

**RECEIVED**

**Jul 31 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Jean H. Toal  
Acting Circuit Court Judge

Appellate Case No. 2024-001997  
Circuit Court Case No. 2022-CP-40-01265

Sarah J. Plant and Parker Plant, ..... Plaintiffs,

v.

Avon Products, Inc.; Amaco, LLC; American Art Clay Co. Inc.;  
The Bargain Barn, LLC; Beacon CMP Corporation; Belk, Inc.;  
Block Drug Company, Inc.; Brenntag North America, Inc.;  
Brenntag Specialties, LLC; Bristol-Myers Squibb Company;  
Chattem, Inc.; Colgate-Palmolive Company; Color Techniques,  
Inc.; Conopco, Inc.; Coty Inc.; Dana Classic Fragrances, Inc.;  
Dillard's, Inc.; Dollar General Corporation; Elizabeth Arden, Inc.;  
Estee Lauder Inc.; Estee Lauder International, Inc.; The Estee  
Lauder Companies Inc.; Hamrick's Incorporated; Highwater Clays,  
Inc.; Houbigant, Inc.; IMI Fabi (Diana) LLC; IMI Fabi (USA) Inc.;  
IMI Fabi, LLC; Ingles Markets, Incorporated; L'Oreal USA, Inc.;  
L'Oreal USA Products, Inc.; Lowcountry Grocers LLC; Martin  
Himmel Inc.; May Kay Inc.; Maybelline LLC; Noxell Corporation;  
Pfizer Inc.; R.T. Vanderbilt Holding Company, Inc.; Revlon  
Consumer Products Corporation; Revlon, Inc.; Rite Aid of South  
Carolina, Inc.; Southeastern Grocers, Inc.; Topco Associates, LLC;  
Vanderbilt Minerals, LLC; Variety Wholesalers, Inc.; Variety  
Wholesalers, Inc.; Vi-Jon, LLC; Walgreen Co.; Walmart, Inc.;  
Whittaker, Clark & Daniels, Inc.; Winn-Dixie Stores, Inc.; Yves  
Saint Laurent America, Inc. .... Defendants,

of which

IMI Fabi (Diana) LLC; IMI Fabi (USA) Inc.; and IMI Fabi, LLC  
are the ..... Appellants.

RECORD ON APPEAL  
(VOLUME VII)

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July 31, 2025

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Procter & Gamble  
 Attn: Duane Cephus  
 93 Beaver Court  
 Hunt Valley, MD 21030  
 Fax#(410)785-8677

24-May-2004

Dear Sir/Madam:

We certify that the following products will meet specifications on the attached data sheets.  
 Shipped on May 2004 against your Purchase Order No. 5600309120.

<u>Customer Code No.</u>	<u>Products No</u>	<u>Lot No.</u>	<u>Wt. Of Bags</u>	<u>No. Of Bags</u>
10200017	141	24R28	50#	672

Thank You for this opportunity to be of service.

Regards,  
 IMIFABI (DIANA)

*Michael Brown*  
 Michael Brown  
 Plant Manager

IMIFABI(DIANA) LLC - Rt #3 and Old Harrisville Road - Natural Bridge, NY - 13665  
 Phone: (001) 315-644-4443 -Fax: (001) 315-644-4512

NOXELL-CG-002189

8  
 SUTTON 8-18-2022 SK 10849



**CERTIFICATE OF ANALYSIS**

Customer Code #10200017

Customer S.A. #5600309120

Product: 141 Cosmetic Talc BC

Lot# 24R29 Code 600 042604

Manufactured: 26-Apr-2004

Expiration Date: 26-Apr-2009

**TEST PARAMETER**

**SPECIFICATIONS**

**TEST RESULTS**


Loss on Ignition (B25C)	Maximum 6.0%	1.11%
Water-Soluble Iron	No Blue Color	No Blue Color
Water-Soluble Substances	Maximum 0.1%	0.02%
Acid-Soluble Substances	Maximum 6.0%	0.96%
Arsenic	Maximum 3 PPM	Less Than 3 PPM
Lead	Maximum 20 PPM	Less Than 20 PPM
Dry Brightness	Minimum 90	92.3
Loose Bulk Density	14 To 18 PCF	15.5 PCF
Tapped Bulk Density	38 To 48 PCF	43.0 PCF
Through 325 Mesh	Minimum 99.8%	99.9%

