



ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR: 332711 NAME: Mary Haley Ousley FIRM NAME: Lexington Law Group, LLP STREET ADDRESS: 503 Divisadero Street CITY AND ZIP CODE: San Francisco, CA 94117 E-MAIL ADDRESS: mhousley@lexlawgroup.com ATTORNEY FOR (NAME): Center for Environmental Health	<b>FOR COURT USE ONLY</b>  <b>FILED</b> <i>San Francisco County Superior Court</i>  <b>AUG 28 2025</b> CLERK OF THE COURT BY: <i>Edmund J. [Signature]</i> Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS MAILING ADDRESS: 400 MCALLISTER STREET, ROOM 103 CITY AND ZIP CODE: SAN FRANCISCO, 94102 BRANCH NAME: CIVIC CENTER COURTHOUSE	CASE NUMBER: CGC-25-623029  <input checked="" type="checkbox"/> NO TRIAL DATE SET  <input type="checkbox"/> TRIAL DATE: _____ DEPT: _____
PLAINTIFF/PETITIONER: Center for Environmental Health  DEFENDANT/RESPONDENT: The Vita Coco Company, Inc., et al.	
<p style="text-align: center;"><b>AMENDMENT TO:</b></p> <p style="text-align: center;"> <input checked="" type="checkbox"/> COMPLAINT    <input type="checkbox"/> CROSS-COMPLAINT          FILING DATE: <u>5/23/2025</u> </p> <p>NAME OF CROSS-COMPLAINANT: _____</p>	

**FICTITIOUS NAME (SEC. 474 C.C.P. NO APPEARANCE REQUIRED)**

Upon filing the complaint/cross-complaint in this case, plaintiff(s) being ignorant of the true name of a defendant(s), designated such defendant(s) in the complaint/cross-complaint by the fictitious name(s) of

DOE \_\_\_\_\_  ROE \_\_\_\_\_  MULTIPLE DEFENDANTS (*attach SFCIV-015 form*)

Having discovered the true name(s) of the defendant(s)/cross-defendant(s) to be  
 Please see the attachment.

I request the complaint/cross-complaint be amended to reflect the true name wherever it appears in the pleading.

Date: 8/25/2025

Mary Haley Ousley  
 \_\_\_\_\_  
 Printed Name

*[Signature]*  
 \_\_\_\_\_  
 Signature of Party or Attorney

**ORDER**

The complaint/cross-complaint is amended to reflect the true name wherever it appears in the pleading.

Date: Aug. 27, 2025

*[Signature]*  
 \_\_\_\_\_  
 Judicial Officer

**ATTACHMENT: AMENDMENT – FICTITIOUS NAME** (Number): 1-5

*(This Attachment may be used with SFCIV-014)*

Gobrand, Inc. in place of the reference to Doe 1 in each place that it appears in the operative Complaint;

United Natural Foods, Inc. in place of the reference to Doe 2 in each place that it appears in the operative Complaint;

United Natural Foods West, Inc. in place of the reference to Doe 3 in each place that it appears in the operative Complaint;

Zico Rising, Inc. in place of the reference to Doe 4 in each place that it appears in the operative Complaint; and

Groundforce Capital Management, LLC in place of the reference to Doe 5 in each place that it appears in the operative Complaint.

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**PROOF OF SERVICE**

I, Sophia R. Filipe, declare:

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

On August 25, 2025, I served the following document(s) on all interested parties in this action by placing a true copy thereof in the manner and at the addresses indicated below:

**AMENDMENT TO COMPLAINT**

**BY MAIL:** I am readily familiar with the firm’s practice for collecting and processing mail with the United States Postal Service (“USPS”). Under that practice, mail would be deposited 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.

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

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

*Please see attached service list*

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

**BY OVERNIGHT DELIVERY:** I deposited such document(s) in a box or other facility 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 below.

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

Executed on August 25, 2025 at San Francisco, California.



