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*Attorneys for Plaintiff*  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

NATASHA PARACHA, On Behalf  
of Herself and All Others Similarly  
Situated,

Plaintiff,

v.

GENERAL MILLS, INC., a Delaware  
Corporation

Defendant.

Case No.: 2:18-cv-07659

**CLASS ACTION COMPLAINT FOR:**

1. VIOLATION OF THE UNFAIR  
COMPETITION LAW, Business and  
Professions Code §17200 *et seq.*; and
2. VIOLATION OF THE  
CONSUMERS LEGAL REMEDIES  
ACT, Civil Code §1750 *et seq.*

**DEMAND FOR JURY TRIAL**

1 Plaintiff Natasha Paracha brings this action on behalf of herself and all others  
2 similarly situated against Defendant General Mills, Inc. and states:

3 **FACTUAL ALLEGATIONS**

4 1. Defendant manufactures, markets, sells, and distributes various food  
5 products. This lawsuit concerns four of those products: Cheerios Toasted Whole  
6 Grain Oat Cereal, Nature Valley Granola Protein Oats n' Honey, Nature Valley  
7 Crunchy Granola Bars – Oat's n' Honey, and Lucky Charms (the "Products").<sup>1</sup>

8 2. In marketing its Products, Defendant seeks to appeal to the consuming  
9 public's ever-growing health consciousness and increasing appetite for nutritious,  
10 wholesome foods that will benefit their health and avoidance of highly-processed  
11 foods with non-healthy attributes such as GMOs, artificial additives, gluten, added  
12 sugars, and hydrogenated oils.

13 3. Defendant makes several detailed representations about the health  
14 attributes of its Products on the front of the Product packages. For example,  
15 Defendant represents on the front of each and every Cheerios Toasted Whole Grain  
16 Oat Cereal Product that the Product is "made with 100% whole grain oats", "can help  
17 lower cholesterol" and "may reduce the risk of heart disease", is "simply made" and  
18 "Gluten Free", contains "NO artificial flavors [or] colors", and the "1<sup>st</sup> Ingredient [is]  
19 whole grain oats". Further, on the top of the box, which consumers see when they  
20 pick the Product up off of the shelf and continue to see every morning that they eat  
21 Cheerios, Defendant represents in all capital letters against a white background on an  
22 otherwise yellow box that the "FIRST INGREDIENT [is] WHOLE GRAIN" and that  
23 "A WHOLE GRAIN FOOD IS MADE BY USING ALL THREE PARTS OF THE  
24 GRAIN. ALL GENERAL MILLS BIG G CEREALS CONTAIN MORE WHOLE  
25 GRAIN THAN ANY OTHER SINGLE INGREDIENT." Defendant makes one or  
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27 

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<sup>1</sup> Plaintiff reserves the right to add additional products upon completion of discovery.  
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1 more similar attribute representations on the front of its other Product packages.  
2 These representations are collectively referred to as the “Product healthy attribute  
3 representations”.

4 4. The Product healthy attribute representations lead reasonable consumers  
5 to believe the Products will foster their “good health” and not potentially harm their  
6 health.

7 5. However, recent testing by the Environmental Working Group (EWG),  
8 a nonprofit organization dedicated to protecting human health and the environment,  
9 revealed that Defendant’s Products contain glyphosate, one of the most widely used  
10 herbicides in the United States. EWG’s Children’s Health Initiative, “Breakfast With  
11 a Dose of Roundup?” August 15, 2018, *available at*  
12 <https://www.ewg.org/childrenshealth/glyphosateincereal/#.W3TTbPZFw2w>  
13 (“EWG”) (last visited August 23, 2018). Each year, more than 250 million pounds of  
14 glyphosate is sprayed on American crops, including wheat, barley, and oats just  
15 before they are harvested. *Id.*

16 6. The EWG’s glyphosate findings confirm the results of a study published  
17 in 2016 by the nonprofit Food Democracy Now that found glyphosate in Defendant’s  
18 Cheerios Toasted Whole Grain Oat Cereal Product. *See* Glyphosate: Unsafe on Any  
19 Plate, Food Testing Results and Scientific Reasons for Concern, at p. 5, *available at*  
20 [https://s3.amazonaws.com/media.fooddemocracynow.org/images/FDN\\_Glyphosate](https://s3.amazonaws.com/media.fooddemocracynow.org/images/FDN_Glyphosate_FoodTesting_Report_p2016.pdf)  
21 [\\_FoodTesting\\_Report\\_p2016.pdf](https://s3.amazonaws.com/media.fooddemocracynow.org/images/FDN_Glyphosate_FoodTesting_Report_p2016.pdf) (last visited August 27, 2018).

22 7. The International Agency for Research on Cancer, part of the World  
23 Health Organization, has determined that glyphosate is “probably carcinogenic to  
24 humans”. IARC Monographs Volume 112: evaluation of five organophosphate  
25 insecticides and herbicides, March 20, 2015, *available at*  
26 <http://www.iarc.fr/en/media-centre/iarcnews/pdf/MonographVolume112.pdf> (last  
27 visited August 23, 2018). Glyphosate is even more dangerous for children, who are

1 more susceptible to carcinogens. *See EWG.*

2 8. Recently, Defendant announced that it will drop the “100% Natural ”  
3 representation it makes on its Nature Valley Crunch Granola Bars – Oats n’ Honey  
4 Product as the Product contains glyphosate. *See*  
5 [https://www.bloomberg.com/news/articles/2018-08-23/nature-valley-drops-100-](https://www.bloomberg.com/news/articles/2018-08-23/nature-valley-drops-100-natural-claim-after-pesticide-suit)  
6 [natural-claim-after-pesticide-suit](https://www.bloomberg.com/news/articles/2018-08-23/nature-valley-drops-100-natural-claim-after-pesticide-suit) (last visited August 27, 2018). Defendant has not,  
7 however, indicated it will disclose the presence of glyphosate on any of the Product  
8 packages.

9 9. Because it is a carcinogen with no nutritional value, the presence of *any*  
10 amount of glyphosate in the Products is material to reasonable consumers. No  
11 reasonable consumer would purchase the Products knowing that they contained  
12 glyphosate.