Microbial Limits: Less than 100 Micro-Organisms per gram and the absence of gram negative bacteria. Meets Requirements

This product meets CTFA Requirements.

"IMIFABI certifies that this talc product does not contain detectable levels of asbestos or asbestos-type minerals using current X-Ray Diffraction methods."

"This product does not contain Bovine, Ovine and Caprine materials of any type."

  
Lou Ann Gregory  
Quality Control

  
Michael Brown  
Plant Manager

IMIFABI(DIANA) LLC - Rt #3 and Old Harrisville Road - Natural Bridge, NY - 13865  
Phone: (001) 315-644-4443 -Fax: (001) 315-644-4512



Procter & Gamble  
Attn: Duane Cephus  
93 Beaver Court  
Hunt Valley, MD 21030  
Fax#(410)785-8677

23-Apr-2004

Dear Sir/Madam:

We certify that the following products will meet specifications on the attached data sheets.  
Shipped on April 2004 against your Purchase Order No. 5600309120.

<u>Customer Code No.</u>	<u>Products No</u>	<u>Lot No.</u>	<u>Wt. Of Bags</u>	<u>No. Of Bags</u>
10200017	141	24Q32	50#	672

Thank You for this opportunity to be of service.

Regards,  
IMIFABI (DIANA)

*Michael Brown*  
Michael Brown  
Plant Manager

IMIFABI(DIANA) LLC – Rt #3 and Old Harrisville Road – Natural Bridge, NY – 13665  
Phone: (001) 315-644-4443 -Fax: (001) 315-644-4512



**CERTIFICATE OF ANALYSIS**

Customer Code #10200017

Customer S.A. #5600309120

Product: 141 Cosmetic Talc BC

Lot# 24Q32 Code 600 032904

Manufactured: 29-Mar-2004

Expiration Date: 29-Mar-2009

<u>TEST PARAMETER</u>	<u>SPECIFICATIONS</u>	<u>TEST RESULTS</u>
Loss on Ignition (825C)	Maximum 6.0%	1.46%
Water-Soluble Iron	No Blue Color	No Blue Color
Water-Soluble Substances	Maximum 0.1%	0.07%
Acid-Soluble Substances	Maximum 6.0%	1.04%
Arsenic	Maximum 3 PPM	Less Than 3 PPM
Lead	Maximum 20 PPM	Less Than 20 PPM
Dry Brightness	Minimum 90	92.4
Loose Bulk Density	14 To 18 PCF	14.8 PCF
Tapped Bulk Density	38 To 46 PCF	41.6 PCF
Through 325 Mesh	Minimum 99.8%	99.9%

Microbial Limits: Less than 100 Micro-Organisms per gram and the absence of gram negative bacteria. Meets Requirements

This product meets CTFA Requirements.

"IMIFABI certifies that this talc product does not contain detectable levels of asbestos or asbestos-type minerals using current X-Ray Diffraction methods."

"This product does not contain Bovine, Ovine and Caprine materials of any type."

  
Lou Ann Gregory  
Quality Control

  
Michael Brown  
Plant Manager

IMIFABI(QIANA) LLC - Rt #3 and Old Harrisville Road - Natural Bridge, NY - 13665  
Phone: (001) 315-644-4443 -Fax: (001) 315-644-4512



IMIFABI (DIANA) LLC  
PO Box 398  
Natural Bridge, NY 13865

Procter & Gamble  
Attn: Duane Cephus  
93 Beaver Court  
Hunt Valley, MD 21030  
Fax#(410)785-8677

5-Nov-2003

Dear Sir/Madam:

We certify that the following products will meet specifications on the attached data sheets.  
Shipped on November 2003 against your Purchase Order No. 5600309120.

