

EXHIBIT 1

BLOOD HURST & O'REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
3 THOMAS J. O'REARDON II (247952)
4 PAULA R. BROWN (254142)
5 501 West Broadway, Suite 1490
6 San Diego, CA 92101
7 Tel: 619/338-1100
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9 tblood@bholaw.com
10 toreardon@bholaw.com
11 pbrown@bholaw.com

12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department 1

CLASS ACTION

**DECLARATION OF BEVERLY AVERY
IN SUPPORT OF SERVICE AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

BLOOD HURST & O'REARDON, LLP

1 I, BEVERLY AVERY, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. For nearly seven years, I have been a named plaintiff and Class Representative
6 in the related federal actions and am a named plaintiff and Class Representative in the Second
7 Amended Complaint filed pursuant to this Court's January 8, 2026, order granting preliminary
8 approval in this action.

9 3. Since May 2019 when I became a named plaintiff, I have devoted dozens of
10 hours to this matter, including meetings with counsel, reviewing pleadings and discovery
11 responses, preparing for and attending my deposition, and staying informed about major
12 developments. Serving as a class representative required significant time and attention beyond
13 my ordinary daily responsibilities.

14 4. On May 8, 2019, my attorneys from Blood Hurst & O'Reardon, LLP filed a
15 second amended class action complaint in *Simmons v. Premier Nutrition Corporation*, 3:16-
16 cv-07078-RS (N.D. Cal.) ("*Simmons*") wherein I was substituted as the named plaintiff.
17 *Simmons* is brought on behalf of myself and a class of people from Michigan who purchased
18 Joint Juice. I am the named plaintiff and class representative in *Simmons*.

19 5. On December 17, 2019, the proposed Michigan Class was certified, and I was
20 appointed Class Representative. In connection with the motion for class certification, I
21 submitted a declaration. *See Simmons*, Dkt. No. 60-1 at Exhibit 95.

22 6. I am a resident of the State of Michigan. In 2013, I purchased and consumed
23 Joint Juice. I bought the 30-count "ready to drink" version of Joint Juice from Costco in
24 Auburn Hills, Michigan and drank one of the 8-ounce bottles every day in the morning. I
25 consumed Joint Juice daily for about three or four months. I purchased Joint Juice because I
26 was experiencing joint pain and stiffness. I saw the Joint Juice product labeling, including the
27 Arthritis Foundation reference, and believed that drinking Joint Juice would promote healthy
28 joints, provide smooth movement, and relieve my arthritis symptoms, including joint pain and

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1 stiffness. I felt no change in my joint pain, stiffness or achiness, and do not believe Joint Juice
2 provided me with any of the advertised benefits.

3 7. I volunteered to be a plaintiff and to represent other purchasers in this class
4 action because I believe it is wrong for companies to falsely advertise products. I understand
5 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
6 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
7 that I have carried out this duty.

8 8. I understood that by serving as a class representative, my name would appear
9 on court filings and that I could be subject to public scrutiny. I also understood that I might be
10 required to testify at trial and to disclose private personal and medical information, which I did
11 during my deposition.

12 9. I retained Blood Hurst & O'Reardon, LLP in December 2018 and over the past
13 seven years I have regularly kept in contact with them and stayed informed on the progress of
14 the case. I have answered all of my attorneys' questions regarding my experience with Joint
15 Juice. From the time I agreed to act as a class representative, I understood that the case could
16 proceed to trial and that I would need to make myself available on short notice to comply with
17 court deadlines, discovery obligations, and trial preparation.

18 10. After I was appointed as the Class Representative by the Court, I continued to
19 devote substantial time and effort to this case. I spoke with my attorneys on numerous
20 occasions about my experience with Joint Juice, my need for something to help with my joint
21 pain and joint health, Premier's discovery requests, preparation for my deposition, the case in
22 general, and the possible jury trial.

23 11. My efforts included reviewing and working with my attorneys on the
24 interrogatories and document requests Premier served on me. I answered all the questions to
25 the best of my knowledge and searched my home, emails, and other sources for any
26 documentation related to Joint Juice. After the responses to interrogatories and document
27 requests were prepared by my attorneys, I reviewed them to make sure they were accurate. I
28

BLOOD HURST & O'REARDON, LLP

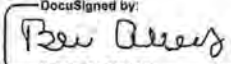
1 signed a verification swearing under the penalty of perjury that the responses were truthful to
2 the best of my knowledge.

3 12. On August 23, 2019, I was deposed in San Francisco. I live in Michigan, and
4 my deposition was noticed to take place in San Francisco, so I arranged for and flew from
5 Detroit to attend and prepare for my deposition. Other than this matter, I have never been a
6 named plaintiff or class representative in any class action lawsuit. I had been deposed only
7 once before in my life. Preparing for my deposition required an in-person meeting and
8 numerous phone calls with my attorneys, during which they asked me detailed questions about
9 my background, medical history, and my experience purchasing and consuming Joint Juice. I
10 reviewed the complaint and my prior responses to interrogatories and requests for production
11 of documents. During the meetings we also went through a mock deposition where they asked
12 questions as if they were Premier's attorneys. During my deposition, I answered all questions
13 under oath and subject to the penalty of perjury. Many of the questions from Premier's
14 attorneys concerned my personal and private medical history.

15 13. From 2018 through the present, I have remained in communication with my
16 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
17 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
18 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
19 support the Settlement.

20 14. I believe the requested \$10,000 service award is fair and reasonable in light of
21 the time, effort, and responsibilities I undertook on behalf of the Class over the past seven
22 years. I did not receive any compensation for my time during the litigation, and I undertook
23 these responsibilities to help other consumers who purchased Joint Juice.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed on March 3/4/2026, 2026, at Lapeer, Michigan.

DocuSigned by:

747A848AF511440
BEVERLY AVERY

BLOOD HURST & O'REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
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12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department 1

CLASS ACTION

**DECLARATION OF PATRICIA BLAND
IN SUPPORT OF SERVICE AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

BLOOD HURST & O'REARDON, LLP

1 I, PATRICIA BLAND, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. For over seven years, I have been a named plaintiff and Class Representative in
6 this action. Over the past seven years, I have devoted dozens of hours to this matter, including
7 meetings with counsel, reviewing pleadings and discovery responses, preparing for and
8 attending my deposition, and staying informed about major developments. Serving as a Class
9 Representative required significant time and attention beyond my ordinary daily
10 responsibilities.

11 3. On July 22, 2020, the proposed Class of people in California who purchased
12 Joint Juice was certified, and I was appointed Class Representative. In connection with the
13 motion for class certification, I submitted a declaration. *See* Exhibit 102 to the March 9, 2020
14 Declaration of Timothy G. Blood.

