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10 *Rob Bonta, Attorney General of California*

EXEMPT FROM FILING FEES
UNDER GOV. CODE § 6103

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF SAN FRANCISCO

14 THE PEOPLE OF THE STATE OF
CALIFORNIA,

15 Plaintiff,

16 vs.

17
18 REVOLUTION CONSUMER
19 SOLUTIONS (CA) LLC; METRO POLY
20 CORP.; PREZERO US PACKAGING LLC;
ADVANCE POLYBAG, INC.,

21 Defendants.
22
23
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Case No. _____

**STIPULATION FOR ENTRY OF FINAL
JUDGMENT ON CONSENT FOR
PERMANENT INJUNCTION AND CIVIL
PENALTIES; EXHIBIT A**

Action filed: October __, 2025

1 Plaintiff, the People of the State of California, acting by and through Attorney General Rob
2 Bonta, in his independent capacity (“Plaintiff” or “People”), and Defendants Revolution
3 Consumer Solutions (CA) LLC (“Revolution”); Metro Poly Corporation (“MetroPoly”); PreZero
4 US Packaging LLC (“Prezero”); and Advance Polybag, Inc. (“API”) (collectively, “Defenfans”) (together with the People, the “Parties,” or each individually, “Party”), hereby stipulate as
5 follows:
6

7 **WHEREAS**, as set forth in the concurrently filed Complaint in the above-captioned matter,
8 the People allege that, by selling and/or distributing to stores in California that are subject to
9 Senate Bill (“SB”) 270 (Pub. Resources Code, § 42280 et seq.), as defined at Public Resources
10 Code section 42280, subdivision (g) (“covered stores”), reusable grocery bags as defined at
11 Public Resources Code section 42280, subdivision (d) made from plastic film (“plastic carryout
12 bags”) that are not “recyclable in this state,” as required by Public Resources Code section 42281,
13 subdivision (b)(1)(C); by representing to customers, consumers, and in submissions under penalty
14 of perjury to CalRecycle that the plastic carryout bags that each Defendant has sold and/or
15 distributed to covered stores are “recyclable,” each Defendant has violated SB 270, the
16 Environmental Marketing Claims Act (Bus. & Prof. Code, § 17580 et seq.) (“EMCA”), the False
17 Advertising Law (*id.*, § 17500 et seq.) (“FAL”), and the Unfair Competition Law (*id.*, § 17200 et
18 seq.) (“UCL”). The People further allege that each Defendant is liable for permanent injunction
19 and civil penalties pursuant to Public Resources Code section 42285; Business and Professions
20 Code sections 17203, 17535, 17536; and Government Code section 12527.6.

21 **WHEREAS**, to avoid continued and protracted litigation regarding the lawfulness of the
22 conduct described above, the Parties engaged in settlement negotiations prior to the filing of the
23 Complaint in this action. In these negotiations, the People were represented by the
24 Attorney General of the State of California. Revolution, Metro Poly, and PreZero were
25 represented by Richard W. Smith of the law firm Sidely Austin LLP. API was represented by
26 Samuel A. Butler and Lauren A. Haas of the law firm Keller and Heckman.
27
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1 **WHEREAS**, the Parties have reached an agreement to resolve this matter in accordance
2 with the terms set forth in the [Proposed] Final Judgment on Consent for Permanent Injunction
3 and Civil Penalties (“Final Judgment”), attached hereto and incorporated herein as Exhibit A.

4 **WHEREAS**, The People believe that: (i) the resolution embodied in this Final Judgment is
5 fair and reasonable and fulfills the People’s enforcement objectives; (ii) no further action is
6 warranted concerning the allegations against each Defendant as contained in the Action, except as
7 provided in this Final Judgment; and (iii) entry of this Final Judgment is in the best interest of the
8 public.

9 **WHEREAS**, each Defendant does not admit any issue of fact or law alleged in the
10 Complaint or otherwise in the above-captioned matter, or any violation of law. Neither the
11 Parties’ agreement to the terms set forth in the Final Judgment nor the Parties’ execution of this
12 Stipulation constitutes an admission of wrongdoing or liability by any Defendant.