<u>Customer Code No.</u>	<u>Products No</u>	<u>Lot No.</u>	<u>Wt. Of Bags</u>	<u>No. Of Bags</u>
10200017	141	23K22	50#	872

Thank You for this opportunity to be of service.

Regards,  
IMIFABI (DIANA)

*Michael Brown*  
Michael Brown  
Plant Manager



**CERTIFICATE OF ANALYSIS**

Customer Code # 10200017

Customer S.A. # 5600309120

Product: 141 Cosmetic Talc BC

Lot# 23K22 Code 600 102103

Manufactured: 21-Oct-2003

Expiration Date: 21-Oct-2008

**TEST PARAMETER**

**SPECIFICATIONS**

**TEST RESULTS**

Loss on Ignition (825C)	Maximum 6.0%	1.04%
Water-Soluble Iron	No Blue Color	No Blue Color
Water-Soluble Substances	Maximum 0.1%	0.05%
Acid-Soluble Substances	Maximum 6.0%	1.06%
Arsenic	Maximum 3 PPM	Less Than 3 PPM
Lead	Maximum 20 PPM	Less Than 20 PPM
Dry Brightness	Minimum 90	91.7
Loose Bulk Density	14 To 18 PCF	15.0 PCF
Tapped Bulk Density	38 To 46 PCF	43.0 PCF
Through 325 Mesh	Minimum 99.8%	99.9%

Microbial Limits: Less than 100 Micro-Organisms per gram and the absence of gram negative bacteria. Meets Requirements

This product meets CTFA Requirements.

"IMIFABI certifies that this talc product does not contain detectable levels of asbestos or asbestos-type minerals using current X-Ray Diffraction methods."

"This product does not contain Bovine, Ovine and Caprine materials of any type."

*Lou Ann Gregory*  
Lou Ann Gregory  
Quality Control

*Michael Brown*  
Michael Brown  
Plant Manager

IMIFABI(DIANA) LLC - Rt #3 and Old Harrisville Road - Natural Bridge, NY - 13665  
Phone: (001) 315-644-4443 -Fax: (001) 315-644-4512



IMIFABI (DIANA) LLC  
 PO Box 398  
 Natural Bridge, NY 13665

**CERTIFICATE OF ANALYSIS**

Customer SA#5600309120  
 Customer Code#10200017

Product: 141 Cosmetic Talc BC

Lot#22Z10 Code 600 120902

Manufactured: 9-Dec-2002

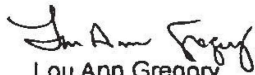
<u>TEST PARAMETER</u>	<u>SPECIFICATIONS</u>	<u>TEST RESULTS</u>
Loss on Ignition (825C)	Maximum 6.0%	2.84%
Water-Soluble Iron	No Blue Color	No Blue Color
Water-Soluble Substances	Maximum 0.1%	0.10%
Acid-Soluble Substances	Maximum 6.0%	1.06%
Arsenic	Maximum 3 PPM	Less Than 3 PPM
Lead	Maximum 10 PPM	Less Than 10 PPM
Through 325 Mesh	Minimum 99.9%	99.9%
Dry Brightness	Minimum 90	91.2
Loose Bulk Density	14 To 18 PCF	14.9 PCF
Tapped Bulk Density	38 To 46 PCF	44.6 PCF

Microbial Limits: Less than 100 Micro-Organisms per gram and the absence of gram negative bacteria. Meets Requirements

This product meets CTFA Requirements.

"IMIFABI certifies that this talc product does not contain detectable levels of asbestos or asbestos-type minerals using current X-Ray Diffraction methods."