13 10. Even though Defendant has acknowledged that Nature Valley Crunch  
14 Granola Bars – Oats n’ Honey Product contains the probable carcinogen glyphosate  
15 and knew that the other Products contain glyphosate or, at a minimum, that it could  
16 not guarantee the Products did not contain glyphosate given its wide use as a  
17 pesticide, Defendant does not disclose this information on the front of the Product  
18 labels, choosing instead to specifically identify only the healthy attributes of its  
19 Products. Nor does Defendant include this information on the back or sides of the  
20 packages, where more detailed Product information is generally found, instead  
21 choosing to repeat and reinforce the healthy attributes identified on the front of the  
22 packages. In fact, nowhere on its Product packages – inside or out – does Defendant  
23 disclose that the Products contain or likely contain glyphosate, such that Defendant’s  
24 Product healthy attribute representations are misleading half-truths.

25 11. As the manufacturer and distributor of the Products, Defendant knew  
26 that the Products contained or likely contained glyphosate. By contrast, Plaintiff and  
27 consumers did not and do not have access to such information. Nor is that fact easily  
28



1 discovered by Plaintiff and consumers before purchase of the Products. Because  
2 Defendant had knowledge that the Products contain or likely contain glyphosate, and  
3 Plaintiff and consumers did not, Defendant had a duty to disclose that fact—and that  
4 glyphosate is a probable carcinogen—to consumers, which it did not do.

5 12. Consumers have a reasonable expectation that material product  
6 information, such as the presence of a probable carcinogen like glyphosate, will be  
7 provided by a product manufacturer, especially when the manufacturer affirmatively  
8 identifies the health-related attributes of its Products such as “Gluten Free”, “100%  
9 Whole Grain”, and “NO Artificial Flavors [or] Colors”. By only identifying the  
10 healthy attributes of its Products, emphasizing its Products are made using all three  
11 parts of the grain, and failing to disclose that the Products contain or likely contain  
12 glyphosate, Defendant actively concealed this information from Plaintiff, Class  
13 members, and the general public. *See* representative Product labels, attached hereto  
14 as Exhibit A.

15 13. Defendant had a duty to disclose the fact that the Products contain or  
16 likely contain glyphosate and that glyphosate is a probable carcinogen, which was  
17 known to Defendant and unknown and/or not reasonably accessible to Plaintiff and  
18 consumers, on its Product labels where the disclosure could be viewed by Plaintiff  
19 and consumers at the point-of-sale.

20 14. By failing to disclose the fact that the Products contain or likely contain  
21 glyphosate and continuing to sell the Products in packages omitting this information,  
22 Defendant has and continues to deceive and mislead consumers, including Plaintiff.

23 15. As a result of Defendant’s misleading half-truths and material  
24 nondisclosures, consumers will continue to purchase Defendant’s Products that,  
25 unbeknownst to them, contain or likely contain glyphosate.

26 16. Plaintiff brings this action on behalf of herself and other similarly  
27 situated consumers who purchased the Products to halt the dissemination of this  
28

1 misleading and deceptive advertising message, correct the misleading perception it  
2 has created in the minds of consumers, and obtain redress for those who have  
3 purchased the Products. Based on violations of California unfair competition laws  
4 (detailed below), Plaintiff seeks declaratory, injunctive, and restitutionary relief for  
5 consumers who purchased the Products.

### 6 **JURISDICTION AND VENUE**

7 17. This Court has original jurisdiction pursuant to 28 U.S.C. §1332(d)(2).  
8 The matter in controversy, exclusive of interest and costs, exceeds the sum or value  
9 of \$5,000,000 and is a class action in which there are in excess of 100 class members  
10 and some members of the Class are citizens of a state different from Defendant.

11 18. This Court has personal jurisdiction over Defendant because Defendant  
12 is authorized to conduct and do business in California, including this District.  
13 Defendant marketed, promoted, distributed, and sold the Products in California, and  
14 Defendant has sufficient minimum contacts with this State and/or sufficiently availed  
15 itself of the markets in this State through its promotion, sales, distribution, and  
16 marketing within this State, including this District, to render the exercise of  
17 jurisdiction by this Court permissible.

18 19. Venue is proper in this Court pursuant to 28 U.S.C. §§1391(a) and (b)  
19 because a substantial part of the events giving rise to Plaintiff's claims occurred while  
20 she resided in this judicial district. Venue is also proper under 18 U.S.C. §1965(a)  
21 because Defendant transacts substantial business in this District.

### 22 **PARTIES**

23 20. Plaintiff Natasha Paracha resides in Los Angeles County, California.  
24 Throughout the relevant period, Plaintiff Paracha routinely was exposed to, saw, and  
25 relied upon Defendant's Product healthy attribute representations by reading the  
26 Cheerios Toasted Whole Grain Oat Cereal Product label at various stores in Walnut,  
27 California, including Vons and Stater Bros. Plaintiff Paracha purchased the Product

for herself, her two young children, and her father for approximately \$4/box. At all relevant times, Plaintiff was unaware that the Product contained glyphosate or that Defendant could not guarantee it did not contain glyphosate. Had Defendant disclosed on the package that the Product contained or may contain glyphosate, Plaintiff Paracha would have seen and read that disclosure and would not have purchased the Product. As a result, Plaintiff Paracha suffered injury in fact and lost money at the time of purchase.

21. Defendant General Mills, Inc. is a Delaware corporation whose headquarters is located at Number One General Mills Blvd, Minneapolis, MN 55426. General Mills, Inc. manufactures, advertises, markets, distributes, and/or sells the Cheerios Toasted Whole Grain Oat Cereal, Nature Valley Granola Protein Oats n' Honey, Nature Valley Crunchy Granola Bars – Oats n' Honey, and Lucky Charms Products to tens of thousands of consumers in California and throughout the United States.

### CLASS DEFINITION AND ALLEGATIONS

22. Plaintiff brings this action on behalf of herself and all other similarly situated consumers pursuant to Rule 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure and seeks certification of the following Class:

#### **Multi-State Class Action**

All consumers who, within the applicable statute of limitations period until the date notice is disseminated, purchased the Products in California, Florida, Illinois, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, New York, and Washington.<sup>2</sup>

<sup>2</sup> The States in the Multistate Class are limited to those States with similar consumer fraud laws as applied to the facts of this case: California (Cal. Bus. & Prof. Code §17200, *et seq.*); Florida (Fla. Stat. §501.201, *et seq.*); Illinois (815 Ill. Comp. Stat. 502/1, *et seq.*); Massachusetts (Mass. Gen. Laws Ch. 93A, *et seq.*); Michigan (Mich. Comp. Laws §445.901, *et seq.*); Minnesota (Minn. Stat. §325F.67, *et seq.*); Missouri (Mo. Rev. Stat. 010, *et seq.*); New Jersey (N.J. Stat. §56:8-1, *et seq.*); New York (N.Y. Gen. Bus. Law §349, *et seq.*); and Washington (Wash. Rev. Code §19.86.010, *et seq.*). These statutes are referred to as “Similar Consumer Fraud Statutes.”