13 **NOW, THEREFORE**, before the taking of any testimony, and without the adjudication of
14 any issue of fact or law, **THE PARTIES HEREBY STIPULATE AND AGREE AS**
15 **FOLLOWS:**

16 1. The San Francisco County Superior Court (“Court”) has jurisdiction over the subject
17 matter of this action and personal jurisdiction over the Parties, and venue is proper in this Court.

18 2. The Final Judgment that is attached hereto as Exhibit A may be entered in this matter,
19 by any judge of this Court.

20 3. The Parties waive their right to move to set aside the Final Judgment through any
21 collateral attack, and further waive their right to appeal from the Final Judgment. Nothing herein
22 shall waive any right to appeal from any decision in connection with a future effort to enforce the
23 Final Judgment.

24 4. Each Defendant will accept service of any Notice of Entry of Judgment entered in this
25 action by delivery of such notice via email to its counsel of record and agrees that service of the
26 Notice of Entry of Judgment will be deemed personal service upon each Defendant for all
27 purposes.
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1 5. This Stipulation may be executed in counterparts, and a scanned or electronic
2 signature shall have the same force and effect as an original signature.

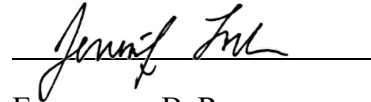
3 **SO STIPULATED.**

4 EXHIBIT A APPROVED AS TO FORM AND SUBMITTED FOR ENTRY OF JUDGMENT
5 BY:

6 **COUNSEL FOR PLAINTIFF, THE PEOPLE
7 OF THE STATE OF CALIFORNIA**

8 Dated: October 16, 2025

Rob Bonta
Attorney General of California
VANESSA C. MORRISON
Supervising Deputy Attorney General

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11 ELIZABETH B. RUMSEY
12 RAISSA S. LERNER
13 BRIAN CALAVAN
14 JENNIFER LODA
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*Attorneys for Plaintiff, the People of the State of
California*

15 **COUNSEL FOR DEFENDANT, REVOLUTION
16 CONSUMER SOLUTIONS (CA) LLC**

17 Dated: October 16, 2025

SIDLEY AUSTIN LLP

18 

19 RICHARD W. SMITH
20 *Attorneys for Defendant, Revolution Consumer
Solutions (CA) LLC*

21 **COUNSEL FOR DEFENDANT, METRO POLY
22 CORPORATION**

23 Dated: October 16, 2025

SIDLEY AUSTIN LLP

24 

25 RICHARD W. SMITH
26 *Attorneys for Defendant, Metro Poly Corporation*

27 ///

28 ///

1 **COUNSEL FOR DEFENDANT, PREZERO US**
2 **PACKAGING LLC**

3 Dated: October 16, 2025

SIDLEY AUSTIN LLP

4 *Richard W. Smith*

RICHARD W. SMITH

5 *Attorneys for Defendant, PreZero US Packaging*
6 *LLC*

7 **COUNSEL FOR DEFENDANT, ADVANCE**
8 **POLYBAG, INC.**

9 Dated:

KELLER AND HECKMAN LLP

10 *Lauren A. Haas*

11 *Attorneys for Defendant, Advance Polybag, Inc.*

1 **COUNSEL FOR DEFENDANT, PREZERO US**
2 **PACKAGING LLC**

3 Dated:

SIDLEY AUSTIN LLP

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5 RICHARD W. SMITH
6 *Attorneys for Defendant, PreZero US Packaging*
7 *LLC*

8 **COUNSEL FOR DEFENDANT, ADVANCE**
9 **POLYBAG, INC.**

10 Dated: October 15, 2025

KELLER AND HECKMAN LLP

11 
12 LAUREN A. HAAS
13 *Attorneys for Defendant, Advance Polybag, Inc.*