\_\_\_\_\_  
Sophia R. Filipe

**SERVICE LIST**

*Center for Environmental Health v. The Vita Coco Company Inc.  
Case No. CGC-25-623029*

<b>ADDRESS</b>	<b>PARTY</b>
Patrick Carey Mary Haley Ousley LEXINGTON LAW GROUP, LLP 503 Divisadero Street San Francisco, CA 94117 pcarey@lexlawgroup.com mhousley@lexlawgroup.com sfilipe@lexlawgroup.com	<i>Plaintiff</i> Center for Environmental Health
George C. Salmas Michael R. Hambly Julia S. Thrower THE FOOD LAWYERS® 1880 Century Park East, Suite 611 Los Angeles, California 90067 george.salmas@thefoodlawyers.com michael.hambly@thefoodlawyers.com julia.thrower@thefoodlawyers.com	<i>Defendants</i> Purcell International Smart & Final LLC Smart & Final Stores LLC Sun Hing Foods, Inc. ALDI, Inc.
Garth N. Ward Adam O'Connor LEWIS BRISBOIS BISGAARD & SMITH LLP 550 West C Street, Suite 1700 San Diego, California 92101 Garth.Ward@lewisbrisbois.com Adam.OConnor@lewisbrisbois.com	<i>Defendant</i> Edward & Sons Trading Co, Inc.
Jessica M. Brown HOLLAND & KNIGHT LLP 560 Mission Street, Suite 1900 San Francisco, CA 94105 Jessica.Brown@hkllaw.com	<i>Defendants</i> Name Rite, LLC Rite Aid Corporation

<p>Joshua A. Bloom  Beth B. Koh  BAY LAW GROUP LLP  1831 Solano Ave. #8554  Berkeley, California 94707  jbloom@baylawgroupllp.com  bkoh@baylawgroupllp.com</p>	<p><i>Defendant</i>  Iberia Foods, LLC</p>
<p>Naoki S. Kaneko  Thomas V. Wynsma  Sarah Garbuzov  SHOOK, HARDY &amp; BACON LLP  Jamboree Center, 5 Park Plaza, Suite 1600  Irvine, California 92614-2546  nkaneko@shb.com  twynsma@shb.com  sgarbuzov@shb.com</p>	<p><i>Defendants</i>  Goya Foods, Inc.  Goya Foods Of California, Inc.</p>
<p>Gregory P. O'Hara  Lauren M. Michals  NIXON PEABODY LLP  One Embarcadero Center, 32nd Floor  San Francisco, CA 94111  gohara@nixonpeabody.com  lmichals@nixonpeabody.com</p>	<p><i>Defendant</i>  The Kroger Co.</p>
<p>David A. Diepenbrock  Chris Horsley  Weintraub Tobin Chediak Coleman Grodin  LAW CORPORATION  400 Capitol Mall, 11th Floor  Sacramento, California 95814  ddiepenbrock@weintraub.com  chorsley@weintraub.com  CCervantes@weintraub.com  SHeller@weintraub.com</p>	<p><i>Defendant</i>  Arcadia Biosciences, Inc.</p>

<p>Gregory L. Doll  Jamie O. Kendall  Melissa Rapp  DOLL AMIR &amp; ELEY LLP  515 S. Flower Street, Suite 1812  Los Angeles, CA 90071  jkendall@dollamir.com  gdoll@dollamir.com  mrapp@dollamir.com</p>	<p><i>Defendants</i>  Amazon.com Services LLC  Amazon.com, Inc.</p>
<p>Maria M. Rohaidy  R. Joseph Decker  TAUBMAN, SIMPSON, YOUNG &amp;  SULENTOR, A Professional Corporation  300 Ocean Gate Suite 130  Long Beach, California 90802-4328  mmr@tsyslaw.com  rjd@tsyslaw.com</p>	<p><i>Defendant</i>  Mercado Latino, Inc,</p>
<p>Amanda H. Russo Goodwin  PROCTER LLP  601 South Figueroa Street Suite 4100  Los Angeles, California 90017  ARusso@goodwinlaw.com</p> <p>Allyson M. McCain  GOODWIN PROCTER LLP  525 Market Street, 32nd Floor  San Francisco, California 94105  AMcCain@goodwinlaw.com</p>	<p><i>Defendant</i>  One Hundred Coconuts LLC</p>
<p>Trenton H. Norris  David M. Barnes  HOGAN LOVELLS US LLP  Four Embarcadero Center, 35th Floor  San Francisco, CA 94111-4024  trent.norris@hoganlovells.com  david.barnes@hoganlovells.com</p>	<p><i>Defendant</i>  Dollar Tree Stores, Inc.</p>

