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Attorneys for Plaintiff
CENTER FOR ENVIRONMENTAL HEALTH

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

CENTER FOR ENVIRONMENTAL
HEALTH, a non-profit corporation,

Plaintiff,

v.

TOTAL SWEETENERS, INC.; et al.,

Defendants.

FILED BY FAX

ALAMEDA COUNTY

February 22, 2019

CLERK OF
THE SUPERIOR COURT
By Shabra Iyamu, Deputy

CASE NUMBER:

RG19001951

Case No. RG 19-001951

ASSIGNED FOR ALL PURPOSES TO:
Judge Brad Seligman, Dept. 23

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

Complaint Filed: January 9, 2019
Trial date: None set

1 On January 9, 2019, Plaintiff Center for Environmental Health ("CEH") filed its
2 original Complaint in *CEH v. Total Sweeteners, Inc., et al.*, Alameda County Superior Court
3 Case No. RG 19-001951.

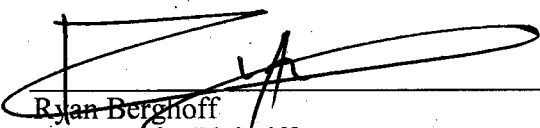
4 Pursuant to California Code of Civil Procedure § 474, CEH hereby amends the
5 Complaint as follows:

- 6 1. By inserting the name B&G FOODS NORTH AMERICA, INC. in place of the
7 reference to DOE 1 in each place that it appears in the Complaint;
- 8 2. By inserting the name HONEYTREE, INC. in place of the reference to DOE 2 in
9 each place that it appears in the Complaint;
- 10 3. By inserting the name TARGET CORPORATION in place of the reference to
11 DOE 3 in each place that it appears in the Complaint;
- 12 4. By inserting the name VITACOST.COM, INC. in place of the reference to DOE 4
13 in each place that it appears in the Complaint;
- 14 5. By inserting the name WAL-MART.COM USA, LLC in place of the reference to
15 DOE 5 in each place that it appears in the Complaint; and

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17
18 Dated: February 22, 2019

Respectfully submitted,

19 LEXINGTON LAW GROUP

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22 Ryan Berghoff
23 Attorney for Plaintiff
24 Center for Environmental Health
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1 **PROOF OF SERVICE**

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3 I, Nick Redfield, declare:

4 I am a citizen of the United States and employed in the County of San Francisco, State of
5 California. I am over the age of eighteen (18) years and not a party to this action. My business
6 address is 503 Divisadero Street, San Francisco, CA 94117 and my email address is
nredfield@lexlawgroup.com.

7 On February 22, 2019, I served the following document(s) on all interested parties in this
8 action by placing a true copy thereof in the manner and at the addresses indicated below:

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

9 ☒ **BY MAIL:** I am readily familiar with the firm's practice for collecting and processing mail
10 with the United States Postal Service ("USPS"). Under that practice, mail would be deposited
11 with USPS that same day with postage thereon fully prepaid at San Francisco, California in the
ordinary course of business. On this date, I placed sealed envelopes containing the above
mentioned documents for collection and mailing following my firm's ordinary business practices.

12 *Please see attached service list.*

13 ☐ **BY FACSIMILE:** I caused all pages of the document(s) listed above to be transmitted via
14 facsimile to the fax number(s) as indicated and said transmission was reported as complete and
without error.

15 ☐ **BY ELECTRONIC MAIL:** I transmitted a PDF version of the document(s) listed above via
16 email to the email address(es) indicated on the attached service list [or noted above] before 5 p.m.
on the date executed.

17 ☐ **BY PERSONAL DELIVERY:** I placed all pages of the document(s) listed above in a sealed
18 envelope addressed to the party(ies) listed above, and caused such envelope to be delivered by
hand to the addressee(s) as indicated.

19 ☐ **BY OVERNIGHT DELIVERY:** I deposited such document(s) in a box or other facility
20 regularly maintained by FedEx, or delivered such document(s) to a courier or driver authorized by
FedEx, with delivery fees paid or provided for, and addressed to the person(s) being served.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23 Executed on February 22, 2019 at San Francisco, California.

24 
25 Nick Redfield

SERVICE LIST
CEH v. Total Sweeteners, Inc., et al.
RG 19-001951

ADDRESS	DEFENDANT
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Kevin T. Haroff Marten Law 555 Montgomery Street, Suite 820 San Francisco, CA 94111	Barkman Honey, LLC