15 4. I am a resident of the State of California. Beginning in 2015, I first purchased
16 and consumed Joint Juice. I first purchased Joint Juice from Walmart located in Porter Ranch,
17 California. I purchased the 6-count "ready to drink" version of Joint Juice. I consumed Joint
18 Juice up to approximately January 2018, and during that period generally consumed one of the
19 bottles every day. I purchased Joint Juice because I was experiencing joint pain and wanted my
20 joints to feel better. I saw the Joint Juice television advertisement featuring Joe Montana and
21 the Joint Juice product labeling, including the Arthritis Foundation logo on the labeling, and I
22 believed the advertising that drinking Joint Juice was good for flexibility and joints, that it
23 would lubricate my cartilage, improve my flexibility, and relieve my knee pain. I do not
24 believe Joint Juice provided me with any of the advertised benefits.

25 5. I volunteered to be a plaintiff and to represent other purchasers in this class
26 action because I believe it is wrong for companies to falsely advertise products. I understand
27 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
28

BLOOD HURST & O'REARDON, LLP

1 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
2 that I have carried out this duty.

3 6. I understood that by serving as a class representative, my name would appear
4 on court filings and that I could be subject to public scrutiny. I also understood that I might be
5 required to testify at trial and to disclose private personal and medical information, which I did
6 during my deposition.

7 7. I retained Blood Hurst & O'Reardon, LLP in November 2018 and over the past
8 seven years I have regularly kept in contact with them and stayed informed on the progress of
9 the case. I have answered all of my attorneys' questions regarding my experience with Joint
10 Juice. From the time I agreed to act as a class representative, I understood that the case could
11 proceed to trial and that I would need to make myself available on short notice to comply with
12 court deadlines, discovery obligations, and trial preparation.

13 8. After I was appointed as the Class Representative by the Court, I continued to
14 devote substantial time and effort to this case. I spoke with my attorneys on numerous
15 occasions about my experience with Joint Juice, my need for something to help with my joint
16 pain and joint health, Premier's multiple sets of discovery requests, preparation for my
17 deposition, the case in general, and the potential trial. Trial in this matter was scheduled
18 several times and ultimately began on August 6, 2024. In preparing for trial, I spent many
19 hours with my attorneys to prepare to testify. I arranged to take time off work and I made
20 preparations to travel to Oakland to testify.

21 9. My efforts included reviewing and working with my attorneys on the discovery
22 requests Premier served on me in 2020 and in 2023. I answered all the questions to the best of
23 my knowledge and searched my home, emails, and other sources for any documentation
24 related to Joint Juice. After the responses to discovery requests were prepared by my attorneys,
25 I reviewed them to make sure they were accurate. I signed a verification swearing under the
26 penalty of perjury that the responses were truthful to the best of my knowledge.

27 10. On May 5, 2020, I was deposed by Premier's attorneys. Other than this matter,
28 I have never been a named plaintiff or class representative in any class action lawsuit.

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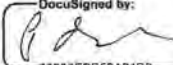
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Preparing for my deposition required numerous videoconference meetings and phone calls with my attorneys, during which they asked me detailed questions about my background, medical history, and my experience purchasing and consuming Joint Juice. I reviewed the complaint and my prior declaration. During the meetings we also went through a mock deposition where they asked questions as if they were Premier's attorneys. During my deposition, I answered all questions under oath and subject to the penalty of perjury. Many of the questions from Premier's attorneys concerned my personal and private medical history.

11. From 2018 through the present, I have remained in communication with my attorneys to get updates on the overall progress of the case. I was fully committed to testifying at trial on behalf of the Class. I have remained committed to the case and will continue to stay active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully support the Settlement.

12. I believe the requested \$10,000 service award is fair and reasonable in light of the time, effort, and responsibilities I undertook on behalf of the Class over the past seven years. I did not receive any compensation for my time during the litigation, and I undertook these responsibilities to help other consumers who purchased Joint Juice.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 3/4/2026, 2026, at Sherman Oaks, California.

DocuSigned by:


PATRICIA BLAND

BLOOD HURST & O'REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
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9 tblood@bholaw.com
10 toreardon@bholaw.com
11 pbrown@bholaw.com

12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department 1

CLASS ACTION

**DECLARATION OF SUSAN CAIAZZO IN
SUPPORT OF SERVICE AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

BLOOD HURST & O'REARDON, LLP

1 I, SUSAN CAIAZZO, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. For over nine years, I have been a named plaintiff and Class Representative in
6 the related federal actions and am a named plaintiff and Class Representative in the Second
7 Amended Complaint filed pursuant to this Court's January 8, 2026, order granting preliminary
8 approval in this action.

9 3. Over the past nine years, I have devoted dozens of hours to this matter,
10 including meetings with counsel, reviewing pleadings and discovery responses, preparing for
11 and attending my deposition, and staying informed about major developments. Serving as a
12 class representative required significant time and attention beyond my ordinary daily
13 responsibilities.

14 4. On November 18, 2016, my attorneys from Blood Hurst & O'Reardon, LLP
15 filed a class action complaint in *Caiazza v. Premier Nutrition Corporation*, 3:16-cv-06685-RS
16 (N.D. Cal.) ("*Caiazza*"). *Caiazza* is brought on behalf of myself and a class of people from
17 Florida who purchased Joint Juice. I am the named plaintiff and class representative in
18 *Caiazza*.

19 5. On December 17, 2019, the proposed Florida Class was certified, and I was
20 appointed Class Representative. In connection with the motion for class certification, I
21 submitted a declaration. *See Caiazza*, Dkt. No. 62-1 at Exhibit 90.

22 6. I am a resident of the State of Florida. Beginning in 2014, I first purchased and
23 consumed Joint Juice. I typically bought the concentrate "Easy Shot" version of Joint Juice
24 from Costco, and drank one recommended serving every day or every two days in the
25 morning. I purchased Joint Juice for about one year. I purchased Joint Juice because I was
26 experiencing joint pain and wanted my joints to feel better. I saw the Joint Juice product
27 labeling and believed the advertising that drinking Joint Juice would provide lubrication to my
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1 joints, help with the motion in my joints, and reduce my joint pain. I do not believe Joint Juice
2 provided me with any of the advertised benefits.

3 7. I volunteered to be a plaintiff and to represent other purchasers in this class
4 action because I believe it is wrong for companies to falsely advertise products. I understand
5 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
6 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
7 that I have carried out this duty.

8 8. I understood that by serving as a class representative, my name would appear
9 on court filings and that I could be subject to public scrutiny. I also understood that I might be
10 required to testify at trial and to disclose private personal and medical information, which I did
11 during my deposition.

12 9. I retained Blood Hurst & O'Reardon, LLP in November 2016 and over the past
13 nine years I have regularly kept in contact with them and stayed informed on the progress of
14 the case. I have answered all of my attorneys' questions regarding my experience with Joint
15 Juice. From the time I agreed to act as a class representative, I understood that the case could
16 proceed to trial and that I would need to make myself available on short notice to comply with
17 court deadlines, discovery obligations, and trial preparation.

18 10. After I was appointed as the Class Representative, I continued to devote
19 substantial time and effort to this case. I spoke with my attorneys on numerous occasions
20 about my experience with Joint Juice, my need for something to help with my joint pain and
21 joint health, Premier's discovery requests, preparation for my deposition, the case in general,
22 and the possible jury trial.

