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Classes*

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

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

Plaintiff,

v.

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

Defendants.

CASE NO.: 2:18-cv-5169

**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. Intentional Misrepresentation**
- 5. Negligent Misrepresentation**
- 6. Unjust Enrichment and  
Common Law Restitution**

**DEMAND FOR JURY TRIAL**

1 Christina Coffey, on behalf of herself and all others similarly situated,  
2 (“Plaintiff”) brings this action against J. Crew Group, Inc., Chinos Holdings, Inc.,  
3 and DOES 1 through 50 (collectively, “Defendants”) to recover monetary damages,  
4 injunctive relief, and other remedies for violations of California laws. Plaintiff  
5 makes the following allegations on information and belief, except as to allegations  
6 pertaining to Plaintiff individually, which are based on her personal knowledge.

## 7 **I. INTRODUCTION**

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

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

19 3. In conjunction with these perpetual sales, and as an integral component  
20 of Defendants’ marketing and advertising campaign, Defendants ubiquitously  
21 advertise false, former price comparisons. On their e-commerce website, and in J.  
22 Crew Factory stores, at or prior to the point of purchase, Defendants list a non-  
23 discounted, original price of the product immediately adjacent to the purported  
24 discounted/sale price of the product. The non-discounted, original price of the  
25 product is not a *bona fide* former price because Defendants never sold the product  
26 for that higher price. The California legislature has deemed this highly effective  
27 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 Plaintiff, 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 Plaintiff 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 Plaintiff and  
15 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 Plaintiff is a citizen 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 citizens of a state different from  
26 that 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.<sup>1</sup>

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

### 12 **III. THE PARTIES**

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

18 11. Plaintiff brings this action on behalf of herself and all other consumers  
19 who similarly purchased clothing and merchandise from Defendants, based on the  
20 mistaken belief that they were receiving a bargain, via their retail stores and online  
21 via an e-commerce website.

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

26  
27 \_\_\_\_\_  
28 <sup>1</sup> <https://stores.factory.jcrew.com/?> (last visited June 11, 2018).

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

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

#### IV. FACTUAL ALLEGATIONS

##### A. Background

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

16. Defendants advertise these sales online via their e-commerce website <https://factory.jcrew.com> and through their retail outlet stores. Defendants own and operate several J. Crew Factory retail outlet stores throughout California and the United States. In California alone, there are approximately twelve J. Crew Factory<sup>2</sup> retail outlet stores:

The Shoppes at Chino Hills	Camarillo Premium Outlets
Ontario Mills	Desert Hills Premium Outlets

<sup>2</sup> 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.

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

17. 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**

18. 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.

19. A substantial aspect of Defendants' brand recognition and consumer appeal is their supposed discounted pricing. J. Crew Factory is commonly known as a 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.

20. 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.

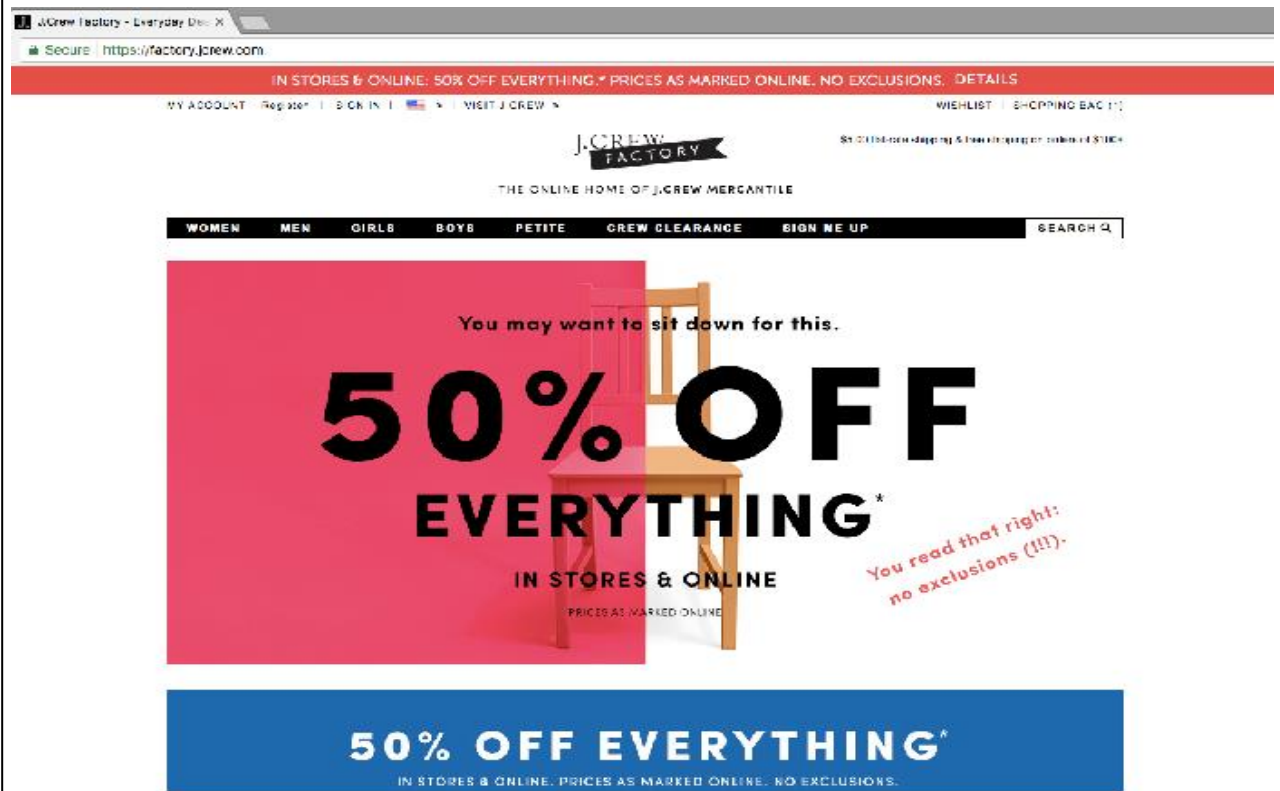
21. Specifically, when a consumer visits Defendants' e-commerce website, there is always a purported sale or discount advertised at the top of the homepage. Generally, it is an advertised site-wide sale offering a percentage off the purported regular price of all products. *See, e.g.*, Figures 1 and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

