

1 IREDALE & YOO, APC  
EUGENE G. IREDALE (75292)  
2 105 W. F Street, Floor 4  
San Diego, CA 92101  
3 Tel: 619/233-1525  
619/233-3221 (fax)  
4 egiredale@iredalelaw.com

5 *Plaintiffs' Counsel*

6

7

8

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9

**FOR THE COUNTY OF ALAMEDA – NORTHERN DIVISION**

10 PATRICIA BLAND and EDWARD  
WHITE, individually and on behalf of all  
11 others similarly situated,

12 Plaintiff,

13 v.

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

15 Defendant.

16  
17 KATHLEEN SONNER, individually and on  
behalf of all others similarly situated,

18 Plaintiff,

19 v.

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

22 Defendant.

23

24

25

26

27

28

**Lead Case No. RG19002714**  
Related to RG20072126 (Sonner)

Assigned for All Purposes to:  
Honorable Michael Markman  
Department 1

**CLASS ACTION**

**DECLARATION OF EUGENE G. IREDALE  
IN SUPPORT OF PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR: (1) FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT; (2) AN AWARD OF  
ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES, AND  
(3) SERVICE AWARDS TO CLASS  
REPRESENTATIVES**

Date: May 5, 2026  
Time: 10:00 a.m.

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

Lead Case No. RG19002714

DECLARATION OF EUGENE IREDALE ISO PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL  
APPROVAL; AWARD OF ATTORNEYS' FEES AND EXPENSES; AND SERVICE AWARDS

1 I, EUGENE G. IREDALE, declare:

2 1. I am a principal at the law firm Iredale & Yoo, APC, and an attorney duly licensed  
3 to practice before the United States Supreme Court, the United States Courts of Appeals for the  
4 Ninth and Second Circuits, the United States District Courts for the Southern, Central, Eastern and  
5 Northern Districts of California, and the courts of the State of California and Massachusetts. I am  
6 Plaintiffs' counsel in the above-entitled matter. I have personal knowledge of the matters stated in  
7 this declaration except those stated on information and belief, and as to those, I believe them to be  
8 true. If called upon, I could and would competently testify to them.

9 2. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class  
10 Action Settlement, for an Award of Attorneys' Fees and Reimbursement of Expenses, and for  
11 Service Awards to Class Representatives.

12 3. The following is a summary of my education, training, and experience:

13 a. I graduated *magna cum laude* from Columbia College in 1973.

14 b. I graduated *cum laude* from Harvard Law School in 1976.

15 c. I began work at Federal Defenders of San Diego, Inc. as a trial attorney in  
16 January 1977. I worked at Federal Defenders for six- and one-half years. From January 1982 to June  
17 1983, I was the Chief Trial Attorney. While at Federal Defenders, I edited the publication,  
18 "Defending a Criminal Case," which was distributed to federal defenders and CJA attorneys  
19 throughout the United States.

20 d. From July 1, 1983, to the present, I have been engaged in the private practice  
21 of law. From 1983 until approximately 1996, I practiced almost exclusively in criminal defense,  
22 primarily in federal court. Beginning in approximately 1996, I began practicing civil litigation as  
23 well, with an emphasis on civil rights and police misconduct litigation under 42 U.S.C. § 1983, the  
24 Federal Tort Claims Act, and *Bivens* actions.

25 e. I have tried more than 200 cases to verdict, both civil and criminal, state and  
26 federal, in California and throughout the United States. I have argued in the California Court of  
27 Appeal, the Ninth and Second Circuits and twice before the United States Supreme Court.

28

1 f. I am a fellow in the American College of Trial Lawyers, an invitation only  
2 fellowship of exceptional trial lawyers.

3 g. I have an AV rating in Martindale-Hubbell.

4 h. I have been recognized in Best Lawyers in America (Naifeh and Smith, 2020)  
5 in the fields of Criminal Defense, and Criminal Defense – White Collar, and as of August 2015,  
6 recognized in the field of Civil Rights Litigation.

7 i. I have been listed in the publication, Best Lawyers in America, for over thirty  
8 years.

9 j. I have lectured on topics relating to trial practice throughout the United  
10 States. This includes a recent lecture for DRI’s 2020 Civil Rights and Governmental Tort Liability  
11 program. For more than a decade I taught at the two-week summer trial practice program put on by  
12 the National Criminal Defense College, first in Houston and later in Macon, Georgia.

13 k. I have lectured on trial practice for the National Association of Criminal  
14 Defense Lawyers (NACDL), the California Attorneys for Criminal Justice (CACJ), the Federal Bar  
15 Association, the San Diego County Bar Association, the Federal Public Defenders, the California  
16 Public Defender Association, and the National Police Accountability Project.

17 4. I believe that the requested fees and costs are fair and reasonable under controlling  
18 law, particularly considering the results realized for the Class.