"This product does not contain Bovine, Ovine and Caprine materials of any type."

  
 Lou Ann Gregory  
 Quality Control

  
 Michael Brown  
 Plant Manager

27 samples

IMIFABI (DIANA) LLC

TEL 315-644-4443

Fax 315-644-4512

9999-69-0274

9999-69-0064

Attn: *Jacqueline*

# MATERIAL SAFETY DATA SHEET

## TALC

EFFECTIVE DATE: April 1, 2001

PREVIOUS ISSUE: November 11, 2000

REGULATORY COMPLIANCE:

•British Legislation, CHIP

•Canadian WHMIS

•EC-directive 91/155/EC

•EC-directive 93/112/EC

•US OSHA Hazard Communication Standard CFR 1910.1200

### 1. IDENTIFICATION OF THE SUBSTANCE/PREP. AND THE COMPANY

PRODUCT NAME: TALC

MANUFACTURER'S NAME: IMIFABI (DIANA) LLC

ADDRESS: RT 3, Natural Bridge, NY, 13665 USA

TELEPHONE NO.: (315) 644-4443

### 2. COMPOSITION/INFORMATION ON INGREDIENTS

CHEMICAL NAME: Talc

SYNONYM: Soapstone

PRODUCTS NAMES:

#1 Lo Micron, 114 USP, 140 USP EP, 141, 618, 643, 1545 USP EP/JP, 1623, 1625, 1626, 1629, 1656 USP EP/JP, 2450, 3351 Dense, 3351 Lustre, 3355 USP EP, 4619, 5251, 4473, 5258 USP FCC.

CHEMICAL FAMILY: Magnesium Silicate

FORMULA: Mg<sub>3</sub> Si<sub>4</sub> O<sub>10</sub> (OH)<sub>2</sub>

CAS No.: 14807-96-6

WEIGHT: 97-100 %

Clark Talc is a naturally occurring mineral, which may contain varying amounts of the following minerals:

Chlorite: CAS # 1318-59-8 0-2 %

Calcite: CAS # 13397-26-7 0-2 %

### 3. HAZARDS IDENTIFICATION

COMMENTS:

- Talc is not listed as a carcinogen by OSHA, NTP or IARC, nor are there detectable levels of free silica and asbestiform fibers in talc
- IMIFABI does not consider talc a controlled substance according to Canada's WHMIS regulations.
- Brief or occasional exposure should not cause special concern any more than to any other relatively inert dust

### 4. FIRST AID MEASURES

No special procedures are required. Some eye, mucous membrane and skin sensitivity may occur with allergic individuals. First aid consists of washing away dust.

In case of discomfort by dust, move to a ventilated area and consult a physician.

Eyes: Wash eyes with large amount of water or saline solution. If irritation or redness develops, get medical attention.

Ingestion: Give large quantities of water to induce vomiting, keep head lower than hips to prevent aspiration. Get medical attention.

### 5. FIRE-FIGHTING MEASURES

Talc is not flammable.

### 6. ACCIDENTAL RELEASE MEASURES

Talc waste is not reactive, flammable or biodegradable. Use conventional means; e.g. sweeping, vacuum, etc. Use caution on wet floor, as it may be slippery.

### 7. HANDLING AND STORAGE

Avoid dust formation. Keep container tightly closed.

### 8. EXPOSURE CONTROL/PERSONAL PROTECTION

OSHA PEL

ACGIH TLV

Table Z-3

RESPIRABLE DUST (TWA-8 Hours Period)

20 mppcf (2 mg/cu. meter)

2 mg/cu. meter

The exposure limits of TALC are shown in Table Z-3-Mineral Dust, published by OSHA (29 CFR 1910.1000) USA.

**RESPIRATORY PROTECTION:** NIOSH approved dust respirator should be used when level exceeds TLV.  
**VENTILATION:** Normal air circulation, use adequate ventilation for low TLV  
**LOCAL EXHAUST:** Collect excessive dust at point of generation  
**PROTECTIVE GLOVES & EYE PROTECTION:** Eye protection advisable to prevent dust from getting in the eyes. Use impermeable gloves.