1 Excluded from this Class are Defendant and its officers,  
2 directors, employees and those who purchased the Products  
3 for the purpose of resale.

4 23. In the alternative to a Multi-State Class, Plaintiff seeks certification of the  
5 following California-Only Class:

6 **California-Only Class Action**

7 All California consumers who within the applicable statute  
8 of limitations period until the date notice is disseminated,  
9 purchased the Products.

10 Excluded from this Class are Defendant and its officers,  
11 directors and employees, and those who purchased the  
12 Products for the purpose of resale.

13 24. **Numerosity.** The members of the Classes are so numerous that joinder  
14 of all members of the Classes is impracticable. Plaintiff is informed and believes that  
15 the proposed Classes contain thousands of purchasers of the Products who have been  
16 damaged by Defendant's conduct as alleged herein. The precise number of Class  
17 members is unknown to Plaintiff.

18 25. **Existence and Predominance of Common Questions of Law and**  
19 **Fact.** This action involves common questions of law and fact, which predominate  
20 over any questions affecting individual Class members. These common legal and  
21 factual questions include, but are not limited to, the following:

- 22 (a) whether Defendant's alleged conduct is unlawful;  
23 (b) whether the alleged conduct constitutes violations of the laws asserted;  
24 (c) whether Defendant engaged in misleading and/or deceptive advertising;  
25 and  
26 (d) whether Plaintiff and Class members are entitled to appropriate  
27 remedies, including restitution and injunctive relief.

28 26. **Typicality.** Plaintiff's claims are typical of the claims of the members

1 of the Classes because, *inter alia*, all Class members were injured through the  
2 uniform misconduct described above. Plaintiff is also advancing the same claims  
3 and legal theories on behalf of herself and all Class members.

4       **27. Adequacy of Representation.** Plaintiff will fairly and adequately  
5 protect the interests of Class members. Plaintiff has retained counsel experienced in  
6 complex consumer class action litigation, and Plaintiff intends to prosecute this  
7 action vigorously. Plaintiff has no adverse or antagonistic interests to those of the  
8 Classes.

9       **28. Superiority.** A class action is superior to all other available means for  
10 the fair and efficient adjudication of this controversy. The damages or other financial  
11 detriment suffered by individual Class members is relatively small compared to the  
12 burden and expense that would be entailed by individual litigation of their claims  
13 against Defendant. It would thus be virtually impossible for members of the Classes,  
14 on an individual basis, to obtain effective redress for the wrongs done to them.  
15 Furthermore, even if Class members could afford such individualized litigation, the  
16 court system could not. Individualized litigation would create the danger of  
17 inconsistent or contradictory judgments arising from the same set of facts.  
18 Individualized litigation would also increase the delay and expense to all parties and  
19 the court system from the issues raised by this action. By contrast, the class action  
20 device provides the benefits of adjudication of these issues in a single proceeding,  
21 economies of scale, and comprehensive supervision by a single court, and presents  
22 no unusual management difficulties under the circumstances here.

23       **29.** Unless a Class is certified, Defendant will retain monies received as a  
24 result of its conduct that were taken from Plaintiff and Class members.

25 //

26 //

27 //

**COUNT I**

**Violation of Business & Professions Code §17200, *et seq.*  
and Similar Consumer Fraud Statutes, *supra* note 2  
(On Behalf of the Multi-State or California-Only Class)**

30. Plaintiff repeats and re-alleges the allegations contained in the paragraphs above, as if fully set forth herein.

31. Plaintiff brings this claim individually and on behalf of the Classes.

32. As alleged herein, Plaintiff has suffered injury in fact and lost money or property at the time of purchase as a result of Defendant's conduct because she purchased Defendant's Products in reliance on Defendant's Product healthy attribute representations. Had Plaintiff known that the Product contained glyphosate or that Defendant could not guarantee it did not contain glyphosate, Plaintiff would not have purchased the Product.

33. The Unfair Competition Law, Business & Professions Code §17200, *et seq.* ("UCL") prohibits any "unlawful," "fraudulent," or "unfair" business act or practice and any false or misleading advertising. The Similar Consumer Fraud Statutes likewise prohibit the use of unfair or deceptive practices in the course of trade or commerce, and are to be liberally construed.

34. In the course of conducting business, Defendant committed "unlawful" business practices by, *inter alia*, making the Product healthy attribute representations, which are misleading half-truths, and the material omissions (which also constitutes advertising within the meaning of §17200) regarding the Products' labeling, as set forth more fully herein, and violating Civil Code §§ 1552, 1573, 1709, and 1711, the California Legal Remedies Act, Civil Code § 1750, *et seq.*, Business & Professions Code §§ 17200, *et seq.* and 17500, *et seq.*, the Similar Consumer Fraud Statutes, and the common law.

35. Plaintiff reserves the right to allege other violations of law, which

1 constitute other unlawful business acts or practices. Such conduct is ongoing and  
2 continues to this date.

3 36. In the course of conducting business, Defendant committed “unfair”  
4 business acts or practices by, *inter alia*, making the Product healthy attribute  
5 representations, which are misleading half-truths, and material omissions (which also  
6 constitutes advertising within the meaning of § 17200) regarding the Products’  
7 labeling, as set forth more fully herein. There is no societal benefit from false  
8 advertising, only harm. While Plaintiff and the public at large were and continue to  
9 be harmed, Defendant has been unjustly enriched by its misleading half-truths and  
10 material omissions. Because the utility of Defendant’s conduct (zero) is outweighed  
11 by the gravity of harm to Plaintiff, consumers, and the competitive market,  
12 Defendant’s conduct is “unfair” having offended an established public policy.  
13 Further, Defendant engaged in immoral, unethical, oppressive, and unscrupulous  
14 activities that are substantially injurious to the public at large.

15 37. There were reasonable available alternatives to further Defendant’s  
16 legitimate business interests, other than the conduct described herein.

17 38. In the course of conducting business, Defendant committed “fraudulent  
18 business act[s] or practices” and deceptive or misleading advertising by, *inter alia*,  
19 making the Product healthy attribute representations, which are misleading half-  
20 truths, and the material omissions (which also constitutes advertising within the  
21 meaning of §17200) regarding the Products as set forth more fully herein.