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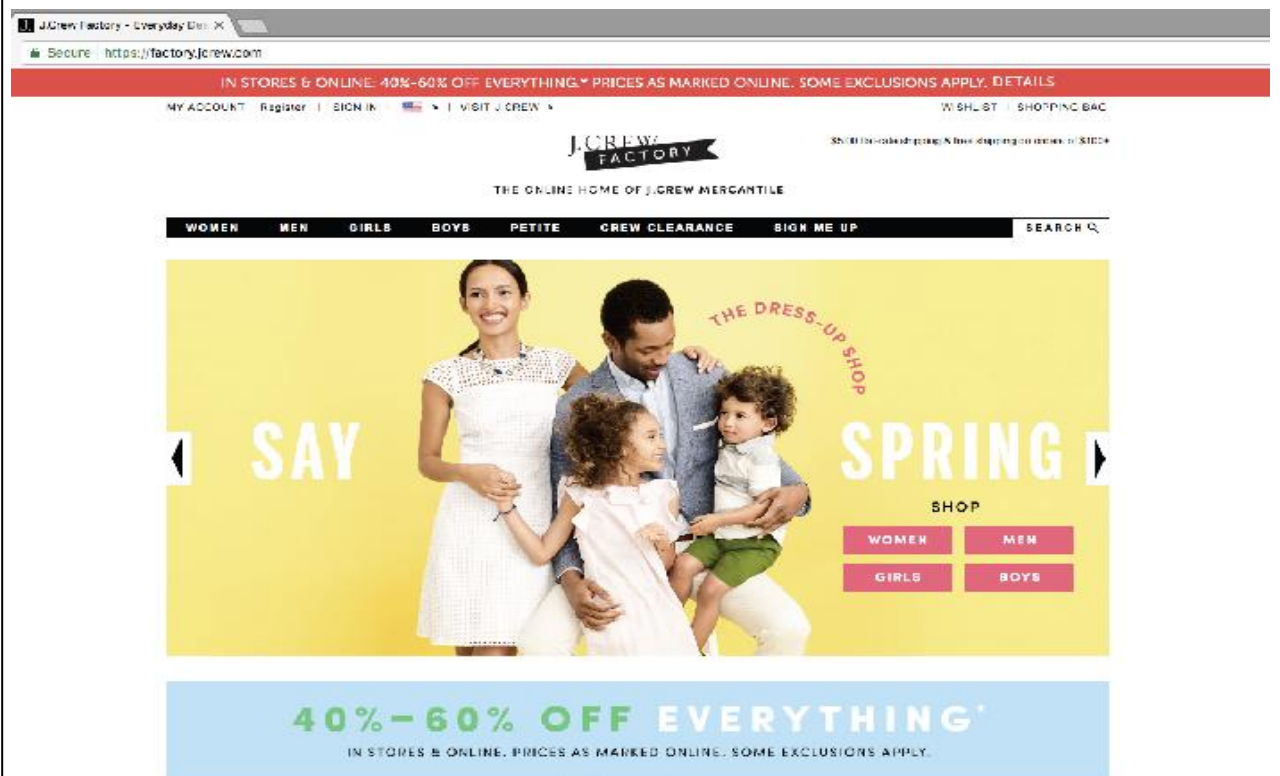
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**Figure 1: E-Commerce Website Homepage on 2/16/2017**



