

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES	Reserved for Clerk's File Stamp FILED Superior Court of California County of Los Angeles 09/17/2026 David W. Slayton, Executive Officer / Clerk of Court By: <u>M. Marquez</u> Deputy
COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012	
NOTICE OF CASE ASSIGNMENT UNLIMITED CIVIL CASE	
Your case is assigned for all purposes to the judicial officer indicated below.	CASE NUMBER: 26STCV29476

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

	ASSIGNED JUDGE	DEPT	ROOM		ASSIGNED JUDGE	DEPT	ROOM
✓	Barbara A. Meiers	636					

Given to the Plaintiff/Cross-Complainant/Attorney of Record David W. Slayton, Executive Officer / Clerk of Court
 on 09/17/2026 (Date) By M. Marquez, Deputy Clerk

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure Section 170.6 must be made within 15 days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Independent Calendaring Courts will be subject to processing under the following time standards:

COMPLAINTS

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days.

CROSS-COMPLAINTS

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

STATUS CONFERENCE

A status conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses, and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party, or if appropriate, on counsel for a party.

This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.

Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

***Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.



Superior Court of California, County of Los Angeles

ALTERNATIVE DISPUTE RESOLUTION (ADR) INFORMATION PACKAGE

THE PLAINTIFF MUST SERVE THIS ADR INFORMATION PACKAGE ON EACH PARTY WITH THE COMPLAINT.

CROSS-COMPLAINANTS MUST SERVE THIS ADR INFORMATION PACKAGE ON ANY NEW PARTIES NAMED TO THE ACTION WITH THE CROSS-COMPLAINT.

WHAT IS ADR?

Alternative Dispute Resolution (ADR) helps people find solutions to their legal disputes without going to trial. The Court offers a variety of ADR resources and programs for various case types.

TYPES OF ADR

- **Negotiation.** Parties may talk with each other about resolving their case at any time. If the parties have attorneys, they will negotiate for their clients.
- **Mediation.** Mediation may be appropriate for parties who want to work out a solution but need help from a neutral third party. A mediator can help the parties reach a mutually acceptable resolution. Mediation may be appropriate when the parties have communication problems and/or strong emotions that interfere with resolution. Mediation may not be appropriate when the parties want a public trial, lack equal bargaining power, or have a history of physical or emotional abuse.
- **Arbitration.** Less formal than a trial, parties present evidence and arguments to an arbitrator who decides the outcome. In "binding" arbitration, the arbitrator's decision is final; there is no right to trial. In "nonbinding" arbitration, any party can request a trial after the arbitrator's decision.
- **Settlement Conferences.** A judge or qualified settlement officer assists the parties in evaluating the strengths and weaknesses of the case and in negotiating a settlement. Mandatory settlement conferences may be ordered by a judicial officer. In some cases, voluntary settlement conferences may be requested by the parties.

ADVANTAGES OF ADR

- **Save time and money.** Utilizing ADR methods is often faster than going to trial and parties can save on court costs, attorney's fees, and other charges.
- **Reduce stress and protect privacy.** ADR is conducted outside of a courtroom setting and does not involve a public trial.
- **Help parties maintain control.** For many types of ADR, parties may choose their ADR process and provider.

DISADVANTAGES OF ADR

- **Costs.** If the parties do not resolve their dispute, they may have to pay for ADR, litigation, and trial.
- **No Public Trial.** ADR does not provide a public trial or decision by a judge or jury.

WEBSITE RESOURCES FOR ADR

- **Los Angeles Superior Court ADR website:** www.lacourt.org/ADR
- **California Courts ADR website:** www.courts.ca.gov/programs-adr.htm

Los Angeles Superior Court ADR Programs for Unlimited Civil (cases valued over \$35,000)

Litigants should closely review the requirements for each program and the types of cases served.

