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9  
10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

12 JACOB SCHEIBE, *individually and on* )  
13 *behalf of all those similarly situated,* )  
14 )  
15 *Plaintiff,* )  
16 )  
17 v. )  
18 )  
19 DR. BERG HOLDINGS, LLC dba Dr. Berg )  
20 *Nutritionals, a Delaware limited liability* )  
21 *company,* )  
22 )  
23 *Defendant.* )

No. '23CV0084 DMS JLB  
**CLASS ACTION COMPLAINT**  
JURY TRIAL DEMANDED

24 \_\_\_\_\_  
25  
26 Jacob Scheibe (“Plaintiff”), individually and on behalf of all others similarly situated, by  
27 and through undersigned counsel, hereby brings this action against Dr. Berg Holdings, LLC dba  
28 Dr. Berg Nutritionals (“DBN”), alleging that its Original Keto Electrolytes powder (“the  
Products”), a dietary supplement manufactured, packaged, labeled, advertised, distributed, and  
sold by Defendant, is misbranded and falsely advertised, and upon information and belief and  
investigation of counsel alleges as follows:

**PARTIES**

1. Plaintiff Jacob Scheibe is and at all times relevant was a citizen of the state of  
California, domiciled in San Diego, California.





1           16. For example, a 2018 survey by L.E.K. Consulting found that overwhelming  
2 numbers of consumers were committed or casual adherents to so-called “clean label” food  
3 attributes: “No artificial ingredients” (69 percent); “No preservatives” (67 percent); or “All-  
4 natural” (66 percent). These were the three most attractive attributes in the consumer survey.  
5 Roughly 60 to 70 percent of consumers reported a willingness to pay a price premium for “clean  
6 label” foods. See <https://www.lek.com/insights/ei/next-generation-mindful-food-consumption>.  
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8           17. This consumer preference has led to an explosion in the category of “clean label”  
9 foods and beverages. Leading analyst Allied Market Research estimated that the “natural foods  
10 and drinks” category would grow by an estimated compound annual growth rate of 13.7 percent  
11 from 2016 to 2023, reaching \$191 billion in annual sales by 2023. See  
12 <https://www.alliedmarketresearch.com/natural-food-and-drinks-market>.  
13

14           18. On or about October 18, 2022, Mr. Scheibe purchased DBN’s Original Keto  
15 Electrolytes powder, tangerine, raspberry lemon, and pomegranate and cherry flavors, from  
16 Amazon.com (Order Nos. 111-5673473-1149868 and 111-1574802-9103466), for a total of  
17 \$117.42 inclusive of tax.

18           19. Mr. Scheibe is a college student who has recently sought to lose weight and add  
19 muscle mass, and to do so has begun to eat with intentionality and take dietary supplements. He  
20 carefully reviews dietary supplement labels, including the Product’s label, to understand the  
21 characteristics of the products he consumes, and he prefers to consume only products that  
22 contain all-natural ingredients and flavorings.  
23

24 **B. Defendant’s Use of Synthetic Flavorings and Deceptive Labels.**

25           20. Defendant DBN formulates, manufactures, and sells a dietary supplement called  
26 Original Keto Electrolytes powder. These powders are marketed as supporting improved  
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1 workout recovery and muscle protein synthesis; hydration levels; and increased blood flow and  
2 energy.

3 21. These dietary supplements come in seven different flavors: raspberry and lemon,  
4 lemonade, grape, strawberry lemonade, orange, pomegranate and cherry, and tangerine.  
5 However, the Products differ only in flavoring; the base formulation for each flavor is the same,  
6 and they are offered for sale for an identical price.  
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8 22. The front label (or “principal display panel”) of all flavors of the Products state  
9 that the Products contain “No Artificial Anything!” as shown in this photograph:  
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18 23. All of the Products also feature depictions of fruits on the front label to identify  
19 the characterizing flavor, as shown above.  
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21 24. The Amazon storefront for DBN Products (which the company controls) also  
22 stated that the Products contained “Zero Artificial Ingredients,” as reflected on Scheibe’s  
23 Amazon receipts:  
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**Items Ordered**

1 of: *Dr. Berg's Original Keto Electrolytes Powder (50 Servings) - Zero Artificial Ingredients - Sugar Free Electrolyte Powder - No Maltodextrin - Hydration Powder - Tangerine*

