

1 LEXINGTON LAW GROUP  
Mark N. Todzo, State Bar No. 168389  
2 Abigail Blodgett, State Bar No. 278813  
503 Divisadero Street  
3 San Francisco, CA 94117  
Telephone: (415) 913-7800  
4 Facsimile: (415) 759-4112  
mtodzo@lexlawgroup.com  
5 ablodgett@lexlawgroup.com

6 Attorneys for Plaintiff  
CENTER FOR ENVIRONMENTAL HEALTH  
7

ENDORSED  
FILED  
ALAMEDA COUNTY

JUL 07 2015

CLERK OF THE SUPERIOR COURT  
By Quon Bui Deputy

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF ALAMEDA  
11

12 Coordination Proceeding Special Title: )  
13 PROPOSITION 65 COCAMIDE DEA CASES )  
14 )  
15 )  
16 This Document Relates To: )  
17 IN THE SUPERIOR COURT FOR THE )  
18 COUNTY OF ALAMEDA *Center for* )  
*Environmental Health v. Biopelle, Inc., et al.,* )  
Case No. RG 14-726964 )  
19 )

) Judicial Council Coordination Proceeding  
No. 4765  
**C.C.P. § 474 AMENDMENT TO  
COMPLAINT**  
Dept.: Dept. 17  
Judge: Hon. George C. Hernandez, Jr.  
Complaint Filed: May 28, 2014  
Trial Date: None set

1                    On May 28, 2014, Plaintiff Center for Environmental Health (“CEH”) filed its  
2 original Complaint in *Center for Environmental Health v. Biopelle, Inc., et al.*, Alameda County  
3 Superior Court Case No. RG 14-726964.

4                    Pursuant to California Code of Civil Procedure § 474, CEH hereby amends the  
5 Complaint as follows:

6                    1.        By inserting the name CBI LABORATORIES, INC. in place of the  
7 reference to DOE 11 in each place that it appears in the Complaint.

8  
9  
10 Dated: July 7, 2015

Respectfully submitted,

11 LEXINGTON LAW GROUP

12  
13 

14 

---

Abigail Blodgett  
15 Attorneys for Plaintiff  
16 CENTER FOR ENVIRONMENTAL HEALTH  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **PROOF OF SERVICE**

2 I declare that:

3 I am employed in San Francisco County, California. I am over the age of 18 years and  
4 not a party to the within cause; my business address is 503 Divisadero Street, San Francisco, CA  
94117. My electronic notification address is cfisher@lexlawgroup.com.

5 On July 7, 2015, I served true copies of the following document:

6 **C.C.P. § 474 AMENDMENT TO COMPLAINT**

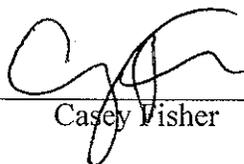
7 I transmitted via electronic mail the document listed above to the electronic mail  
8 addresses set forth below at 9:52 A.m. on July 7, 2015:

9 *Please see attached service list.*

10 The transmission was reported as complete and without error.

11 I declare under penalty of perjury that the foregoing is true and correct, and that this  
12 declaration was executed on July 7, 2015, at San Francisco, California.

13 Signed: \_\_\_\_\_



14 Casey Fisher

**SERVICE LIST**  
**JCCP 4765**

ADDRESS	PARTY
<p>Jeffrey Margulies William L. Troutman Julie Glazer Fulbright &amp; Jaworksi LLP 555 South Flower Street, 41<sup>st</sup> Floor Los Angeles, CA 90071 jeff.margulies@nortonrosefulbright.com william.troutman@nortonrosefulbright.com julie.glazer@nortonrosefulbright.com Lauren.shoor@nortonrosefulbright.com matthew.gurvitz@nortonrosefulbright.com</p>	<p>Bloomingdale's, Inc.; Burlington Coat Factory Warehouse Corporation; Dermstore LLC; Dolgen California, LLC; Dollar General Corporation; Marshalls of MA, Inc.; Marshalls of CA, LLC; Nordstrom, Inc.; Philip Scott, Inc.; Ross Stores, Inc.; Target Corporation; The TJX Companies, Inc.</p>
<p>Mark N. Todzo Howard Hirsch Lexington Law Group 503 Divisadero Street San Francisco, CA 94117 mtodzo@lexlawgroup.com hhirsch@lexlawgroup.com ablodgett@lexlawgroup.com cfisher@lexlawgroup.com</p>	<p>Center for Environmental Health</p>
<p>John E. Dittoe Reed Smith LLP 101 Second Street, Suite 1800 San Francisco, CA 94105 jdittoe@reedsmith.com</p>	<p>CVS Pharmacy, Inc.</p>
<p>Wendy L. Feng Covington &amp; Burling LLP One Front Street, 35<sup>th</sup> Floor San Francisco, CA 94111 wfeng@cov.vom</p>	<p>MSD Consumer Care, Inc.</p>
<p>Margaret Carew Toledo Stacy E. Don Toledo Don LLP 3001 Douglas Blvd., Suite 340 Roseville, CA 95661 toledo@toledodon.com don@toledodon.com</p>	<p>Nutraceutical Corporation</p>
<p>Bruce Nye Barbara Adams Adams Nye Becht LLP 222 Kearny Street, Seventh Floor San Francisco, CA 94108 bnye@adamsnye.com badams@adamsnye.com</p>	<p>Raani Corporation</p>

Joseph M. Breall Breall & Breall, LLP 3625 California Street San Francisco, CA 94118 jmbreall@brealllaw.com	Rejuvi Laboratory, Inc.
Daniel N. Greenbaum 7120 Hayvenhurst Ave., Suite 320 Van Nuys, CA 91406 dgreenbaum@greenbaumlawfirm.com	Shefa LMV, LLC
Jane B. Kroesche Skadden, Arps, Slate, Meagher & Flom LLP 525 University Avenue, Suite 1400 Palo Alto, CA 94301 jane.kroesche@skadden.com	Signature Club A Ltd.
Jade F. Jurdi Barnes & Thornburg LLP 2029 Century Park East, Suite 3000 Los Angeles, CA 90067 jade.jurdi@btlaw.com Levi.heath@btlaw.com	United Pet Group, Inc.