23 11. My efforts included reviewing and working with my attorneys on the
24 interrogatories and document requests Premier served on me. I answered all the questions to
25 the best of my knowledge and searched my home, emails, and other sources for any
26 documentation related to Joint Juice. After the responses to interrogatories and document
27 requests were prepared by my attorneys, I reviewed them to make sure they were accurate. I
28

BLOOD HURST & O'REARDON, LLP

1 signed a verification swearing under the penalty of perjury that the responses were truthful to
2 the best of my knowledge.

3 12. On September 20, 2019, I was deposed in Philadelphia, Pennsylvania. I live in
4 Florida, and my deposition was noticed to take place in Philadelphia, so I arranged for and
5 flew from Florida to attend and prepare for my deposition. This was the first deposition I had
6 ever given, and other than this matter, I have never been a plaintiff in any lawsuit. Preparing
7 for my deposition required an in-person meeting and numerous phone calls with my attorneys,
8 during which they asked me detailed questions about my background, medical history, and my
9 experience purchasing and consuming Joint Juice. I reviewed the complaint and my prior
10 responses to interrogatories and requests for production of documents. During the meetings we
11 also went through a mock deposition where they asked questions as if they were Premier's
12 attorneys. During my deposition, I answered all questions under oath and subject to the penalty
13 of perjury. Many of the questions from Premier's attorneys concerned my personal and private
14 medical history.

15 13. From 2016 through the present, I have remained in communication with my
16 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
17 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
18 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
19 support the Settlement.

20 14. I believe the requested \$10,000 service award is fair and reasonable in light of
21 the time, effort, and responsibilities I undertook on behalf of the Class over the past nine years.
22 I did not receive any compensation for my time during the litigation, and I undertook these
23 responsibilities to help other consumers who purchased Joint Juice.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed on March ^{3/4/2026} ____, 2026, at Cape Coral, Florida.

DocuSigned by:



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SUSAN CAIAZZO

BLOOD HURST & O'REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
 2 TIMOTHY G. BLOOD (149343)
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 11 pbrown@bholaw.com

12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
 16 WHITE, individually and on behalf of all
 17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
 21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
 24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
 28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
 Related to RG20072126 (Sonner)

Assigned for All Purposes to:
 Honorable Michael Markman
 Department 1

CLASS ACTION

DECLARATION OF SANDRA DENT IN SUPPORT OF SERVICE AWARD

Bland Complaint Filed: 1/15/2019
 Sonner Complaint Filed: 9/01/2020

BLOOD HURST & O'REARDON, LLP

1 I, SANDRA DENT, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. For over nine years, I have been a named plaintiff and Class Representative in
6 the related federal actions and am a named plaintiff and Class Representative in the Second
7 Amended Complaint filed pursuant to this Court's January 8, 2026, order granting preliminary
8 approval in this action.

9 3. Over the past nine years, I have devoted dozens of hours to this matter,
10 including meetings with counsel, reviewing pleadings and discovery responses, preparing for
11 and attending my deposition, and staying informed about major developments. Serving as a
12 class representative required significant time and attention beyond my ordinary daily
13 responsibilities.

14 4. On November 21, 2016, my attorneys from Blood Hurst & O'Reardon, LLP
15 filed a class action complaint in *Dent v. Premier Nutrition Corporation*, 3:16-cv-06721-RS
16 (N.D. Cal.) ("*Dent*"). *Dent* is brought on behalf of myself and a class of people from Illinois
17 who purchased Joint Juice. I am the named plaintiff and class representative in *Dent*.

18 5. On December 17, 2019, the proposed Illinois Class was certified, and I was
19 appointed Class Representative. In connection with the motion for class certification, I
20 submitted a declaration. *See Dent*, Dkt. No. 64-1 at Exhibit 94.

21 6. I am a resident of the State of Illinois. Beginning in 2012, I first purchased and
22 consumed Joint Juice. I bought the 6-count "ready to drink" version of Joint Juice from
23 Walmart in Illinois. I purchased and consumed Joint Juice until 2016. At first and until the end
24 of 2013, I consumed Joint Juice daily. Joint Juice was expensive. As time went on, I did not
25 always consume one bottle every day. I purchased Joint Juice because I wanted my joints to
26 feel better and give me easier movement without joint pain and discomfort. I saw Joint Juice
27 advertising, including a television commercial and the product labeling, and believed that
28

BLOOD HURST & O'REARDON, LLP

1 drinking Joint Juice would alleviate my joint pain and discomfort and improve my flexibility
2 and movement. I do not believe Joint Juice provided me with any of the advertised benefits.

3 7. I volunteered to be a plaintiff and to represent other purchasers in this class
4 action because I believe it is wrong for companies to falsely advertise products. I understand
5 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
6 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
7 that I have carried out this duty.

8 8. I understood that by serving as a class representative, my name would appear
9 on court filings and that I could be subject to public scrutiny. I also understood that I might be
10 required to testify at trial and to disclose private personal and medical information, which I did
11 during my deposition. In February 2025, I was informed that *Dent* had been selected as the
12 next case to proceed to trial among the related federal actions. I planned to travel to San
13 Francisco from Chicago to attend and testify at the trial that was scheduled to begin in
14 February 2026.

15 9. I retained Blood Hurst & O'Reardon, LLP in November 2016 and over the past
16 nine years I have regularly kept in contact with them and stayed informed on the progress of
17 the case. I have answered all of my attorneys' questions regarding my experience with Joint
18 Juice. From the time I agreed to act as a class representative, I understood that the case could
19 proceed to trial and that I would need to make myself available on short notice to comply with
20 court deadlines, discovery obligations, and trial preparation.

21 10. After I was appointed as the Class Representative by the Court, I continued to
22 devote substantial time and effort to this case. I spoke with my attorneys on numerous
23 occasions about my experience with Joint Juice, my need for something to help with my joint
24 pain and joint health, Premier's discovery requests, preparation for my deposition, the case in
25 general, and the possible jury trial.

26 11. My efforts included reviewing and working with my attorneys on the
27 interrogatories and document requests Premier served on me. I answered all the questions to
28 the best of my knowledge and searched my home, emails, and other sources for any

BLOOD HURST & O'REARDON, LLP

1 documentation related to Joint Juice. After the responses to interrogatories and document
2 requests were prepared by my attorneys, I reviewed them to make sure they were accurate. I
3 signed a verification swearing under the penalty of perjury that the responses were truthful to
4 the best of my knowledge.

5 12. On September 17, 2019, I was deposed in San Francisco. I live in Illinois, and
6 my deposition was noticed to take place in San Francisco, so I arranged for and flew from
7 Chicago to attend and prepare for my deposition. Other than this matter, I have never been a
8 plaintiff in any lawsuit. I had been deposed only once before in my life, more than thirty years
9 ago. Preparing for my deposition required an in-person meeting and numerous phone calls
10 with my attorneys, during which they asked me detailed questions about my background,
11 medical history, and my experience purchasing and consuming Joint Juice. I reviewed the
12 complaint and my prior responses to interrogatories and requests for production of documents.
13 During the meetings we also went through a mock deposition where they asked questions as if
14 they were Premier's attorneys. During my deposition, I answered all questions under oath and
15 subject to the penalty of perjury. Many of the questions from Premier's attorneys concerned
16 my personal and private medical history.

