CAP Effective Date: This CAP becomes effective upon acceptance by Compliance staff of the U.S. Consumer Product Safety Commission.

E & E CO., LTD. d/b/a JLA Home