

1 Reuben Yeroushalmi (SBN 193981)

reuben@yeroshalmi.com

2 Alexandra Purcell (SBN 347862)

alexandra@yeroshalmi.com

3 **YEROUSHALMI & YEROUSHALMI***

9100 Wilshire Boulevard, Suite 240W

Beverly Hills, California 90212

5 Telephone: (310) 623-1926

6 Facsimile: (310) 623-1930

7 Attorneys for Plaintiff,

CONSUMER ADVOCACY GROUP, INC.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF ALAMEDA**

12 CONSUMER ADVOCACY GROUP, INC.,
13 in the public interest,

14 Plaintiff,

15 v.

16 BURLINGTON COAT FACTORY OF
17 TEXAS, INC., a Florida Corporation;
18 and DOES 1-30,

19 Defendants.

CASE NO. **23CV055337**

COMPLAINT FOR PENALTY AND
INJUNCTION

Violation of Proposition 65, the Safe
Drinking Water and Toxic Enforcement
Act of 1986 (*Health & Safety Code*, §
25249.5, *et seq.*)

ACTION IS AN UNLIMITED CIVIL
CASE (exceeds \$25,000)

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23 Plaintiff CONSUMER ADVOCACY GROUP, INC. alleges three causes of action
24 against defendants BURLINGTON COAT FACTORY OF TEXAS, INC., and DOES 1-30 as
25 follows:

26 **THE PARTIES**

- 1 1. Plaintiff CONSUMER ADVOCACY GROUP, INC. (“Plaintiff” or “CAG”) is an
2 organization qualified to do business in the State of California. CAG is a person within
3 the meaning of Health and Safety Code Section 25249.11, subdivision (a). CAG, acting
4 as a private attorney general, brings this action in the public interest as defined under
5 Health and Safety Code Section 25249.7, subdivision (d).
- 6 2.
- 7 3. Defendant BURLINGTON COAT FACTORY OF TEXAS, INC. (“BURLINGTON
8 TX”) is a Florida Corporation, qualified to do business in Florida, and doing business in
9 the State of California at all relevant times herein.
- 10 4. Plaintiff is presently unaware of the true names and capacities of defendants DOES 1-30,
11 and therefore sues these defendants by such fictitious names. Plaintiff will amend this
12 Complaint to allege their true names and capacities when ascertained. Plaintiff is
13 informed, believes, and thereon alleges that each fictitiously named defendant is
14 responsible in some manner for the occurrences herein alleged and the damages caused
15 thereby.
- 16 5. At all times mentioned herein, the term “Defendants” includes BURLINGTON TX, and
17 DOES 1-30.
- 18 6. Plaintiff is informed and believes, and thereon alleges that each of the Defendants at all
19 times mentioned herein have conducted business within the State of California.
- 20 7. Upon information and belief, at all times relevant to this action, each of the Defendants,
21 including DOES 1-30, was an agent, servant, or employee of each of the other
22 Defendants. In conducting the activities alleged in this Complaint, each of the
23 Defendants was acting within the course and scope of this agency, service, or
24 employment, and was acting with the consent, permission, and authorization of each of
25 the other Defendants. All actions of each of the Defendants alleged in this Complaint
26 were ratified and approved by every other Defendant or their officers or managing
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1 agents. Alternatively, each of the Defendants aided, conspired with and/or facilitated the
2 alleged wrongful conduct of each of the other Defendants.

- 3 8. Plaintiff is informed, believes, and thereon alleges that at all relevant times, each of the
4 Defendants was a person doing business within the meaning of Health and Safety Code
5 Section 25249.11, subdivision (b), and that each of the Defendants had ten (10) or more
6 employees at all relevant times.

7 **JURISDICTION**

- 8 9. The Court has jurisdiction over this lawsuit pursuant to California Constitution Article
9 VI, Section 10, which grants the Superior Court original jurisdiction in all causes except
10 those given by statute to other trial courts. This Court has jurisdiction over this action
11 pursuant to Health and Safety Code Section 25249.7, which allows enforcement of
12 violations of Proposition 65 in any Court of competent jurisdiction.