## 9. PHYSICAL AND CHEMICAL PROPERTIES

**DECOMPOSITION POINT:** -1000° C (1830° F)      **SPECIFIC GRAVITY(WATER=1):** 2.5-2.8  
**SOLUBILITY IN WATER:** Insoluble      **% VOLATILE BY VOL:** Non-Volatile  
**HARDNESS:** 1 MOHS      **APPEARANCE:** White to Off-white powder  
**ODOR:** Odorless      **EVAPORATION RATE (BUTYL ACET.=1):** N/A

## 10. STABILITY AND REACTIVITY

**CHEMICAL STABILITY:** Stable      **CONDITIONS TO AVOID:** None  
**MATERIALS TO AVOID:** Strong acids and alkalis  
**HAZARDOUS DECOMPOSITION PRODUCTS:** None

## 11. TOXICOLOGICAL INFORMATION

**POTENTIAL HEALTH EFFECTS (ACUTE & CHRONIC):** May cause eye and skin irritation. Ingestion may cause gastrointestinal irritation, nausea and diarrhea.  
 Long term exposure to high amount of talc without the approved dust mask may lead to chronic cough and dyspepsia.

## 12. ECOLOGICAL INFORMATION

**Ecotoxicity Effects:** No known effect on environment or expected under normal use.

## 13. DISPOSAL CONSIDERATIONS

**WASTE DISPOSAL METHOD:** Use normal solid waste, disposal methods to comply with Federal and local laws.

## 14. TRANSPORT INFORMATION

Not classified as dangerous material by DOT. No special precautions are required.

## 15. REGULATORY INFORMATION

**Canadian WHMIS:** Non-Hazardous product

**CANADIAN DOMESTIC SUBSTANCES LIST:** As a naturally occurring substance, talc is considered to be on the Canadian DSL.

**CERCLA:** 40 CFR Part 302, Table 302.4      Talc is not listed. Notification of the spill is not required.

**EPA-TCLP:** 40 CFR Part 261-24, appendix II- Table I, No noticeable amount of Toxic substances leaches out.

**RCRA:** Talc is not classified as a hazardous waste under Section 3001 of RCRA, and under regulation 40 CFR Part 261.4 (b)(7).

**SARA TITLE III:** This product is not subject to SARA Title III

**TSCA CHEMICAL SUBSTANCES INVENTORY:** Talc is listed, CAS # 14807-96-6

**Conformance of Talc to FDA regulations:** Please note that talc meets the FDA criteria covering the safe use of talc in articles intended for food contact use.

21 CFR 73.1559

Color Additive

21 CFR 175.300(b)(3)(xxvi) Resinous and Polymeric Coatings

21 CFR 182.70 &

21 CFR 182.90

Food Contact Surface Component

Talc meets Food Chemical Codex (FCC) specifications and can be used as a direct or indirect food additive.

**TYPICAL HEAVY METAL CONTENT:** Pb .0003 %, Cd <.0005%, As .0005 %, Ni <.002 %, Cr .008 %, Be .003 % Hg <.3 g/t

## 16. OTHER INFORMATION

**PREPARED BY:** MICHAEL BROWN

MIFABI (DIANA) LLC PO Box 398, Natural Bridge, NY 13665

**TELEPHONE NO.:** 315-644-4443

**DATE OF ISSUE:** 04/01/2001



**RAW MATERIAL SPECIFICATION INFORMATION**

<b><u>Revision #:</u></b>	3	<b><u>Date Effective:</u></b>	03/07/2008
<b><u>R&amp;D Trade Name:</u></b>	IMIFABI 643 B.C.	<b><u>Code #:</u></b>	9999-69-0064
<b><u>INCI Name:</u></b>	TALC		