17 13. From 2016 through the present, I have remained in communication with my
18 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
19 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
20 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
21 support the Settlement.

22 14. I believe the requested \$10,000 service award is fair and reasonable in light of
23 the time, effort, and responsibilities I undertook on behalf of the Class over the past nine years.
24 I did not receive any compensation for my time during the litigation, and I undertook these
25 responsibilities to help other consumers who purchased Joint Juice.

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I declare under penalty of perjury under the laws of the State of California that the
3/4/2026
foregoing is true and correct. Executed on March ____, 2026, at Maywood, Illinois.

Signed by:

Sandra Dent

5CAB2E97F44348A...

SANDRA DENT

BLOOD HURST & O'REARDON, LLP

BLOOD HURST & O'REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
3 THOMAS J. O'REARDON II (247952)
4 PAULA R. BROWN (254142)
5 501 West Broadway, Suite 1490
6 San Diego, CA 92101
7 Tel: 619/338-1100
8 619/338-1101 (fax)
9 tblood@bholaw.com
10 toreardon@bholaw.com
11 pbrown@bholaw.com

12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department 1

CLASS ACTION

**DECLARATION OF DONNA LUX IN
SUPPORT OF SERVICE AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

BLOOD HURST & O'REARDON, LLP

1 I, DONNA LUX, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. For over nine years, I have been a named plaintiff and Class Representative in
6 the related federal actions and am a named plaintiff and Class Representative in the Second
7 Amended Complaint filed pursuant to this Court's January 8, 2026, order granting preliminary
8 approval in this action.

9 3. Over the past nine years, I have devoted dozens of hours to this matter,
10 including meetings with counsel, reviewing pleadings and discovery responses, preparing for
11 and attending my deposition, and staying informed about major developments. Serving as a
12 class representative required significant time and attention beyond my ordinary daily
13 responsibilities.

14 4. On November 18, 2016, my attorneys from Blood Hurst & O'Reardon, LLP
15 filed a class action complaint in *Lux v. Premier Nutrition Corporation*, 3:16-cv-06703-RS
16 (N.D. Cal.) ("*Lux*"). *Lux* is brought on behalf of myself and a class of people from Connecticut
17 who purchased Joint Juice. I am the named plaintiff and class representative in *Lux*.

18 5. On December 17, 2019, the proposed Connecticut Class was certified, and I
19 was appointed Class Representative. In connection with the motion for class certification, I
20 submitted a declaration. *See Lux*, Dkt. No. 62-1 at Exhibit 91.

21 6. I am currently a resident of the State of Florida but previously I was a resident
22 of the State of Connecticut. Beginning in 2014, I first purchased and consumed Joint Juice. I
23 made all purchases of Joint Juice while I was a resident of Connecticut. I bought the 30-count
24 "ready to drink" version of Joint Juice from BJ's Wholesale in Connecticut and drank one of
25 the 8-ounce bottles every day. I consumed Joint Juice daily for about three months. I
26 purchased Joint Juice because I was experiencing joint pain and wanted my joints to feel
27 better. I saw the Joint Juice product labeling and believed the advertising that drinking Joint
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BLOOD HURST & O'REARDON, LLP

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Juice would lubricate my joints, improve motion in my knees, and reduce my joint pain and discomfort. I do not believe Joint Juice provided me with any of the advertised benefits.

7. I volunteered to be a plaintiff and to represent other purchasers in this class action because I believe it is wrong for companies to falsely advertise products. I understand that I was appointed by the Court to be the representative of the Class, and it is my duty to act in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe that I have carried out this duty.

8. I understood that by serving as a class representative, my name would appear on court filings and that I could be subject to public scrutiny. I also understood that I might be required to testify at trial and to disclose private personal and medical information, which I did during my deposition.

9. I retained Blood Hurst & O'Reardon, LLP in November 2016 and over the past nine years I have regularly kept in contact with them and stayed informed on the progress of the case. I have answered all of my attorneys' questions regarding my experience with Joint Juice. From the time I agreed to act as a class representative, I understood that the case could proceed to trial and that I would need to make myself available on short notice to comply with court deadlines, discovery obligations, and trial preparation.

10. After I was appointed as the Class Representative by the Court, I continued to devote substantial time and effort to this case. I spoke with my attorneys on numerous occasions about my experience with Joint Juice, my need for something to help with my joint pain and joint health, Premier's discovery requests, preparation for my deposition, the case in general, and the possible jury trial.

11. My efforts included reviewing and working with my attorneys on the interrogatories and document requests Premier served on me. I answered all the questions to the best of my knowledge and searched my home, emails, and other sources for any documentation related to Joint Juice. After the responses to interrogatories and document requests were prepared by my attorneys, I reviewed them to make sure they were accurate. I

BLOOD HURST & O'REARDON, LLP

1 signed a verification swearing under the penalty of perjury that the responses were truthful to
2 the best of my knowledge.

3 12. On September 18, 2019, I was deposed in San Francisco. At the time I lived in
4 Connecticut, and my deposition was noticed to take place in San Francisco, so I arranged for
5 and flew from Connecticut to attend and prepare for my deposition. This was the first
6 deposition I had ever given, and other than this matter, I have never been a plaintiff in any
7 lawsuit. Preparing for my deposition required an in-person meeting and numerous phone calls
8 with my attorneys, during which they asked me detailed questions about my background,
9 medical history, and my experience purchasing and consuming Joint Juice. I reviewed the
10 complaint and my prior responses to interrogatories and requests for production of documents.
11 During the meetings we also went through a mock deposition where they asked questions as if
12 they were Premier's attorneys. During my deposition, I answered all questions under oath and
13 subject to the penalty of perjury. Many of the questions from Premier's attorneys concerned
14 my personal and private medical history.

15 13. From 2016 through the present, I have remained in communication with my
16 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
17 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
18 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
19 support the Settlement.

20 14. I believe the requested \$10,000 service award is fair and reasonable in light of
21 the time, effort, and responsibilities I undertook on behalf of the Class over the past nine years.
22 I did not receive any compensation for my time during the litigation, and I undertook these
23 responsibilities to help other consumers who purchased Joint Juice.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed on March ^{3/4/2026} ____, 2026, at _____, Florida.

26 DocuSigned by:
27 DONNA LUX
28 438864965182403
DONNA LUX

BLOOD HURST & O'REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
3 THOMAS J. O'REARDON II (247952)
4 PAULA R. BROWN (254142)
5 501 West Broadway, Suite 1490
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7 Tel: 619/338-1100
8 619/338-1101 (fax)
9 tblood@bholaw.com
10 toreardon@bholaw.com
11 pbrown@bholaw.com

12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department 1

CLASS ACTION

**DECLARATION OF ANNETTE
RAVINSKY IN SUPPORT OF SERVICE
AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

BLOOD HURST & O'REARDON, LLP

1 I, ANNETTE RAVINSKY, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. For over nine years I have been a named plaintiff and Class Representative in
6 the related federal actions, and am a named plaintiff and Class Representative in the Second
7 Amended Complaint filed pursuant to this Court's January 8, 2026, order granting preliminary
8 approval in this action.