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



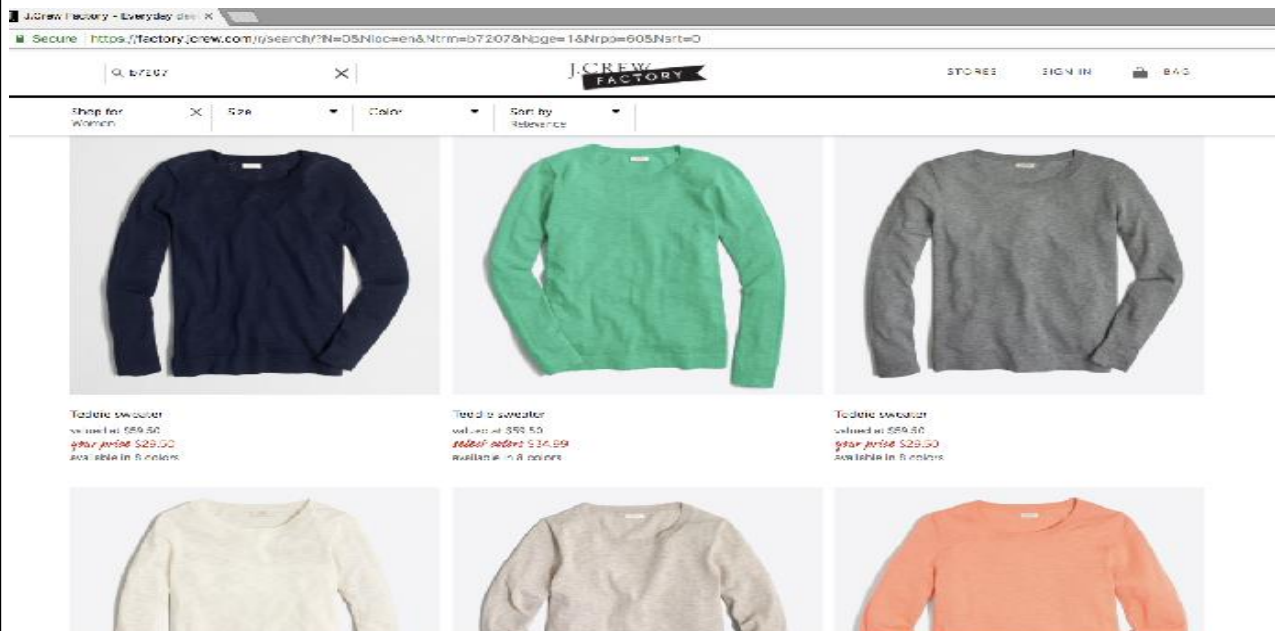
22. Defendants continuously offer site-wide sales and/or discounts. There are other days, however, where the sale advertised at the top of the homepage is not site-wide (e.g., “50% off women’s shirts & men’s accessories,” etc.). Significantly, even on days where there is not a site-wide sale advertised 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

23. 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.

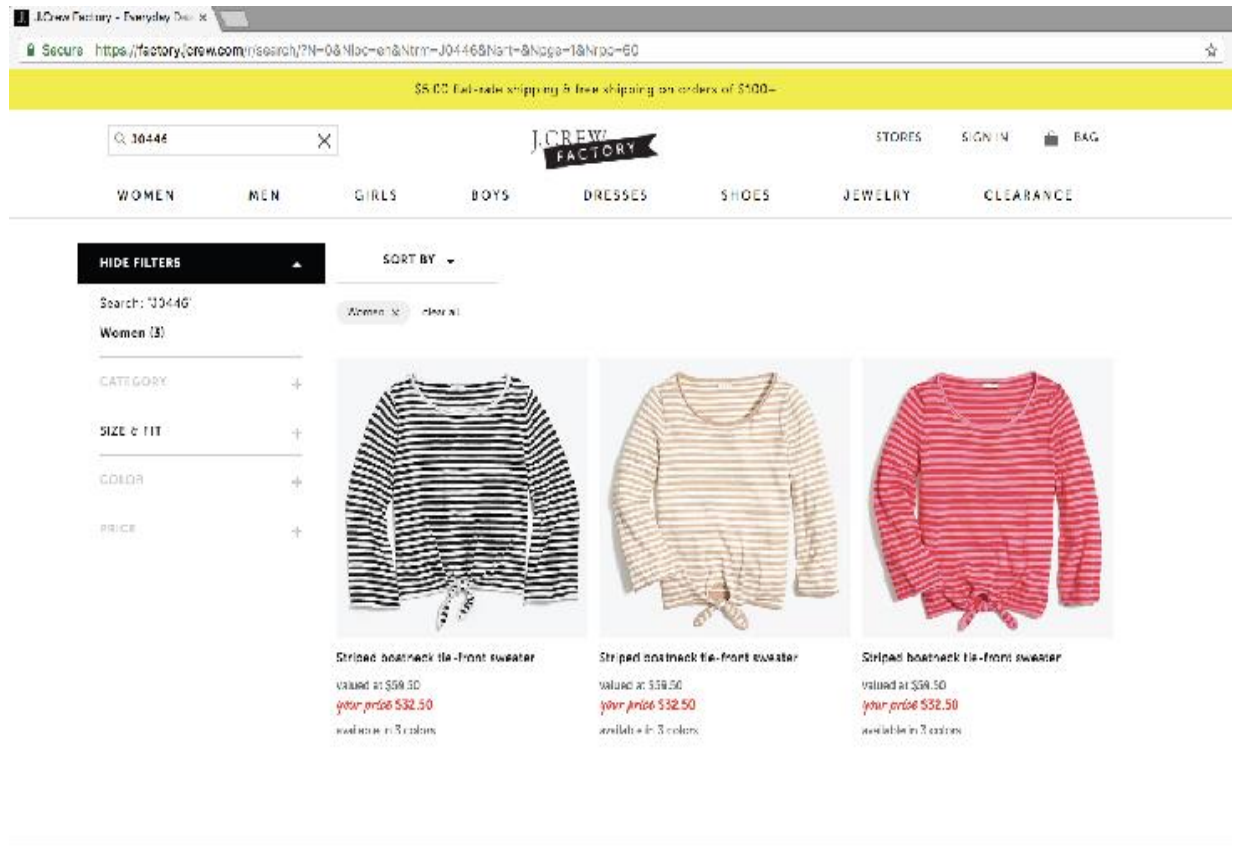
24. Consumers purchasing Defendants’ J. Crew Factory merchandise and clothing reasonably believe that the “valued at” price indicates a higher, former price for which the products were actually sold.