22 39. Defendant’s actions, claims, and misleading statements, as more fully  
23 set forth above, are misleading and/or likely to deceive the consuming public within  
24 the meaning of Business & Professions Code §17200, *et seq.* and the Similar  
25 Consumer Fraud Statutes.

26 40. Plaintiff relied on Defendant’s Product healthy attribute representations  
27 and was in fact injured as a result of those misleading half-truths and material  
28



omissions. Plaintiff has suffered injury in fact and lost money as a result of her purchases of Defendant's Products.

41. Unless restrained and enjoined, Defendant will continue to engage in the above described conduct. Accordingly, injunctive relief is appropriate.

42. Plaintiff, on behalf of herself, all others similarly situated, and the general public, seeks declaratory relief and an injunction prohibiting Defendant from continuing such practices, restitution of all money obtained from Plaintiff and the members of the Classes collected as a result of unfair competition, and all other relief this Court deems appropriate, consistent with Business & Professions Code § 17203 and the Similar Consumer Fraud Statutes.

**COUNT II**  
**Violations of the Consumers Legal Remedies Act – Civil Code § 1750 *et seq.***  
**(On Behalf of the California-Only Class)**

43. Plaintiff repeats and re-alleges the allegations contained in the paragraphs above, as if fully set forth herein.

44. Plaintiff brings this claim individually and on behalf of the California-Only Class.

45. This cause of action is brought pursuant to the Consumers Legal Remedies Act, California Civil Code § 1750, *et seq.* (the "Act").

46. Plaintiff is a consumer as defined by California Civil Code § 1761(d). The Products are "goods" within the meaning of the Act.

47. Defendant violated and continues to violate the Act by engaging in the following practices proscribed by California Civil Code § 1770(a) in transactions with Plaintiff and the California-Only Class which were intended to result in, and did result in, the sale of the Products:

- (5) Representing that [the Products have] . . . characteristics, . . . uses [and] benefits . . . which [they do] not have . . . .

\* \* \*

(7) Representing that [the Products] are of a particular standard, quality, or grade ... if they are of another.

48. Defendant violated the Act by making the Product healthy attribute representations, which are misleading half-truths, and the material omissions, as described above, when it knew or should have known that the misleading half-truths and material omissions were misleading and deceptive.

49. Pursuant to California Civil Code § 1782(d), Plaintiff and the California-Only Class seek a Court Order declaring Defendant to be in violation of the CLRA, enjoining the above-described wrongful acts and practices of Defendant, and ordering restitution and disgorgement.

50. Pursuant to § 1782 of the Act, Plaintiff notified Defendant in writing by certified mail of the particular violations of § 1770 of the Act and demanded that Defendant rectify the problems associated with the actions detailed above and give notice to all affected consumers of Defendant's intent to so act. A copy of the letter is attached hereto as Exhibit B.

51. If Defendant fails to rectify or agree to rectify the problems associated with the actions detailed above and give notice to all affected consumers within 30 days of the date of written notice pursuant to § 1782 of the Act, Plaintiff will amend this Complaint to add claims for actual, punitive, and statutory damages as appropriate.

52. Pursuant to § 1780 (d) of the Act, attached hereto as Exhibit C is the affidavit showing that this action has been commenced in the proper forum.

### **PRAYER FOR RELIEF**

Wherefore, Plaintiff prays for a judgment:

A. Certifying the Classes as requested herein;

1 B. Issuing an order declaring that Defendant is in violation of the UCL and  
2 CLRA;

3 C. Enjoining Defendant's conduct;

4 D. Awarding restitution and disgorgement of Defendant's revenues to  
5 Plaintiff and the proposed Class members;

6 E. Awarding attorneys' fees and costs; and

7 F. Providing such further relief as may be just and proper.

8 **DEMAND FOR JURY TRIAL**

9 Plaintiff hereby demands a trial of her claims by jury to the extent authorized  
10 by law.

11 Dated: August 31, 2018

BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, P.C.

/s/Patricia N. Syverson

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail notice list, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice list.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed the 31st day of August 2018.

/s/Patricia N. Syverson

Patricia N. Syverson

# EXHIBIT A





# Cheerios

Toasted Whole Grain Oat Cereal

made with **100% WHOLE GRAIN OATS**



CAN HELP *lower* CHOLESTEROL\*

Serving Suggestion

SIMPLY MADE  
Gluten Free  
GROWN. MILLED. TOASTED.

NO ARTIFICIAL FLAVORS  
NO ARTIFICIAL COLORS

\*THREE GRAMS OF SOLUBLE FIBER DAILY FROM WHOLE GRAIN OAT FOODS, LIKE CHEERIOS CEREAL, IN A DIET LOW IN SATURATED FAT AND CHOLESTEROL, MAY REDUCE THE RISK OF HEART DISEASE. CHEERIOS PROVIDES 1 GRAM PER SERVING.

NET WT 12 OZ (340g)



PER 1 CUP SERVING			
100 CALORIES	0.5g SAT FAT 1% DV	140mg SODIUM 3% DV	1g SUGARS
SEE NUTRITION FACTS FOR "AS PREPARED" INFORMATION			



# Cheerios

## Nutrition Facts

Serving Size 1 cup (28g)  
Children Under 4 -  $\frac{3}{4}$  cup (21g)  
Servings Per Container about 12  
Children Under 4 - about 16

Amount Per Serving	Cheerios	with % cup skim milk	Cereal for Children under 4
<b>Calories</b>	100	150	80
Calories from Fat	15	20	10
<b>% Daily Value**</b>			
<b>Total Fat</b> 2g*	<b>3%</b>	<b>3%</b>	1.5g
Saturated Fat 0.5g	<b>3%</b>	<b>3%</b>	0g
Trans Fat 0g			0g
Polyunsaturated Fat 0.5g			0.5g
Monounsaturated Fat 0.5g			0.5g
<b>Cholesterol</b> 0mg	<b>0%</b>	<b>1%</b>	0mg
<b>Sodium</b> 140mg	<b>6%</b>	<b>8%</b>	105mg
<b>Potassium</b> 180mg	<b>5%</b>	<b>11%</b>	135mg
<b>Total Carb</b> 20g	<b>7%</b>	<b>9%</b>	15g
Dietary Fiber 3g	<b>11%</b>	<b>11%</b>	2g
Soluble Fiber 1g			0g
Sugars 1g			1g
Other Carbohydrate 16g			12g
<b>Protein</b> 3g			2g

	<b>% Daily Value**</b>	
Protein	-	9%
Vitamin A	10%	15%
Vitamin C	10%	10%
Calcium	10%	25%
Iron	45%	45%
Vitamin D	10%	25%
Thiamin	25%	30%
Riboflavin	2%	10%
Niacin	25%	25%
Vitamin B <sub>6</sub>	25%	25%
Folic Acid	50%	50%
Vitamin B <sub>12</sub>	25%	30%
Phosphorus	10%	20%
Magnesium	8%	10%
Zinc	25%	30%

\* Amount in cereal. A serving of cereal plus skim milk provides 2g total fat, less than 5mg cholesterol, 200mg sodium, 380mg potassium, 26g total carbohydrate (7g sugars), and 8g protein.

