

**LAW OFFICES OF RONALD A. MARRON**  
RONALD A. MARRON  
(SBN 175650)  
*ron@consumersadvocates.com*  
MICHAEL T. HOUCHIN  
(SBN 305541)  
*mike@consumersadvocates.com*  
651 Arroyo Drive  
San Diego, California 92103  
Telephone: (619) 696-9006  
Facsimile: (619) 564-6665  
**Class Counsel**

**COHELAN KHOURY & SINGER**  
TIMOTHY D. COHELAN (SBN 60827)  
*TCohelan@CKSLaw.com*  
ISAM C. KHOURY (SBN 58759)  
*IKhoury@CKSLaw.com*  
MICHAEL D. SINGER (SBN 115301)  
*msinger@ckslaw.com*  
J. JASON HILL (SBN 179630)  
*JHill@CKSLaw.com*  
605 C Street, Suite 200  
San Diego, California 92101  
Telephone: (619) 239-8148  
Facsimile: (619) 595-3000

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

VEDA WOODARD, TERESA RIZZO-MARINO, and DIANE MORRISON,  
on behalf of themselves, all others  
similarly situated, and the general  
public,

Plaintiffs,

vs.

LEE LABRADA; LABRADA  
BODYBUILDING NUTRITION, INC.;  
LABRADA NUTRITIONAL  
SYSTEMS, INC.; DR. MEHMET C.  
OZ, M.D.; ENTERTAINMENT  
MEDIA VENTURES, INC. d/b/a OZ  
MEDIA; ZOCO PRODUCTIONS,  
LLC; HARPO PRODUCTIONS, INC;  
SONY PICTURES TELEVISION, INC;  
NATUREX, INC.; and  
INTERHEALTH  
NUTRACEUTICALS, INC.,

Defendants.

CASE NO. 5:16-cv-00189-JGB-SP

CLASS ACTION

**PLAINTIFF’S NOTICE OF  
MOTION AND MOTION FOR  
FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: December 19, 2022  
Time: 9:00 a.m.  
Ctrm: 1  
Judge: Hon. Jesus G. Bernal

**TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE THAT**, on December 19, 2022 at 9:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 1 of the United States District Court for the Central District of California, Eastern Division, 3470 Twelfth Street Riverside, California 92501, before the Honorable Jesus G. Bernal, presiding, Plaintiff Veda Woodard (“Plaintiff”) will, and hereby does, move the Court for an Order for final approval of a class action settlement with Defendant Labrada Bodybuilding Nutrition, Inc. (“Labrada”).

This motion is based on this Notice of Motion, the concurrently-filed Memorandum of Points and Authorities, the concurrently-filed Declaration of Gajan Retnasaba and Exhibits A through E attached thereto, the concurrently-filed Proposed Order Granting Plaintiff’s Motion for Final Approval, all prior pleading and proceedings in this matter, and all other evidence and written and oral argument that will be submitted in support of the Motion.

DATED: November 21, 2022 */s/ Ronald A. Marron*  
RONALD A. MARRON

**LAW OFFICES OF  
RONALD A. MARRON**  
RONALD A. MARRON  
*ron@consumersadvocates.com*  
Michael T. Houchin  
*mike@consumersadvocates.com*  
651 Arroyo Drive  
San Diego, California 92103  
Telephone: (619) 696-9006  
Facsimile: (619) 564-6665

**COHELAN KHOURY & SINGER**  
TIMOTHY D. COHELAN  
*TCohelan@CKSLaw.com*  
ISAM C. KHOURY

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*IKhoury@CKSLaw.com*  
MICHAEL D. SINGER  
*msinger@ckslaw.com*  
JAMES J. HILL  
*JHill@CKSLaw.com*  
605 C St #200  
San Diego, California 92101  
Telephone: (619) 239-8148  
Facsimile: (619) 595-3000  
***Class Counsel***

**LAW OFFICES OF RONALD A. MARRON**  
RONALD A. MARRON  
(SBN 175650)  
*ron@consumersadvocates.com*  
MICHAEL T. HOUCHIN  
(SBN 305541)  
*mike@consumersadvocates.com*  
LILACH HALPERIN  
(SBN 323202)  
*lilach@consumersadvocates.com*  
651 Arroyo Drive  
San Diego, California 92103  
Telephone: (619) 696-9006  
Facsimile: (619) 564-6665  
**Class Counsel**

**COHELAN KHOURY & SINGER**  
TIMOTHY D. COHELAN (SBN 60827)  
*TCohelan@CKSLaw.com*  
ISAM C. KHOURY (SBN 58759)  
*IKhoury@CKSLaw.com*  
MICHAEL D. SINGER (SBN 115301)  
*msinger@ckslaw.com*  
J. JASON HILL (SBN 179630)  
*JHill@CKSLaw.com*  
605 C Street, Suite 200  
San Diego, California 92101  
Telephone: (619) 239-8148  
Facsimile: (619) 595-3000

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

VEDA WOODARD, TERESA RIZZO-MARINO, and DIANE MORRISON,  
on behalf of themselves, all others  
similarly situated, and the general  
public,

Plaintiffs,

vs.

LEE LABRADA; LABRADA  
BODYBUILDING NUTRITION, INC.;  
LABRADA NUTRITIONAL  
SYSTEMS, INC.; DR. MEHMET C.  
OZ, M.D.; ENTERTAINMENT  
MEDIA VENTURES, INC. d/b/a OZ  
MEDIA; ZOCO PRODUCTIONS,  
LLC; HARPO PRODUCTIONS, INC;  
SONY PICTURES TELEVISION, INC;  
NATUREX, INC.; and  
INTERHEALTH  
NUTRACEUTICALS, INC.,

Defendants.

