

via overnight delivery

June 10, 2025

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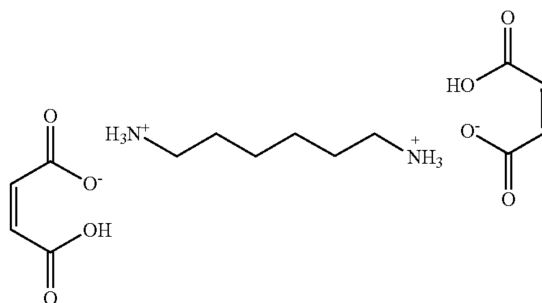
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Re: *Repair Mode™ Bond Building Nail Serum*

Dear Mr. Murphy:

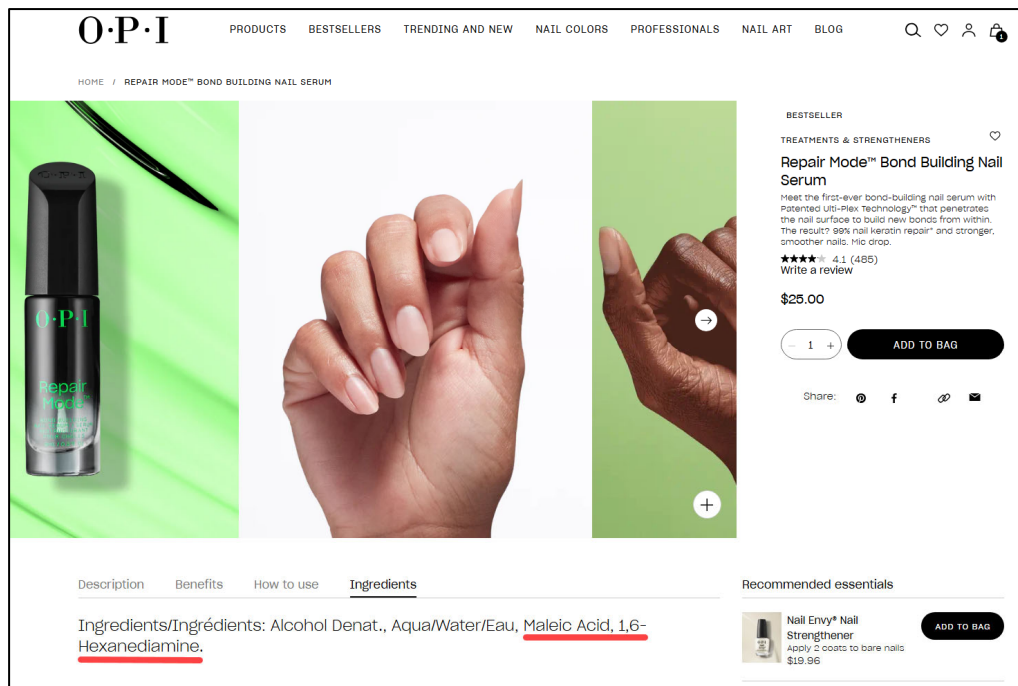
We represent Olaplex, Inc. ("Olaplex") in certain intellectual property matters. Olaplex owns U.S. Patent No. 12,214,225 B2 (the "'255 Patent"), which issued on April 4, 2025, a copy of which is attached.

Claim 1 of the '255 Patent recites a method of treating keratin of a person, the method comprising contacting the keratin with a composition comprising a compound having a chemical structure of:

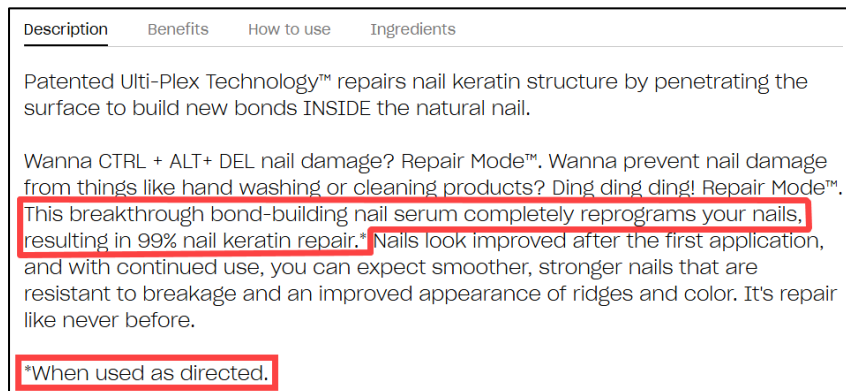
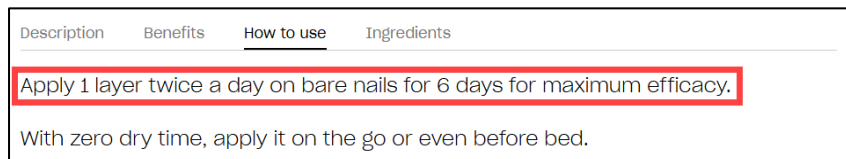


This is the chemical structure for maleic acid, 1,6-hexanediamine, which is in Wella Operations US, LLC's ("Wella's")¹ Repair Mode™ Bond Building Nail Serum product (the "Product"), as stated in the "Ingredients" section of the web page at <https://www.opi.com/products/treatments-strengtheners-repair-mode-bond-building-nail-serum>:

¹ If OPI Products, Inc. ("OPI") is responsible for the marketing and sales discussed in this letter, our demand applies to OPI.



Furthermore, the “How to use” section of the same web page directs users to contact their nails with the Product, and the “Description” and “Benefits” sections also encourage such use and explicitly recognize that nails contain keratin:



Description	Benefits	How to use	Ingredients
	99% nail keratin repair.*		
	94% protection of keratin protein from damage.*		
	4x stronger nails in 6 days.*		
	A vegan formula with no animal-derived ingredients or by-products.		
	9-free. Free of Formaldehyde, Formaldehyde Resin, Toluene, Xylene, Dibutyl phthalate (DBP), Camphor, Parabens, Ethyl Tosylamide, and Triphenyl Phosphate. Cap made with PCR (post-consumer recycled materials).		
	*When used as directed		

Accordingly:

- 1) use of the Product since February 4, 2025, by any Product customer within the United States as instructed above on the opi.com website by Wella (and/or OPI) directly infringed/es at least claim 1 of the '255 Patent under 35 U.S.C. § 271(a);
- 2) any testing of the Product within the United States since February 4, 2025, as instructed above by individual(s) working for Wella and/or OPI directly infringed/es at least claim 1 of the '255 Patent under 35 U.S.C. § 271(a);
- 3) Wella's and/or OPI's offers to sell and/or sales of the Product within the United States since at least its receipt of this letter (or since acquiring knowledge of the '255 Patent, if earlier) to any customer using the Product as described in 1) above constitute acts of contributory patent infringement of at least claim 1 of the '255 Patent under 35 U.S.C. § 271(c); and
- 4) Wella's and/or OPI's instructions within the United States since at least its receipt of this letter (or since acquiring knowledge of the '255 Patent, if earlier) to any customer (using the Product as described in 1) above) to contact their keratin with the Product constitute acts of induced patent infringement of at least claim 1 of the '255 Patent under 35 U.S.C. § 271(b).

Olaplex demands that Wella (and, as applicable, OPI) immediately cease all marketing and sales within the United States of the Product, or agree to license the '255 Patent rights that have otherwise been, and are otherwise being, infringed. If licensing is the preferred option, have your counsel contact me to discuss next steps. Otherwise, please provide written confirmation to the undersigned, via email and in the form set forth below, that the alternative cease-and-desist steps have been taken.

We trust that Wella and OPI will take Olaplex's concerns seriously, and we look forward to receiving Wella's prompt response so that this matter can be resolved promptly and amicably. Nothing in this letter constitutes a waiver of any of Olaplex's rights and remedies, whether at law or in equity, all of which are expressly reserved.

Sincerely,



Mark T. Garrett

Wella Operations US, LLC confirms that it has ceased all marketing and sales within the United States of the Repair Mode™ Bond Building Nail Serum product:

Signed

Name

Title

Date

OPI Products, Inc. confirms that it has ceased all marketing and sales within the United States of the Repair Mode™ Bond Building Nail Serum product:

Signed

Name

Title

Date