- **Civil Mediation Vendor Resource List.** Litigants in unlimited civil cases may use the Civil Mediation Vendor Resource List to arrange voluntary mediations without Court referral or involvement. The Resource List includes organizations that have been selected through a formal process that have agreed to provide a limited number of low-cost or no-cost mediation sessions with attorney mediators or retired judges. Organizations may accept or decline cases at their discretion. Mediations are scheduled directly with these organizations and are most often conducted through videoconferencing. The organizations on the Resource List target active civil cases valued between \$50,000-\$250,000, though cases outside this range may be considered. *For more information and to view the list of vendors and their contact information, download the Resource List Flyer and FAQ Sheet at www.lacourt.org/ADR/programs.html.*
RESOURCE LIST DISCLAIMER: The Court provides this list as a public service. The Court does not endorse, recommend, or make any warranty as to the qualifications or competency of any provider on this list. Inclusion on this list is based on the representations of the provider. The Court assumes no responsibility or liability of any kind for any act or omission of any provider on this list.
- **Mediation Volunteer Panel (MVP).** Unlimited civil cases referred by judicial officers to the Court's Mediation Volunteer Panel (MVP) are eligible for three hours of virtual mediation at no cost with a qualified mediator from the MVP. Through this program, mediators volunteer preparation time and three hours of mediation at no charge. If the parties agree to continue the mediation after three hours, the mediator may charge their market hourly rate. When a case is referred to the MVP, the Court's ADR Office will provide information and instructions to the parties. The Notice directs parties to meet and confer to select a mediator from the MVP or they may request that the ADR Office assign them a mediator. The assigned MVP mediator will coordinate the mediation with the parties. *For more information or to view MVP mediator profiles, visit the Court's ADR webpage at www.lacourt.org/ADR or email ADRCivil@lacourt.org.*
- **Mediation Center of Los Angeles (MCLA) Referral Program.** The Court may refer unlimited civil cases to mediation through a formal contract with the Mediation Center of Los Angeles (MCLA), a nonprofit organization that manages a panel of highly qualified mediators. Cases must be referred by a judicial officer or the Court's ADR Office. The Court's ADR Office will provide the parties with information for submitting the case intake form for this program. MCLA will assign a mediator based on the type of case presented and the availability of the mediator to complete the mediation in an appropriate time frame. MCLA has a designated fee schedule for this program. *For more information, contact the Court's ADR Office at ADRCivil@lacourt.org.*
- **Resolve Law LA (RLLA) Virtual Mandatory Settlement Conferences (MSC).** Resolve Law LA provides three-hour virtual Mandatory Settlement Conferences at no cost for personal injury and non-complex employment cases. Cases must be ordered into the program by a judge pursuant to applicable Standing Orders issued by the Court and must complete the program's online registration process. The program leverages the talent of attorney mediators with at least 10 years of litigation experience who volunteer as settlement officers. Each MSC includes two settlement officers, one each from the plaintiff and defense bars. Resolve Law LA is a joint effort of the Court, Consumer Attorneys Association of Los Angeles County (CAALA), Association of Southern California Defense Counsel (ASCDC), Los Angeles Chapter of the American Board of Trial Advocates (LA-ABOTA), Beverly Hills Bar Foundation (BHBF), California Employment Lawyers Association (CELA), and Los Angeles County Bar Association (LACBA). *For more information, visit <https://resolvelawla.com>.*

- **Judicial Mandatory Settlement Conferences (MSCs).** Judicial MSCs are ordered by the Court for unlimited civil cases and may be held close to the trial date or on the day of trial. The parties and their attorneys meet with a judicial officer who does not make a decision, but who instead assists the parties in evaluating the strengths and weaknesses of the case and in negotiating a settlement. For more information, visit <https://www.lacourt.org/division/civil/CI0047.aspx>.

Los Angeles Superior Court ADR Programs for Limited Civil (cases valued below \$35,000)

Litigants should closely review the requirements for each program and the types of cases served.

- **Dispute Resolution Program Act (DRPA) Day-of-Hearing Mediation.** Through the Dispute Resolution Program Act (DRPA), the Court works with county-funded agencies, including the Los Angeles County Department of Consumer & Business Affairs (DCBA) and the Center for Conflict Resolution (CCR), to provide voluntary day-of-hearing mediation services for small claims, unlawful detainer, limited civil, and civil harassment matters. DCBA and CCR staff and trained volunteers serve as mediators, primarily for self-represented litigants. There is no charge to litigants. *For more information, visit <https://dcba.lacounty.gov/countywidedrp>.*
- **Temporary Judge Unlawful Detainer Mandatory Settlement Conference Pilot Program.** Temporary judges who have been trained as settlement officers are deployed by the Court to designated unlawful detainer court locations one day each week to facilitate settlement of unlawful detainer cases on the day of trial. For this program, cases may be ordered to participate in a Mandatory Settlement Conference (MSC) by judicial officers at Stanley Mosk, Long Beach, Compton, or Santa Monica. Settlement rooms and forms are available for use on the designated day at each courthouse location. There is no charge to litigants for the MSC. *For more information, contact the Court's ADR Office at ADRCivil@lacourt.org.*

SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

PT Organics Limited; Does 1 - 100

Electronically FILED by
Superior Court of California,
County of Los Angeles
9/17/2026 10:21 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By M. Marquez, Deputy Clerk

YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

Clean Product Advocates LLC

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. ¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Los Angeles County Superior Court
111 North Hill Street, Los Angeles, Ca. 90012

CASE NUMBER
(Número del Caso)

26STCV29476

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Elham Shabatian SBN 221953; Cliffwood Law Firm; 12100 Wilshire Boulevard, Suite 800, LA, Ca. 90025; 310-200-3227

DATE: 09/17/2026 Clerk, by David W. Slayton, Executive Officer/Clerk of Court, Deputy
(Fecha) (Secretario) M. Marquez (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]



NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):
- ☐ on behalf of (specify):
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):
- ☐ by personal delivery on (date):

1 CLIFFWOOD LAW FIRM
2 ELHAM SHABATIAN (SBN 221953)
3 12100 Wilshire Boulevard
4 Suite 800
5 Los Angeles, California 90025
6 Tel: (310) 200-3227
7 Email: ellie@cliffwoodlaw.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
9/17/2026 10:21 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By M. Marquez, Deputy Clerk

Attorneys for Plaintiff
Clean Product Advocates, LLC

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10 Clean Product Advocates LLC,) Case No. 26STCV29476
11 Plaintiff,)
12 vs.) COMPLAINT FOR PENALTY AND
13) INJUNCTION
14 PT Organics Limited; DOES 1 -) Violation of Proposition 65,
15 100,) the Safe Drinking Water and
16 DEFENDANTS.) Toxic Enforcement Act of 1986
17) (Health & Safety Code Sections
18) 25249.5, et. seq.)
19)
20) ACTION IS AN UNLIMITED CIVIL
21) CASE (exceeds \$25,000.00)
22)
23)
24)
25)
26)
27)
28)

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

23
24
25
26

1 3. Defendants have failed to sufficiently warn consumers and
2 individuals in California about potential exposure to Lead in
3 connection with Defendants' manufacture and/or import, and/or
4 sale, and/or distribution of the Product in violation of
5 Proposition 65.

6 4. Plaintiff seeks injunctive relief compelling Defendants
7 to sufficiently warn consumers in California before exposing
8 them to Lead in Products (Health & Safety Code Section
9 25249.7(a)). Plaintiff also seeks civil penalties against
10 Defendants for their violations of Proposition 65 along with
11 reasonable attorney's fees and legal costs (Health & Safety Code
12 Section 25249.7(b)).

13 **PARTIES**

14 5. Plaintiff CPA is a LLC operating in the State
15 of California dedicated to protecting the health of California
16 citizens through the elimination or reduction of toxic exposure
17 from consumer products. It brings this action in the public
18 interest pursuant to Health & Safety Code Section 25249.7.

19 6. Defendant PT Organics Limited, is a business entity, that
20 either manufactures and/or imports, and/or sells and/or
21 distributes products in Los Angeles County and throughout the
22 State of California, within the meaning of Health & Safety Code
23 Section 25249.11.
24
25
26
27
28

1 7. Defendants DOES 1 through 100, inclusive, are sued
2 herein under fictitious names. Their true names and capacities
3 are unknown to Plaintiff. When their true names and capacities
4 are ascertained, plaintiff will amend this complaint by
5 inserting their true names and capacities herein. Plaintiff is
6 informed and believes and thereon alleges, that each of the
7 fictitiously named defendants is responsible in some manner for
8 the occurrences alleged in this complaint and that Plaintiff's
9 damages as alleged in this complaint were proximately caused by
10 such defendants.
11

12 8. Plaintiff is informed and believes and thereon alleges,
13 that at all times alleged in this complaint, each defendant was
14 the agent, alter ego, servant, joint venturer, joint employer
15 and/or employee, of each of the remaining defendants, and in
16 doing the things hereinafter alleged, was acting within the
17 course and scope of said relationships and with the permission
18 and consent of all other co-defendants. All conduct was also
19 ratified by Defendants and each of them.
20

21 **JURISDICTION AND VENUE**

22 9. California Constitution Article VI, Section 10, grants
23 the Superior Court original jurisdiction in all cases except
24 those given by statute to other trial courts. The Health and
25 Safety Code statutes upon which this action is based does not
26
27
28

1 give jurisdiction to any other Court. As such, this Court has
2 jurisdiction over this action.