\*\* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Potassium		3,500mg	3,500mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g
Protein		50g	65g

**Ingredients:** Whole Grain Oats, Corn Starch, Sugar, Salt, Tripotassium Phosphate, Vitamin E (mixed tocopherols) Added to Preserve Freshness.

**Vitamins and Minerals:** Calcium Carbonate, Iron and Zinc (mineral nutrients), Vitamin C (sodium ascorbate), A B Vitamin (niacinamide), Vitamin B<sub>6</sub> (pyridoxine hydrochloride), Vitamin A (palmitate), Vitamin B<sub>1</sub> (thiamin mononitrate), A B Vitamin (folic acid), Vitamin B<sub>12</sub>, Vitamin D<sub>3</sub>.

DISTRIBUTED BY GENERAL MILLS SALES, INC.,  
MINNEAPOLIS, MN 55440 USA

GLUTEN FREE

**Not made with genetically modified ingredients.**

Trace amounts of genetically modified (also known as "genetically engineered") material may be present due to potential cross contact during manufacturing and shipping.



**We serve the world by  
Making Food  
People Love**

We welcome  
your questions  
and comments  
[generalmills.com](http://generalmills.com)  
1.800.328.1144

© General Mills Patent: [generalmills.com/pat](http://generalmills.com/pat)

Exchange: 1 1/2 starch  
Based on Academy of Nutrition and Dietetics and American Diabetes Association criteria

This package is sold by weight, not by volume. You can be assured of proper weight even though some settling of contents normally occurs during shipment and handling.





# atstanding!

100% whole grain oats in every single gluten-free O.

Each bowl of Cheerios is so much more than cereal.  
It's whole-grained fuel for your day. Finger food for little hands. A shared  
moment across generations. So grab a box and have an OATSTANDING day!



24<sup>g</sup>

WHOLE GRAIN PER SERVING  
AT LEAST 48g RECOMMENDED DAILY

# Cheerios

GENERAL MILLS  
IS ON A JOURNEY

to always make  
our cereals better.

— HOW? —

BEING  
RESPONSIBLE

We have committed to  
sustainably source  
100% of our cereal  
boxes by 2020.

GIVING BACK

Since 1996, our cereals  
have given more  
than \$175 million  
to America's schools  
through Box Tops  
for Education™.

— THAT'S WHY —

CHEERIOS

- ✓ 1 gram of sugar  
per serving
- ✓ not made with  
genetically modified  
ingredients\*
- ✓ 12 vitamins and  
minerals

\*Trace amounts of genetically modified  
(also known as "genetically engineered")  
material may be present due to potential cross  
contact during manufacturing and shipping.

PROUD SPONSOR OF

 **Celiac Disease  
FOUNDATION**

[celiac.org](http://celiac.org)



FIRST INGREDIENT  
**WHOLE GRAIN**

**BEST If Used By**

14MAR2019 BU 2136 09 C

A WHOLE GRAIN FOOD IS MADE BY USING ALL THREE PARTS OF  
THE GRAIN. ALL GENERAL MILLS BIG G CEREALS CONTAIN  
MORE WHOLE GRAIN THAN ANY OTHER SINGLE INGREDIENT.



**Ch**  
**FA**  
**chee**

Toasted Whole Grain  
100% Whole Grain



# VALUE PACK

# 24 BARS

# NATURE VALLEY™

## CRUNCHY

granola bars

made with  
**100% NATURAL**  
whole grain  
OATS

ENLARGED  
TO SHOW  
DETAIL

U

**24**  
BARS

PER 2 BARS

**190**  
CALORIES

**1g**  
SAT FAT  
4% DV

**180mg**  
SODIUM  
7% DV

**11g**  
SUGARS

## Oats 'n Honey

16g of whole grain\*

ENLARGED  
TO SHOW  
DETAIL

U

**24**  
BARS

PER 2

**190**  
CALORIES

1.88 OZ (506g)

12 - 1.49 OZ (42g) 2-BAR POUCHES NET WT 1 LB 1.88 OZ (17.88 OZ) (506g)



\*16g of whole grain per serving.  
At least 48g of whole grain recommended daily.

# Nutrition Facts

Serving Size 2 bars (42g)  
Servings Per Container 12

Amount Per Serving	2 bars		1 bar	
<b>Calories</b>	190		100	
Calories from Fat	60		30	
	% DV*		% DV*	
<b>Total Fat</b>	7g	<b>11%</b>	3.5g	<b>6%</b>
Saturated Fat	1g	<b>4%</b>	0g	<b>0%</b>
Trans Fat	0g		0g	
<b>Cholesterol</b>	0mg	<b>0%</b>	0mg	<b>0%</b>
<b>Sodium</b>	180mg	<b>7%</b>	90mg	<b>4%</b>
<b>Total Carbohydrate</b>	29g	<b>10%</b>	15g	<b>5%</b>
Dietary Fiber	2g	<b>9%</b>	1g	<b>4%</b>
Sugars	11g		6g	
<b>Protein</b>	3g		2g	
Iron		<b>4%</b>		<b>2%</b>

Not a significant source of vitamin A, vitamin C and calcium.

\* Percent Daily Values (DV) are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

**Ingredients:** Whole Grain Oats, Sugar, Canola Oil, Rice Flour, Honey, Salt, Brown Sugar Syrup, Baking Soda, Soy Lecithin, Natural Flavor.

