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Classes*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

CHRISTINA COFFEY and JENNY
LU, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

J. CREW GROUP, INC., a corporation;
CHINOS HOLDINGS, INC., a
corporation; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: 2:18-cv-05169-MWF-AS

**FIRST AMENDED CLASS ACTION
COMPLAINT**

- 1. Violation of California
Consumer Legal Remedies Act**
- 2. Violation of California False
Advertising Law**
- 3. Violation of California Unfair
Competition Law**
- 4. Violation of Nevada Deceptive
Trade Practices Act**
- 5. Intentional Misrepresentation**
- 6. Negligent Misrepresentation**
- 7. Unjust Enrichment and
Common Law Restitution**

DEMAND FOR JURY TRIAL

1 Christina Coffey and Jenny Lu, on behalf of themselves and all others
2 similarly situated, (“Plaintiffs”) bring this action against J. Crew Group, Inc., Chinos
3 Holdings, Inc., and Does 1 through 50 (collectively, “Defendants”) to recover
4 monetary damages, injunctive relief, and other remedies for violations of California
5 and Nevada laws. Plaintiffs make the following allegations on information and
6 belief, except as to allegations pertaining to Plaintiffs individually, which are based
7 on their respective personal knowledge.

8 **I. INTRODUCTION**

9 1. J. Crew is a popular brand that manufactures, advertises, and sells
10 clothing and merchandise. J. Crew Factory is a cheaper, retail outlet version of the
11 J. Crew brand. This case focuses on the false and deceptive sales prices of J. Crew
12 Factory clothing and merchandise.

13 2. During the statute of limitations period, and continuing to this day,
14 Defendants have deceived consumers throughout California and the United States
15 by offering perpetual sales on all of their clothing and merchandise sold at J. Crew
16 Factory stores and the J. Crew Factory website. Quite literally, these sales are
17 perpetual because they never end. And because the clothing and merchandise is
18 perpetually on sale, the so-called sale price is actually the price at which Defendants
19 regularly offer for sale, and sell, their clothing and merchandise.

20 3. In conjunction with these perpetual sales, and as an integral component
21 of Defendants’ marketing and advertising campaign, Defendants ubiquitously
22 advertise false, former price comparisons. On their e-commerce website, and in J.
23 Crew Factory stores, at or prior to the point of purchase, Defendants list a non-
24 discounted, original price of the product immediately adjacent to the purported
25 discounted/sale price of the product. The non-discounted, original price of the
26 product is not a *bona fide* former price because Defendants never sold the product
27 for that higher price. The California legislature has deemed this highly effective
28 advertising practice to be unlawful through several consumer protection statutes.

1 4. Defendants willfully engaged in this deceptive and unlawful conduct
2 for the sole purpose of maximizing profits. Consumers, like Plaintiffs, are deceived
3 into purchasing Defendants' merchandise because they believe that the purported
4 sale is going to end (and consequently the discounted price will expire), when in
5 reality, Defendants simply replace the sale with another sale, and all of their
6 products continue to be sold at false, discounted prices.

7 5. In essence, Defendants have implemented, and continue to implement,
8 a perpetual sale and a false, former price comparison scheme in order to deceive
9 consumers into thinking they are getting a bargain, when no such bargain exists.

10 6. As a result of this unlawful scheme, Defendants have been able to
11 induce purchases that would not otherwise have occurred, overcharge Plaintiffs and
12 other consumers in that this pricing scheme has enabled Defendants to charge more
13 for products while simultaneously advertising them as substantially discounted, and
14 otherwise obtain wrongful profits. Defendants' misconduct has caused Plaintiffs
15 and Class members to suffer financial damages.

16 **II. JURISDICTION AND VENUE**

17 7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §
18 1332(a) because Plaintiffs are citizens of the State of California, Defendants are
19 citizens of the State of New York, and the amount in controversy exceeds the sum or
20 value of \$75,000, exclusive of interest and costs. This Court also has subject matter
21 jurisdiction pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. §
22 1332(d)(2), because this is a class action, including claims asserted on behalf of a
23 nationwide class, filed under Rule 23 of the Federal Rules of Civil Procedure, there
24 are at least 100 proposed Class members, the aggregate amount in controversy
25 exceeds five million dollars, and Defendants are citizen of a state different from that
26 of at least one member of the Classes.

27 8. This Court has personal jurisdiction over Defendants because a
28 substantial portion of the wrongdoing alleged in this Complaint took place in the

1 State of California, Defendants are authorized to do business in the State of
 2 California, have sufficient minimum contacts with the State of California, and/or
 3 otherwise intentionally avail themselves of the markets in the State of California
 4 through the promotion, marketing, and sale of products and services in this State, to
 5 render the exercise of jurisdiction by this Court permissible under traditional notions
 6 of fair play and substantial justice. Specifically, Defendants operate at least twelve
 7 J. Crew Factory stores throughout California and they operate a store in Las Vegas,
 8 Nevada.¹

9 9. Venue is proper in this District under 28 U.S.C. §§ 1391(b)(2) because
 10 substantial parts of the events or omissions giving rise to the claims occurred in this
 11 District and/or a substantial part of property that is the subject of this action is
 12 situated in this District.

13 **III. THE PARTIES**

14 10. Plaintiff Coffey is a United States citizen and currently resides in the
 15 County of Los Angeles, California. During the statute of limitations period,
 16 Plaintiff Coffey has purchased several articles of clothing and other merchandise
 17 from Defendants, at their Ontario Mills and Desert Hills outlet stores, at purported
 18 sale and discount prices.

19 11. Plaintiff Lu is a United States citizen and currently resides in the
 20 County of Los Angeles, California. During the statute of limitations period,
 21 Plaintiff Lu has purchased several articles of clothing and other merchandise from
 22 Defendants, at their Las Vegas, Camarillo, Cabazon, Ontario, and Tejon outlet
 23 stores, all at purported sale and discount prices.

24 12. Plaintiffs bring this action on behalf of themselves and all other
 25 consumers who similarly purchased clothing and merchandise from Defendants,
 26

27 ¹ <https://stores.factory.jcrew.com/?>; [https://stores.factory.jcrew.com/en/j-crew-factory-las-](https://stores.factory.jcrew.com/en/j-crew-factory-las-vegas-premium-outlets)
 28 [vegas-premium-outlets](https://stores.factory.jcrew.com/en/j-crew-factory-las-vegas-premium-outlets) (last visited July 18, 2018).

1 based on the mistaken belief that they were receiving a bargain, via their retail stores
2 and online via an e-commerce website.

3 13. Defendant J. Crew Group, Inc. is a Delaware corporation that is based
4 and headquartered in New York. J. Crew Group, Inc. does business throughout the
5 state of California and the United States by selling clothing and merchandise in
6 retail outlet stores and online via the e-commerce website <https://factory.jcrew.com>.

7 14. Chinos Holdings, Inc. is a Delaware corporation that is based and
8 headquartered in New York. J. Crew Group, Inc. is a wholly-owned subsidiary of
9 Chinos Holdings, Inc.

10 15. The true names and capacities of DOES 1 through 50, inclusive, are
11 unknown to Plaintiffs at this time, and Plaintiffs therefore sue such DOE Defendants
12 under fictitious names. Plaintiffs are informed and believe, and thereon allege, that
13 each Defendant designated as a DOE is in some manner highly responsible for the
14 occurrences alleged herein, and that Plaintiffs and Class Members' injuries and
15 damages, as alleged herein, were proximately caused by the conduct of such DOE
16 Defendants. Plaintiffs will seek leave of the Court to amend this Complaint to
17 allege the true names and capacities of such DOE Defendants when ascertained.

18 **IV. FACTUAL ALLEGATIONS**

19 **A. Background**

20 16. The false and deceptive sales that are at the heart of this case are
21 ubiquitously advertised to consumers of J. Crew Factory clothing and merchandise.
22 As alleged in detail herein, none of the merchandise that Defendants advertise and
23 sell to consumers is ever actually sold at the higher, former price that is advertised.

24 17. Defendants advertise these sales online via their e-commerce website
25 <https://factory.jcrew.com> and through their retail outlet stores. Defendants own and
26 operate several J. Crew Factory retail outlet stores throughout California and the
27
28

United States. In California alone, there are approximately twelve J. Crew Factory² retail outlet stores:

The Shoppes at Chino Hills	Camarillo Premium Outlets
Ontario Mills	Desert Hills Premium Outlets
Las Americas Premium Outlets	Gilroy Premium Outlets
J Crew Mercantile Westgate	Great Mall of the Bay Area
San Francisco Premium Outlets	Vacaville Premium Outlets
Fountains at Roseville	Napa Premium Outlets

18. Defendants' Nevada store is located in the Las Vegas Premium Outlets center.

19. Defendants' pricing scheme is highly coordinated, in that the sales and purported discounted prices advertised on Defendants' e-commerce website are the same as the sales and purported discounted prices advertised at the point of purchase at Defendants' retail outlet stores.

B. Defendants' Advertised Perpetual Sales are Unlawful

20. Defendants implement a scheme to deceive consumers into believing they are being offered a discount from the regular prices of Defendants' clothing and merchandise when, in fact, consumers are not getting any discount whatsoever.

21. A substantial aspect of Defendants' brand recognition and consumer appeal is their supposed discounted pricing. J. Crew Factory is commonly known as cheaper, outlet-store version of the J. Crew Brand. Thus, consumers are already predisposed to believe that they are getting a discount by buying J. Crew Factory clothing. Defendants' false, perpetual sales only further this mistaken belief.

