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Laralei S. Paras, State Bar No. 203319
THE CHANLER GROUP
2560 Ninth Street
Parker Plaza, Suite 214
Berkeley, CA 94710-2565
Telephone: (510) 848-8880
Facsimile: (510) 848-8118
E-mail: laralei@chanler.com

Attorneys for Plaintiff
ANTHONY E. HELD, PH.D., P.E.

ENDORSED
FILED
2019 MAR 25 P 1:15
CLERK OF THE COURT
SUPERIOR COURT OF CA
COUNTY OF SANTA CLARA
BY S. UY DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR SANTA CLARA COUNTY
UNLIMITED CIVIL JURISDICTION

ANTHONY E. HELD, PH.D., P.E.

Plaintiff,

v.

H & H LABORATORIES INC.; *et al.*,

Defendants.

Case No. 15CV288860

**[PROPOSED] DEFAULT JUDGMENT
AGAINST DEFENDANT H & H
LABORATORIES INC.**

(Cal. Rules of Court, Rule 3.1800)

Date: March 25, 2019
Time: 1:30 p.m.
Dept: 6

Complaint Filed: December 10, 2015

Lodged Concurrently with Request for Court
Judgment (Form CIV-100); Case Summary and
Memorandum in Support of Application for
Entry of Default Judgment; Declaration of
Laralei S. Paras; and [Proposed] Order

1 Pursuant to Code of Civil Procedure section 585, the Court hereby enters final judgment in
2 favor of plaintiff Anthony E. Held, Ph.D., P.E. against defendant H & H Laboratories Inc. as
3 follows:

4 1. H & H Laboratories Inc. is permanently enjoined from offering any vinyl/PVC gloves
5 containing diisononyl phthalate (DINP) in California without first providing clear and reasonable
6 warnings regarding the risks of cancer caused by exposures to DINP, as required by Health and
7 Safety Code section 25249.7(a). This includes, but is not limited to, the *Sterex 100 Count X-Large*
8 *Vinyl Powder Free Exam Gloves, VECPPFGXL, UPC #8 524720 020442*, identified in the Complaint.

9 2. H & H Laboratories Inc. is ordered to pay \$2,500 in statutory penalties, pursuant to
10 Health and Safety Code section 25249.7(b);

11 3. H & H Laboratories Inc. is ordered to pay \$35,000 in costs and attorneys' fees to
12 plaintiff as reimbursement of his reasonable attorneys' fees and costs pursuant to Code of Civil
13 Procedure section 1021.5.

14 4. All amounts required by paragraphs 2 and 3 of this Default Judgment are due within
15 thirty days of the date of entry of this Default Judgment. These amounts shall be paid to plaintiff's
16 attorneys by check made payable to "The Chanler Group" and shall be sent to The Chanler Group,
17 2560 Ninth Street, Parker Plaza Suite 214, Berkeley, California 94710.

18 **IT IS SO ORDERED.**

19
20 Dated: MAR 25 2019

Theodore C. Zayner

JUDGE OF THE SUPERIOR COURT