

230 N. Maryland Ave. Suite 306 Glendale, CA 91206 P: 818.507.8525 F: 818.507.8588 info@KJTLawGroup.com

November 7, 2018

VIA U.S. MAIL

Black Seed Herb, Inc. Attn: Abdel-Aziz Benadim 17 Oberfest Street Liberty, NY 12754

RE: <u>60-Day Notice of Violations - Dismissal</u> Tamar Kaloustian to Black Seed Herb, Inc.

Dear Mr. Benadim:

As you are aware, KJT Law Group, LLP represents Tamar Kaloustian ("Claimant"), a citizen of the State of California acting in the interest of the general public, in connection with a notice of violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code §§ 25249.5 et seq., with respect Black Seed Herb, Inc.'s manufacture, distribution, and/or sale of Sweet Sunnah's Natural Psyllium Husk Powder.

We filed our 60-Day Notice for the above-referenced consumer product on March 21, 2018, and the Complaint for Injunctive Relief and Civil Penalties on August 30, 2018. After further investigation, we are dismissing the Complaint at this time. Notice of this withdrawal and Request for Dismissal are concurrently being sent to the Attorney General through the Proposition 65 Enforcement office copied herein.

Thank you in advance for your professional courtesy and cooperation in the handling of this matter.

Regards,

Caspar Jivalagian, Esq. KJT Law Group, LLP

cc: Proposition 65 Enforcement Reporting

Attn: Prop 65 Coordinator 1515 Clay Street, Suite 2000

PO Box 70550

Oakland, California 94612-0550

**Enclosure: Request for Dismissal** 

| ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 2  | CIV-1  |
|--|--|
| NAME: Caspar Jivalagian, Esq.  | 82818 FOR COURT USE ONLY   |
| FIRM NAME: KJT Law Group, LLP  |  |
| STREET ADDRESS: 230 N. Maryland Avenue, Suite 306  |  |
| CITY: Glendale STATE: CA   | ZIP CODE: 91206  |
| TELEPHONE NO.: 818-507-8525 FAX NO.: 818   | 3-507-8588   |
| E-MAIL ADDRESS: caspar@kjtlawgroup.com   | FILED  |
| ATTORNEY FOR (Name): PLAINTIFF TAMAR KALOUSTIAN  | MECEL  |
| SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELI   | ES NOV 0 1 2018 FILING WINDOW  |
| STREET ADDRESS: 111 N. Hill Street   | und Olle   |
| MAILING ADDRESS: 111 N. Hill Street  | Mo.  |
| CITY AND ZIP CODE: Los Angeles, CA 90012   | TO MINO  |
| BRANCH NAME: Stanley Mosk Courthouse   | - CILING   |
| Plaintiff/Petitioner: TAMAR KALOUSTIAN   |  |
| Defendant/Respondent: BLACK SEED HERB, INC.  |  |
| REQUEST FOR DISMISSAL  | CASE NUMBER:<br>BC720173   |
|  |  |
| A conformed copy will not be returned by the clerk unless  |  |
| actions (call Rules of Court, fules 3.760 and 3.770.)  | tion or a class action or of any party or cause of action in a class   |
| 1. TO THE CLERK: Please dismiss this action as follows:  |  |
| a. (1) X With prejudice (2) Without prejudice  | 08   |
| b. (1) Complaint (2) Petition  |  |
| (3) Cross-complaint filed by (name):   | on (date):   |
| (4) Cross-complaint filed by (name):   | on (date):   |
| (5) x Entire action of all parties and all causes of ac  |  |
| (6) Other (specify):*  |  |
| (Complete in all cases except family law cases.)   |  |
| The court did x did not waive court fees and co  | osts for a party in this case. (This information may be obtained from the  |
| clerk. If court fees and costs were waived, the declaration on   | the back of this form must be completed).  |
| ate: 10/31/2018  |  |
| aspar Jivalagian, Esq.   |  |
| THE OR PRINT NAME OF X ATTORNEY PARTY WITHOUT ATTORNEY)  | The state of the s |
| diamissal requested is of specified parties only of specified causes of action only,<br>of specified cross-complaints only, so state and identify the parties, causes of   |  |
| ion, or cross-complaints to be dismissed.  | Plaintiff/Petitioner Defendant/Respondent  |
|  | Cross Complainant  |
| TO THE CLERK: Consent to the above dismissal is hereby g   | iven.**  |
| te:  |  |
| PE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)   | (SIGNATURE)  |
| a cross-complaint - or Response (Family Law) seeking affirmative   | Attorney or party without attorney for:  |
| ef – is on file, the attorney for cross-complainant (respondent) must sign consent if required by Code of Civil Procedure section 581 (i) or (i).  | Plaintiff/Petitioner Defendant/Respondent  |
| The state of the s | Cross Complainant  |
| be completed by clerk)   |  |
| Dismissal entered as requested on (date):  |  |
| Dismissal entered on (date):   | as to only (name):   |
| Dismissal not entered as requested for the following res   | asons (specify):   |
| Alfanora de Vita de Caractería |  |
| a. Attorney or party without attorney notified on (date):  |  |
| b. Attorney or party without attorney not notified. Filing p   |  |
|  | turn conformed copy  |
| 5: Clerk, by   | Deputy Page 1 of 2   |