**Price**  
\$36.99

Sold by: Dr. Berg Products ([seller profile](#))

Condition: New

1 of: *Dr. Berg's Original Keto Electrolytes Powder - Zero Artificial Ingredients - Sugar Free Electrolyte Powder - No Maltodextrin - Hydration Powder - Raspberry Lemon 50 Servings*

\$34.99

Sold by: Dr. Berg Products ([seller profile](#))

Condition: New

**Items Ordered**

1 of: *Dr. Berg's Original Keto Electrolytes Powder (50 Servings) - Zero Artificial Ingredients - Sugar Free Electrolyte Powder - No Maltodextrin - Hydration Powder - Pomegranate and Cherry*

**Price**  
\$36.99

Sold by: Dr. Berg Products ([seller profile](#))

Condition: New

25. These natural flavoring claims are false. The Products are flavored using an artificial flavoring, DL malic acid, that is derived from petrochemicals.

26. All flavors of the Products state, on the back label, that they contain “malic acid.”

27. While there is a naturally occurring form of malic acid, it is extremely expensive to formulate in the large quantities and is almost never used in mass-produced food products. Instead, testing by an independent third-party laboratory has confirmed that the malic acid that Defendant uses in these Products is DL malic acid, a synthetic substance derived from petrochemicals.<sup>1</sup>

28. This type of malic acid is manufactured in petrochemical plants from benzene or butane—components of gasoline and lighter fluid, respectively—through a series of chemical reactions, some of which involve highly toxic chemical precursors and byproducts.

29. Fruit flavors in a food are imparted by the interactions between sugars, acids, lipids, and various volatile compounds. The relative sweetness or tartness of a fruit flavor is

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<sup>1</sup> DL malic acid is also called d-hydroxybutanedioic acid or (R)-(+)-2-Hydroxysuccinic acid.

1 determined by the ratio between the sugars (mainly glucose and fructose) and acids, such as  
2 citric and malic acid.

3 30. The quality and consumer acceptability of fruit flavors is based on their perceived  
4 sweetness and tartness, which in turn is driven by the ratio between sugars and acids. Fruits such  
5 as lemons, raspberries, tangerines, cherries, and pomegranates have their own natural ratio of  
6 sugars and acids.  
7

8 31. The malic acid used in the Products is used to create, simulate, and/or reinforce  
9 the fruit flavors stated on the labels.

10 32. Defendant uses the petrochemical-derived DL malic acid in its Products to create,  
11 simulate, or reinforce the fruit flavors but pretends otherwise, conflating natural and artificial  
12 flavorings, misbranding the Products and deceiving consumers.  
13

14 33. The ingredients on the Products' label are declared in a way that is misleading and  
15 contrary to law, because Defendant designates the ingredient by its generic name, "malic acid,"  
16 instead of by its specific name, "DL malic acid."  
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### 17 **C. Requirements for Labelling**

18 34. Federal regulations promulgated pursuant to the Food, Drug, and Cosmetic Act  
19 ("FDCA") require that a food's label accurately describe the nature of the food product and its  
20 characterizing flavors. 21 C.F.R. § 102.5(a).  
21

22 35. Artificial flavor is defined as "any substance, the function of which is to impart  
23 flavor, which is not derived from a spice, fruit or fruit juice, vegetable or vegetable juice, edible  
24 yeast, herb, bark, bud, root, leaf or similar plant material, meat, fish, poultry, eggs, dairy  
25 products, or fermentation products thereof." 21 C.F.R § 101.22(a)(1).  
26

27 36. Natural flavor is defined as "essential oil, oleoresin, essence or extractive, protein  
28 hydrolysate, distillate, or any product of roasting, heating or enzymolysis, which contains the

1 flavoring constituents” from fruits or vegetables, “whose significant function in food is flavoring  
2 rather than nutritional.” 21 C.F.R § 101.22(a)(3).

3 37. Any recognizable primary flavor identified directly or indirectly on the front label  
4 of a food product, whether by word, vignette, depiction of a fruit, or other means is referred to  
5 as a “characterizing flavor.” 21 C.F.R. § 101.22.  
6

7 38. Here, the Products’ labels both state the characterizing flavors (lemons,  
8 raspberries, tangerines, cherries, pomegranates, and others) and reinforce the statement of the  
9 characterizing flavor by depictions of fruits on the Products’ websites.