**CONTAINS SOY; MAY CONTAIN PEANUT, ALMOND AND PECAN INGREDIENTS.**

DISTRIBUTED BY  
**GENERAL MILLS SALES, INC.,**  
MINNEAPOLIS, MN 55440 USA

© General Mills

Carbohydrate Choices: 2

3004470176

Partially Produced with Genetic Engineering  
Learn more at Ask.GeneralMills.com



# VALUE PACK

24  
BARS

## NATURE VALLEY™

CRUNCHY

granola bars

Oats 'n Honey

16g of whole grain\*

12 - 1.49 OZ (42g) 2-BAR POUCHES NET WT 1 LB 1.88 OZ (17.88 OZ) (506g)



ENLARGED  
TO SHOW  
DETAIL



24  
BARS

PER 2 BARS

190  
CALORIES

1g  
SAT FAT

180mg  
SODIUM

11g  
SUGARS

% DV

Oats  
16g

2-BAR POUCHES



**NATURE VALLEY**

granola bars

**Oats 'n Honey**

Nature Valley™  
Crunchy bars are  
made with the best  
ingredients from  
nature like 100%  
natural whole  
grain oats and  
honey.

**Enjoy!**



15g







**NO** Corn Syrup  
**NO** Colors from Artificial Sources  
**NO** Artificial Flavors

# **Nutrition Facts**

Serving Size 1/2 cup (50g)  
 Servings Per Container about 6

Amount Per Serving	
Calories	210
Calories from Fat	50
	% Daily Value*
Total Fat 6g	8%
Saturated Fat 0.5g	3%
Trans Fat 0g	
Polyunsaturated Fat 1.5g	
Monounsaturated Fat 3g	
Cholesterol 0mg	0%
Sodium 140mg	6%
Potassium 140mg	4%
Total Carbohydrate 31g	10%
Dietary Fiber 3g	11%
Sugars 12g	
Protein 10g	13%

Calcium 4% • Iron 10%

Not a significant source of vitamin A and vitamin C.  
 Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories 2,000	2,500
Total Fat	Less than 65g	80g
Saturated Fat	Less than 20g	25g
Cholesterol	Less than 300mg	300mg
Sodium	Less than 2,400mg	2,400mg
Total Carbohydrate	300g	375g
Dietary Fiber	25g	30g
Sugars	50g	65g

Ingredients: Whole Grain Oats, Soy Protein Isolate, Canola Oil, Honey, Molasses, Maltodextrin, Soy Lecithin, Natural Flavors, Sodium Bicarbonate, Sodium Citrate, Vitamin E (mixed tocopherols) Added to Preserve

**THIS PRODUCT MAY CONTAIN NUTS AND OTHER ALLERGENS. PLEASE READ THE LABEL FOR MORE INFORMATION.**

MINNEAPOLIS, MN 55440 USA

3245427109

11:44 (M-F 7:30-5:30 CT)

For more information, please visit us online at [www.naturevalley.com](http://www.naturevalley.com)

Produced with Genetic

Modified with Genetic

Modified with Genetic

Modified with Genetic

Modified with Genetic

Modified with Genetic

Modified with Genetic

Modified with Genetic

Modified with Genetic

## **GRANOLA+PROTEIN**

At Nature Valley, our love of nature inspires us to create wholesome foods that taste great, like our Protein Crunchy Granola. Clusters of whole grain oats and a sweet touch of honey make this a simple way to add protein throughout your day.

It's more than just a cereal  
 Try it as a topper on yogurt, oatmeal, salads, fruit or just eat it by itself. A handful anytime.



**ENJOY ALL OF OUR HEARTY & DELICIOUS BREAKFAST OPTIONS!**

**BETTER IF USED BY**

**18 JUN 2019  
 JKJK 07:3001A**

**• 25g of Whole Grain per serving**  
 At least 1/2 cup recommended

**10g of PROTEIN**







WHOLE GRAIN IS THE 1<sup>ST</sup> INGREDIENT

# Lucky Charms

FROSTED TOASTED  
OAT CEREAL WITH  
MARSHMALLOWS

Now With  
**MAGICAL  
UNICORN**  
MARSHMALLOWS



ENLARGED TO  
SHOW DETAIL

PER 3/4 CUP SERVING

110  
CALORIES

0g  
SAT FAT  
9% DV

170mg  
SODIUM  
7% DV

10g  
SUGARS

Gluten  
Free

SEE NUTRITION FACTS FOR PREPARED INFORMATION

NET WT 10.5 OZ (297g)

(297g)

PER  
11  
CAL





## Nutrition Facts

Serving Size  $\frac{1}{4}$  cup (27g)  
Servings Per Container about 11

Amount Per Serving	Lucky Charms	with $\frac{1}{4}$ cup skim milk
<b>Calories</b>	110	150
Calories from Fat	10	10

	% Daily Value**	
<b>Total Fat</b> 1g*	2%	2%
Saturated Fat 0g	0%	0%
Trans Fat 0g		
Polyunsaturated Fat 0g		
Monounsaturated Fat 0g		
<b>Cholesterol</b> 0mg	0%	1%
<b>Sodium</b> 170mg	7%	10%
<b>Potassium</b> 50mg	1%	7%
<b>Total Carbohydrate</b> 22g	7%	9%
Dietary Fiber 2g	6%	6%
Sugars 10g		
Other Carbohydrate 10g		
<b>Protein</b> 2g		

Vitamin A	10%	15%
Vitamin C	10%	10%
Calcium	10%	25%
Iron	25%	25%
Vitamin D	10%	25%
Thiamin	25%	30%
Riboflavin	25%	35%
Niacin	25%	25%
Vitamin B <sub>6</sub>	25%	25%
Folic Acid	50%	50%
Vitamin B <sub>12</sub>	25%	35%
Phosphorus	4%	15%
Magnesium	4%	6%
Zinc	25%	30%

\* Amount in cereal. A serving of cereal plus skim milk provides 1g total fat, less than 5mg cholesterol, 240mg sodium, 250mg potassium, 28g total carbohydrate (16g sugars), and 6g protein.

\*\* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Potassium		3,500mg	3,500mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

**Ingredients:** Whole Grain Oats, Sugar, Oat Flour, Corn Syrup, Modified Corn Starch, Corn Starch, Dextrose, Salt, Gelatin, Trisodium Phosphate, Yellow 5 & 6, Red 40, Blue 1, Natural and Artificial Flavor, Vitamin E (mixed tocopherols).  
**Added to Preserve Freshness.**

**Vitamins and Minerals:** Calcium Carbonate, Zinc and Iron (mineral nutrients), Vitamin C (sodium ascorbate), A B Vitamin (niacinamide), Vitamin B<sub>6</sub> (pyridoxine hydrochloride), Vitamin B<sub>2</sub> (riboflavin), Vitamin B<sub>1</sub> (thiamin mononitrate), Vitamin A (palmitate), A B Vitamin (folic acid), Vitamin B<sub>12</sub>, Vitamin D<sub>3</sub>.