19 5. In February 2022, my firm associated as trial counsel in this matter. On March 8,  
20 2022, I filed formal notices of appearance. My firm prosecuted this litigation on a contingent basis  
21 with no guarantee of recovery. My firm, along with co-counsel, bore 100% of the financial risk in  
22 pursuing the litigation. My firm advanced expenses with the understanding that we would be paid a  
23 fee and receive reimbursement for expenses only if successful.

24 6. I have been involved in every aspect of the federal trial in *Montera*, and the state trial  
25 in *Bland* and *Sonner* from trial preparation to post-trial proceedings. Following the trial in *Montera*,  
26 where I conducted opening and closing statements and examined numerous fact and expert  
27 witnesses, I was also involved in fact and expert discovery efforts in the related cases, including  
28 taking the depositions of two of Premier’s PMK witnesses, Nicholas Stiritz and Lance Palumbo,

1 participating in pretrial conferences, and working with several of the retained experts in preparation  
2 for the *Bland* and *Sonner* trial in August 2024. I was responsible for significant aspects of the trial  
3 presentation in *Montera* and had significant responsibility for overall trial strategy and trial  
4 presentation. I had those same responsibilities in the *Bland* and *Sonner* trial in this Court that was  
5 stayed on the first day of trial. I prepared extensively for trial because these are complex cases.  
6 Preparing for trial entailed familiarizing myself with the scientific literature and empirical research  
7 related to physiology and the efficacy (or lack thereof) of glucosamine and chondroitin; reviewing  
8 expert reports and depositions from the retained experts; reviewing and understanding the  
9 underlying data forming the basis of these experts' opinions; becoming familiar with principles of  
10 brand development, marketing, and advertising; reviewing tens of thousands of pages of discovery  
11 provided by Premier related to the development of Joint Juice, and the marketing and advertising of  
12 Joint Juice; and reviewing the depositions of multiple witnesses, including corporate officials at  
13 Premier.

14           7.       My firm is composed of two partners, Ms. Yoo and me, and three additional lawyers.  
15 Because of the breadth of discovery in this case and the complexity of the scientific evidence, I  
16 devoted substantial time preparing for the trials in federal and state court. For this reason, my firm  
17 passed on other employment opportunities, and turned down multiple cases to devote the time and  
18 resources necessary to conduct trial in this matter.

19           8.       To the extent possible, I relied on my co-counsel from Blood Hurst & O'Reardon  
20 ("BHO") given their substantial history with this litigation and our relative expertise and experience  
21 to minimize any duplication of effort. By way of example, Mr. Bucci from BHO assisted me with  
22 reviewing thousands of pages of corporate documents provided by Premier to help prepare for the  
23 deposition of Premier witness Lance Palumbo. Mr. O'Reardon from BHO organized scientific  
24 studies and research to help prepare me for witness examinations, and to prepare the opening  
25 statement and related demonstratives and Mr. Blood assisted me in trial framing and presentation  
26 and navigating legal issues of which he had more experience. Nevertheless, I did spend a significant  
27 amount of time reviewing the scientific studies themselves and expert reports and depositions to  
28 become sufficiently conversant about the decades of scientific research for trial.

1           9.       I reviewed the time entries to identify the merits of the work performed and to remove  
2 erroneous or duplicative entries. While I believe all the work performed was reasonable, I  
3 nonetheless erred on the side of caution and deleted some time billed. As a result, I believe that the  
4 hours reflected in our fee application are under-inclusive. Further, I exercised billing judgment by  
5 not entering time that was duplicative, unnecessary, or *de minimis*. I also exercised my best  
6 judgment during litigation to keep my hours as low as reasonably possible.

7           10.       For work performed on this case, and excluding any hours I submitted in connection  
8 with the fee motion in the federal *Montera* case, Iredale & Yoo’s lodestar totals \$230,212.50 This  
9 lodestar is based on 219.25 hours of my time at a billing rate of \$1,050 per hour, which reflects my  
10 current market rate and is the same hourly rate approved by the Court in *Montera*, a fee order that  
11 was subsequently affirmed on appeal. This lodestar figure does not include charges for expense  
12 items.

13           11.       The expense ledger, Exhibit A, is a true and accurate record of the expenses incurred  
14 in this matter. It is generated in the ordinary and customary course of business. My firm’s  
15 bookkeeper prepares the expense ledger in the usual course of business by referencing receipts,  
16 statements, credit card records and other financial documents. I have reviewed and approved  
17 payment for all out-of-pocket expenses. I have reviewed the corresponding documentation and  
18 corroborating records where necessary. I reviewed this material to confirm the accuracy of the  
19 entries on the expense ledger as well as the reasonableness of the expenses committed to the  
20 litigation.