² Defendants also own and operate stores called J. Crew Mercantile. J. Crew Mercantile and J. Crew Factory sell the same merchandise and the same false and deceptive sales practices are implemented in the same manner at both stores. The only difference, other than name, is that J. Crew Mercantile stores are located in regular shopping malls, while J. Crew Factory stores are located in outlet malls.

22. During the relevant time period, and continuing to this day, Defendants prominently display sales at the top of their e-commerce website that are designed to induce consumers to purchase their products under the mistaken belief that consumers are getting a significant bargain.

23. Specifically, when a consumer visits Defendants' e-commerce website, there is always a purported sale or discount advertised at the top of the homepage. Generally, it is an advertised site-wide sale offering a percentage off the purported regular price of all products. *See, e.g.*, Figures 1 and 2 below.

Figure 1: E-Commerce Website Homepage on 2/16/2017

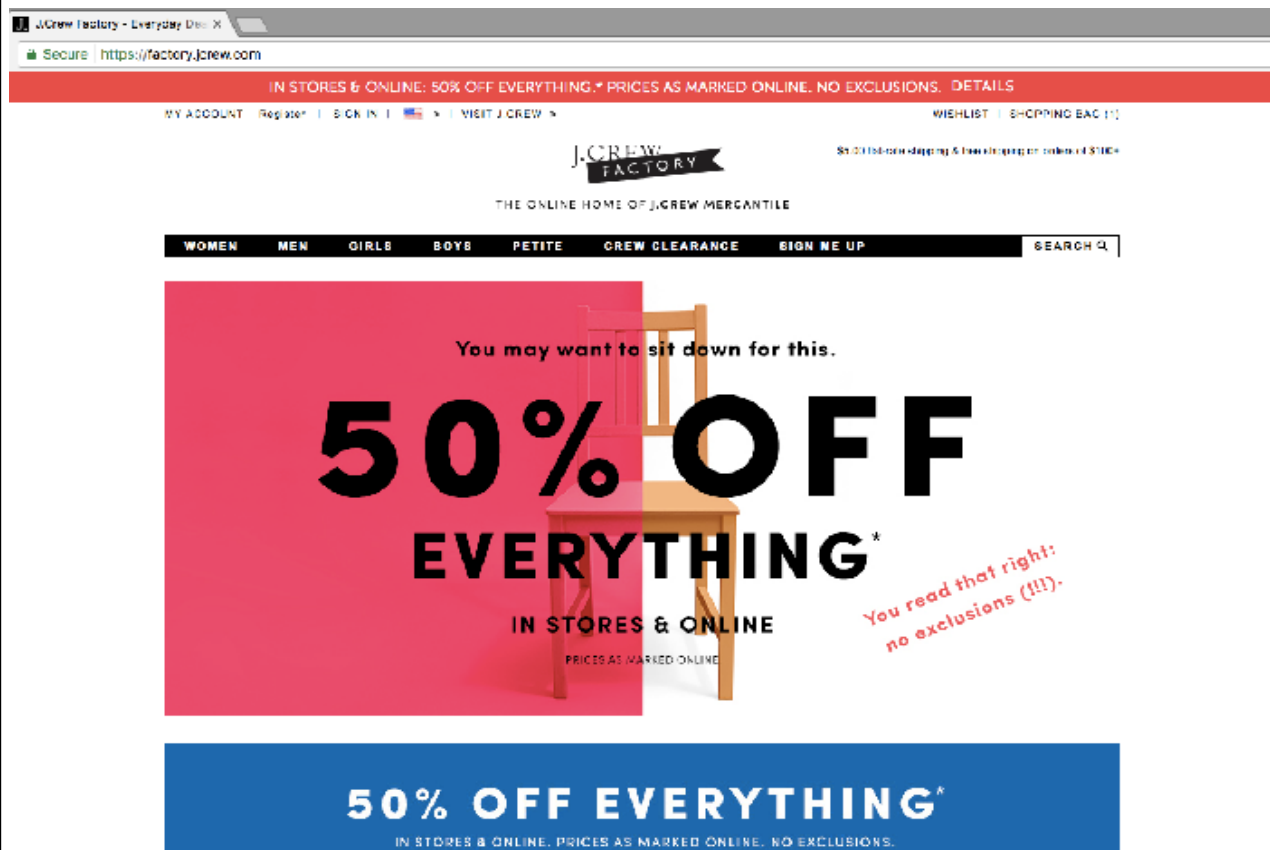
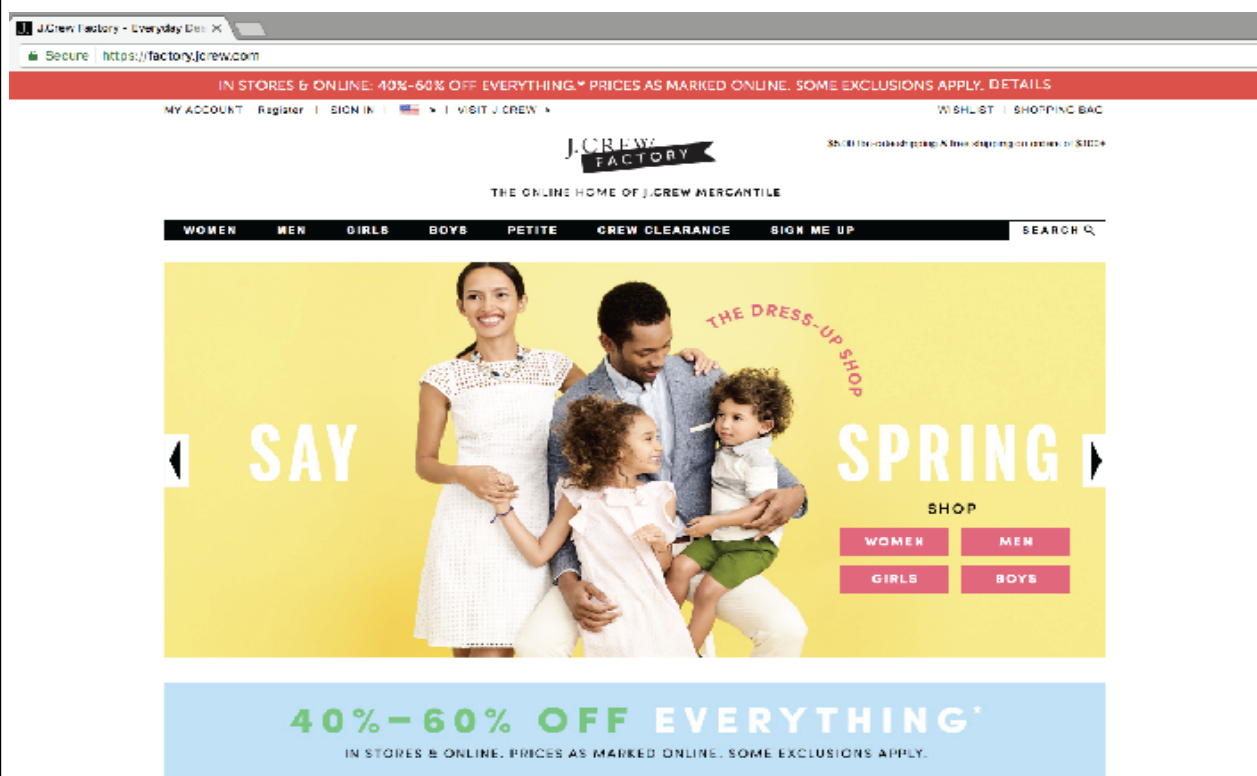


Figure 2: E-Commerce Website Homepage on April 20, 2017



24. Defendants continuously offer site-wide sales and/or discounts. There are other days, however, where the sale advertised at the top of the homepage is not site-wide (e.g., “50% off women’s shirts & men’s accessories,” etc.). Significantly, even on days where there is not a site-wide sale advertised at the top of the homepage, all of Defendants’ products are still individually advertised as being discounted or on sale at the point of purchase. *See, infra*, section IV.C.

C. Defendants’ False, Former Price Comparisons are Unlawful

25. As part of their deceptive advertising scheme, Defendants advertise false, former price comparisons in conjunction with the perpetual sales. Every single day, all of Defendants’ products are purportedly sold at a discount off a higher, former price. Defendants convey this higher former price using the language “valued at” compared with “your price,” which is accentuated in red font to draw

the consumer's attention to the purported discount. *See, e.g.*, Figures 3 through 6 below.

26. Consumers purchasing Defendants' J Crew Factory merchandise and clothing reasonably believe that the "valued at" price indicates a higher, former price for which the products were actually sold.