10 39. If a food product’s characterizing flavor is not created exclusively by the named  
11 flavor ingredient, the product’s front label must state that the product’s flavor was simulated or  
12 reinforced with either natural or artificial flavorings or both. If any artificial flavor is present  
13 which “simulates, resembles or reinforces” the characterizing flavor, the front label must  
14 prominently inform consumers that the product is “Artificially Flavored.” 21 C.F.R. §  
15 101.22(i)(2).  
16

17 40. A food product’s label also must include a statement of the “presence or absence  
18 of any characterizing ingredient(s) or component(s) . . . when the presence or absence of such  
19 ingredient(s) or component(s) in the food has a material bearing on price or consumer  
20 acceptance . . . and consumers may otherwise be misled about the presence or absence of the  
21 ingredient(s) or component(s) in the food.” 21 C.F.R. § 102.5.  
22

23 41. Such statement must be in boldface print on the front display panel and of  
24 sufficient size for an average consumer to notice.

25 42. California’s Sherman Food, Drug, and Cosmetic Law, Cal. Health & Saf. Code §  
26 109875, *et seq.*, incorporates all food flavoring and additive regulations of the FDCA.  
27  
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1           43. By changing the ratio between sugars and acids that is naturally found in fruits  
2 such as lemons, raspberries, tangerines, cherries, and pomegranates, the DL malic acid used in  
3 the Products reinforces, simulates, or creates the characterizing flavors, regardless of any other  
4 effect it may have or purpose for which it was included.

5           44. DL malic acid is not a “natural flavor” as this term is defined by federal and state  
6 regulations and is not derived from a fruit or vegetable or any other natural source. The Products  
7 therefore contain artificial flavorings.

8           45. Because the Products contain artificial flavoring, California law requires the  
9 Products to display both front- and back-label disclosures to inform consumers that the Products  
10 are artificially flavored.

11           46. The Products have none of the required disclosures regarding the use of artificial  
12 flavors.

13           47. Plaintiff reserves the right to amend this Complaint to add further products that  
14 contain similar label misrepresentations as testing continues.

15           49. Labels are the chief means by which food product manufacturers convey critical  
16 information to consumers, and consumers have been conditioned to rely on the accuracy of the  
17 claims made on these labels. As the California Supreme Court stated in a case involving alleged  
18 violations of the UCL and FAL, “Simply stated: labels matter. The marketing industry is based  
19 on the premise that labels matter, that consumers will choose one product over another similar  
20 product based on its label.” *Kwikset Corp. v. Superior Court*, 51 Cal.4th 310, 328 (2011).

21           50. Plaintiff reviewed the label on the Products prior to his purchase as well as the  
22 company’s Amazon storefront, and reviewed the natural flavoring claims being made there.  
23 Consumers such as Plaintiff who viewed the Products’ labels and the company’s website  
24 reasonably understood Defendant’s “No Artificial Anything!” and “Zero Artificial Ingredients”  
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1 statements, as well as its failure to disclose the use of artificially derived malic acid, to mean  
2 that the Products contain only natural flavorings. This representation was also false.

3 51. Consumers including Plaintiff reasonably relied on Defendant's statements such  
4 that they would not have purchased the Products from Defendant if the truth about the Products  
5 was known, or would have only been willing to pay a substantially reduced price for the Products  
6 had they known that Defendant's representations were false and misleading.

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8 52. In the alternative, because of its deceptive and false labelling statements,  
9 Defendant was enabled to charge a premium for the Products relative to key competitors'  
10 products, or relative to the average price charged in the marketplace.

11 53. Consumers including Plaintiff especially rely on label claims made by food  
12 product manufacturers such as DBN, as they cannot confirm or disprove those claims simply by  
13 viewing or even consuming the Products.

14  
15 54. Plaintiff suffered economic injury by Defendant's fraudulent and deceptive  
16 conduct as stated herein, and there is a causal nexus between Defendant's deceptive conduct and  
17 Plaintiff's injury.

18 **CLASS ACTION ALLEGATIONS**

19 55. Plaintiff brings this action individually and as representative of all those similarly  
20 situated pursuant to Federal Rule of Civil Procedure 23 on behalf of all consumers in the state  
21 of California who purchased the Products within four years prior to the filing of this Complaint.