**SPECIFICATION TESTS**

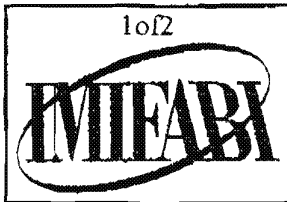
<b>Test Description</b>	<b>Range</b>	<b>Method/Remarks</b>
COLOR	TMS	M-00-001 / WHITE
ODOR	TMS	M-00-002
PHYSICAL FORM	TMS	M-00-003 / POWDER
INFRARED SPECTRUM	TMS	E-12-102
TOTAL AEROBIC PLATE COUNT	< 100 c.f.u./gram	ELMTM-001
NON-CONFORMING ORGANISMS	NONE RECOVERED	ELMTM-001
SHELF LIFE	60 MONTHS	M-00-004 / FROM DATE OF MANUFACTURE IN ORIGINAL UNOPENED CONTAINERS.
STORAGE CONDITIONS	(1) AMBIENT ROOM TEMPERATURE	M-00-005 / SEALED CONTAINERS
SHIPPING CONDITIONS	(1) AMBIENT TEMPERATURE	M-00-006 / SEALED CONTAINERS

**SPECIFICATION NOTES**

ADDITIONAL INFORMATION:

Bulk Density: 26 - 31 lbs/ cu. ft.

END OF RAW MATERIAL SPECIFICATION - TOTAL PAGES: 2



**CERTIFICATE OF ANALYSIS**

**IMI FABI LLC**  
**Benwood, West Virginia 26031**

Date: July 9, 2007

Quality Assurance Contact: Brian Lewis (304) 233-0050  
Sales Office: Benwood, West Virginia (304) 233-0050

Product: 643 Talc BC

Lot Number: L187H  
Date Manufactured: July 3, 2007      Expiration: July 3, 2012  
Manufacture location: Benwood, WV

TEST PROCEDURE	SPECIFICATION		TEST Results
	MIN	MAX	
Dry Brightness L Value (M.I. 93002)	94.0		95.5
% Free Moisture (M.I. 93005)		0.3	0.16
% Pass 200 Mesh (M.I. 93004)	98.0		99.9
Bulk Density (M.I.98028)	26	31	27.0
Microbial counts / g (USP)		100	Pass
Microbial gram neg. (USP)	0	ND	Pass

Raw Material Identification Number: CNHC023160006

This product meets or exceeds current regulatory requirements established by: CTFA.  
This product does not contain detectable levels of asbestiform minerals as tested by X-ray diffraction methods.  
This product does not contain Bovine, Ovine, or Caprine materials of any type.

Quality Controller


We certify the above results to be correct based on testing performed in our laboratory.

*Rick*  
07/11/07

09:49 JUL-10-2007 J LESTICIAN WAREHOUSE P.02 260 695 0975

Confidential - Subject to Protective Order

Moore\_EL\_00000903

2of2 	<b>CERTIFICATE OF ANALYSIS</b>  IMI FABI LLC Benwood, West Virginia 26031
---	--

643 Talc BC, LOT# L187H

Raw Material Identification: CNHC023160006

CTFA METHODS, SPECIFICATIONS, ANALYTICAL RESULTS

ANALYTE	SPECIFICATION	RESULT	INTERPRETATION
Identification	To pass test	Passes test	Meets CTFA
Loss on Ignition (825°C)	< 6.0%	5.31%	Meets CTFA
Water Soluble Iron	No blue color	Passes test	Meets CTFA
Acid Soluble Substances	< 6.0%	1.44%	Meets CTFA
Water Soluble Substances	< 0.1%	0.03%	Meets CTFA
Arsenic	< 3 ppm	0.28 ppm	Meets CTFA
Lead	< 10 ppm	1.15 ppm	Meets CTFA