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

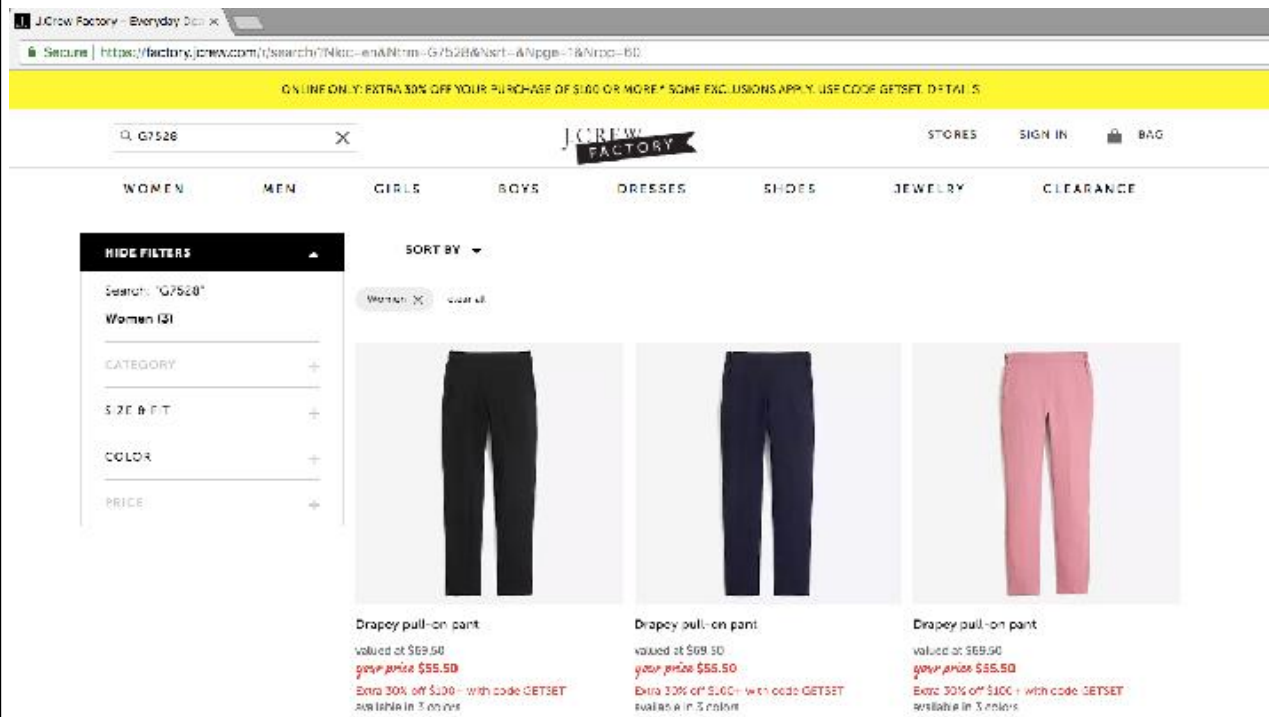


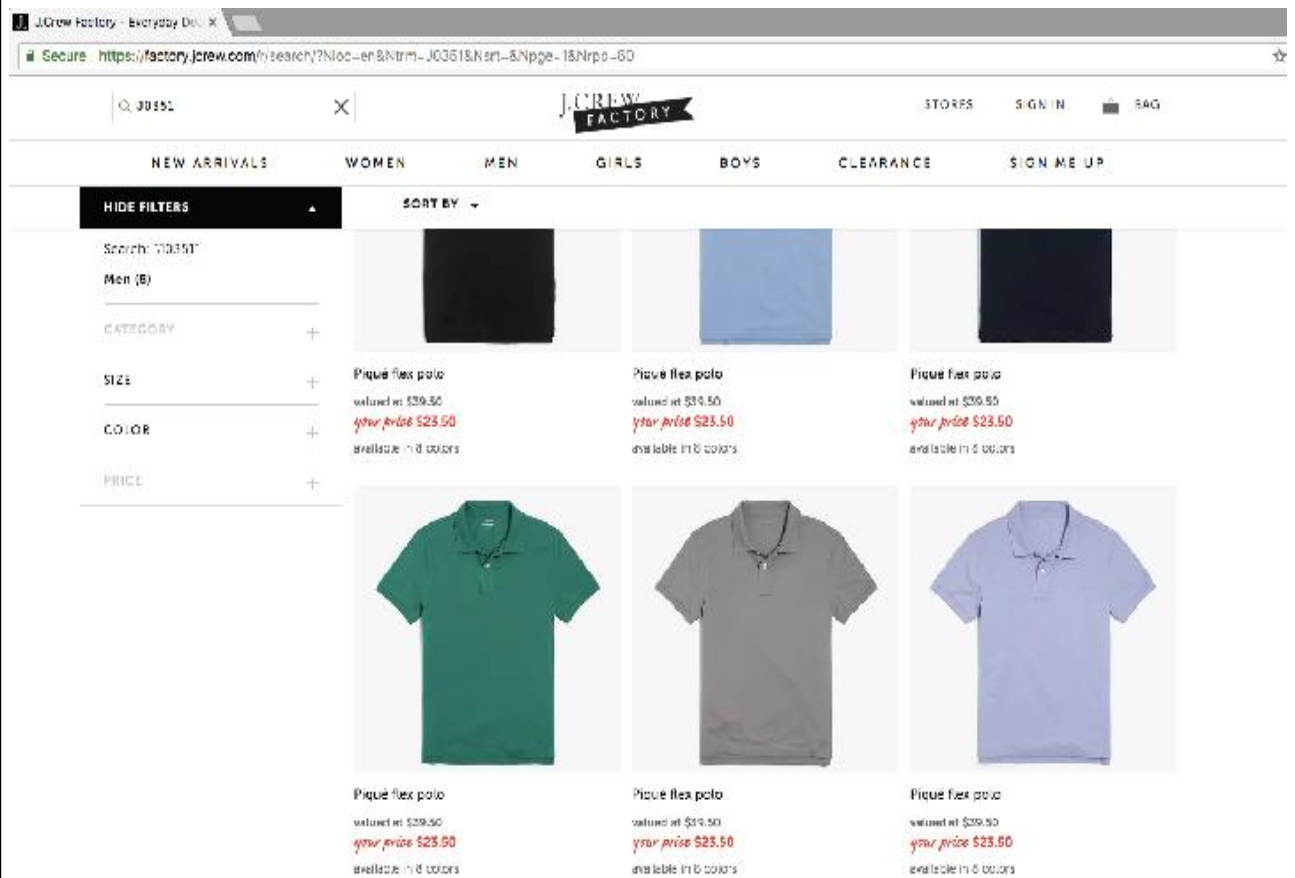


**Figure 4: Women's Striped Boatneck Tie-front Sweater on April 29, 2018**



**Figure 5: Women's Drapey Pull-on Pant on May 9, 2018**



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

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

26. 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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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, 2016<sup>3</sup>**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
Women's Plaid Ruffle Shirt Regular / Item f7852	74.5	37

<sup>3</sup> 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 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 1, 2016**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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, 2016<sup>4</sup>**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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

<sup>4</sup> 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.

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
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, 2016<sup>5</sup>**

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

<sup>5</sup> 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.

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 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 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 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
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**December 14, 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 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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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
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**December 26, 2016<sup>6</sup>**

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 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

<sup>6</sup> Sales on December 25, 2016 are not listed.

1	Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
	Women's Schoolboy Blazer Regular / item 92480	158	79
2	Women's Classic Tote Bag / item f6133	98	58
3	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
4	Men's Driggs Jean in medium wash / item c9885	69.5	32.5
5	Men's 11" broken in Rivington Short / item 79622	42.5	21
6	Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

**December 29, 2016**

8	Product	"Valued At" Price	"Your" Price
9	Floral lace shirt / F7404	69.5	34.99
10	Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
11	Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
	Women's Schoolboy Blazer Regular / item 92480	158	79
12	Women's Classic Tote Bag / item f6133	98	58.5
13	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
14	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
15	Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

**December 30, 2016**

18	Product	"Valued At" Price	"Your" Price
19	Floral lace shirt / F7404	69.5	34.99
20	Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	85	51
21	Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
	Women's Schoolboy Blazer Regular / item 92480	158	79
22	Women's Classic Tote Bag / item f6133	98	58.5
23	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
24	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
25	Men's Sutton Broken-in Chino / item 38648	59.5	29.50 - 35.50

**December 31, 2016**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 2, 2017**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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

1	Men's Driggs Jean in medium wash / item c9885	69.5	34.5