Figure 3: Men's Teddie Sweater on June 28, 2017

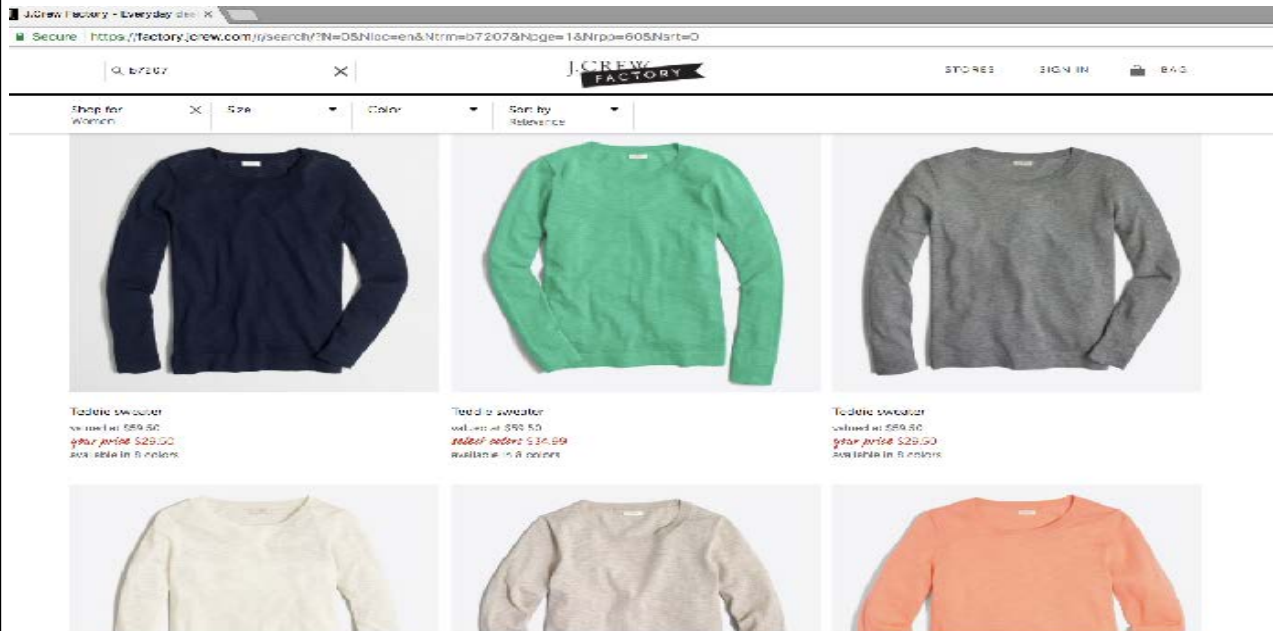


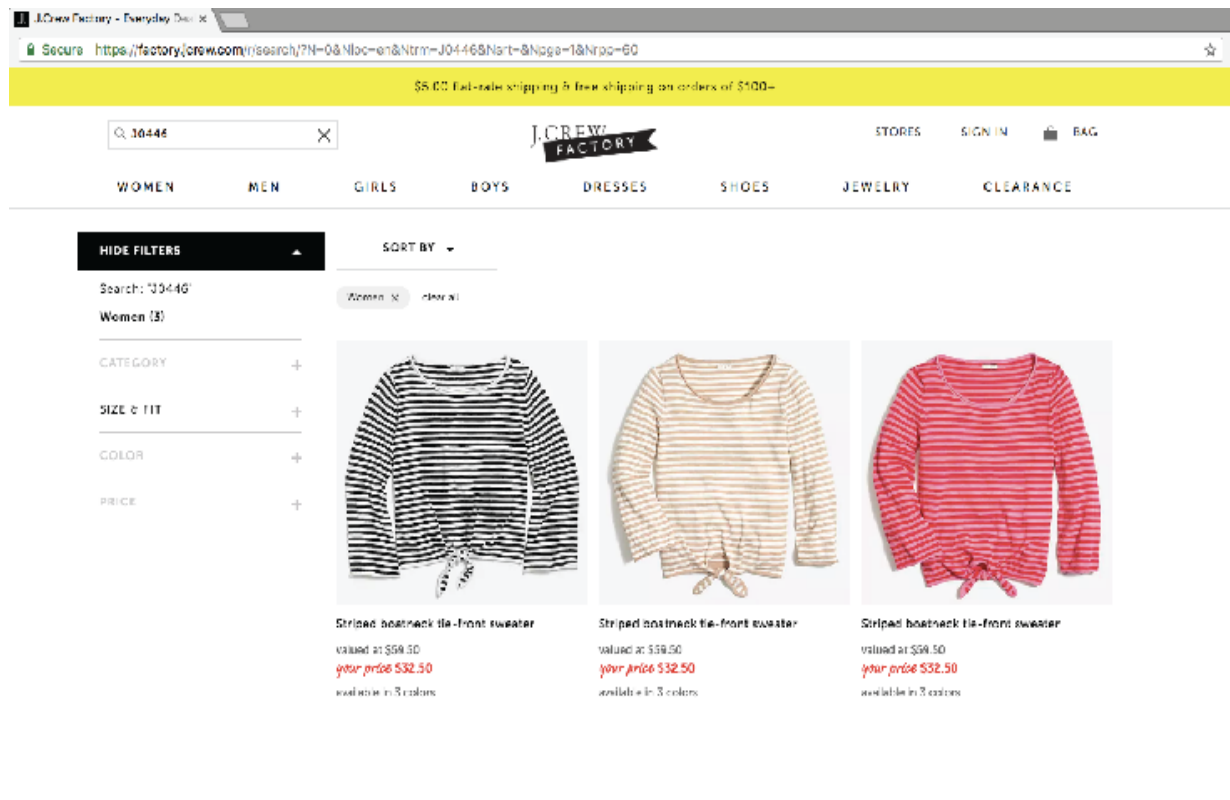
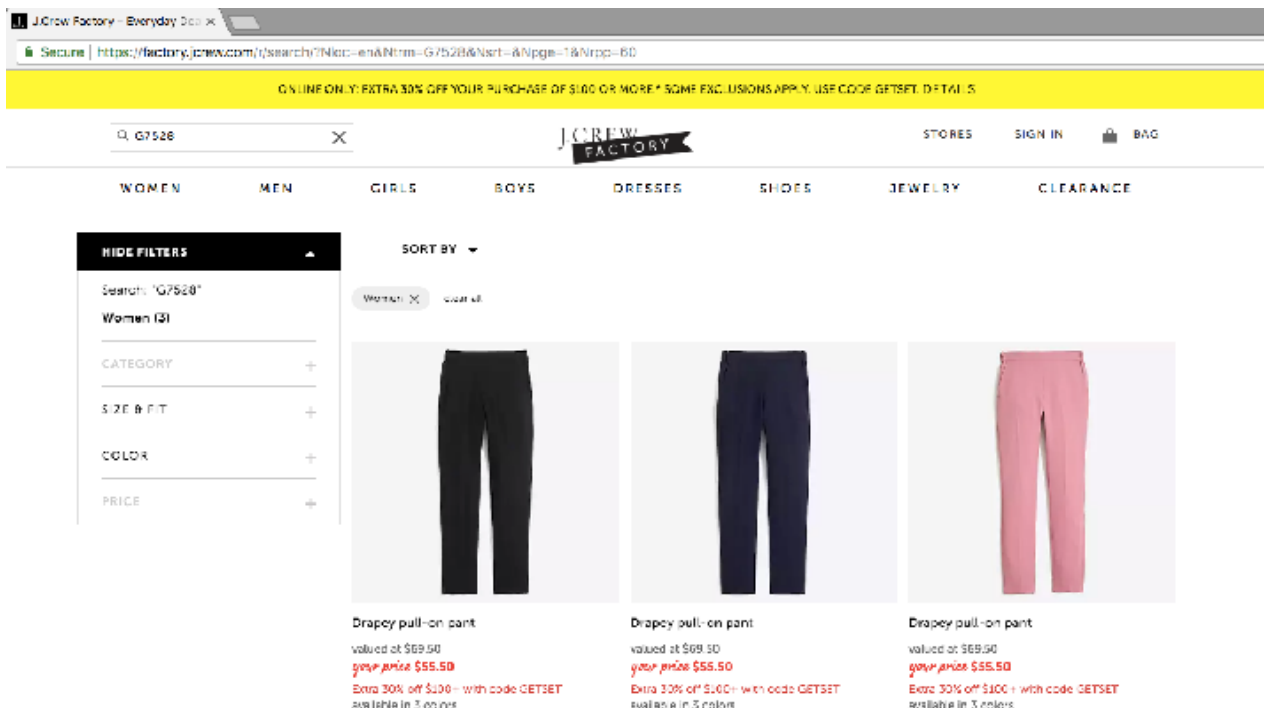
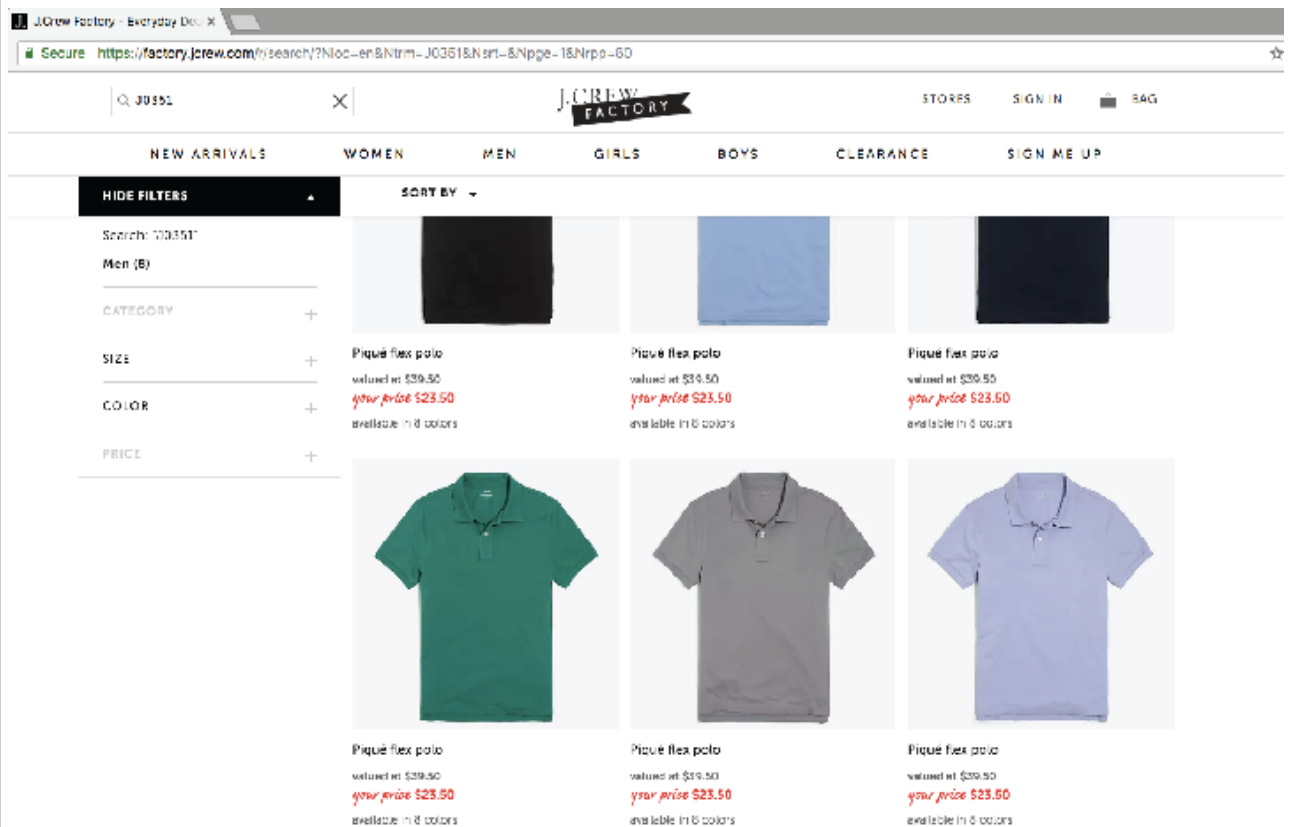
Figure 4: Women's Striped Boatneck Tie-front Sweater on April 29, 2018**Figure 5: Women's Drapey Pull-on Pant on May 9, 2018**