22 56. Excluded from the Class are Defendant and its affiliates, parents, subsidiaries,  
23 employees, officers, agents, and directors. Also excluded are any judicial officers presiding over  
24 this matter and the members of their immediate families and judicial staff.

25  
26 57. Plaintiff reserves the right to alter the Class definition, and to amend this  
27 Complaint to add Subclasses, as necessary to the full extent permitted by applicable law.

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1           58. Certification of Plaintiff’s claims for class-wide treatment is appropriate because  
2 Plaintiff can prove the elements of the claims on a class-wide basis using the same evidence as  
3 individual Class members would use to prove those elements in individual actions alleging the  
4 same claims.

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6           59. **Numerosity – Rule 23(a)(1):** The size of the Class is so large that joinder of all  
7 Class members is impracticable. Plaintiff believes and avers there are thousands of Class  
8 members geographically dispersed throughout the state.

9           60. **Existence and Predominance of Common Questions of Law and Fact – Rule**  
10 **23(a)(2), (b)(3):** There are questions of law and fact common to the Class. These questions  
11 predominate over any questions that affect only individual Class members. Common legal and  
12 factual questions and issues include but are not limited to:

- 13  
14           a. Whether the marketing, advertising, packaging, labeling, and other  
15 promotional materials for Defendant’s Products is misleading and deceptive;  
16           b. Whether a reasonable consumer would understand Defendant’s “No Artificial  
17 Anything!” and “Zero Artificial Ingredients” claims to indicate that the  
18 Products contained only natural flavorings, and reasonably relied upon those  
19 representations;  
20           c. Whether Defendant was unjustly enriched at the expense of the Plaintiff and  
21 Class members;  
22           d. the proper amount of damages and disgorgement or restitution;  
23           e. the proper scope of injunctive relief; and  
24           f. the proper amount of attorneys’ fees.

25  
26           61. Defendant engaged in a common course of conduct in contravention of the laws  
27 Plaintiff seeks to enforce individually and on behalf of the Class. Similar or identical violations  
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1 of law, business practices, and injuries are involved. Individual questions, if any, pale by  
2 comparison, in both quality and quantity, to the numerous common questions that predominate  
3 this action. The common questions will yield common answers that will substantially advance  
4 the resolution of the case.

5  
6 62. In short, these common questions of fact and law predominate over questions that  
7 affect only individual Class members.

8 63. **Typicality – Rule 23(a)(3):** Plaintiff’s claims are typical of the claims of the Class  
9 members because they are based on the same underlying facts, events, and circumstances  
10 relating to Defendant’s conduct.

11 64. Specifically, all Class members, including Plaintiff, were harmed in the same way  
12 due to Defendant’s uniform misconduct described herein; all Class members suffered similar  
13 economic injury due to Defendant’s misrepresentations; and Plaintiff seeks the same relief as  
14 the Class members.  
15

16 65. There are no defenses available to Defendant that are unique to the named  
17 Plaintiff.

18 66. **Adequacy of Representation – Rule 23(a)(4):** Plaintiff is a fair and adequate  
19 representative of the Class because Plaintiff’s interests do not conflict with the Class members’  
20 interests. Plaintiff will prosecute this action vigorously and is highly motivated to seek redress  
21 against Defendant.  
22

23 67. Furthermore, Plaintiff has selected competent counsel who are experienced in  
24 class action and other complex litigation. Plaintiff and Plaintiff’s counsel are committed to  
25 prosecuting this action vigorously on behalf of the Class and have the resources to do so.  
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1           68. **Superiority – Rule 23(b)(3)**: The class action mechanism is superior to other  
2 available means for the fair and efficient adjudication of this controversy for at least the  
3 following reasons

- 4           a. the damages individual Class members suffered are small compared to the  
5 burden and expense of individual prosecution of the complex and extensive  
6 litigation needed to address Defendant’s conduct such that it would be  
7 virtually impossible for the Class members individually to redress the wrongs  
8 done to them. In fact, they would have little incentive to do so given the  
9 amount of damage each member has suffered when weighed against the costs  
10 and burdens of litigation;
- 11           b. the class procedure presents fewer management difficulties than individual  
12 litigation and provides the benefits of single adjudication, economies of scale,  
13 and supervision by a single Court;
- 14           c. the prosecution of separate actions by individual Class members would create  
15 a risk of inconsistent or varying adjudications, which would establish  
16 incompatible standards of conduct for Defendant; and
- 17           d. the prosecution of separate actions by individual Class members would create  
18 a risk of adjudications with respect to them that would be dispositive of the  
19 interests of other Class members or would substantively impair or impede their  
20 ability to protect their interests.