<p>Tyler D. Bowlin  John P. Wallan  MILLER NASH LLP  340 Golden Shore, Suite 450  Long Beach, CA 90802  jack.wallan@millernash.com  tyler.bowlin@millernash.com</p>	<p><i>Defendant</i>  Advanced Business Strategies, LLC</p>
<p>Willis M. Wagner  Alexandra L. Lizano  GREENBERG TRAURIG LLP  400 Capitol Mall, Suite 2400  Sacramento, CA 95814  will.wagner@gtlaw.com  alexandra.lizano@gtlaw.com</p>	<p><i>Defendants</i>  Kehe Distributors, Inc.  Kehe Distributors, LLC</p>
<p>Dawn Sestito  Natalie D. Camastra  O'MELVENY &amp; MYERS LLP  400 S. Hope Street, Suite 1900  Los Angeles, CA 90071  dsestito@omm.com  ncamastra@omm.com</p>	<p><i>Defendant</i>  Trader Joe's Company</p>
<p>Matthew R. Orr  Jennifer K. Singh  Rebecca M. Lee  AMIN WASSERMAN GURNANI, LLP  515 South Flower Street, 18th Floor  Los Angeles, California 90071  morr@awglaw.com  jsingh@awglaw.com  rlee@awglaw.co</p>	<p><i>Defendants</i>  All Market Inc.  CoAqua NA, Inc.  Raley's  The Vita Coco Company Inc.  Target Brands, Inc.  Target Corporation</p>

<p>Jeffrey A. Rosenfeld  Brett H. Oberst  ALSTON &amp; BIRD LLP  350 South Grand Avenue, 51st Floor  Los Angeles, CA 90071  Isaac Walrath  ALSTON &amp; BIRD LLP  55 Second Street, Suite 2100  San Francisco, CA 94105  Jeffrey.Rosenfeld@alston.com  Brett.Oberst@alston.com  Isaac.Walrath@alston.com</p>	<p><i>Defendants'</i>  Walmart Inc.  Nova Usa Inc.  C20 Coconut Water, LLC,  Jarritos, Inc.  Tipp Distributors, Inc.</p>
<p>J.T. Wells Blaxter  Brian R. Blackman  David P. Adams  Troy M. Heisman  BLAXTER   BLACKMAN LLP  601 Montgomery Street, Suite 1110  San Francisco, California 94111  wblaxter@blaxterlaw.com  bblackman@blaxterlaw.com  dadams@blaxterlaw.com  theisman@blaxterlaw.com</p>	<p><i>Defendant</i>  Whole Foods Market California, Inc.</p>
<p>Gary C. Cooper  LAW OFFICES OF GARY C. COOPER  247 Yale Avenue  Kensington, California 94708  gcc@gcooperlaw.com</p>	<p><i>Defendant</i>  Khong Guan Corporation</p>

**CERTIFICATE OF ELECTRONIC SERVICE**

**(CCP 1010.6, and CRC 2.251)**

I, Edward Santos, a Deputy Clerk of the Superior Court of the County of San Francisco, certify that I am not a party to the within action.

On August 28, 2025, I electronically served:

**ORDER ON AMENDMENT TO COMPLAINT (DOE AMENDMENT NAMES)**

via File & ServeXpress on the recipients designated on the Transaction Receipt located on the File & ServeXpress website.

Date:

AUG 28 2025

Brandon E. Riley, Court Executive Officer

By: Edward Santos

Edward Santos, Deputy Clerk