Figure 6: Men's Pique Flex Polo on June 2, 2018

27. During the statute of limitations period, Defendants did not sell their products at the advertised original, higher former prices.

28. For example, as demonstrated in the tables below, during a three-month time period of November 17, 2016 to February 18, 2017, Defendants always sold their merchandise for less than the advertised original, former price:

November 17, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5

Men's Convoy Jacket / item f4369	148	74
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

November 18, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	44.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	41.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	14.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's Convoy Jacket / item f4369	148	74
Men's Sutton Broken-in Chino / item 38648	59.5	32.5

November 19, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	44.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	41.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	14.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's Convoy Jacket / item f4369	148	74
Men's Sutton Broken-in Chino / item 38648	59.5	32.5

November 20, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	44.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	41.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	14.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5

Men's Convoy Jacket / item f4369	148	74
Men's Sutton Broken-in Chino / item 38648	59.5	32.5

November 21, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	39.99
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

November 22, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

November 23, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	39
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5

Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	23.5

November 24, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	39
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	23.5

November 25, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	39
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	23.5

November 26, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	39
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5

Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	23.5

November 27, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Classic Blazer / item f7409	158	79
Women's Classic Tote Bag / item f6133	98	39
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	23.5

November 28, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	29.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	34
Women's Wool Sidewalk Skirt / item 95435	69.5	27.5
Women's Classic Blazer / item f7409	--	--
Women's Classic Tote Bag / item f6133	98	39
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	31.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	14.5
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's Convoy Jacket / item f4369	148	sold out
Men's Sutton Broken-in Chino / item 38648	59.5	23.5

November 30, 2016³

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5

³ Sales data for November 29, 2016 is not included. In addition, as of November 28, 2016, the Women's Classic Blazer / item f7409 stopped being sold. Hereinafter, sales prices for the Women's Schoolboy Blazer Regular / item 92480 are listed.

Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 1, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 2, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 3, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5

Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 4, 2016

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's Convoy Jacket / item f4369	148	84.99
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 5, 2016⁴

Product	"Valued At" Price	"Your" Price
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's Convoy Jacket / item f4369	--	--
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 6, 2016

Product	"Valued At" Price	"Your" Price
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⁴ On this day, the Men's Convoy Jacket / item f4369 stopped being sold. Hereinafter, sales prices for the Men's 11" Broken in Rivington Short / item 79622 are listed.

Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 7, 2016⁵

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	22.50 to 29.50

December 8, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21

⁵ On this day, the Women's Plaid Ruffle Shirt Regular / Item f7852 stopped being sold. Hereinafter, sales prices for the Women's Floral lace shirt / F7404 are listed.

Men's Sutton Broken-in Chino / item 38648	59.5	22.50 to 29.50
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December 9, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	27.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	22.50-23.50

December 10, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	27.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.50 - 34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	22.50 - 23.50

December 11, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	27.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.50 - 34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	39.5

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	22.50 - 23.50

December 12, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.50 - 34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 13, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	27.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.50 - 34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	22.50 - 29.50

December 14, 2016

Product	"Valued At" Price	"Your" Price
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1	Floral lace shirt / F7404	69.5	34.99
2	Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
3	Women's Wool Sidewalk Skirt / item 95435	69.5	27.50 - 34.99
4	Women's Schoolboy Blazer Regular / item 92480	158	79
5	Women's Classic Tote Bag / item f6133	98	49
6	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
7	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
8	Men's Driggs Jean in medium wash / item c9885	69.5	27.5
9	Men's 11" broken in rivington short / item 79622	42.5	21
10	Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 15, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	27.5
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	34
Women's Wool Sidewalk Skirt / item 95435	69.5	27.5
Women's Schoolboy Blazer Regular / item 92480	158	63
Women's Classic Tote Bag / item f6133	98	39
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	31.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	14.5
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	17
Men's Sutton Broken-in Chino / item 38648	59.5	23.5

December 16, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.50 - 34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 17, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.50 - 34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 18, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 19, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 20, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	42.5
Women's Wool Sidewalk Skirt / item 95435	69.5	27.5
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	39.5
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	27.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 21, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 22, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

December 23, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

December 24, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

December 26, 2016⁶

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	34.99 -

⁶ Sales on December 25, 2016 are not listed.

f4557		44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

December 27, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

December 28, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

December 29, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99

Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

December 30, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

December 31, 2016

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99 - 39.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

January 1, 2017

Product	"Valued At" Price	"Your" Price
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1	Floral lace shirt / F7404	69.5	34.99
2	Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
3	Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
4	Women's Schoolboy Blazer Regular / item 92480	158	79
5	Women's Classic Tote Bag / item f6133	98	58.5
6	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
7	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
8	Men's Driggs Jean in medium wash / item c9885	69.5	32.5
9	Men's 11" broken in rivington short / item 79622	42.5	21
10	Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

January 2, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

January 3, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	32.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

January 4, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	89.5
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	34.5

January 5, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	89.5
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	34.5

January 6, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	89.5
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	4.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	34.5

January 7, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	89.5
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	34.5

January 8, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	89.5
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	34.5

January 9, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	59.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	118
Women's Classic Tote Bag / item f6133	98	68.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	26.5
Men's Driggs Jean in medium wash / item c9885	69.5	49.5
Men's 11" broken in rivington short / item 79622	42.5	34
Men's Sutton Broken-in Chino / item 38648	59.5	49.5

January 10, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	49
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	34.5

January 11, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	24.50 - 35.50

January 12, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5

Men's Sutton Broken-in Chino / item 38648	59.5	24.50 - 35.50
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January 13, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	24.50 - 35.50

January 14, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	24.50 - 35.50

January 15, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99

Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	19.5
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	24.50 - 35.50

January 16, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	47.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

January 17, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	47.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

January 18, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	44.99

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	34
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

January 19, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	34
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

January 20, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	34
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

January 21, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	44.99

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	34
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

January 22, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	34
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

January 23, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	34
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

January 24, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	34.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	44.99

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	34
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

January 25, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	69.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	134
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	29.5
Men's Driggs Jean in medium wash / item c9885	69.5	54.5
Men's 11" broken in rivington short / item 79622	42.5	38
Men's Sutton Broken-in Chino / item 38648	59.5	49.5

January 26, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

January 27, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	44.99

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

January 28, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

January 29, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

January 30, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	44.99

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

January 31, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	58.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

February 1, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	99
Women's Classic Tote Bag / item f6133	98	49.99
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	48.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

February 2, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	99
Women's Classic Tote Bag / item f6133	98	69.99
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	44.99

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	48.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

February 3, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	99
Women's Classic Tote Bag / item f6133	98	69.99
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	48.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

February 4, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	99
Women's Classic Tote Bag / item f6133	98	69.99
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	
Men's Driggs Jean in medium wash / item c9885	69.5	48.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

February 5, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	47.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	69.99
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	44.99

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

February 6, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	47.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Women's Classic Tote Bag / item f6133	98	69.99
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	41.5
Men's 11" broken in rivington short / item 79622	42.5	25.5
Men's Sutton Broken-in Chino / item 38648	59.5	35.5

February 7, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	99
Women's Classic Tote Bag / item f6133	98	69.99
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	48.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	41.5

February 8, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	74.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	126
Women's Classic Tote Bag / item f6133	98	69.99

Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	29.5
Men's Driggs Jean in medium wash / item c9885	69.5	64.5
Men's 11" broken in rivington short / item 79622	42.5	39.5
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

February 9, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	74.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	126
Women's Classic Tote Bag / item f6133	98	69.99
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	29.5
Men's Driggs Jean in medium wash / item c9885	69.5	64.5
Men's 11" broken in rivington short / item 79622	42.5	39.5
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

February 10, 2017⁷

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	74.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	126
Women's Classic Tote Bag / item f6133	--	--
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	29.5
Men's Driggs Jean in medium wash / item c9885	69.5	64.5
Men's 11" broken in rivington short / item 79622	42.5	39.5
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

February 11, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	74.5

⁷ On this day, the Women's Classic Tote Bag / item f6133 stopped being sold.

Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	126
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	29.5
Men's Driggs Jean in medium wash / item c9885	69.5	64.5
Men's 11" broken in rivington short / item 79622	42.5	39.5
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

February 12, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	74.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	126
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	29.5
Men's Driggs Jean in medium wash / item c9885	69.5	64.5
Men's 11" broken in rivington short / item 79622	42.5	39.5
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

February 13, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	48.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	24.5

February 14, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	54.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	94.5
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item	79.5	44.99

f4557		
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
Men's Driggs Jean in medium wash / item c9885	69.5	48.5
Men's 11" broken in rivington short / item 79622	42.5	29.5
Men's Sutton Broken-in Chino / item 38648	59.5	24.5

February 15, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	39.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

February 16, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	39.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

February 17, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	39.5
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18

Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

February 18, 2017

Product	"Valued At" Price	"Your" Price
Floral lace shirt / F7404	69.5	24.99
Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	39.6
Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
Women's Schoolboy Blazer Regular / item 92480	158	79
Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	18
Men's Driggs Jean in medium wash / item c9885	69.5	34.5
Men's 11" broken in rivington short / item 79622	42.5	21
Men's Sutton Broken-in Chino / item 38648	59.5	29.5

29. In sum, during this three-month period, Defendants never sold any of the foregoing products at their advertised higher, former prices. Put differently, these former prices were false because not once during the entire three-month period did Defendants ever sell any of these products at the advertised former prices.

30. Moreover, during the period of February 19, 2017 through June 2017, Defendants never sold these products, as well as others, at their higher, former advertised prices.

31. Defendants continue to engage in this unfair and unlawful business practice, as illustrated in the tables below:

April 27, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	32.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	49.5
Women's Drapev pull-on pant / G7528	69.5	48.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5

Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5
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April 28, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	32.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	59.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	49.5
Women's Drapev pull-on pant / G7528	69.5	48.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	44.5

April 29, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	32.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	59.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	49.5
Women's Drapev pull-on pant / G7528	69.5	48.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	44.5

April 30, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapev pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 1, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapev pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 2, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	47.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	49.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	66
Women's Denim jacket / H5092	85	74.5
Women's Drapev pull-on pant / G7528	69.5	59
Men's Flex Polo / J0351	39.5	34.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	14.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	54.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	44.5

May 3, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	47.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	49.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	66
Women's Denim jacket / H5092	85	74.5
Women's Drapev pull-on pant / G7528	69.5	59
Men's Flex Polo / J0351	39.5	34.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	14.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	54.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	44.5

May 4, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	47.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	49.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	69
Women's Denim jacket / H5092	85	74.5
Women's Drapev pull-on pant / G7528	69.5	59
Men's Flex Polo / J0351	39.5	34.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	14.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	54.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	44.5

May 5, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	47.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	49.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	69
Women's Denim jacket / H5092	85	74.5
Women's Drapev pull-on pant / G7528	69.5	59
Men's Flex Polo / J0351	39.5	34.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	14.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	54.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	44.5

May 6, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapev pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 7, 2018

Product	"Valued At"	"Your"
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	Price	Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapey pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 8, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	35.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	49.5
Women's Drapey pull-on pant / G7528	69.5	39.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 9, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	47.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	44.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	66.5
Women's Denim jacket / H5092	85	68
Women's Drapey pull-on pant / G7528	69.5	55.5
Men's Flex Polo / J0351	39.5	34.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	14.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	46.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	39.5

May 10, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	46.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	44.5

1	Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	66.5
2	Women's Denim jacket / H5092	85	59.5
3	Women's Drapey pull-on pant / G7528	69.5	54.5
4	Men's Flex Polo / J0351	39.5	34.5
5	Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
6	Men's Waving skeleton boxers / J0614	16.5	14.5
7	Men's Cotton-linen striped crewneck sweater / J0573	59.5	46.5
8	Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	39.5

May 11, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	46.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	44.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	66.5
Women's Denim jacket / H5092	85	59.5
Women's Drapey pull-on pant / G7528	69.5	54.5
Men's Flex Polo / J0351	39.5	34.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	14.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	46.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	39.5

May 12, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	46.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	44.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	66.5
Women's Denim jacket / H5092	85	59.5
Women's Drapey pull-on pant / G7528	69.5	54.5
Men's Flex Polo / J0351	39.5	34.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	14.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	46.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	39.5

May 13, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	46.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	44.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	66.5
Women's Denim jacket / H5092	85	59.5

1	Women's Drapey pull-on pant / G7528	69.5	54.5
	Men's Flex Polo / J0351	39.5	34.5
2	Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
	Men's Waving skeleton boxers / J0614	16.5	14.5
3	Men's Cotton-linen striped crewneck sweater / J0573	59.5	46.5
4	Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	39.5

May 14, 2018

6	Product	"Valued At" Price	"Your" Price
7	Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
	Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
8	Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
9	Women's Denim jacket / H5092	85	42.5
	Women's Drapey pull-on pant / G7528	69.5	34.5
10	Men's Flex Polo / J0351	39.5	19.5
	Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
11	Men's Waving skeleton boxers / J0614	16.5	8
	Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
12	Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 15, 2018

15	Product	"Valued At" Price	"Your" Price
16	Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
	Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
17	Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
18	Women's Denim jacket / H5092	85	42.5
	Women's Drapey pull-on pant / G7528	69.5	34.5
19	Men's Flex Polo / J0351	39.5	19.5
	Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
20	Men's Waving skeleton boxers / J0614	16.5	8
	Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
21	Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 16, 2018

24	Product	"Valued At" Price	"Your" Price
25	Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
	Women's Wrap mini skirt in cotton poplin / J0785	64.5	25.5
26	Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
	Women's Denim jacket / H5092	85	59.5
27	Women's Drapey pull-on pant / G7528	69.5	41.5
	Men's Flex Polo / J0351	39.5	24.5
28	Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95

Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 17, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	25.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	59.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	24.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 18, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	25.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	59.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	24.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 19, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	25.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	59.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	24.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 20, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	25.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	59.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	24.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 21, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	25.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	59.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	24.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 22, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	25.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	55.5
Women's Denim jacket / H5092	85	59.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	24.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	29.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 23, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapey pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 24, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapey pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 25, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	24.95
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapey pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 26, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	24.95
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapey pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 27, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	24.95
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapey pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 28, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	24.95
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapey pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 29, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	24.95
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	39.5
Women's Denim jacket / H5092	85	42.5
Women's Drapey pull-on pant / G7528	69.5	34.5
Men's Flex Polo / J0351	39.5	19.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

May 30, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	35.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	47.5
Women's Denim jacket / H5092	85	49.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	34.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

May 31, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	35.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	47.5
Women's Denim jacket / H5092	85	49.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	34.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

June 1, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	35.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	47.5
Women's Denim jacket / H5092	85	49.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	34.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

June 2, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	35.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	47.5
Women's Denim jacket / H5092	85	49.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	34.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

June 3, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	35.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	47.5
Women's Denim jacket / H5092	85	49.5
Women's Drapey pull-on pant / G7528	69.5	41.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	34.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

June 4, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	35.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	38.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	46.5
Women's Denim jacket / H5092	85	50.5
Women's Drapev pull-on pant / G7528	69.5	39.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

June 5, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	35.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	38.5
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	46.5
Women's Denim jacket / H5092	85	50.5
Women's Drapev pull-on pant / G7528	69.5	39.5
Men's Flex Polo / J0351	39.5	23.5
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	9.5
Men's Cotton-linen striped crewneck sweater / J0573	59.5	35.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	29.5

June 6, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	46.5
Women's Denim jacket / H5092	85	49.5
Women's Drapev pull-on pant / G7528	69.5	39.5
Men's Flex Polo / J0351	39.5	18.50-19.50
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

June 7, 2018

Product	"Valued At" Price	"Your" Price
Women's Striped Boatneck Tie-front Sweater / J0446	59.5	29.5
Women's Wrap mini skirt in cotton poplin / J0785	64.5	32
Women's Distressed high-rise jean in bella wash with 29" inseam / H4496	79.5	46.5
Women's Denim jacket / H5092	85	49.5
Women's Drapey pull-on pant / G7528	69.5	39.5
Men's Flex Polo / J0351	39.5	18.50-19.50
Men's 7" Reade lightweight drawstring short / H5050	49.5	24.95
Men's Waving skeleton boxers / J0614	16.5	8
Men's Cotton-linen striped crewneck sweater / J0573	59.5	29.5
Men's Slim-fit washed shirt in end-on-end cotton / G7104	49.5	24.5

32. For all of the foregoing products listed above, from April 27, 2018 to the present, Defendants similarly advertised false, former price comparisons, in that the products were never offered for sale at the advertised former prices. Thus, Defendants continue to engage in false and deceptive pricing scheme to this day.