2	Men's 11" broken in Rivington Short / item 79622	42.5	25.5
3	Men's Sutton Broken-in Chino / item 38648	59.5	34.5

**January 6, 2017**

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

**January 7, 2017**

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

**January 8, 2017**

22	Product	"Valued At" Price	"Your" Price
23	Floral lace shirt / F7404	69.5	34.99
24	Women's Patriotic Wash Skinny Jean w/ 26" inseam / item e7293	79.5	49.5
25	Women's Wool Sidewalk Skirt / item 95435	69.5	34.99
26	Women's Schoolboy Blazer Regular / item 92480	158	89.5
27	Women's Classic Tote Bag / item f6133	98	49
28	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

**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	79.5	44.99

f4557		
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

1	Women's Classic Tote Bag / item f6133	98	58.5
2	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
3	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
4	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 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 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



1	Women's Classic Tote Bag / item f6133	98	58.5
2	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	34.99 - 44.99
3	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
4	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 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 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

1	Women's Classic Tote Bag / item f6133	98	58.5
2	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
3	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
4	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 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 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

1	Women's Classic Tote Bag / item f6133	98	58.5
2	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
3	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
4	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 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 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

1	Women's Classic Tote Bag / item f6133	98	58.5
2	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
3	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	24.5
4	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 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 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

1	Women's Classic Tote Bag / item f6133	98	49.99
2	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
3	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
4	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 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 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 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 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



1	Women's Schoolboy Blazer Regular / item 92480	158	99
2	Women's Classic Tote Bag / item f6133	98	69.99
3	Men's Plaid Rugged Elbow-patch Shirt (Regular) / item f4557	79.5	44.99
4	Men's Washed Pique Polo Shirt (Regular) / item 53240	36.5	21.5
5	Men's Driggs Jean in medium wash / item c9885	69.5	48.5
6	Men's 11" broken in Rivington Short / item 79622	42.5	29.5
7	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, 2017<sup>7</sup>**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 12, 2017**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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

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

**February 13, 2017**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 15, 2017**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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

27. 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.