- 13 10. This Court has jurisdiction over Defendants named herein because Defendants either
14 reside or are located in this State or are foreign corporations authorized to do business in
15 California, are registered with the California Secretary of State, or who do sufficient
16 business in California, have sufficient minimum contacts with California, or otherwise
17 intentionally avail themselves of the markets within California through their
18 manufacture, distribution, promotion, marketing, or sale of their products within
19 California to render the exercise of jurisdiction by the California courts permissible
20 under traditional notions of fair play and substantial justice.

- 21 11. Venue is proper in the County of Alameda because one or more of the instances of
22 wrongful conduct occurred, and continues to occur, in the County of Alameda and/or
23 because Defendants conducted, and continue to conduct, business in the County of
24 Alameda with respect to the consumer product that is the subject of this action.

25 **BACKGROUND AND PRELIMINARY FACTS**

- 26 12. In 1986, California voters approved an initiative to address growing concerns about
27 exposure to toxic chemicals and declared their right “[t]o be informed about exposures to
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1 chemicals that cause cancer, birth defects, or other reproductive harm." Ballot Pamp.,
2 Proposed Law, Gen. Elec. (Nov. 4, 1986) at p. 3. The initiative, The Safe Drinking
3 Water and Toxic Enforcement Act of 1986, codified at Health and Safety Code Sections
4 25249.5, *et seq.* ("Proposition 65"), helps to protect California's drinking water sources
5 from contamination, to allow consumers to make informed choices about the products
6 they buy, and to enable persons to protect themselves from toxic chemicals as they see
7 fit.

8 13. Proposition 65 requires the Governor of California to publish a list of chemicals known
9 to the state to cause cancer, birth defects, or other reproductive harm. *Health & Safety*
10 *Code* § 25249.8. The list, which the Governor updates at least once a year, contains over
11 700 chemicals and chemical families. Proposition 65 imposes warning requirements and
12 other controls that apply to Proposition 65-listed chemicals.

13 14. All businesses with ten (10) or more employees that operate or sell products in California
14 must comply with Proposition 65. Under Proposition 65, businesses are: (1) prohibited
15 from knowingly discharging Proposition 65-listed chemicals into sources of drinking
16 water (*Health & Safety Code* § 25249.5), and (2) required to provide "clear and
17 reasonable" warnings before exposing a person, knowingly and intentionally, to a
18 Proposition 65-listed chemical (*Health & Safety Code* § 25249.6).

19 15. Proposition 65 provides that any person "violating or threatening to violate" the statute
20 may be enjoined in any court of competent jurisdiction. *Health & Safety Code* §
21 25249.7. "Threaten to violate" means "to create a condition in which there is a
22 substantial probability that a violation will occur." *Health & Safety Code* § 25249.11(e).
23 Defendants are also liable for civil penalties of up to \$2,500.00 per day per violation,
24 recoverable in a civil action. *Health & Safety Code* § 25249.7(b).

25 16. Plaintiff identified certain practices of manufacturers and distributors of Glasses Case,
26 Sandals with PVC Components, and Travel Mani Set of exposing, knowingly and
27 intentionally, persons in California to Diethyl Hexyl Phthalate and Bis (2-ethylhexyl)

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1 phthalate and Diisononyl Phthalate of such products without first providing clear and
2 reasonable warnings of such to the exposed persons prior to the time of exposure.

3 Plaintiff later discerned that Defendants engaged in such practice.

4 17. On January 1, 1988, the Governor of California added Diethyl Hexyl Phthalate and Bis
5 (2-ethylhexyl) phthalate (“DEHP”) to the list of chemicals known to the State to cause
6 cancer, (*Cal. Code Regs. tit. 27, § 27001(b)*) and on October 24, 2003, the Governor
7 added DEHP to the list of chemicals known to the State to cause developmental male
8 reproductive toxicity (*Cal. Code Regs. tit. 27, § 27001(c)*). Pursuant to Health and
9 Safety Code sections 25249.9 and 25249.10, twenty (20) months after addition of DEHP
10 to the list of chemicals known to the State to cause reproductive toxicity, DEHP became
11 fully subject to Proposition 65 warning requirements and discharge prohibitions.