9 3. Over the past nine years, I have devoted dozens of hours to this matter,
10 including meetings with counsel, reviewing pleadings and discovery responses, preparing for
11 and attending my deposition, and staying informed about major developments. Serving as a
12 class representative required significant time and attention beyond my ordinary daily
13 responsibilities.

14 4. On November 18, 2016, my attorneys from Blood Hurst & O'Reardon, LLP
15 filed a class action complaint in *Ravinsky v. Premier Nutrition Corporation*, 3:16-cv-06704-
16 RS (N.D. Cal.) ("*Ravinsky*"). *Ravinsky* is brought on behalf of myself and a class of people
17 from Pennsylvania who purchased Joint Juice. I am the named plaintiff and class
18 representative in *Ravinsky*.

19 5. On December 17, 2019, the proposed Pennsylvania Class was certified, and I
20 was appointed Class Representative. In connection with the motion for class certification, I
21 submitted a declaration. *See Ravinsky*, Dkt. No. 62-1 at Exhibit 92.

22 6. I am a resident of the State of Pennsylvania. Beginning in the summer of 2011,
23 I first purchased and consumed Joint Juice. I typically bought the six-pack version of Joint
24 Juice and drank one bottle daily for over six months. After the six-month period, I continued to
25 buy and drink Joint Juice off and on for another year or so—up until 2013. I kept buying Joint
26 Juice because I wanted to give it a chance to work, but it was getting to the point where I could
27 not afford to keep drinking it daily any longer. I first purchased Joint Juice from Walmart. I
28 purchased Joint Juice because I was experiencing joint pain and stiffness. I saw Joint Juice

BLOOD HURST & O'REARDON, LLP

1 labeling and advertising, including a Joe Montana television commercial, and believed those
2 advertisements that drinking Joint Juice would provide greater flexibility and reduce my joint
3 pain. I do not believe Joint Juice provided me with any of the advertised benefits.

4 7. I volunteered to be a plaintiff and to represent other purchasers in this class
5 action because I believe it is wrong for companies to falsely advertise products. I understand
6 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
7 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
8 that I have carried out this duty.

9 8. I understood that by serving as a class representative, my name would appear
10 on court filings and that I could be subject to public scrutiny. I also understood that I might be
11 required to testify at trial and to disclose private personal and medical information, which I did
12 during my deposition.

13 9. I retained Blood Hurst & O'Reardon, LLP in November 2016 and over the past
14 nine years I have regularly kept in contact with them and stayed informed on the progress of
15 the case. I have answered all of my attorneys' questions regarding my experience with Joint
16 Juice. From the time I agreed to act as a class representative, I understood that the case could
17 proceed to trial and that I would need to make myself available on short notice to comply with
18 court deadlines, discovery obligations, and trial preparation.

19 10. After I was appointed as the Class Representative, I continued to devote
20 substantial time and effort to this case. I spoke with my attorneys on numerous occasions
21 about my experience with Joint Juice, my need for something to help with my joint pain and
22 joint health, Premier's discovery requests, preparation for my deposition, the case in general,
23 and the possible jury trial.

24 11. My efforts included reviewing and working with my attorneys on the
25 interrogatories and document requests Premier served on me. I answered all the questions to
26 the best of my knowledge and searched my home, emails, and other sources for any
27 documentation related to Joint Juice. I preserved and provided my attorneys the bottles of Joint
28 Juice that were in my possession. After the responses to interrogatories and document requests

BLOOD HURST & O'REARDON, LLP

1 were prepared by my attorneys, I reviewed them to make sure they were accurate. I signed a
2 verification swearing under the penalty of perjury that the responses were truthful to the best
3 of my knowledge.

4 12. I sat for my deposition in this action, which was the first deposition I had ever
5 given. Preparing for it required an in-person meeting and numerous phone calls with my
6 attorneys, during which they asked me detailed questions about my background, medical
7 history, and my experience purchasing and consuming Joint Juice. I reviewed the complaint
8 and my prior responses to interrogatories and requests for production of documents. During
9 the meetings we also went through a mock deposition where they asked questions as if they
10 were Premier's attorneys. On September 10, 2019, I attended the deposition in Philadelphia. I
11 answered all questions from Premier's attorneys under oath and subject to the penalty of
12 perjury. Many of the questions had to do with my personal and private medical history.

13 13. From 2016 through the present, I have remained in communication with my
14 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
15 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
16 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
17 support the Settlement.

18 14. I believe the requested \$10,000 service award is fair and reasonable in light of
19 the time, effort, and responsibilities I undertook on behalf of the Class over the past nine years.
20 I did not receive any compensation for my time during the litigation, and I undertook these
21 responsibilities to help other consumers who purchased Joint Juice.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed on March 3/4/2026, 2026, at Philadelphia, Pennsylvania.

Signed by:

0FA6DG102E03418...
ANNETTE RAVINSKY

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
3 THOMAS J. O'REARDON II (247952)
4 PAULA R. BROWN (254142)
5 501 West Broadway, Suite 1490
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7 Tel: 619/338-1100
8 619/338-1101 (fax)
9 tblood@bholaw.com
10 toreardon@bholaw.com
11 pbrown@bholaw.com

12 *Attorneys for Plaintiffs and Class Counsel*

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department 1

CLASS ACTION

**DECLARATION OF KATHLEEN
SONNER IN SUPPORT OF SERVICE
AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

1 I, KATHLEEN SONNER, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. For over eleven years, I have been a named plaintiff and Class Representative
6 in this action. Over that time, I have devoted dozens of hours to this matter, including meetings
7 with counsel, reviewing pleadings and discovery responses, preparing for and attending my
8 deposition, and staying informed about major developments. Serving as a Class Representative
9 required significant time and attention beyond my ordinary daily responsibilities.

10 3. On September 12, 2014, my attorneys from Blood Hurst & O'Reardon, LLP
11 filed the first amended class action complaint in *Mullins v. Premier Nutrition Corporation*,
12 3:13-cv-01271-RS (N.D. Cal.) ("*Mullins*") wherein I was substituted in as the named plaintiff
13 and proposed class representative. *Mullins* was brought on behalf of myself and a class of
14 people from California who purchased Joint Juice.

15 4. On April 15, 2016, the proposed California Class was certified, and I was
16 appointed Class Representative. Trial in *Mullins* was scheduled for May 2018. I was fully
17 committed to traveling to San Francisco and testifying at trial. The 2018 trial in *Mullins* did
18 not end up occurring, and the case went through an appeal. In September 2020, my attorneys
19 filed the current "*Sonner*" action in state court on behalf of myself and the same Class of
20 California purchasers of Joint Juice.