DISTRIBUTED BY GENERAL MILLS SALES, INC.,  
MINNEAPOLIS, MN 55440 USA

GLUTEN FREE

© General Mills

Patent: generalmills.com/pat

Exchange: 1½ Starch

Based on Academy of Nutrition and Dietetics and

American Diabetes Association criteria.

This package is sold by weight, not by volume. You can be assured of proper weight even though some settling of contents normally occurs during shipment and handling.

F 3083360888 SSG 3472497888

Partially Produced with Genetic

Engineering

Learn more at Ask.GeneralMills.com



# Help Lucky Win a Magical New Charm

THE RACE FOR THE NEW UNICORN CHARM IS UNDER WAY AND LUCKY MUST BE SPEEDIER THAN HIS MAGICAL FRIEND TO WIN THE DAY.

TO WIN THE RACE, MOVE FROM CHARM TO CHARM FOLLOWING THE ORDER OF LUCKY'S MAGICAL CHARMS LISTED BELOW AND TRY TO FIND A PATH THAT LETS LUCKY COLLECT 10 UNICORN CHARMS BEFORE REACHING THE FINISH LINE.



**START**

seeing a unicorn in the wild will bring you good luck.

unicorns can cleanse water with a touch of their horn.

unicorns can heal whatever troubles you.

a unicorn always knows when you are telling the truth.

**FINISH**

**HOORAY!**  
you have found your way and the new

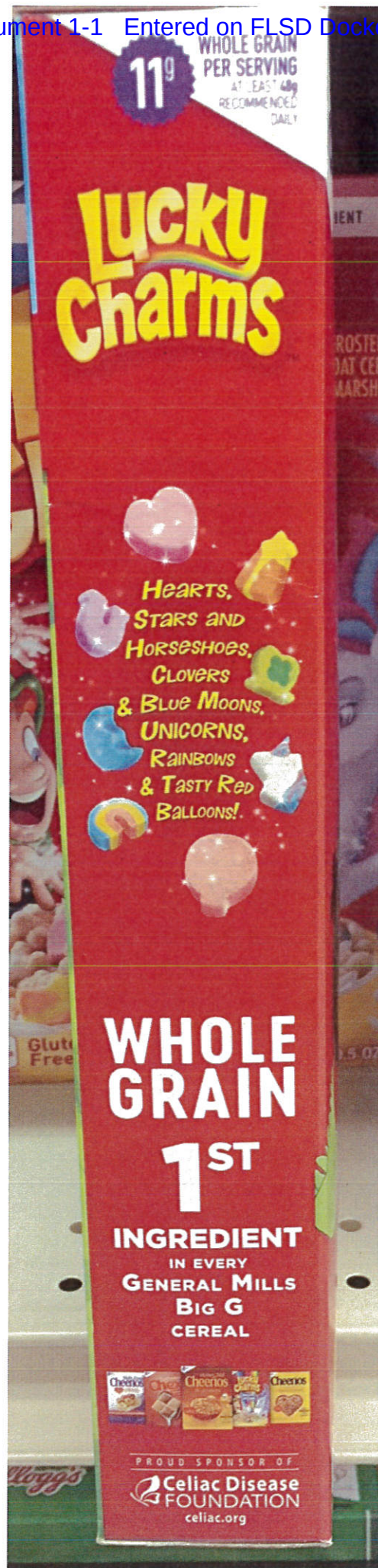
**UNICORN CHARM**

is here to **STAY!**

NET WT 10

PER 3/4  
110  
CALORIES  
SEE NUTRITION







# **EXHIBIT B**



BONNETT FAIRBOURN  
FRIEDMAN & BALINT PC

WILLIAM G. FAIRBOURN  
VAN BUNCH  
ELAINE A. RYAN  
KIMBERLY C. PAGE  
WILLIAM F. KING  
CARRIE A. LALIBERTE  
NADA DJORDJEVIC<sup>4</sup>

ANDREW S. FRIEDMAN  
ROBERT J. SPURLOCK  
ANDREW Q. EVERROAD  
CHRISTINA L. HANISCH  
T. BRENT JORDAN<sup>2</sup>  
LISA T. HAUSER  
ANDREA M. WRIGHT

FRANCIS J. BALINT, JR.  
C. KEVIN DYKSTRA  
PATRICIA N. SYVERSON  
MANFRED P. MUECKE<sup>1</sup>  
TY D. FRANKEL  
DANIEL R. LEATHERS<sup>3</sup>

MICHAEL N. WIDENER, Of Counsel

<sup>1</sup> Admitted Only in California  
<sup>2</sup> Admitted Only in Pennsylvania  
<sup>3</sup> Admitted Only in New Jersey, New York  
and Pennsylvania  
<sup>4</sup> Admitted Only in Illinois

August 31, 2018

**VIA CERTIFIED MAIL**  
**(RECEIPT NO 7014 1200 0001 5814 2017)**

General Mills, Inc.  
General Counsel  
Number One General Mills Blvd,  
Minneapolis, MN 55426

Re: *Natasha Paracha v. General Mills, Inc.*

Dear Sir or Madam:

Our law firm together with Siprut PC represents Natasha Paracha and all other consumers similarly situated in an action against General Mills, Inc. (“General Mills” or “Defendant”), arising out of, *inter alia*, misrepresentations and material omissions by Defendant that lead reasonable consumers to believe that your Products<sup>1</sup> will foster their good health and not potentially harm their health.

Ms. Paracha and others similarly situated purchased Defendant’s Products unaware that the Products contained or likely contained glyphosate, a probable carcinogen. Because Defendant does not disclose this fact on its Product packages, the healthy attribute representations Defendant makes on its Product packages are misleading half-truths reasonably likely to deceive the public. The full claims, including the facts and circumstances surrounding these claims, are detailed in the Class Action Complaint, a copy of which is enclosed and incorporated by this reference.

Defendant’s misleading half-truths and material omissions are misleading and constitute unfair methods of competition and unlawful practices, undertaken by Defendant with the intent to induce the consuming public to purchase the Products. The misleading half-truths and material omissions do not assist consumers; they simply mislead them.