28. 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.

29. 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 Drapey 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

**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 Drapey 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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 Drapey 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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 1, 2018**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 2, 2018**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 Drapey 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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 Drapey 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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 Drapey 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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 Drapey 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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 7, 2018**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 11, 2018**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 14, 2018**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 15, 2018**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 16, 2018**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 17, 2018**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 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	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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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 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	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**

<b>Product</b>	<b>"Valued At" Price</b>	<b>"Your" Price</b>
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



**June 7, 2018**

<b>Product</b>	<b>“Valued At” Price</b>	<b>“Your” Price</b>
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

30. 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 a false and deceptive pricing scheme to this day.

**D. Plaintiff and Class Members Were Deceived and Harmed**

31. During the statute of limitations period, Plaintiff 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 was getting a discount on these products based on the purported sales.

32. For example, on or about November 24, 2017, Plaintiff 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 spent in total \$70.65, and she spent between \$40-\$50 on the jeans. Plaintiff noticed that the jeans and other products were advertised as being on sale from higher, “valued at” prices. Plaintiff observed the “valued at” prices, and believed that the prices were higher, former prices at which the products were sold. Accordingly, Plaintiff believed she was getting a considerable discount, based on

1 the advertised higher prices. Based on the purported discounts, Plaintiff decided to  
2 purchase the jeans, and other products, from Defendants.

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

7 34. As with Plaintiff, consumers were likely to be deceived by Defendants'  
8 misrepresentations that the merchandise was on sale when it was not. Consumers  
9 would not have purchased the products, or they would have paid substantially less  
10 for the products, had the misrepresentations not been made. In reality, Defendants  
11 never intended, nor did they ever actually sell, any of their merchandise at the  
12 advertised former price.

13 35. Plaintiff and Class members did not know, and have no reason to know,  
14 of these unlawful and deceptive sales practices. In contrast, Defendants know, knew  
15 or should have known that Plaintiff and other Class members did and would rely on  
16 the advertised deceptive sales.

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

21 37. As a result of this misleading business practice, and the harm caused to  
22 Plaintiff and other consumers, Defendants should be enjoined from deceptively  
23 advertising false perpetual sales. Furthermore, Defendants should be required to  
24 pay for all damages caused to misled consumers, including Plaintiff.

25 38. Despite being misled by Defendants, Plaintiff would purchase clothing  
26 and merchandise from Defendants in the future if the prices of Defendants'  
27 merchandise were advertised fairly and accurately and Plaintiff could be certain that  
28 any advertised higher former prices are genuine prices and that any advertised sales

are *bona fide* sales. Absent an injunction, Plaintiff and Class members run the risk of future harm. Specifically, Plaintiff and Class members can no longer rely on Defendants' sale-related advertising in the future. Further, Plaintiff and Class members also run the risk of purchasing purportedly on-sale products from Defendants in the future, reasonably but mistakenly believing that Defendants halted their deceptive pricing practices.

## V. CLASS ACTION ALLEGATIONS

39. Plaintiff brings this action pursuant to Rule 23 of the Federal Rules of Civil Procedure, individually and on behalf of all members of the following Nationwide Class, California Subclass, and California Consumer Subclass (collectively, the "Classes"):

### Nationwide Class

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

### California Subclass

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

### California Consumer Subclass

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

40. Plaintiff is a member of all the Classes.

41. Excluded from the Classes are the following individuals and/or entities: Defendants and their parents, subsidiaries, affiliates, officers and directors, current or former employees, and any entity in which Defendants have a controlling

1 interest; all individuals who make a timely election to be excluded from this  
2 proceeding using the correct protocol for opting out, and; all judges assigned to hear  
3 any aspect of this litigation, as well as their immediate family members.

4 42. Plaintiff reserves the right to name additional Class representatives and  
5 modify or amend the definitions of the proposed Classes and/or add subclasses  
6 before the Court determines whether certification is appropriate.

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

12 44. There are questions of law and fact common to the Classes that will  
13 drive the resolution of this action. These questions include, but are not limited to,  
14 the following:

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

- h. Whether Plaintiff and the Class are entitled to damages and/or restitution, and in what amount;
- i. Whether Defendants are likely to continue using false, misleading or unlawful sales such that an injunction is necessary; and
- j. Whether Plaintiff and the Classes are entitled to an award of reasonable attorneys' fees, pre-judgment interest, and costs of suit.

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

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

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

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

49. The representative Plaintiff's claims are typical of those of the Classes, as all members of the Classes are similarly affected by Defendants' uniform unlawful conduct as alleged herein.