21 5. I purchased and consumed Joint Juice while I was a resident of the State of
22 California. In late 2013, I purchased the 6-count "ready to drink" version of Joint Juice from
23 Ralph's in San Diego. I purchased and consumed Joint Juice because I was experiencing joint
24 pain and wanted my joints to feel better. I saw the Joint Juice television advertisement and
25 product labeling, including the Arthritis Foundation logo on the labeling, and I believed the
26 advertising that drinking Joint Juice would help with the fluid in my joints and improve my
27 joint health, making my joints more comfortable and flexible with less joint pain. I do not
28 believe Joint Juice provided me with any of the advertised benefits.

1 6. I volunteered to be a plaintiff and to represent other purchasers in this class
2 action because I believe it is wrong for companies to falsely advertise products. I understand
3 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
4 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
5 that I have carried out this duty.

6 7. I understood that by serving as a class representative, my name would appear
7 on court filings and that I could be subject to public scrutiny. I also understood that I might be
8 required to testify at trial and to disclose private personal and medical information, which I did
9 during my deposition.

10 8. I retained my attorneys in September 2014 and over the past eleven years I have
11 regularly kept in contact with them and stayed informed on the progress of the case. I have
12 answered all of my attorneys' questions regarding my experience with Joint Juice. From the
13 time I agreed to act as a class representative, I understood that the case could proceed to trial
14 and that I would need to make myself available on short notice to comply with court deadlines,
15 discovery obligations, and trial preparation.

16 9. After I was appointed as the Class Representative by the Court, I continued to
17 devote substantial time and effort to this case. I spoke with my attorneys on numerous
18 occasions about my experience with Joint Juice, my need for something to help with my joint
19 pain and joint health, Premier's discovery requests, preparation for my deposition, a
20 declaration I signed in March 2018 that was filed in *Mullins*, the case in general, and the
21 potential trials. Trial in this matter was scheduled several times and ultimately began on
22 August 6, 2024. In preparing for trial, I had several phone calls and spent time with my
23 attorneys preparing to testify. I arranged to travel to Oakland to testify at trial.

24 10. My efforts included reviewing and working with my attorneys on the
25 interrogatories and document requests Premier served on me. I answered all the questions to
26 the best of my knowledge and searched my home, emails, and other sources for any
27 documentation related to Joint Juice. I provided my attorneys with the remaining Joint Juice
28 that I had in my possession. I later provided supplemental responses to Premier's requests.

1 After the responses to interrogatories and document requests were prepared by my attorneys, I
2 reviewed them to make sure they were accurate. I signed verifications swearing under penalty
3 of perjury that the responses were truthful to the best of my knowledge.

4 11. On November 13, 2014, I was deposed in San Francisco. I lived in San Diego,
5 and my deposition was noticed to take place in San Francisco, so I traveled there to attend and
6 prepare for my deposition. That was the first deposition I had ever given. Preparing for my
7 deposition required an in-person meeting and numerous phone calls with my attorneys, during
8 which they asked me detailed questions about my background, medical history, and my
9 experience purchasing and consuming Joint Juice. I reviewed the complaint and my prior
10 responses to interrogatories and requests for production of documents. During the meetings,
11 we also went through a mock deposition where they asked questions as if they were Premier's
12 attorneys. During my deposition, I answered all questions under oath and subject to the penalty
13 of perjury. Many of the questions from Premier's attorneys concerned my personal and private
14 medical history.

15 12. From 2014 through the present, I have remained in communication with my
16 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
17 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
18 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
19 support the Settlement.

20 13. I believe the requested \$10,000 service award is fair and reasonable in light of
21 the time, effort, and responsibilities I undertook on behalf of the Class over the past eleven
22 years. I did not receive any compensation for my time during the litigation, and I undertook
23 these responsibilities to help other consumers who purchased Joint Juice.

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

26 Executed on March 20, 2026, at Nashville, Tennessee.

27 *s/ Kathleen Sonner*

28 _____
KATHLEEN SONNER

BLOOD HURST & O'REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
3 THOMAS J. O'REARDON II (247952)
4 PAULA R. BROWN (254142)
5 501 West Broadway, Suite 1490
6 San Diego, CA 92101
7 Tel: 619/338-1100
8 619/338-1101 (fax)
9 tblood@bholaw.com
10 toreardon@bholaw.com
11 pbrown@bholaw.com

12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department 1

CLASS ACTION

**DECLARATION OF MARILYN SPENCER
IN SUPPORT OF SERVICE AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

BLOOD HURST & O'REARDON, LLP

1 I, MARILYN SPENCER, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. For over nine years, I have been a named plaintiff and Class Representative in
6 the related federal actions and am a named plaintiff and Class Representative in the Second
7 Amended Complaint filed pursuant to this Court's January 8, 2026, order granting preliminary
8 approval in this action.

9 3. Over the past nine years, I have devoted dozens of hours to this matter,
10 including meetings with counsel, reviewing pleadings and discovery responses, preparing for
11 and attending my deposition, and staying informed about major developments. Serving as a
12 class representative required significant time and attention beyond my ordinary daily
13 responsibilities.

14 4. On December 12, 2016, my attorneys from Blood Hurst & O'Reardon, LLP
15 filed a class action complaint in *Spencer v. Premier Nutrition Corporation*, 3:16-cv-7090-RS
16 (N.D. Cal.) ("*Spencer*"). *Spencer* is brought on behalf of myself and a class of people from
17 Maryland who purchased Joint Juice. I am the named plaintiff and class representative.

18 5. On December 17, 2019, the proposed Maryland Class was certified, and I was
19 appointed Class Representative. In connection with the motion for class certification, I
20 submitted a declaration. *See Spencer*, Dkt. No. 58-1 at Exhibit 96.

21 6. I am a resident of the State of Maryland. Beginning in approximately June
22 2013, I first purchased and consumed Joint Juice. I first purchased the 6-count "ready to drink"
23 version of Joint Juice from Walmart in Maryland. I also bought the 30-count "ready to drink"
24 version of Joint Juice from Sam's Club in Maryland. I consumed Joint Juice up to
25 approximately June 2016, and during that period generally consumed one of the bottles every
26 morning. I purchased Joint Juice because I was experiencing joint pain and stiffness and
27 wanted my joints to feel better. I saw the Joint Juice television advertisement, website, and
28 product labeling, including the Arthritis Foundation logo on the labeling, and I believed the

BLOOD HURST & O'REARDON, LLP

1 advertising that drinking Joint Juice would lubricate my joints, and improve my joint health
2 and flexibility, and relieve my joint pain and stiffness. I do not believe Joint Juice provided me
3 with any of the advertised benefits.

4 7. I volunteered to be a plaintiff and to represent other purchasers in this class
5 action because I believe it is wrong for companies to falsely advertise products. I understand
6 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
7 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
8 that I have carried out this duty.

9 8. I understood that by serving as a class representative, my name would appear
10 on court filings and that I could be subject to public scrutiny. I also understood that I might be
11 required to testify at trial and to disclose private personal and medical information, which I did
12 during my deposition.

13 9. I retained Blood Hurst & O'Reardon, LLP in November 2016 and over the past
14 nine years I have regularly kept in contact with them and stayed informed on the progress of
15 the case. I have answered all of my attorneys' questions regarding my experience with Joint
16 Juice. From the time I agreed to act as a class representative, I understood that the case could
17 proceed to trial and that I would need to make myself available on short notice to comply with
18 court deadlines, discovery obligations, and trial preparation.