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24           69. Unless the Class is certified, Defendant will retain monies received as a result of  
25 its unlawful and deceptive conduct alleged herein.

26           70. Unless a class-wide injunction is issued, Defendant will likely continue to  
27 advertise, market, promote, and sell its Products in an unlawful and misleading manner, as  
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1 described throughout this Complaint, and members of the Class will continue to be misled,  
2 harmed, and denied their rights under the law. Plaintiff may wish to rely on Defendant’s label  
3 representations and purchase the Products in the future, but cannot currently do so.

4 71. **Ascertainability.** To the extent ascertainability is required, the Class members are  
5 readily ascertainable from Defendant’s records and/or its agents’ records of retail and online  
6 sales, as well as through public notice.

7 72. Defendant has acted on grounds applicable to the Class as a whole, thereby  
8 making appropriate final injunctive and declaratory relief concerning the Class as a whole.

9  
10 **COUNT 1**  
11 **VIOLATION OF CALIFORNIA BUSINESS & PROFESSIONS CODE**  
12 **SECTION 17200 *et seq.* — “UNFAIR” CONDUCT**

13 73. Plaintiff realleges the preceding paragraphs as if fully set forth herein and, to the  
14 extent necessary, pleads this cause of action in the alternative.

15 74. Plaintiff has standing to pursue this claim as Plaintiff has suffered injury in fact as  
16 a result of Defendant’s actions as set forth herein.

17 75. Defendant’s actions as alleged in this Complaint constitute “unfair” conduct  
18 within the meaning of California Business and Professions Code Section 17200, *et seq.*

19 76. Defendant’s business practices, as alleged herein, are “unfair” because it  
20 misrepresents the nature of the flavoring used in the Products and fails to disclose accurately the  
21 artificial flavoring used in the Products.

22 77. As a result of this “unfair” conduct, Plaintiff expended money and engaged in  
23 activities it would not otherwise have spent or conducted.

24 78. Defendant’s wrongful business practices alleged herein constituted, and continue  
25 to constitute, a continuing course of unfair competition since it continues to market and sell its  
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1 products in a manner that offends public policy and/or in a fashion that is immoral, unethical,  
2 oppressive, unscrupulous and/or substantially injurious to its customers.

3 79. Defendant publicly disseminated untrue or misleading representations regarding  
4 the flavoring of its Products, which it knew, or in the exercise of reasonable care should have  
5 known, were untrue or misleading.  
6

7 80. Pursuant to Business and Professions Code Section 17203, Plaintiff seeks an order  
8 of this court enjoining Defendant from continuing to engage in “unfair” business practices and  
9 any other act prohibited by law, including those acts set forth in this Complaint, and further seek  
10 all other relief allowable under Business and Professions Code Section 17200, *et seq.*  
11

12 **COUNT 2**  
13 **VIOLATION OF CALIFORNIA BUSINESS & PROFESSIONS CODE**  
14 **SECTION 17200 *et seq.* — “FRAUDULENT” CONDUCT**

15 81. Plaintiff realleges the preceding paragraphs as if fully set forth herein and, to the  
16 extent necessary, plead this cause of action in the alternative.

17 82. Plaintiff has standing to pursue this claim as Plaintiff has suffered injury in fact as  
18 a result of Defendant’s actions as set forth above.

19 83. Defendant’s actions as alleged in this Complaint constitute “fraudulent” conduct  
20 within the meaning of California Business and Professions Code Section 17200 *et seq.*

21 84. Defendant’s business practices, as alleged herein, are “fraudulent” because it  
22 misrepresents the nature of the flavoring used in the Products and fails to disclose accurately the  
23 artificial flavoring used in the Products.

24 85. As a result of this “fraudulent” conduct, Plaintiff expended money and engaged in  
25 activities it would not otherwise have spent or conducted.

26 86. Defendant’s wrongful business practices alleged herein constituted, and continue  
27 to constitute, a continuing course of unfair competition since it continues to market and sell its  
28

1 products in a manner that offends public policy and/or in a fashion that is immoral, unethical,  
2 oppressive, unscrupulous and/or substantially injurious to its customers.