1           57. Further, Cal Civ. Code § 1770(a)(5) prohibits “[r]epresenting that goods  
2 or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or  
3 quantities which they do not have . . . .” By offering false and perpetual sales and price  
4 discounts, Defendants have misrepresented and continue to misrepresent that their  
5 clothing and merchandise have characteristics (that they are offered at a bargain price)  
6 which they do not have. Therefore, Defendants have violated section 1770(a)(5) of the  
7 CLRA.

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

13           59. Under Cal. Civ. Code § 1780(a), Plaintiff and Class members seek  
14 injunctive and equitable relief for Defendants’ violations of the CLRA. Concurrent  
15 with the filing of this Complaint on June 11, 2018, Plaintiff sent a notice letter by  
16 certified mail to Defendants of her intent to pursue claims under the CLRA, and an  
17 opportunity to cure, consistent with California Civil Code § 1782. In accordance  
18 with California Civil Code § 1780(d), Plaintiff is filing a declaration of venue,  
19 attached hereto as Exhibit A.

20           60. Further, money damages are inadequate to remedy Plaintiff’s and Class  
21 members’ harm. Absent an injunction, Defendants may continue their deceptive  
22 and false pricing practices, leading to future harm for many consumers.

23           61. Plaintiff seeks injunctive relief only, pursuant to the CLRA. If  
24 Defendants fail to take corrective action within 30 days of receipt of the notice  
25 letter, Plaintiff intends to amend the Complaint to include a request for damages as  
26 permitted under Cal. Civ. Code § 1782(d).

**COUNT II**

**Violation of the California False Advertising Law**

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

62. Plaintiff incorporates herein by specific reference, as though fully set forth, the allegations in paragraphs 1 through 61.

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

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

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

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

1           66. Part and parcel with its advertised perpetual sales, Defendants advertise  
2 false, former price comparisons, which reflect the purported “valued at” price of the  
3 product immediately adjacent to the purported sale/discounted price of the product  
4 at the point of purchase. The original or former price of the product is false because  
5 the product never actually sold for that advertised price. The FAL specifically  
6 prohibits this type of false advertising. Cal. Bus. & Prof. Code § 17501 provides in  
7 relevant part:

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

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

17           68. Defendants’ false advertisements were calculated to induce Plaintiff  
18 and Class members to purchase clothing and merchandise they otherwise would not  
19 have and/or to spend more money than they otherwise would have spent, in order to  
20 increase Defendants’ profits.

21           69. Through their unfair acts and practices, Defendants have improperly  
22 obtained money from Plaintiff and the Classes. As such, Plaintiff requests that this  
23 Court cause Defendants to restore this money to Plaintiff and all Class members,  
24 and to enjoin Defendants from continuing to violate the FAL in the future. Money  
25 damages are inadequate to remedy Plaintiff’s and Class members’ harm. Absent an  
26 injunction, Defendants may continue their deceptive and false pricing practices,  
27 leading to future harm for many consumers.



1 getting a discount, when they are not. Consequently, the regular price of the  
2 merchandise is inflated, and the corresponding sale price is nothing more than a  
3 deceptive illusion of a discount. As a result, consumers, including Plaintiff, were  
4 likely to believe that they were receiving products at a substantially discounted  
5 price. This deception was likely to have induced reasonable consumers, including  
6 Plaintiff, to buy Defendants' clothing and merchandise, which they otherwise would  
7 not have purchased.

8 79. The gravity of the harm to Plaintiff and Class members resulting from  
9 these unfair acts and practices outweighs any conceivable reasons, justifications  
10 and/or motives of Defendants for engaging in such deceptive acts and practices. By  
11 committing the acts and practices alleged herein, Defendants have engaged in, and  
12 continue to engage in, unfair business practices under the UCL.

13 80. Under the UCL, a business act or practice is "fraudulent" if it actually  
14 deceives or is likely to deceive members of the consuming public.

15 81. Defendants' conduct here was and continues to be fraudulent because it  
16 has the effect of deceiving consumers into believing that they are getting a bargain,  
17 for the sole purpose to induce purchases, when no such bargain exists. Because  
18 Defendants misled Plaintiff and Class members, Defendants' conduct was  
19 "fraudulent" under the UCL.

20 82. As a result of Defendants' fraudulent business acts and practices,  
21 Defendants have and continue to fraudulently obtain money from Plaintiff and  
22 members of the Classes.

23 83. Plaintiff requests that this Court cause Defendants to restore this money  
24 to Plaintiff and the Class and to enjoin Defendants from continuing to violate the  
25 UCL as alleged herein. Money damages are inadequate to remedy Plaintiff's and  
26 Class members' harm. Absent an injunction, Defendants may continue their  
27 deceptive and false pricing practices, leading to future harm for many consumers.

28

1 84. Plaintiff also requests that the Court award reasonable attorneys' fees  
2 and costs pursuant to Fed. R. Civ. P. 23(h) and Cal. Code of Civ. Proc. § 1021.5.

3 **COUNT IV**

4 **Intentional Misrepresentation**

5 **(For the Classes Against All Defendants)**

6 85. Plaintiff incorporates herein by specific reference, as though fully set  
7 forth, the allegations in paragraphs 1 through 84.

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

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

17 88. At all relevant times when such misrepresentations were made,  
18 Defendants knew that the representations were false and misleading, or have acted  
19 recklessly in making the representations, without regard to the truth.