21           12.       As detailed below, separate and apart from the expenses my firm submitted in  
22 connection with the *Montera* fee motion, my firm has incurred a total of \$6,442.26 in unreimbursed  
23 litigation expenses in connection with the prosecution of this litigation, as reflected in the expense  
24 ledger attached as **Exhibit A**. My firm paid to obtain the transcript of the deposition of Lance  
25 Palumbo, which was not separately purchased by co-counsel at Blood Hurst & O’Reardon (“BHO”).  
26 My firm also incurred travel-related expenses associated with the Palumbo deposition that took  
27 place in Colorado and the August 2024 trial of *Bland* and *Sonner*. In addition, on June 12, 2024, my  
28



# **EXHIBIT A**

**IREDALE AND YOO, APC**  
**JOINT JUICE EXPENSES**

<b>Date</b>	<b>Expense</b>	<b>Amount</b>
09.28.2023	Veritext – Deposition Transcript	\$ 3,089.60
06.13.2024	Green Filing (efiling)	17.02
08.09.2024	Mileage Reimbursement	9.33
04.14.2024	Southwest Airlines	55.00
04.15.2024	Grand Hyatt – Dinner	445.15
07.08.2024	Reimburse Gene Iredale – Travel to Oakland	255.98
07.17.2024	Southwest Airlines	163.01
07.23.2024	Allianz Travel Insurance	215.07
07.29.2024	Allianz Travel Insurance	111.25
08.05.2024	Marriott Hotel	285.50
08.04.2024	Uber	30.00
08.05.2024	Uber	43.05
08.05.2024	Uber	52.58
08.06.2024	Southwest Airlines	141.99
08.06.2024	Uber	9.94
08.07.2024	Marriott	345.09
08.07.2024	Uber	12.66
08.07.2024	Uber	12.97
08.07.2024	Uber	60.99
08.09.2024	Reimburse Madeline Filner – Luggage over weight	350.00
08.09.2024	Marriott	736.08
<b>TOTAL</b>		<b>\$6,442.26</b>

1 **CERTIFICATE OF SERVICE**

2 ***Patricia Bland; Edward White v. Premier Nutrition Company, LLC***

Alameda County Superior Court, Case No. RG19002714

3 ***Kathleen Sonner v. Premier Nutrition Company, LLC***

4 Alameda County Superior Court, Case No. RG20072126

5 I hereby certify that on March 20, 2026, I electronically filed the foregoing with the Clerk of  
6 the Court using One Legal Online Court Services, and electronically served the foregoing upon the  
7 attorney(s) of record for each party in this case at the e-mail address(es) registered for such service  
through One Legal Online Court Services, addressed as follows:

8 ***Attorneys for Defendant Premier Nutrition Company, LLC***

9 FAEGRE DRINKER BIDDLE  
& REATH LLP  
10 DAVID J.F. GROSS (*pro hac vice*)  
1950 University Avenue, Suite 450  
11 East Palo Alto, CA 94303  
Tel: 650/324-6704  
12 650/324-6701 (fax)  
david.gross@faegredrinker.com

FAEGRE DRINKER BIDDLE  
& REATH LLP  
AARON D. VAN OORT (*pro hac vice*)  
KATHERINE S. RAZAVI (*pro hac vice*)  
CHAD DROWN (*pro hac vice*)  
KIRSTEN L. ELFSTRAND (*pro hac vice*)  
RORY F. COLLINS (*pro hac vice*)  
90 S. Seventh Street, Suite 2200  
Minneapolis, MN 55402  
Tel: 612/766-7000  
612/766-1600 (fax)  
aaron.vanoort@faegredrinker.com  
kate.razavi@faegredrinker.com  
chad.drown@faegredrinker.com  
kirsten.elfstrand@faegredrinker.com  
rory.collins@faegredrinker.com

13 FAEGRE DRINKER BIDDLE  
& REATH LLP  
14 KATLYN M. MOSELEY (*pro hac vice*)  
15 1500 K Street NW, Suite 1100  
Washington, DC 20005  
Tel: 202/842-8800  
16 katlyn.moseley@faegredrinker.com

17 FAEGRE DRINKER BIDDLE  
& REATH LLP  
18 LISA S. CARLSON (*pro hac vice*)  
19 320 South Canal Street, Suite 330  
Chicago, IL 60606-5707  
Tel: 312/569-1000  
20 lisa.carlson@faegredrinker.com

FAEGRE DRINKER BIDDLE  
& REATH LLP  
MARK D. TATICCHI (*pro hac vice*)  
One Logan Square, Suite 2000  
Philadelphia, PA 19103  
Tel: 215/988-2700  
21 215/998-2757 (fax)  
mark.taticchi@faegredrinker.com

PremierNutritionService@faegredrinker.com

22 Parties may access this filing through the Court’s website.

23  
24 I certify under penalty of perjury that the foregoing is true and correct. Executed on March  
20, 2026.

25 *s/ Janet Kohnenberger*

26 Janet Kohnenberger  
BLOOD HURST & O’REARDON, LLP  
27 jkohnenberger@bholaw.com