3 87. Defendant publicly disseminated untrue or misleading representations regarding  
4 the flavoring of its Products, which it knew, or in the exercise of reasonable care should have  
5 known, were untrue or misleading.  
6

7 88. Pursuant to Business and Professions Code Section 17203, Plaintiff seeks an  
8 order of this Court enjoining Defendant from continuing to engage in “fraudulent” business  
9 practices and any other act prohibited by law, including those acts set forth in this Complaint,  
10 and further seeks all other relief allowable under Business and Professions Code Section 17200,  
11 *et seq.*  
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13 **COUNT 3**  
14 **VIOLATION OF CALIFORNIA BUSINESS & PROFESSIONS CODE**  
15 **SECTION 17200 *et seq.* — “UNLAWFUL” CONDUCT**

16 89. Plaintiff realleges the preceding paragraphs as if fully set forth herein and, to the  
17 extent necessary, pleads this cause of action in the alternative.

18 90. Plaintiff has standing to pursue this claim as Plaintiff has suffered injury in fact as  
19 a result of Defendant’s actions as set forth above.

20 91. Defendant’s actions as alleged in this Complaint constitute “unlawful” conduct  
21 within the meaning of California Business and Professions Code Section 17200, *et seq.*

22 92. Defendant’s business practices, as alleged herein, are “unlawful” because it  
23 misrepresents the nature of the flavoring used in the Products and fails to disclose accurately the  
24 artificial flavoring used in the Products.

25 93. As a result of this “unlawful” conduct, Plaintiff expended money and engaged in  
26 activities he would not otherwise have spent or conducted.  
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- 1 c. Defendant’s acts and practices constitute the advertisement of goods, without the
- 2 intent to sell them as advertised;
- 3 d. Defendant’s acts and practices fail to represent that transactions involving its
- 4 Products involve actions that are prohibited by law, particularly the use of
- 5 misleading nutritional labelling; and
- 6
- 7 e. Defendant’s acts and practices constitute representations that its Products have
- 8 been supplied in accordance with previous representations when they were not.

9 54. By reason of the foregoing, Plaintiff and the Class have been irreparably harmed,  
10 entitling them to injunctive relief, disgorgement, and restitution.

11 55. Pursuant to Cal. Civ. Code § 1782, Plaintiff notified Defendant in writing of the  
12 particular violations of the CLRA described herein and demanded Defendant rectify the actions  
13 described above by providing complete monetary relief, agreeing to be bound by their legal  
14 obligations and to give notice to all affected customers of their intent to do so. Plaintiff sent this  
15 notice by certified mail to Defendant, at least 30 days before the filing of this Complaint.  
16

17 56. Pursuant to Cal. Civ. Code §§ 1770 and 1780, Plaintiff and the Class are entitled  
18 to recover actual damages sustained as a result of Defendant’s violations of the CLRA. Such  
19 damages include, without limitation, monetary losses and actual, punitive, and consequential  
20 damages, in an amount to be proven at trial.  
21

22 57. Pursuant to Cal. Civ. Code §§ 1770 and 1780, Plaintiff is entitled to enjoin  
23 publication of misleading and deceptive nutritional labels on Defendant’s Products and to  
24 recover reasonable attorneys’ fees and costs.

25 **COUNT 6**  
26 **UNJUST ENRICHMENT**

27 58. Plaintiff realleges the preceding paragraphs as if fully set forth herein and, to the  
28 extent necessary, pleads this cause of action in the alternative.





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- e. Ordering Defendant to pay attorneys’ fees and litigation costs to Plaintiff pursuant to California Code of Civil Procedure Section 1021.5 and the common-law private-attorney-general doctrine;
- f. Ordering Defendant to pay both pre- and post-judgment interest on any amounts awarded; and
- g. Such other relief as the Court may deem just and proper.

TRIAL BY JURY IS DEMANDED ON ANY COUNTS SO TRIABLE.

Respectfully submitted,

/s/ Charles C. Weller  
Charles C. Weller (Cal. SBN: 207034)  
Attorney for Plaintiff

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January 17, 2023

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Dr. Berg Electrolyte Powder Naturally Flavored? Not So Much, Class Action Claims](#)

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