12 18. On December 20, 2013, the Governor of California added Diisononyl Phthalate
13 (“DINP”) to the list of chemicals known to the State to cause cancer (*Cal. Code Regs. tit.*
14 *27, § 27001(b)*). Pursuant to Health and Safety Code sections 25249.9 and 25249.10,
15 twenty (20) months after addition of DINP to the list of chemicals known to the State to
16 cause cancer, DINP became fully subject to Proposition 65 warning requirements and
17 discharge prohibitions.

18 **SATISFACTION OF PRIOR NOTICE**

19 19. Plaintiff served the following notices for alleged violations of Health and Safety Code
20 Section 25249.6, concerning consumer products exposures:

- 21 a. On or about May 16, 2023, Plaintiff gave notice of alleged violations of Health
22 and Safety Code Section 25249.6, concerning consumer products exposures
23 subject to a private action to BURLINGTON TX, and to the California Attorney
24 General, County District Attorneys, and City Attorneys for each city containing
25 a population of at least 750,000 people in whose jurisdictions the violations
26 allegedly occurred, concerning the Glasses Case.

1 b. On or about June 6, 2023, Plaintiff gave notice of alleged violations of Health
2 and Safety Code Section 25249.6, concerning consumer products exposures
3 subject to a private action to BURLINGTON TX, and to the California Attorney
4 General, County District Attorneys, and City Attorneys for each city containing
5 a population of at least 750,000 people in whose jurisdictions the violations
6 allegedly occurred, concerning the Sandals with PVC Components.

7 c. On or about June 13, 2023, Plaintiff gave notice of alleged violations of Health
8 and Safety Code Section 25249.6, concerning consumer products exposures
9 subject to a private action to BURLINGTON TX, and to the California Attorney
10 General, County District Attorneys, and City Attorneys for each city containing
11 a population of at least 750,000 people in whose jurisdictions the violations
12 allegedly occurred, concerning the Travel Mani Set.

13 20. Before sending the notice of alleged violations, Plaintiff investigated the consumer
14 products involved, the likelihood that such products would cause users to suffer
15 significant exposures to DINP and DEHP, and the corporate structure of each of the
16 Defendants.

17 21. Plaintiff's notice of alleged violation included a Certificate of Merit executed by the
18 attorney for the noticing party, CAG. The Certificate of Merit stated that the attorney for
19 Plaintiff who executed the certificate had consulted with at least one person with relevant
20 and appropriate expertise who reviewed data regarding the exposures to DINP and
21 DEHP, the subject Proposition 65-listed chemical of this action. Based on that
22 information, the attorney for Plaintiff who executed the Certificate of Merit believed
23 there was a reasonable and meritorious case for this private action. The attorney for
24 Plaintiff attached to the Certificate of Merit served on the Attorney General the
25 confidential factual information sufficient to establish the basis of the Certificate of
26 Merit.

1 22. Plaintiff's notice of alleged violations also included a Certificate of Service and a
2 document entitled "The Safe Drinking Water & Toxic Enforcement Act of 1986
3 (Proposition 65) A Summary." *Health & Safety Code* § 25249.7(d).

4 23. Plaintiff is commencing this action more than sixty (60) days from the dates that Plaintiff
5 gave notice of the alleged violations to BURLINGTON TX, and DOES 1-30, and the
6 public prosecutors referenced in Paragraph 21.

7 24. Plaintiff is informed, believes, and thereon alleges that neither the Attorney General, nor
8 any applicable district attorney or city attorney has commenced and is diligently
9 prosecuting an action against the Defendants.

10 **FIRST CAUSE OF ACTION**

11 **(By CONSUMER ADVOCACY GROUP, INC. and against and DOES 1-10 for**
12 **Violations of Proposition 65, The Safe Drinking Water and Toxic Enforcement Act**
13 **of 1986 (*Health & Safety Code*, §§ 25249.5, *et seq.*))**

14 **Women's Accessories**

15 25. Plaintiff repeats and incorporates by reference paragraphs 1 through 26 of this complaint
16 as though fully set forth herein.

17 26. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
18 distributor, promoter, or retailer of **Glasses Case** ("Glasses Case"), including but not
19 limited to: "Nikky by Nicole Lee U.S.A"; "www.nikkybag.com"; "Glasses Case"; "Style
20 # NK20340"; "Designed with pride in U.S.A."; "980727669458"; .