D. Plaintiffs and Class Members Were Deceived and Harmed

33. During the statute of limitations period, Plaintiff Coffey has purchased numerous products on different occasions from Defendants, including jeans, shorts, a jacket, a belt, a handbag, jewelry, shirts, socks, and a sweater – all under the belief they originally sold for higher prices and that Plaintiff Coffey was getting a discount on these products based on the purported sales.

34. For example, on or about November 24, 2017, Plaintiff Coffey purchased several items, including a pair of white denim jeans, at the J. Crew Factory retail outlet store in Ontario, California. On this day, according to her credit card statement, Plaintiff Coffey spent in total \$70.65, and she spent between \$40-\$50 on the jeans. Plaintiff Coffey noticed that the jeans and other products were advertised as being on sale from higher, “valued at” prices. Plaintiff Coffey observed the “valued at” prices, and believed that the prices were higher, former prices at which the products were sold. Accordingly, Plaintiff Coffey believed she was getting a considerable discount, based on the advertised higher prices. Based

1 on the purported discounts, Plaintiff Coffey decided to purchase the jeans, and other
2 products, from Defendants.

3 35. Plaintiff Coffey was induced to purchase all of these products,
4 including the jeans, based on the advertised sales and higher, former price
5 comparisons. Plaintiff Coffey would not have purchased the jeans and other
6 products, or would have paid less for them, if it were not for this deceptive
7 advertising.

8 36. Similarly, during the statute of limitations period, Plaintiff Lu has
9 regularly purchased numerous products on different occasions from Defendants,
10 including shoes, shirts, skirts, pants, and jackets – all under the belief they originally
11 sold for higher prices and that Plaintiff Lu was getting a discount on these products
12 based on the purported sales.

13 37. On or about December 24, 2017, Plaintiff Lu purchased a pair of suede
14 heeled shoes at the J. Crew Factory retail outlet store in Las Vegas, Nevada. On this
15 day, according to her credit card statement, Plaintiff Lu spent in total \$37.87.
16 Plaintiff Lu noticed that the shoes were advertised as being on sale from a higher,
17 “valued at” price. Plaintiff Lu observed the “valued at” price, and believed that the
18 price was a higher, former price at which the shoes were sold. Accordingly,
19 Plaintiff Lu believed she was getting a considerable discount, based on the
20 advertised higher price. Based on the purported discount, Plaintiff Lu decided to
21 purchase the shoes from Defendants.

22 38. Plaintiff Lu was induced to purchase all of these products, including the
23 shoes, based on the advertised sales and higher, former price comparisons. Plaintiff
24 Lu would not have purchased the shoes and other products, or would have paid less
25 for them, if it were not for this deceptive advertising.

26 39. As with Plaintiffs, consumers were likely to be deceived by
27 Defendants’ misrepresentations that the merchandise was on sale when it was not.
28 Consumers would not have purchased the products, or they would have paid

1 substantially less for the products, had the misrepresentations not been made. In
2 reality, Defendants never intended, nor did they ever actually sell, any of their
3 merchandise at the advertised former price.

4 40. Plaintiffs and Class members did not know, and have no reason to
5 know, of these unlawful and deceptive sales practices. In contrast, Defendants
6 know, knew or should have known that Plaintiffs and other Class members did and
7 would rely on the advertised deceptive sales.

8 41. Each Class member has been exposed to the same or substantially
9 similar deceptive practice, as all of the clothing and merchandise that Defendants
10 have sold were falsely advertised as being on sale and/or discounted off a higher,
11 former price that was not a *bona fide* higher price.

12 42. As a result of this misleading business practice, and the harm caused to
13 Plaintiffs and other consumers, Defendants should be enjoined from deceptively
14 advertising false perpetual sales. Furthermore, Defendants should be required to
15 pay for all damages caused to misled consumers, including Plaintiffs.

16 43. Despite being misled by Defendants, Plaintiffs would purchase clothing
17 and merchandise from Defendants in the future if the prices of Defendants'
18 merchandise were advertised fairly and accurately and Plaintiffs could be certain
19 that any advertised higher former prices are genuine prices and that any advertised
20 sales are *bona fide* sales. Absent an injunction, Plaintiffs and Class members run the
21 risk of future harm. Specifically, Plaintiffs and Class members can no longer rely
22 on Defendants' sale-related advertising in the future. Further, Plaintiffs and Class
23 members also run the risk of purchasing purportedly on-sale products from
24 Defendants in the future, reasonably but mistakenly believing that Defendants halted
25 their deceptive pricing practices.

26 **V. CLASS ACTION ALLEGATIONS**

27 44. Plaintiffs bring this action pursuant to Rule 23 of the Federal Rules of
28 Civil Procedure, individually and on behalf of all members of the following

1 Nationwide Class, California Subclass, California Consumer Subclass, and Nevada
 2 Subclass (collectively, the “Classes”):

3 **Nationwide Class**

4 All natural persons who purchased one or more products from Defendants via
 5 their e-commerce website <https://factory.jcrew.com> or a J. Crew Factory retail
 6 store in the United States during the relevant statute of limitations period.

7 **California Subclass**

8 All natural persons who purchased one or more products from Defendants via
 9 their e-commerce website <https://factory.jcrew.com> or a J. Crew Factory retail
 10 store in the state of California during the relevant statute of limitations period.

11 **California Consumer Subclass**

12 All natural persons who purchased one or more products from Defendants via
 13 their e-commerce website <https://factory.jcrew.com> or a J. Crew Factory retail
 14 store in the state of California for personal, family, or household purposes
 15 during the relevant statute of limitations period.

16 **Nevada Subclass**

17 All natural persons who purchased one or more products from Defendants via
 18 their e-commerce website <https://factory.jcrew.com> or a J. Crew Factory retail
 19 store in the state of Nevada during the relevant statute of limitations period.

20 45. Plaintiff Coffey is a member of the Nationwide Class, the California
 21 Subclass, and the California Consumer Subclass. Plaintiff Lu is a member of all the
 22 Classes.

23 46. Excluded from the Classes are the following individuals and/or entities:
 24 Defendants and their parents, subsidiaries, affiliates, officers and directors, current
 25 or former employees, and any entity in which Defendants have a controlling
 26 interest; all individuals who make a timely election to be excluded from this
 27 proceeding using the correct protocol for opting out; and all judges assigned to hear
 28 any aspect of this litigation, as well as their immediate family members.

1 47. Plaintiffs reserve the right to name additional Class representatives and
2 modify or amend the definitions of the proposed Classes and/or add subclasses
3 before the Court determines whether certification is appropriate.

4 48. The Classes are so numerous that joinder of all members would be
5 impractical. On information and belief, the number of individuals who purchased
6 Defendants' products within the relevant time period is at least in the thousands.
7 Class members are readily identifiable and ascertainable through proofs of purchase
8 and other records.

9 49. There are questions of law and fact common to the Classes that will
10 drive the resolution of this action. These questions include, but are not limited to,
11 the following:

- 12 a. Whether Defendants misrepresented the regular price of their
13 products;
- 14 b. Whether Defendants' products are perpetually on sale;
- 15 c. Whether Defendants have advertised false, former price
16 comparisons;
- 17 d. Whether Defendants misrepresented material facts and/or failed to
18 disclose material facts in connection with the marketing and sale of
19 their products;
- 20 e. Whether Defendants' use of false or deceptive price advertising
21 constituted false advertising under California Law;
- 22 f. Whether Defendants engaged in unfair, unlawful and/or fraudulent
23 business practices under California law;
- 24 g. Whether Defendants' unlawful conduct, as alleged herein, was
25 intentional and knowing;
- 26 h. Whether Plaintiffs and the Class are entitled to damages and/or
27 restitution, and in what amount;
- 28

- 1 i. Whether Defendants are likely to continue using false, misleading or
2 unlawful sales such that an injunction is necessary; and
3 j. Whether Plaintiffs and the Classes are entitled to an award of
4 reasonable attorneys' fees, pre-judgment interest, and costs of suit.

5 50. Defendants have engaged in a common course of conduct giving rise to
6 violations of the legal rights sought to be enforced uniformly by Plaintiffs and the
7 Class members. Similar or identical statutory and common law violations, business
8 practices, and injuries are involved. Therefore, individual questions, if any, pale in
9 comparison to the numerous common questions presented in this action.

10 51. The injuries sustained by members of the Classes flow, in each
11 instance, from a common nucleus of operative fact. Each instance of harm suffered
12 by Plaintiffs and members of the Classes has directly resulted from a single course
13 of illegal conduct – namely, the implementation of perpetual sales and false former
14 price comparisons in order to induce consumers to purchase Defendants' products.
15 A substantial portion, if not all, of the alleged unlawful conduct occurred in and
16 stemmed from business activities in the state of California.

17 52. Given the similar nature of the Class members' claims and the absence
18 of material differences in the statutes and common laws upon which the Class
19 members' claims are based, the proposed Classes will be easily managed by the
20 Court and the parties.

21 53. Because of the relatively small size of the individual Class members'
22 claims, no Class member could afford to seek legal redress on an individual basis.
23 A class action is superior to any alternative means of prosecution.

24 54. The representative Plaintiffs' claims are typical of those of the Classes,
25 as all members of the Classes are similarly affected by Defendants' uniform
26 unlawful conduct as alleged herein.
27
28

55. Defendants acted, and failed to act, on grounds generally applicable to Plaintiffs and the Classes, supporting the imposition of uniform relief to ensure compatible standards of conduct toward the members of the Classes.