19 10. After I was appointed as the Class Representative by the Court, I continued to
20 devote substantial time and effort to this case. I spoke with my attorneys on numerous
21 occasions about my experience with Joint Juice, my need for something to help with my joint
22 pain and joint health, Premier's discovery requests, preparation for my deposition, the case in
23 general, and the possible jury trial.

24 11. My efforts included reviewing and working with my attorneys on the
25 interrogatories and document requests Premier served on me. I answered all the questions to
26 the best of my knowledge and searched my home, emails, and other sources for any
27 documentation related to Joint Juice. After the responses to interrogatories and document
28 requests were prepared by my attorneys, I reviewed them to make sure they were accurate. I

BLOOD HURST & O'REARDON, LLP

1 signed a verification swearing under the penalty of perjury that the responses were truthful to
2 the best of my knowledge.

3 12. On September 25, 2019, I was deposed in San Francisco. I live in Maryland,
4 and my deposition was noticed to take place in San Francisco, so I arranged for and flew from
5 Maryland to attend and prepare for my deposition. Other than this matter, I have never been a
6 named plaintiff or class representative in any class action lawsuit. This was the first deposition
7 I had ever given. Preparing for my deposition required an in-person meeting and numerous
8 phone calls with my attorneys, during which they asked me detailed questions about my
9 background, medical history, and my experience purchasing and consuming Joint Juice. I
10 reviewed the complaint and my prior responses to interrogatories and requests for production
11 of documents. During the meetings we also went through a mock deposition where they asked
12 questions as if they were Premier's attorneys. During my deposition, I answered all questions
13 under oath and subject to the penalty of perjury. Many of the questions from Premier's
14 attorneys concerned my personal and private medical history.

15 13. From 2016 through the present, I have remained in communication with my
16 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
17 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
18 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
19 support the Settlement.

20 14. I believe the requested \$10,000 service award is fair and reasonable in light of
21 the time, effort, and responsibilities I undertook on behalf of the Class over the past nine years.
22 I did not receive any compensation for my time during the litigation, and I undertook these
23 responsibilities to help other consumers who purchased Joint Juice.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed on March 3/4/2026, 2026, at Halethorpe, Maryland.

Signed by:

08845D708C0041C

MARILYN SPENCER

BLOOD HURST & O'REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
3 THOMAS J. O'REARDON II (247952)
4 PAULA R. BROWN (254142)
5 501 West Broadway, Suite 1490
6 San Diego, CA 92101
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9 tblood@bholaw.com
10 toreardon@bholaw.com
11 pbrown@bholaw.com

12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department I

CLASS ACTION

**DECLARATION OF MARY TRUDEAU IN
SUPPORT OF SERVICE AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

BLOOD HURST & O'REARDON, LLP

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I, MARY TRUDEAU, declare:

1. I am a named plaintiff and Class Representative in this action. I have personal knowledge of the facts stated below and, if called upon to testify, would be competent to do so.

2. For nearly seven years, I have been a named plaintiff and Class Representative in the related federal actions and am a named plaintiff and Class Representative in the Second Amended Complaint filed pursuant to this Court’s January 8, 2026, order granting preliminary approval in this action.

3. Since October 2018 when I retained Blood Hurst & O’Reardon, LLP, I have devoted dozens of hours to this matter, including meetings with counsel, reviewing pleadings and discovery responses, preparing for and attending my deposition, and staying informed about major developments. Serving as a class representative required significant time and attention beyond my ordinary daily responsibilities.

4. On May 8, 2019, my attorneys from Blood Hurst & O’Reardon, LLP filed a first amended class action complaint in *Schupp v. Premier Nutrition Corporation*, 3:16-cv-7090-RS (N.D. Cal.) (“*Schupp*”) wherein I was substituted as the named plaintiff. *Schupp* is brought on behalf of myself and a class of people from Massachusetts who purchased Joint Juice. I am the named plaintiff and class representative in *Schupp*.

5. On December 17, 2019, the proposed Massachusetts Class was certified, and I was appointed Class Representative. In connection with the motion for class certification, I submitted a declaration. *See Schupp*, Dkt. No. 60-1 at Exhibit 98.

6. I am a resident of the State of Massachusetts. Beginning in approximately November 2015, I first purchased and consumed Joint Juice. I purchased the 6-count “ready to drink” version of Joint Juice from Walmart in Hadley, Massachusetts. I consumed Joint Juice for eleven months, and during that period I generally consumed one of the 8-ounce bottles every morning. I purchased Joint Juice because I wanted my joints to feel better. I saw the Joint Juice product packaging, and I believed the advertising that drinking Joint Juice would

BLOOD HURST & O'REARDON, LLP

1 lubricate my joints, improve my joint flexibility, and relieve my joint stiffness. I do not believe
2 Joint Juice provided me with any of the advertised benefits.

3 7. I volunteered to be a plaintiff and to represent other purchasers in this class
4 action because I believe it is wrong for companies to falsely advertise products. I understand
5 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
6 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
7 that I have carried out this duty.

8 8. I understood that by serving as a class representative, my name would appear
9 on court filings and that I could be subject to public scrutiny. I also understood that I might be
10 required to testify at trial and to disclose private personal and medical information, which I did
11 during my deposition.

12 9. Over the past seven years, I have regularly kept in contact with my attorneys
13 from Blood Hurst & O'Reardon, LLP and stayed informed on the progress of the case. I have
14 answered all of my attorneys' questions regarding my experience with Joint Juice. From the
15 time I agreed to act as a class representative, I understood that the case could proceed to trial
16 and that I would need to make myself available on short notice to comply with court deadlines,
17 discovery obligations, and trial preparation.

18 10. After I was appointed as the Class Representative by the Court, I continued to
19 devote substantial time and effort to this case. I spoke with my attorneys on numerous
20 occasions about my experience with Joint Juice, my need for something to help with my joint
21 pain and joint health, Premier's discovery requests, preparation for my deposition, the case in
22 general, and the possible jury trial.

23 11. My efforts included reviewing and working with my attorneys on the
24 interrogatories and document requests Premier served on me. I answered all the questions to
25 the best of my knowledge and searched my home, emails, and other sources for any
26 documentation related to Joint Juice. After the responses to interrogatories and document
27 requests were prepared by my attorneys, I reviewed them to make sure they were accurate. I
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1 signed a verification swearing under the penalty of perjury that the responses were truthful to
2 the best of my knowledge.

3 12. On September 19, 2019, I was deposed in San Francisco. I live in
4 Massachusetts, and my deposition was noticed to take place in San Francisco, so I arranged for
5 and flew from Massachusetts to attend and prepare for my deposition. Other than this matter, I
6 have never been a named plaintiff or class representative in any class action lawsuit. This was
7 the first deposition I had ever given. Preparing for my deposition required an in-person
8 meeting and numerous phone calls with my attorneys, during which they asked me detailed
9 questions about my background, medical history, and my experience purchasing and
10 consuming Joint Juice. I reviewed the complaint and my prior responses to interrogatories and
11 requests for production of documents. During the meetings we also went through a mock
12 deposition where they asked questions as if they were Premier's attorneys. During my
13 deposition, I answered all questions under oath and subject to the penalty of perjury. Many of
14 the questions from Premier's attorneys concerned my personal and private medical history.