\*Analysis by independent certified laboratory

  
Controlled By

Results Verified

  
Quality Controller



IMIFABI (DIANA) LLC  
PO Box 388  
Natural Bridge, NY 13865

CERTIFICATE OF ANALYSIS

Product: 3355 Talc USP BC

Lot#21L23

Code 300 111901

Manufactured:

19-Nov-01

Description  
Identification

Meets Requirements  
Meets Requirements

Meets Requirements  
Meets Requirements

TEST PARAMETER

SPECIFICATIONS

TEST RESULTS

Loss on Ignition (1,000C)	Maximum 6.5%	4.99%
Acid-Soluble Substances	Maximum 2.0%	1.14%
Reaction & Soluble Substances	Maximum 0.1%	0.09%
Water-Soluble Iron	No Blue Color	No Blue Color
Arsenic	Maximum 3 PPM	Less Than 3 PPM
Lead	Maximum 10 PPM	Less Than 10 PPM
Heavy Metals	Maximum 40 PPM	Less Than 40 PPM
Dry Brightness	Minimum 90	91.4
Loose Bulk Density	25 To 30 PCF	25.3 PCF
Tapped Bulk Density	63 To 70 PCF	65.7 PCF
pH	9.0 (+/-0.5)	9.41
Thru 325 Mesh	Minimum 97.0%	98.8%
Thru 200 Mesh	Minimum 99.0%	99.7%
Sulfur	Negative	Negative

Microbial Limits: Less than 100 Micro-Organisms per gram and the absence of gram negative bacteria. Meets Requirements

This product meets CTFA, and USP24 requirements.

"IMIFABI certifies that this talc product does not contain detectable levels of asbestos or asbestos-type minerals using current X-Ray Diffraction methods."

"This product does not contain Bovine, Ovine or Caprine materials of any type"

*Michael Brown*  
Michael Brown  
Plant Manager

IMIFABI (DIANA) LLC

TEL 315-644-6443

Fax 315-644-4512



# CERTIFICATE OF ANALYSIS

**IMI FABI LLC**

**209 Marshall Street, Benwood, West Virginia 26031**

Quality Assurance Contact: Erin Moore: (304) 233-0050  
Sales Office: Benwood, West Virginia (304) 233-0050

Date: **5/31/2017**

Talc: **141 Talc BC**

Customer: **Cosmetic Specialties c/o J. Lestician Warehouse**

Lot Nr. **BFB1143R**

Date Manufactured: **5/23/2017**

Expiration Date: **5/23/2022**

Manufacture location: Benwood, WV

Specifications				
Description	Method	Min	Max	Result
Brightness L*	M.I. 93002	94.5		<b>97.25</b>
Moisture %	M.I. 93005		0.3	<b>0.06</b>
Bulk Density #/cu.ft.	M.I. 98028	14	18	<b>17.07</b>
-325 mesh screen %	M.I. 93004	99.9		<b>99.90</b>
Microbial counts / g	USP		100	<b>PASS</b>
Microbial gram neg.	USP		0	<b>PASS</b>
Mold/Yeast	USP		50	<b>PASS</b>
Staph Aureus	USP		0	<b>PASS</b>

Raw Material Identification Number: **ILOTFFNCNOLGM16**

This product meets or exceeds current regulatory requirements established by: CTFA  
This product does not contain detectable levels of asbestiform minerals as tested by X-ray diffraction methods.  
This product does not contain Bovine, Ovine or Caprine materials of any type.