56. Plaintiffs will fairly and adequately protect the interests of the Classes, and have retained counsel competent and experienced in class action litigation. The Class representatives have no interest that conflict with, or are adverse to, those of the other Class members.

COUNT I

Violation of the California Consumer Legal Remedies Act

(For the California Consumer Subclass Against all Defendants)

57. Plaintiffs incorporate herein by specific reference, as though fully set forth, the allegations in paragraphs 1 through 56.

58. This cause of action is brought pursuant to the California Consumer Legal Remedies Act (“CLRA”), California Civil Code § 1750, *et seq.*

59. Plaintiffs and Class members are “consumers” within the meaning of California Civil Code § 1761(d).

60. The selling of merchandise by Defendants to Plaintiffs and the Classes were “transactions” within the meaning of California Civil Code § 1761(e). The merchandise purchased by Plaintiffs and the Classes are “goods” within the meaning of Civil Code §1761(a).

61. As alleged herein, Defendants violated the CLRA by falsely representing the nature, existence and amount of price discounts by advertising false perpetual sales and/or false, former price comparisons. Such a pricing scheme is in violation of California Civil Code § 1770, subsection (a)(9) (“[a]dvertising goods or services with intent not to sell them as advertised”) and subsection (a)(13) (“[m]aking false or misleading statements of fact concerning reasons for, existence of, or amounts of price reductions”).

62. Further, Cal Civ. Code § 1770(a)(5) prohibits “[r]epresenting that goods

1 or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or
2 quantities which they do not have” By offering false and perpetual sales and price
3 discounts, Defendants have misrepresented and continue to misrepresent that their
4 clothing and merchandise have characteristics (that they are offered at a bargain price)
5 which they do not have. Therefore, Defendants have violated section 1770(a)(5) of the
6 CLRA.

7 63. Plaintiffs relied on Defendants’ false representations regarding the sale
8 price of the products that they purchased. Plaintiffs would not have purchased
9 Defendants’ products, or would have paid less for the products, but for Defendants’
10 unlawful conduct. Consumers were also likely to have relied upon Defendants’
11 deceptive sales and false price comparisons.

12 64. Under Cal. Civ. Code § 1780(a), Plaintiffs and Class members seek
13 injunctive and equitable relief for Defendants’ violations of the CLRA. Concurrent
14 with the filing of this Complaint on June 11, 2018, Plaintiff Coffey sent a notice
15 letter by certified mail to Defendants of her intent to pursue claims under the CLRA,
16 and an opportunity to cure, consistent with California Civil Code § 1782. More than
17 30 days have expired since Defendants received this notice, and on information and
18 belief, Defendants have failed to correct or remedy the alleged unlawful conduct
19 within the meaning of Cal. Civ. Code § 1782.

20 65. Plaintiffs request that this Court enjoin Defendants from continuing to
21 violate the CLRA as discussed herein and/or from violating the CLRA in the future
22 and to order restitution to Plaintiffs and the Classes. Plaintiffs also request an award
23 of actual and punitive damages, attorneys’ fees and costs, and any other relief that
24 the Court deems proper, pursuant to California Civil Code § 1780(a).

25 **COUNT II**

26 **Violation of the California False Advertising Law**

27 **(For the California Subclass and California Consumer Subclass)**

1 66. Plaintiffs incorporate herein by specific reference, as though fully set
2 forth, the allegations in paragraphs 1 through 65.

3 67. California's False Advertising Law ("FAL"), California Business and
4 Professions Code § 17500, *et seq.*, prohibits unfair, deceptive, untrue, or misleading
5 advertising, including, but not limited to, false statements as to worth, value and
6 former price.

7 68. Cal. Bus. & Prof. Code § 17500 provides in relevant part:

8 "It is unlawful for any person, firm, corporation or association . . . to make or
9 disseminate or cause to be made or disseminated before the public in this
10 state, or to make or disseminate or cause to be made or disseminated from this
11 state before the public in any state, in any newspaper or other publication, or
12 any advertising device . . . including over the Internet, any statement,
13 concerning that real or personal property or those services . . . which is untrue
14 or misleading, and which is known, or which by the exercise of reasonable
15 care should be known, to be untrue or misleading, or for any person, firm, or
16 corporation to so make or disseminate or cause to be so made or disseminated
17 any such statement as part of a plan or scheme with the intent not to sell that
18 personal property or those services, professional or otherwise, so advertised at
19 the price stated therein, or as so advertised."

20 69. Defendants' practice of advertising sales of limited duration, but that
21 are immediately followed by another sale, are false and they are designed to mislead
22 consumers into believing they are getting a significant discount, when in actuality,
23 they are paying the regular or even greater price for the item they are purchasing.
24 This conduct squarely violates Cal. Bus. & Prof. Code § 17500.

25 70. Part and parcel with its advertised perpetual sales, Defendants advertise
26 false, former price comparisons, which reflect the purported "valued at" price of the
27 product immediately adjacent to the purported sale/discounted price of the product
28 at the point of purchase. The original or former price of the product is false because
the product never actually sold for that advertised price. The FAL specifically
prohibits this type of false advertising. Cal. Bus. & Prof. Code § 17501 provides in
relevant part:

1 “No price shall be advertised as a former price of any advertised thing, unless
 2 the alleged former price was the prevailing market price . . . within three
 3 months next immediately preceding the publication of the advertisement or
 4 unless the date when the alleged former price did prevail is clearly, exactly
 and conspicuously stated in the advertisement.”

5 71. As alleged herein, Defendants do not sell their clothing and
 6 merchandise at the prevailing market price – let alone during the previous three
 7 months of the purported discounted price – thus rendering their advertised former
 8 prices deceptive and in violation of Cal. Bus. & Prof. Code § 17501.

9 72. Defendants’ false advertisements were calculated to induce Plaintiffs
 10 and Class members to purchase clothing and merchandise they otherwise would not
 11 have and/or to spend more money than they otherwise would have spent, in order to
 12 increase Defendants’ profits.

13 73. Through their unfair acts and practices, Defendants have improperly
 14 obtained money from Plaintiffs and the Classes. As such, Plaintiffs request that this
 15 Court cause Defendants to restore this money to Plaintiffs and all Class members,
 16 and to enjoin Defendants from continuing to violate the FAL in the future. Money
 17 damages are inadequate to remedy Plaintiffs’ and Class member’s harm. Absent an
 18 injunction, Defendants may continue their deceptive and false pricing practices,
 19 leading to the future harm for many consumers.

20 74. Plaintiffs also request that the Court award reasonable attorneys’ fees
 21 and costs pursuant to Fed. R. Civ. P. 23(h) and Cal. Code of Civ. Proc. § 1021.5.

22 **COUNT III**

23 **Violation of the California Unfair Competition Law**

24 **(For the California Subclass and California Consumer Subclass)**

25 75. Plaintiffs incorporate herein by specific reference, as though fully set
 26 forth, the allegations in paragraphs 1 through 74.

27 76. Plaintiffs and Class members are “persons” within the meaning of Cal.
 28 Bus. & Prof. Code § 17204.

1 77. The California Unfair Competition Law (“UCL”), Cal. Bus. & Prof.
2 Code § 17200, *et seq.*, defines unfair business competition to include any “unlawful,
3 unfair or fraudulent” act or practice, as well as any “unfair, deceptive, untrue or
4 misleading” advertising.

5 78. Under the UCL, a business act or practice is “unlawful” if it violates
6 any established state or federal law.

7 79. Defendants’ false and misleading advertising of perpetual sales and
8 false, former price comparisons violates the “unlawful” prong of the UCL because
9 the underlying conduct violates the CLRA, FAL, and other applicable laws, as
10 described herein.

11 80. As result of Defendants’ unlawful business acts and practices, they
12 have unlawfully obtained money from Plaintiffs and members of the Classes.

13 81. Under the UCL, a business act or practice is “unfair” if the defendant’s
14 conduct is substantially injurious to consumers, offends public policy, and is
15 immoral, unethical, oppressive, and unscrupulous, as the benefits for committing
16 such acts or practices are outweighed by the gravity of the harm to the alleged
17 victims.

18 82. Defendants have violated the “unfair” prong of the UCL by
19 misrepresenting a false sale price to induce consumers into believing they are
20 getting a discount, when they are not. Consequently, the regular price of the
21 merchandise is inflated, and the corresponding sale price is nothing more than a
22 deceptive illusion of a discount. As a result, consumers, including Plaintiffs, were
23 likely to believe that they were receiving products at a substantially discounted
24 price. This deception was likely to have induced reasonable consumers, including
25 Plaintiffs, to buy Defendants’ clothing and merchandise, which they otherwise
26 would not have purchased.

27 83. The gravity of the harm to Plaintiffs and Class members resulting from
28 these unfair acts and practices outweighs any conceivable reasons, justifications

1 and/or motives of Defendants for engaging in such deceptive acts and practices. By
2 committing the acts and practices alleged herein, Defendants have engaged in, and
3 continue to engage in, unfair business practices under the UCL.

4 84. Under the UCL, a business act or practice is “fraudulent” if it actually
5 deceives or is likely to deceive members of the consuming public.

6 85. Defendants’ conduct here was and continues to be fraudulent because it
7 has the effect of deceiving consumers into believing that they are getting a bargain,
8 for the sole purpose to induce purchases, when no such bargain exists. Because
9 Defendants misled Plaintiffs and Class members, Defendants’ conduct was
10 “fraudulent” under the UCL

11 86. As a result of Defendants’ fraudulent business acts and practices,
12 Defendants have and continue to fraudulently obtain money from Plaintiffs and
13 members of the Classes.

