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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.

GT's LIVING FOODS, LLC, *et al.*,

Defendants.

FILED BY FAX

ALAMEDA COUNTY

October 28, 2020

CLERK OF
THE SUPERIOR COURT
By Shabra Iyamu, Deputy

CASE NUMBER:

RG19047748

Case No. RG 19-047748

ASSIGNED FOR ALL PURPOSES TO:
Judge Winifred Y. Smith, Dept. 21

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

Action Filed: December 20, 2019

Trial Date: None set

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On December 20, 2019, Plaintiff Center for Environmental Health (“CEH”) filed its Complaint in this action. Pursuant to California Code of Civil Procedure § 474, CEH hereby amends the Complaint as follows:

1. By inserting the name HEALTH-ADE, LLC in place of the reference to DOE 3 in each place that it appears in the Complaint.

2. By inserting the name SUJA LIFE, LLC in place of the reference to DOE 4 in each place that it appears in the Complaint.

Dated: October 28, 2020

Respectfully submitted,

LEXINGTON LAW GROUP



Meredyth Merrow
Attorney for Plaintiff
Center for Environmental Health

1 **PROOF OF SERVICE**

2
3 I, Owen Sutter, 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
osutter@lexlawgroup.com.

7 On October 28, 2020, 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 **BY FACSIMILE:** I caused all pages of the document(s) listed above to be transmitted via
13 facsimile to the fax number(s) as indicated and said transmission was reported as complete and
without error.

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

16 *Please see attached service list*

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
21 FedEx, with delivery fees paid or provided for, and addressed to the person(s) being served
below.

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

24 Executed on October 28, 2020 at San Francisco, California.

25 

26 _____
27 Owen Sutter
28

SERVICE LIST

**CEH v. GT's Living Foods, LLC, et al.
RG 19-047748**

ADDRESS	DEFENDANT
Mark Todzo Joseph Mann Meredyth Merrow 503 Divisadero Street San Francisco, CA 94117 mtodzo@lexlawgroup.com jmann@lexlawgroup.com mmerrow@lexlawgroup.com	<i>Plaintiff</i> Center for Environmental Health
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Scott M. Voelz Zach A. Tafoya O'Melveny & Myers 400 S. Hope Street, Floor 18 Los Angeles, CA 90071 svoelz@omm.com ztafoya@omm.com	<i>Defendants</i> GT'S Living Foods, LLC Millennium Products, Inc.
J. Noah Hagey Matthew Borden David Kwasniewski Braun Hagey & Borden 351 California St., 10 th Floor San Francisco, CA 94104 hagey@braunhagey.com borden@braunhagey.com kwasniewski@braunhagey.com rowe@braunhagey.com baker@braunhagey.com	<i>Defendant</i> Humm Kombucha, LLC