20 89. Plaintiff and members of the Classes have reasonably and justifiably  
21 relied on Defendants' intentional misrepresentations when purchasing the  
22 merchandise, and had the correct facts been known, would not have purchased the  
23 merchandise, or would not have purchased the merchandise at the prices at which  
24 they were offered, as the pricing scheme alleged herein has enabled Defendants to  
25 overcharge Plaintiff and other consumers for products while simultaneously  
26 deceiving them into believing they are getting a substantial discount.

27 90. Therefore, as a direct and proximate result of Defendants' intentional  
28 misrepresentations, Plaintiff and members of the Classes have suffered economic

1 losses and other general and specific damages, including but not limited to the  
2 amounts paid for Defendants' products, and any interest that would have accrued on  
3 those monies, all in an amount to be proven at trial.

4 91. Plaintiff also requests that the Court award reasonable attorneys' fees  
5 and costs pursuant to Fed. R. Civ. P. 23(h) and Cal. Code of Civ. Proc. § 1021.5.

6 **COUNT V**

7 **Negligent Misrepresentation**

8 **(For the Classes Against All Defendants)**

9 92. Plaintiff incorporates herein by specific reference, as though fully set  
10 forth, the allegations in paragraphs 1 through 91.

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

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

20 95. At all relevant times when such misrepresentations were made,  
21 Defendants knew that the representations were false and misleading, or have acted  
22 recklessly in making the representations, without regard to the truth. At minimum,  
23 Defendants acted negligently in failing to be aware that their perpetual sales and  
24 false, former price comparisons were false and deceptive. Because these sales  
25 occurred every day, Defendants had no reasonable grounds for believing that their  
26 misrepresentations were not false and misleading.

27 96. Plaintiff and members of the Classes have reasonably and justifiably  
28 relied on Defendants' negligent misrepresentations when purchasing the



1 merchandise, and had the correct facts been known, would not have purchased the  
2 merchandise or would not have purchased the merchandise at the prices at which  
3 they were offered.

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

9 98. Plaintiff also requests that the Court award reasonable attorneys' fees  
10 and costs pursuant to Fed. R. Civ. P. 23(h) and Cal. Code of Civ. Proc. § 1021.5.

#### 11 **COUNT VI**

#### 12 **Unjust Enrichment and Common Law Restitution**

#### 13 **(For the Classes Against All Defendants)**

14 99. Plaintiff incorporates herein by specific reference, as though fully set  
15 forth, the allegations in paragraphs 1 through 98.

16 100. As a result of Defendants' wrongful and deceptive conduct, Plaintiff  
17 and Class members have suffered a detriment while Defendants have received a  
18 benefit.

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

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

7           103. Thus, Defendants are in possession of funds that were wrongfully  
8 retained from Plaintiff and Class members that should be disgorged as illegally  
9 gotten gains.

10           104. Plaintiff also requests that the Court award reasonable attorneys' fees  
11 and costs pursuant to Fed. R. Civ. P. 23(h) and Cal. Code of Civ. Proc. § 1021.5.

12                           **PRAYER FOR RELIEF**

13           **WHEREFORE**, Plaintiff, individually and on behalf of the Classes,  
14 respectfully prays for following relief:

15           1.       Certification of this case as a class action on behalf of the Classes  
16 defined above, appointment of Plaintiff as class representative, and appointment of  
17 her counsel as Class counsel;

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

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

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

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

3           6.     An award to Plaintiff and her counsel of their reasonable expenses and  
4 attorneys' fees pursuant to Cal. Code of Civ. Proc. § 1021.5, Cal. Civ. Code §  
5 1780(e), Fed. R. Civ. P. 23(h), or any other applicable statute;

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

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

9                     **DEMAND FOR JURY TRIAL**

10          Plaintiff, on behalf of herself and the Classes, hereby demands a jury trial  
11 with respect to all issues triable of right by jury.

12  
13 DATED: June 11, 2018

FARUQI & FARUQI, LLP

14  
15 By: /s/ Benjamin Heikali  
16 Benjamin Heikali

17  
18 DATED: June 11, 2018

THE WAND LAW FIRM, P.C.

19  
20 By: /s/ Aubry Wand  
21 Aubry Wand

22 *Attorneys for Plaintiff and the Putative Class*  
23  
24  
25  
26  
27  
28

# **EXHIBIT A**

**DECLARATION OF CHRISTINA COFFEY**

I, Christina Coffey, hereby declare:

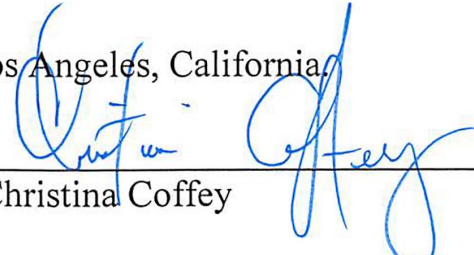
1. I am the Named Plaintiff in the above-entitled action. I am a competent adult over eighteen years of age and I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would testify competently thereto.

2. I am a citizen of the United States and California. I am a resident of the County of Los Angeles in the State of California.

3. The transaction that forms the basis of my claims asserted in this case – namely, my purchase of J. Crew Factory clothing – took place at J. Crew Factory retail outlet stores located in San Bernardino County and Riverside County.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on 6/8/18 at Los Angeles, California.

  
Christina Coffey