3 10. Venue is proper in Los Angeles County Superior Court
4 pursuant to Code of Civil Procedure Sections 394, 395 and 395.5
5 as wrongful conduct as alleged in this complaint has occurred
6 and continues to occur in this County.

7 **FIRST CAUSE OF ACTION**

8 **(Violation of Proposition 65 - Against All Defendants**
9

10 11. Plaintiff incorporates by reference herein, each and
11 every allegation set forth above in this complaint.

12 12. Proposition 65 mandates that California citizens be
13 informed about exposures to chemicals that cause cancer, birth
14 defects, and other reproductive harm.

15
16 13. More than sixty days prior to the filing of this
17 lawsuit, Plaintiff issued a 60-Day Notice of Violation as
18 required by and in compliance with Proposition 65. Plaintiff
19 also provided said Notice to the various required public
20 enforcement agencies along with a Certificate of Merit. The
21 Notice alleged a violation of Proposition 65 by failing to
22 sufficiently warn consumers in California of the health hazards
23 associated with Lead contained in the product.

24 14. The appropriate public enforcement agencies provided
25 with the Notice failed to commence and diligently prosecute a
26 cause of action against Defendants.

1 15. At all times relevant herein, Defendants manufactured
2 and/or imported and/or sold and/or distributed the above
3 described product, containing Lead, in violation of Health and
4 Safety Code Sections 25249.6 et. seq. Plaintiff is informed and
5 believes and thereon alleges that such violation has continued
6 after service of the Notice described above and such conduct
7 will continue to occur into the future.

8 16. In manufacturing, and/or importing, and/or selling
9 and/or distributing the product, Defendants failed to provide
10 clear and reasonable warnings to consumers in the State of
11 California who may be exposed to Lead through reasonably
12 foreseeable use of the product.

13 17. The product described above exposed individuals to Lead
14 through direct ingestion of the product described above in this
15 complaint. This exposure is a natural and foreseeable
16 consequence of Defendants placing the product into the stream of
17 commerce. As such Defendants intend that consumers will ingest
18 said product, exposing them to Lead.

19 18. Defendants knew or should have known that their
20 product contained Lead and exposed individuals to Lead as
21 described above in this complaint. The Notice described above
22 informed Defendants of the presence of Lead in their product.
23 Likewise, media coverage concerning Lead related chemicals in
24 consumer products provided "Constructive Notice" to Defendants.
25
26
27
28

1 Defendants' actions, therefore, were deliberate and not
2 accidental.

3 19. Individuals exposed to Lead contained in
4 Defendants' Product through direct ingestion resulting from
5 reasonably foreseeable use of the product have suffered and
6 continue to suffer irreparable harm. There is no other plain,
7 speedy or adequate remedy at law other than the relief requested
8 in this complaint.

9 20. Defendants are liable for a maximum civil penalty of
10 \$2,500.00 per day for each violation of Proposition 65 pursuant
11 to Health and Safety Code Section 252497(b). Injunctive relief
12 is also appropriate pursuant to Health and Safety Code Section
13 25249.7(a).

14 21. Defendants knew or should have known that their
15 product contained Lead and exposed individuals to Lead as
16 described above in this complaint. Also, the Notice stated that
17 there was Lead in the subject product. Likewise, media coverage
18 concerning Lead and related chemicals in consumer products
19 provided "Constructive Notice" to Defendants.

20
21
22 **PRAYER FOR RELIEF**

23 Wherefore, Plaintiff prays for judgment against Defendants,
24 and each of them, as follows:

25 1. Civil penalties in the amount of \$2,500.00 per day for
26 each violation of the law as described above in this complaint;

2. A preliminary and permanent injunction against Defendants from manufacturing, and/or importing, and/or selling and/or distributing products in California without providing a clear and reasonable warning as required by Proposition 65 and related regulations;

3. Reasonable attorney's fees and costs of suit;

4. Pre-Judgement interest as allowed by law; and

5. Such other and further relief as may be just and proper.

Respectfully Submitted:

Dated: September 17, 2026

CLIFFWOOD LAW FIRM,

By: 151 Elham Shabatian
Elham Shabatian
Attorney for Plaintiff
Clean Product Advocates LLC