*RA* 5/31/17

Quality controller

*RW*  
06/02/17

Revlon - Moore - 000042



# CERTIFICATE OF ANALYSIS

IMI FABI LLC

209 Marshall Street, Benwood, West Virginia 26031

Talc: **141 Talc BC**

Lot Nr. **BFB1143R**

Raw Material Identification Number: **ILOTFFNCNOLGM16**

## CTFA Methods, Specifications, Analytical results

Analyte	Specification	Result	Interpretation
Identification	To pass test	Passes Test	Meets CTFA 16
Loss on Ignition (825°C)	≤ 6.0%	1.1	Meets CTFA 16
Water-Soluble Iron	No blue color	Passes Test	Meets CTFA 16
Acid Soluble Substances	≤ 6.0%	0.61%	Meets CTFA 16
Water Soluble Substances	≤ 0.1%	0.07%	Meets CTFA 16
Arsenic	≤ 3 ppm	<0.1 ppm	Meets CTFA 16
Lead	≤ 5 ppm	< 2 ppm	Meets CTFA 16

Analysis by independent certified laboratory. Analysis performed on incoming raw material and not on a representative sample from this lot.

  
5-31-17  
Controlled by

  
5/31/17  
Quality controller



# CERTIFICATE OF ANALYSIS

**IMI FABI LLC**

**209 Marshall Street, Benwood, West Virginia 26031**

Quality Assurance Contact: Brian Cline: (304) 233-0050  
Sales Office: Benwood, West Virginia (304) 233-0050

Date: **4/14/2015**

Talc: **3351 Lustre**

Customer: **Cosmetic Specialties c/o J. Lestician Warehouse**

Lot Nr: **BFI1090P**

Date Manufactured: **3/31/2015**

Expiration Date: **3/31/2020**

Manufacture location: Benwood, WV

### Specifications

Description	Method	Min	Max	Result
Brightness L*	M.I. 93002	94		<b>96.06</b>
Moisture %	M.I. 93005		0.3	<b>0.12</b>
Bulk Density #/cu.ft.	M.I. 98028	32	37	<b>33.94</b>
Tap Bulk Density #/cu.ft.	M.I. 93003	70	80	<b>0.00</b>
-200 mesh screen %	M.I. 93004	90		<b>99.00</b>
Microbial counts / g	USP		100	<b>PASS</b>
Microbial gram neg.	USP		0	<b>PASS</b>
Mold/Yeast	USP		50	<b>PASS</b>
Staph Aureus	USP		0	<b>PASS</b>

Raw Material Identification Number: **CCBCCNFCG131200**

This product meets or exceeds current regulatory requirements established by: CTFA  
This product does not contain detectable levels of asbestiform minerals as tested by X-ray diffraction methods.  
This product does not contain Bovine, Ovine or Caprine materials of any type.

  
Quality controller

Revlon - Moore - 000044



# CERTIFICATE OF ANALYSIS

IMI FABI LLC

209 Marshall Street, Benwood, West Virginia 26031

Talc: **3351 Lustre**

Lot Nr. **BFI1090P**

Raw Material Identification Number: **CCBCCNFCG131200**

## CTFA Methods, Specifications, Analytical results

Analyte	Specification	Result	Interpretation
Identification	To pass test	Passes Test	Meets CTFA
Loss on Ignition (825°C)	≤ 6.0%	2.8%	Meets CTFA
Water-Soluble Iron	No blue color	Passes Test	Meets CTFA
Acid Soluble Substances	≤ 6.0%	0.9%	Meets CTFA
Water Soluble Substances	≤ 0.1%	0.08%	Meets CTFA
Arsenic	≤ 3 ppm	<0.1 ppm	Meets CTFA
Lead	≤ 10 ppm	<2 ppm	Meets CTFA

Analysis by independent certified laboratory. Analysis performed on incoming raw material and not on a representative sample from this lot.

  
Controlled by

  
Quality controller



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Quality controller

**RECEIVED**

**Jul 31 2025**

**SC Court of Appeals**

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PROOF OF SERVICE

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I, the undersigned of the law offices of Womble Bond Dickinson (US) LLP, attorneys for Appellants, do hereby certify that I have served all parties to this appeal with a copy of the pleading(s) specific below by emailing them at the addresses below:

Pleading(s): Record on Appeal (Volume VII)

Parties Served:

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*Counsel for Respondents*

By: /s/ M. Todd Carroll

July 31, 2025