21 27. Glasses Case contains DINP.

22 28. Defendants knew or should have known that DINP has been identified by the State of
23 California as a chemical known to cause cancer and therefore was subject to Proposition
24 65 warning requirements. Defendants were also informed of the presence of DINP in
25 Glasses Case within Plaintiff's notice of alleged violations further discussed above at
26 Paragraph 29a.

27 29. Plaintiff's allegations regarding Glasses Case concerns "[c]onsumer products
28 exposure[s]," which "is an exposure that results from a person's acquisition, purchase,

1 storage, consumption, or other reasonably foreseeable use of a consumer good, or any
2 exposure that results from receiving a consumer service.” *Cal. Code Regs. tit. 27, §*
3 *25602(b)*. Glasses Case is consumer products, and, as mentioned herein, exposures to
4 DINP took place as a result of such normal and foreseeable consumption and use.

5 30. Plaintiff is informed, believes, and thereon alleges that between May 16, 2020 and the
6 present, each of the Defendants knowingly and intentionally exposed California
7 consumers and users of Glasses Case which Defendants manufactured, distributed, or
8 sold as mentioned above, to DINP without first providing any type of clear and
9 reasonable warning of such to the exposed persons before the time of exposure.
10 Defendants have distributed and sold Glasses Case in California. Defendants know and
11 intend that California consumers will use and consume Glasses Case thereby exposing
12 them to DINP. Further, Plaintiff is informed, believes, and thereon alleges that
13 Defendants are selling Glasses Case under a brand or trademark that is owned or licensed
14 by the Defendants or an entity affiliated thereto; have knowingly introduced DINP into
15 Glasses Case or knowingly caused DINP to be created in Glasses Case; have covered,
16 obscured or altered a warning label that has been affixed to Glasses Case by the
17 manufacturer, producer, packager, importer, supplier or distributor of Glasses Case have
18 received a notice and warning materials for exposure from Glasses Case without
19 conspicuously posting or displaying the warning materials; and/or have actual
20 knowledge of potential exposure to DINP from Glasses Case. Defendants thereby
21 violated Proposition 65.

22 31. The principal routes of exposure are through dermal contact, ingestion and inhalation.
23 Persons sustain exposures by handling Glasses Case without wearing gloves or any other
24 personal protective equipment, or by touching bare skin or mucous membranes with
25 gloves after handling Glasses Case, as well as through direct and indirect hand to mouth
26 contact, hand to mucous membrane, or breathing in particulate matter dispersed from
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1 Glasses Case as well as environmental medium that carry the DEHP once contained in
2 the Glass Case.

3 32. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
4 Proposition 65 as to Glasses Case have been ongoing and continuous, as Defendants
5 engaged and continue to engage in conduct which violates Health and Safety Code
6 Section 25249.6, including the manufacture, distribution, promotion, and sale of Glasses
7 Case, so that a separate and distinct violation of Proposition 65 occurred each and every
8 time a person was exposed to DINP by Glasses Case as mentioned herein.

9 33. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
10 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
11 violations alleged herein will continue to occur into the future.

12 34. Based on the allegations herein, Defendants are liable for civil penalties of up to
13 \$2,500.00 per day per individual exposure to DINP from Glasses Case, pursuant to
14 Health and Safety Code Section 25249.7(b).

15 35. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
16 filing this Complaint.

17 SECOND CAUSE OF ACTION

18 **(By CONSUMER ADVOCACY GROUP, INC. and against BURLINGTON TX ,**
19 **and DOES 11-20 for Violations of Proposition 65, The Safe Drinking Water and**
20 **Toxic Enforcement Act of 1986 (*Health & Safety Code, §§ 25249.5, et seq.*)**

21 **Footwear**

22 36. Plaintiff repeats and incorporates by reference paragraphs 27 through 37 of this
23 complaint as though fully set forth herein.

24 37. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
25 distributor, promoter, or retailer of **Sandals with PVC Components ("Sandals")**,
26 including but not limited to: (1) "Zigi Soho"; "Briella"; "CLRPV"; "US 8"; "Synthetic
27 Upper"; "Synthetic Sole"; "FT21186B-03"; "Made in China"; "Diara Rose Gold"; "SHO
28 1159241079320"; (2) "Shoemall.com: "Zigi Soho"; "Style: Briella"; "Color: CLRPV";

1 “Size: 8”; “Synthetic Upper”; “Synthetic Sole”; “FT21186B-03”; “Made in China”; “473
2 50435”; “UPC 883668570128”;

3 38. Sandals contains DEHP.