Defendant’s misleading half-truths and material omissions violate California Civil Code §1770(a) under, *inter alia*, the following subdivisions:

---

<sup>1</sup> The products include Cheerios Toasted Whole Grain Oat Cereal, Nature Valley Granola Protein Oats n’ Honey, Nature Valley Crunchy Granola Bars – Oat’s n’ Honey, and Lucky Charms.

August 31, 2018  
Page 2

- (5) Representing that [the Products have] . . . characteristics, . . . uses [or] benefits. . . which [they do] not have.

\* \* \*

- (7) Representing that [the Products] are of a particular standard, quality, or grade . . . if they are of another.

California Civil Code §§ 1770(a)(5) and (7).

Defendant's misleading half-truths and material omissions also constitute violations of California Business and Professions Code §17200, *et seq.*

While the Complaint constitutes sufficient notice of the claims asserted, pursuant to California Civil Code § 1782, we hereby demand on behalf of our client and all others similarly situated that General Mills immediately correct and rectify this violation of California Civil Code § 1770 by ceasing the misleading marketing campaign and ceasing dissemination of misleading and deceptive information as described in the enclosed Complaint. In addition, General Mills should offer a refund to all consumer purchasers of the Products plus reimbursement for interest, costs, and fees.

Plaintiff will, after 30 days from the date of this letter, file a further amended Complaint as permitted by California Civil Code § 1782, to include claims for actual and punitive damages (as may be appropriate) if a full and adequate response to this letter is not received. These damage claims also would include claims under the Consumers Legal Remedies Act. Thus, to avoid further litigation, it is in the interest of all parties concerned that General Mills address these violations immediately.

General Mills must undertake all of the following actions to satisfy the requirements of California Civil Code § 1782(c):

1. Identify or make a reasonable attempt to identify purchasers of the Products;
2. Notify all such purchasers so identified that upon their request, General Mills will offer an appropriate remedy for its wrongful conduct, which can include a full refund of the purchase price paid for the Products, plus interest, costs and fees;
3. Undertake (or promise to undertake within a reasonable time if it cannot be done immediately) the actions described above for all Product purchasers who so request; and
4. Cease from representing to consumers that the Products provide the healthy

August 31, 2018  
Page 3

attributes identified on the Product packages, without also disclosing that the Products contain or likely contain glyphosate, as more fully described in the enclosed Complaint.

We await your response.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Patricia N. Syverson". The signature is fluid and cursive, with the first name "Patricia" being more prominent.

Patricia N. Syverson  
For the Firm

PNS:td  
Enclosures

# **EXHIBIT C**

BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, P.C.

ELAINE A. RYAN (*To be Admitted Pro Hac Vice*)

CARRIE A. LALIBERTE (*To be Admitted Pro Hac Vice*)

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Phoenix, AZ 85016

eryan@bffb.com

claliberte@bffb.com

Telephone: (602) 274-1100

BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, P.C.

PATRICIA N. SYVERSON (CA SBN 203111)

MANFRED P. MUECKE (CA SBN 222893)

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San Diego, CA 92101

psyverson@bffb.com

mmuecke@bffb.com

Telephone: (619) 798-4593

SIPRUT PC

STEWART M. WELTMAN (*To be Admitted Pro Hac Vice*)

TODD L. MCLAWHORN (*To be Admitted Pro Hac Vice*)

MICHAEL CHANG (*To be Admitted Pro Hac Vice*)

17 North State Street

Chicago, Illinois 60602

sweltman@siprut.com

tmclawhorn@siprut.com

mchang@siprut.com

Telephone: (312) 236-0000

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

NATASHA PARACHA, On Behalf of  
Herself and All Others Similarly  
Situated,

Plaintiff,

v.

GENERAL MILLS, INC., a Delaware  
Corporation,

Defendant.

Case No.:

**CLASS ACTION**

**DECLARATION OF PATRICIA N.  
SYVERSON PURSUANT TO  
CALIFORNIA CIVIL CODE §  
1780(d)**

1 I, Patricia N. Syverson, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of  
3 the State of California. I am a shareholder of the law firm of Bonnett, Fairbourn,  
4 Friedman & Balint, P.C., the counsel of record for Plaintiff in the above-entitled  
5 action.

6 2. Defendant General Mills, Inc. has done and is doing business in the  
7 Central District of California. Such business includes the distributing, marketing,  
8 labeling, packaging and sale of Cheerios Toasted Whole Grain Oat Cereal, Nature  
9 Valley Granola Protein Oats n' Honey, Nature Valley Crunchy Granola Bars –  
10 Oat's n' Honey, and Lucky Charms. Furthermore, Plaintiff Natasha Paracha  
11 purchased Cheerios Toasted Whole Grain Oat Cereal in Walnut, California.

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

14 Executed this 31st day of August 2018, at San Diego, California.

15 BONNETT, FAIRBOURN, FRIEDMAN  
16 & BALINT, P.C.

17 /s/Patricia N. Syverson

18 Patricia N. Syverson (203111)  
19 Manfred P. Muecke (222893)  
20 600 W. Broadway, Suite 900  
San Diego, CA 92101  
psyverson@bffb.com  
mmuecke@bffb.com  
Telephone: (619) 798-4593

21 BONNETT, FAIRBOURN, FRIEDMAN  
22 & BALINT, P.C.

23 Elaine A. Ryan (*To be Admitted Pro Hac Vice*)  
24 Carrie A. Laliberte (*To be Admitted Pro Hac Vice*)  
25 2325 E. Camelback Rd., Suite 300  
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claliberte@bffb.com  
Telephone: (602) 274-1100

26 SIPRUT PC

27 Stewart M. Weltman (*To be Admitted Pro Hac Vice*)  
28 Todd L. McLawhorn (*To be Admitted Pro Hac Vice*)  
Michael Chang (*To be Admitted Pro Hac Vice*)  
17 North State Street



Chicago, Illinois 60602  
sweltman@siprut.com  
tmclawhorn@siprut.com  
mchang@siprut.com  
Telephone: (312) 236-0000

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic mail notice list

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 31, 2018.

/s/Patricia N. Syverson

Patricia N. Syverson (203111)  
BONNETT FAIRBOURN FRIEDMAN  
& BALINT, P.C.  
600 W. Broadway, Suite 900  
San Diego, CA 92101  
Telephone: (619) 798-4593

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Against General Mills Over Alleged Presence of Glyphosate in Oat-Filled Products Transferred to Florida](#)

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