15 13. From 2018 through the present, I have remained in communication with my
16 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
17 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
18 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
19 support the Settlement.

20 14. I believe the requested \$10,000 service award is fair and reasonable in light of
21 the time, effort, and responsibilities I undertook on behalf of the Class over the past seven
22 years. I did not receive any compensation for my time during the litigation, and I undertook
23 these responsibilities to help other consumers who purchased Joint Juice.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed on March ^{3/4/2026} ____, 2026, at Amherst, Massachusetts.

26
27 Signed by:
Mary Trudeau
E0B411E0DF684DC
28 MARY TRUDEAU

1 BLOOD HURST & O'REARDON, LLP
2 TIMOTHY G. BLOOD (149343)
3 THOMAS J. O'REARDON II (247952)
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8 619/338-1101 (fax)
9 tblood@bholaw.com
10 toreardon@bholaw.com
11 pbrown@bholaw.com

12 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF ALAMEDA**

15 PATRICIA BLAND and EDWARD
16 WHITE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 PREMIER NUTRITION COMPANY,
21 LLC; and DOES 1-25, inclusive,

22 Defendant.

23 KATHLEEN SONNER, individually and
24 on behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 PREMIER NUTRITION COMPANY,
28 LLC; and DOES 1-25, inclusive,

Defendant.

Lead Case No. RG19002714
Related to RG20072126 (Sonner)

Assigned for All Purposes to:
Honorable Michael Markman
Department I

CLASS ACTION

**DECLARATION OF EDWARD WHITE IN
SUPPORT OF SERVICE AWARD**

Bland Complaint Filed: 1/15/2019
Sonner Complaint Filed: 9/01/2020

1 I, EDWARD WHITE, declare:

2 1. I am a named plaintiff and Class Representative in this action. I have personal
3 knowledge of the facts stated below and, if called upon to testify, would be competent to do
4 so.

5 2. I was added as a named plaintiff and Class Representative in the First Amended
6 Class Action Complaint filed in this action on May 12, 2020. Over the past six years, I have
7 devoted dozens of hours to this matter, including meetings with counsel, reviewing pleadings
8 and discovery responses, preparing for and attending my deposition, and staying informed
9 about major developments. Serving as a Class Representative required significant time and
10 attention beyond my ordinary daily responsibilities.

11 3. On July 22, 2020, the proposed Class of people in California who purchased
12 Joint Juice was certified, and I was appointed Class Representative. In connection with the
13 motion for class certification, I submitted a declaration.

14 4. I am a resident of the State of California. Beginning in 2016, I first purchased
15 and consumed Joint Juice. I purchased Joint Juice from several Costco locations in California.
16 I purchased the 30-count "ready to drink" version of Joint Juice. I consumed Joint Juice until
17 roughly the end of 2018, and during that period generally consumed one of the 8-ounce bottles
18 every day. I purchased Joint Juice because I was experiencing joint pain and wanted to have
19 healthy, flexible joints and less pain. I saw the Joint Juice product labeling, including the
20 Arthritis Foundation reference, and I believed the advertising that drinking Joint Juice was
21 good for flexibility and joints, and that it would help with my joint pain. I do not believe Joint
22 Juice provided me with any of the advertised benefits.

23 5. I volunteered to be a plaintiff and to represent other purchasers in this class
24 action because I believe it is wrong for companies to falsely advertise products. I understand
25 that I was appointed by the Court to be the representative of the Class, and it is my duty to act
26 in the best interest of the Class and to not put my interests ahead of theirs in this case. I believe
27 that I have carried out this duty.

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1 6. I understood that by serving as a class representative, my name would appear
2 on court filings and that I could be subject to public scrutiny. I also understood that I might be
3 required to testify at trial and to disclose private personal and medical information, which I did
4 during my deposition.

5 7. I retained Blood Hurst & O'Reardon, LLP in 2020, and over the past six years I
6 have regularly kept in contact with them and stayed informed on the progress of the case. I
7 have answered all of my attorneys' questions regarding my experience with Joint Juice. From
8 the time I agreed to act as a class representative, I understood that the case could proceed to
9 trial and that I would need to make myself available on short notice to comply with court
10 deadlines, discovery obligations, and trial preparation.

11 8. After I was appointed as the Class Representative by the Court, I continued to
12 devote substantial time and effort to this case. I spoke with my attorneys on numerous
13 occasions about my experience with Joint Juice, my need for something to help with my joint
14 pain and joint health, Premier's multiple sets of discovery requests, preparation for my
15 deposition, the case in general, and the potential trial. Trial in this matter was scheduled
16 several times and ultimately began on August 6, 2024. In preparing for trial, I spent many
17 hours with my attorneys to prepare to testify. I arranged to take time off work and I made
18 preparations to travel to Oakland to testify.

19 9. My efforts included reviewing and working with my attorneys on the discovery
20 requests Premier served on me in 2020 and in 2023. I answered all the questions to the best of
21 my knowledge and searched my home, emails, and other sources for any documentation
22 related to Joint Juice. After the responses to discovery requests were prepared by my attorneys,
23 I reviewed them to make sure they were accurate. I signed a verification swearing under the
24 penalty of perjury that the responses were truthful to the best of my knowledge.

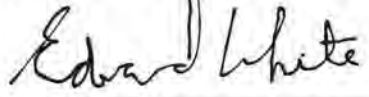
25 10. On May 6, 2020, I was deposed by Premier's attorneys. Other than this matter,
26 I have never been deposed and have never been a named plaintiff or class representative in any
27 class action lawsuit. Preparing for my deposition required numerous videoconference meetings
28 and phone calls with my attorneys, during which they asked me detailed questions about my

1 background, medical history, and my experience purchasing and consuming Joint Juice. I
2 reviewed the complaint and my prior declaration. During the meetings we also went through a
3 mock deposition where they asked questions as if they were Premier's attorneys. During my
4 deposition, I answered all questions under oath and subject to the penalty of perjury. Many of
5 the questions from Premier's attorneys concerned my personal and private medical history.

6 11. From 2020 through the present, I have remained in communication with my
7 attorneys to get updates on the overall progress of the case. I was fully committed to testifying
8 at trial on behalf of the Class. I have remained committed to the case and will continue to stay
9 active and involved as necessary. I reviewed the Settlement Agreement in this case, and I fully
10 support the Settlement.

11 12. I believe the requested \$10,000 service award is fair and reasonable in light of
12 the time, effort, and responsibilities I undertook on behalf of the Class over the past six years. I
13 did not receive any compensation for my time during the litigation, and I undertook these
14 responsibilities to help other consumers who purchased Joint Juice.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed on March 03, 2026, at Harbor City, California.



EDWARD WHITE

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