4 39. Defendants knew or should have known that DEHP has been identified by the State of
5 California as a chemical known to cause cancer and reproductive toxicity and therefore
6 was subject to Proposition 65 warning requirements. Defendants were also informed of
7 the presence of DEHP in Sandals within Plaintiff's notice of alleged violations further
8 discussed above at Paragraph 29a.

9 40. Plaintiff's allegations regarding Sandals concerns “[c]onsumer products exposure[s],”
10 which “is an exposure that results from a person's acquisition, purchase, storage,
11 consumption, or other reasonably foreseeable use of a consumer good, or any exposure
12 that results from receiving a consumer service.” *Cal. Code Regs. tit. 27, § 25602(b)*.
13 Sandals is consumer products, and, as mentioned herein, exposures to DEHP took place
14 as a result of such normal and foreseeable consumption and use.

15 41. Plaintiff is informed, believes, and thereon alleges that between June 5, 2020 and the
16 present, each of the Defendants knowingly and intentionally exposed California
17 consumers and users of Sandals which Defendants manufactured, distributed, or sold as
18 mentioned above, to DEHP without first providing any type of clear and reasonable
19 warning of such to the exposed persons before the time of exposure. Defendants have
20 distributed and sold Sandals with PVC Components in California. Defendants know and
21 intend that California consumers will use and consume Sandals thereby exposing them to
22 DEHP. Further, Plaintiff is informed, believes, and thereon alleges that Defendants are
23 selling Sandals under a brand or trademark that is owned or licensed by the Defendants
24 or an entity affiliated thereto; have knowingly introduced DEHP into Sandals or
25 knowingly caused DEHP to be created in Sandals with PVC Components; have covered,
26 obscured or altered a warning label that has been affixed to Glasses Case by the
27 manufacturer, producer, packager, importer, supplier or distributor of Sandals with PVC
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1 Components have received a notice and warning materials for exposure from Sandals
2 without conspicuously posting or displaying the warning materials; and/or have actual
3 knowledge of potential exposure to DEHP from Sandals. Defendants thereby violated
4 Proposition 65.

5 42. The principal routes of exposure are through dermal contact, ingestion and inhalation.
6 Persons sustain exposures by handling Sandals without wearing gloves or any other
7 personal protective equipment, or by touching bare skin or mucous membranes with
8 gloves after handling Sandals with PVC Components, as well as through direct and
9 indirect hand to mouth contact, hand to mucous membrane, or breathing in particulate
10 matter dispersed as well as environmental medium that carry the DEHP once contained
11 in the Sandals.

12 43. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
13 Proposition 65 as to Sandals have been ongoing and continuous, as Defendants engaged
14 and continue to engage in conduct which violates Health and Safety Code Section
15 25249.6, including the manufacture, distribution, promotion, and sale of Sandals, so that
16 a separate and distinct violation of Proposition 65 occurred each and every time a person
17 was exposed to DEHP by Sandals as mentioned herein.

18 44. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
19 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
20 violations alleged herein will continue to occur into the future.

21 45. Based on the allegations herein, Defendants are liable for civil penalties of up to
22 \$2,500.00 per day per individual exposure to DEHP from Sandals with PVC
23 Components, pursuant to Health and Safety Code Section 25249.7(b).

24 46. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
25 filing this Complaint.
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THIRD CAUSE OF ACTION

**(By CONSUMER ADVOCACY GROUP, INC. and against BURLINGTON TX ,
and DOES 21-30 for Violations of Proposition 65, The Safe Drinking Water and
Toxic Enforcement Act of 1986 (Health & Safety Code, §§ 25249.5, et seq.))**

Travel Accessory

47. Plaintiff repeats and incorporates by reference paragraphs 38 through 48 of this complaint as though fully set forth herein.