14 87. Plaintiffs request that this Court cause Defendants to restore this money
15 to Plaintiffs and the Class and to enjoin Defendants from continuing to violate the
16 UCL as alleged herein. Money damages are inadequate to remedy Plaintiffs’ and
17 Class member’s harm. Absent an injunction, Defendants may continue their
18 deceptive and false pricing practices, leading to the future harm for many
19 consumers.

20 88. Plaintiffs also request that the Court award reasonable attorneys’ fees
21 and costs pursuant to Fed. R. Civ. P. 23(h) and Cal. Code of Civ. Proc. § 1021.5.

22 **COUNT IV**

23 **Nevada Deceptive Trade Practices Act**

24 **Nev. Rev. Stat. § 598.0915 *et seq.***

25 **(For the Nevada Subclass Against All Defendants)**

26
27 89. Plaintiffs incorporate herein by specific reference, as though fully set
28 forth, the allegations in paragraphs 1 through 88.

1 90. This claim, which asserts violations of the Nevada Deceptive Trade
2 Practices Act (the “NDTPA”), Nev. Rev. Stat. § 598.0915 *et seq.* and Nev. Rev.
3 Stat. § 41.600(1), is asserted against each of the Defendants based on their conduct
4 described above.

5 91. The NDTPA applies to the purchase transactions of Plaintiff Lu and
6 members of the Nevada Subclass.

7 92. Plaintiff Lu, members of the Nevada Subclass, and each of the
8 Defendants are “persons,” within the meaning of sections 598.0915 and 598.0923 of
9 the NDTPA.

10 93. Plaintiff Lu and members of the Nevada Subclass are “victim[s] of
11 consumer fraud” within the meaning of Nev. Rev. Stat. § 41.600(1).

12 94. The clothing items and merchandise sold by Defendants and purchased
13 by Plaintiff Lu and other consumers are goods within the meaning of NDTPA.

14 95. The conduct of Defendants, as alleged herein, constitutes unlawful
15 practices that occurred in connection with the sale and or advertisement of goods
16 and services, within the meaning of the NDTPA.

17 96. Defendants’ deceptive omissions, concealment, and suppression of
18 material fact, as alleged herein, violated the NDTPA by: (a) representing that goods
19 or services for sale or lease were of a particular standard, quality, or grade, or that
20 such goods were of a particular style or model, despite knowing that such goods or
21 services were of another standard, quality, grade, style, or model, Nev. Rev. Stat. §
22 598.0915(7); (b) advertising goods or services with intent not to sell or lease them as
23 advertised, Nev. Rev. Stat. § 598.0915(9); (c) making false or misleading statements
24 of fact concerning the price of goods or services for sale or lease, or the reasons for,
25 existence of or amounts of price reductions, Nev. Rev. Stat. § 598.0915(13); and (d)
26 knowingly failing to disclose a material fact in connection with the sale or lease of
27 goods or services, Nev. Rev. Stat. § 598.0923(2).

28

1 97. As described herein, Defendants violated these provisions of NDTPA
2 by engaging in unfair or deceptive acts or practices in the conduct of any trade or
3 commerce. Specifically, Defendants marketed and sold their merchandise to
4 consumers in a manner that was intentionally designed to deceive them into
5 believing that they were getting a substantial bargain based on the perpetual sales
6 and false, former price comparisons alleged herein. However, these were not *bona*
7 *fide* sales or former prices. Therefore, Defendants have made misrepresentations as
8 to the nature of sales and discounts pertaining to their products.

9 98. By way of the foregoing, Defendants deprived Plaintiff Lu and
10 members of the Nevada Subclass the benefit of their bargain.

11 99. Defendants' acts and practices alleged herein were intended to and did
12 result in the sale of merchandise in violation of the NDTPA, from which Defendants
13 benefitted financially.

14 100. Plaintiff Lu and members of the Nevada Subclass relied on Defendants'
15 conduct and omissions, to the extent one can reasonable rely on statements omitted,
16 concealed, and not otherwise made.

17 101. As a direct result of Defendants' actions and omissions of material
18 facts, Plaintiff Lu and members of the Nevada Subclass were induced to make
19 purchases that they otherwise would not have made.

20 102. The NDTPA is, by its express terms, a cumulative remedy, such that
21 remedies under its provisions can be awarded in addition to those provided under
22 separate statutory schemes and/or common law remedies, such as those alleged in
23 the other Counts of this First Amended Complaint.

24 103. Under the NDPTA and Nev. Rev. Stat. § 41.600(1), Plaintiff Lu and
25 members of the Nevada Subclass have standing to pursue this claim because they
26 suffered an ascertainable loss resulting from Defendants' conduct and are victims of
27 consumer fraud.

28

105. Based on the foregoing, Plaintiff Lu and members of the Nevada Subclass are entitled to damages, declaratory and injunctive relief, and well as all other relief deemed just and equitable in the circumstances and as allowable by law.

Intentional Misrepresentation
(For the Classes Against All Defendants)

14 106. Plaintiffs incorporate herein by specific reference, as though fully set
15 forth, the allegations in paragraphs 1 through 104.

108. Defendants' misrepresentations are material because reasonable consumers attach importance to advertised sales and purported discounts and are induced to act thereon in making purchase decisions.

111. Therefore, as a direct and proximate result of Defendants' intentional misrepresentations, Plaintiffs and members of the Classes have suffered economic losses and other general and specific damages, including but not limited to the amounts paid for Defendants' products, and any interest that would have accrued on those monies, all in an amount to be proven at trial.

112. Plaintiffs also request that the Court award reasonable attorneys' fees and costs pursuant to Fed. R. Civ. P. 23(h) and Cal. Code of Civ. Proc. § 1021.5.

COUNT VI

(For the Classes Against All Defendants)

114. Defendants marketed and sold its merchandise to consumers in a manner that was intentionally designed to deceive them into believing that they were getting a substantial bargain based on the perpetual sales and false, former price comparisons alleged herein. However, these were not *bona fide* sales or former prices. Therefore, Defendants have made misrepresentations as to the nature of sales and discounts pertaining to their products.

115. Defendants' misrepresentations are material because reasonable consumers attach importance to advertised sales and purported discounts and are induced to act thereon in making purchase decisions.

122. Defendants' misleading, inaccurate and deceptive marketing intentionally cultivates the perception that consumers are being offered a discount from the company's regular prices when they are not. Plaintiffs and Class members were intended to rely upon Defendants' misrepresentations when they purchased Defendants' merchandise. Plaintiffs and Class members would not have purchased Defendants' merchandise, or would have paid less for the merchandise, as the pricing scheme alleged herein has enabled Defendants to overcharge Plaintiffs and other consumers for products while simultaneously deceiving them into believing they are getting a substantial discount, if Defendants had not misrepresented that the merchandise was on sale.

123. Defendants should not be allowed to retain the additional and ill-gotten profits generated from the sale of products that were unlawfully marketed, advertised and promoted. Allowing Defendants to retain these unjust profits would offend traditional notions of justice and fair play and induce companies to misrepresent key characteristics of their products in order to increase sales and at the expense of consumers.

124. Thus, Defendants are in possession of funds that were wrongfully retained from Plaintiffs and Class members that should be disgorged as illegally gotten gains.

125. Plaintiffs also request that the Court award reasonable attorneys' fees and costs pursuant to Fed. R. Civ. P. 23(h) and Cal. Code of Civ. Proc. § 1021.5.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, individually and on behalf of the Classes, respectfully pray for following relief:

1. Certification of this case as a class action on behalf of the Classes defined above, appointment of Plaintiffs as class representatives, and appointment of their counsel as Class counsel;

2. A declaration that Defendants' actions, as described herein, violate the claims described herein;

3. An award of injunctive and other equitable relief as is necessary to protect the interests of Plaintiffs and the Classes, including, *inter alia*, an order prohibiting Defendants from engaging in the unlawful act described above;

4. An award to Plaintiffs and the Classes of restitution and/or other equitable relief, including, without limitation, restitutionary disgorgement of all profits and unjust enrichment that Defendants obtained from Plaintiffs and the Classes as a result of its unlawful, unfair and fraudulent business practices described herein;

5. An award of all economic, monetary, actual, consequential, and compensatory damages caused by Defendants' conduct;

6. An award to Plaintiffs and their counsel of their reasonable expenses and attorneys' fees pursuant to Cal. Code of Civ. Proc. § 1021.5, Cal. Civ. Code § 1780(e), the Nevada Deceptive Trade Practices Act, Fed. R. Civ. P. 23(h), or any other applicable statute;

7. An award to Plaintiffs and the Classes of pre and post-judgment interest, to the extent allowable; and

8. For such further relief that the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs, on behalf of themselves and the Classes, hereby demand a jury trial with respect to all issues triable of right by jury.

DATED: July 19, 2018

FARUQI & FARUQI, LLP

By: /s/ Benjamin Heikali
Benjamin Heikali

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DATED: July 19, 2018

THE WAND LAW FIRM, P.C.

By: /s/ Aubry Wand
AUBRY WAND

Attorneys for Plaintiffs and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2018, a copy of the foregoing Notice of Appeal and Representation Statement has been electronically filed via the Court's ECF system.

Dated: July 19, 2018

By: /s/ Benjamin Heikali
Benjamin Heikali