48. Each of the Defendants is, and at all times mentioned herein was, a manufacturer, distributor, promoter, or retailer of **Travel Mani Set (“Mani Set”)**, including but not limited to: “Wendy Bellissimo”; “Essential Foot Travel Collection”; Copyright Wendy Bellissimo Media Inc.”; “Formulated Exclusively and Distributed by: Pearl World Inc.”; “Designed in the USA”; “Made in China”;

49. Mani Set contains DEHP.

50. Defendants knew or should have known that DEHP has been identified by the State of California as a chemical known to cause cancer and reproductive toxicity and therefore was subject to Proposition 65 warning requirements. Defendants were also informed of the presence of DEHP in Mani Set within Plaintiff's notice of alleged violations further discussed above at Paragraph 29a.

51. Plaintiff's allegations regarding Mani Set concerns “[c]onsumer products exposure[s],” which “is an exposure that results from a person’s acquisition, purchase, storage, consumption, or other reasonably foreseeable use of a consumer good, or any exposure that results from receiving a consumer service.” *Cal. Code Regs. tit. 27, § 25602(b)*. Mani Set is consumer products, and, as mentioned herein, exposures to DEHP took place as a result of such normal and foreseeable consumption and use.

52. Plaintiff is informed, believes, and thereon alleges that between June 13, 2020 and the present, each of the Defendants knowingly and intentionally exposed California consumers and users of Mani Set which Defendants manufactured, distributed, or sold as mentioned above, to DEHP without first providing any type of clear and reasonable

1 warning of such to the exposed persons before the time of exposure. Defendants have
2 distributed and sold Mani Set in California. Defendants know and intend that California
3 consumers will use and consume Mani Set thereby exposing them to DEHP. Further,
4 Plaintiff is informed, believes, and thereon alleges that Defendants are selling Mani Set
5 under a brand or trademark that is owned or licensed by the Defendants or an entity
6 affiliated thereto; have knowingly introduced DEHP into Mani Set or knowingly caused
7 DEHP to be created in Mani Set; have covered, obscured or altered a warning label that
8 has been affixed to Glasses Case by the manufacturer, producer, packager, importer,
9 supplier or distributor of Mani Set have received a notice and warning materials for
10 exposure from Mani Set without conspicuously posting or displaying the warning
11 materials; and/or have actual knowledge of potential exposure to DEHP from Mani Set.
12 Defendants thereby violated Proposition 65.

13 53. The principal routes of exposure are through dermal contact, ingestion and inhalation.
14 Persons sustain exposures by handling Mani Set without wearing gloves or any other
15 personal protective equipment, or by touching bare skin or mucous membranes with
16 gloves after handling Mani Set, as well as through direct and indirect hand to mouth
17 contact, hand to mucous membrane, or breathing in particulate matter dispersed from
18 Mani Set as well as through environmental mediums that carry the DEHP contained
19 within the Mani Set.

20 54. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
21 Proposition 65 as to Mani Set have been ongoing and continuous, as Defendants engaged
22 and continue to engage in conduct which violates Health and Safety Code Section
23 25249.6, including the manufacture, distribution, promotion, and sale of Mani Set, so
24 that a separate and distinct violation of Proposition 65 occurred each and every time a
25 person was exposed to DEHP by Mani Set as mentioned herein.
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1 55. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
2 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
3 violations alleged herein will continue to occur into the future.

4 56. Based on the allegations herein, Defendants are liable for civil penalties of up to
5 \$2,500.00 per day per individual exposure to DEHP from Mani Set, pursuant to Health
6 and Safety Code Section 25249.7(b).

7 57. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
8 filing this Complaint.

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11 **PRAYER FOR RELIEF**

12 Plaintiff demands against each of the Defendants as follows:

- 13 1. A permanent injunction mandating Proposition 65-compliant warnings;
14 2. Penalties pursuant to Health and Safety Code Section 25249.7, subdivision (b);
15 3. Costs of suit;
16 4. Reasonable attorney fees and costs; and
17 5. Any further relief that the court may deem just and equitable.

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19 Dated: November 30, 2023

YEROUSHALMI & YEROUSHALMI*

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21 /s/ Reuben Yeroushalmi

22 Reuben Yeroushalmi
23 Attorneys for Plaintiff,
24 CONSUMER ADVOCACY GROUP, INC.
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