CASE NO. 5:16-cv-00189-JGB-SP

CLASS ACTION

**MEMORANDUM OF POINTS  
AND AUTHORITIES IN  
SUPPORT OF PLAINTIFF VEDA  
WOODARD'S MOTION FOR  
FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: December 19, 2022

Time: 9:00 a.m.

Ctrlm: 1

Judge: Hon. Jesus G. Bernal



**TABLE OF CONTENTS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

I. INTRODUCTION.....1

II. THE LITIGATION, SETTLEMENT NEGOTIATIONS, AND  
PRELIMINARY APPROVAL .....2

III. THE SETTLEMENT AGREEMENT .....4

IV. NOTICE HAS BEEN FULLY DISSEMINATED TO THE CLASS .....5

    A. Publication Notice .....6

    B. Online Notice .....6

    C. Direct Email Notice.....7

    D. Press Release .....7

    E. Settlement Website, Email, and Phone Line.....8

    F. CAFA Notice.....8

V. CLAIMS RATE, OPT-OUTS, AND OBJECTIONS .....9

VI. THE SETTLEMENT SHOULD RECEIVE FINAL APPROVAL .....9

    A. Amount Offered in the Settlement .....10

    B. Extent of Discovery and Stage of Proceedings.....12

    C. Strength of Case and Likely Duration of Further Litigation .....12

    D. Absence of Collusion .....13

    E. Absence of Governmental Participation .....13

    F. The Reaction of the Class .....14

VII. CONCLUSION .....14

**TABLE OF AUTHORITIES**

**Cases**

*Acosta v. Trans Union, LLC*,  
243 F.R.D. 377 (C.D. Cal. 2007) .....12

*Balderas v. Massage Envy Franchising, LLC*,  
2014 WL 3610945 (N.D. Cal. July 21, 2014) .....11

*Beirne v. Trepco Imports & Distribution, Ltd.*,  
2020 WL 8669828 (C.D. Cal. Nov. 16, 2020) .....10

*Dupler v. Costco Wholesale Corp.*,  
705 F. Supp. 2d 231 (E.D.N.Y. 2010) .....14

*Garcia v. Pancho Villa's of Huntington Village, Inc.*,  
2012 WL 1843785 (E.D. N.Y. 2012) .....6

*Garner v. State Farm Mut. Auto. Ins. Co.*,  
2010 WL 1687832 (N.D. Cal. Apr. 22, 2010)..... 13, 14

*In re Mego Fin, Corp. Sec. Litig.*,  
213 F.3d 454 (9th Cir. 2000) .....10

*In re Netflix Privacy Litig.*,  
2013 WL 1120801 (N.D. Cal. Mar. 18, 2013) .....14

*In re Omnivision Techs., Inc.*,  
559 F. Supp. 2d 1036 (N.D. Cal. 2008).....14

*In re Syncor ERISA Litig.*,  
516 F.3d 1095 (9th Cir. 2008) .....9

*LaGarde v. Support.com, Inc.*,  
2013 WL 1283325 (N.D. Cal. Mar. 26, 2013) .....13

*Linney v. Cellular Alaska P’ship*,  
151 F.3d 1234 (9th Cir. 1998) .....10

*Litty v. Merrill Lynch & Co.*,  
2015 WL 4698475 (C.D. Cal. Apr. 27, 2015) .....13

1 *Lo v. Oxnard European Motors, LLC*,  
 2 2012 WL 1932283 (S.D. Cal. 2012) .....6  
 3 *Ma v. Covidien Holding, Inc.*,  
 4 2014 WL 360196 (C.D. Cal. Jan. 31, 2014) .....11  
 5 *Nat’l Rural Telecomms. Coop. v. DIRECTV, Inc.*,  
 6 221 F.R.D. 523 (C.D. Cal. 2004) ..... 12, 14  
 7 *Officers for Justice v. Civil Serv. Comm’n of City & Cnty. of San Francisco*,  
 8 688 F.2d 615 (9th Cir. 1982) .....9  
 9 *Staton v. Boeing Co.*,  
 10 327 F.3d 938 (9th Cir. 2003) .....10  
 11 *Stovall-Gusman v. W.W. Granger, Inc.*,  
 12 2015 WL 3776765 (N.D. Cal. June 17, 2015).....11  
 13 *Torrisi v. Tucson Elec. Power Co.*,  
 14 8 F.3d 1370 (9th Cir. 1993) .....10  
 15 *Woodard v. Labrada*,  
 16 2019 WL 4509301 (C.D. Cal. Apr. 23, 2019) .....13  
 17 **Statutes**  
 18 28 U.S.C. § 1715 .....8  
 19 28 U.S.C. § 1715(d) .....8  
 20 Cal. Civ. Code § 1781(d) .....6  
 21 **Rules**  
 22 Fed. R. Civ. P. 23(e).....9, 10  
 23 Fed. R. Civ. P. 23(e)(2).....1, 10  
 24  
 25  
 26  
 27  
 28

1       **I. INTRODUCTION**

2           On July 7, 2022, this Court entered an Order preliminarily approving a Class  
3 Action Settlement (“Settlement”) between Plaintiff Veda Woodard (“Plaintiff”), on  
4 behalf of the certified Classes, and Defendant Labrada Bodybuilding Nutrition, Inc.  
5 (“Defendant” or “Labrada”) (ECF No. 474). The Parties reached the Settlement after  
6 extensive negotiations, including with the assistance of the Honorable Leo S. Papas  
7 (Ret.) as a mediator. The Settlement is memorialized in the Class Action Settlement  
8 (“Agreement”) filed with this Court on June 1, 2022 (ECF No. 468-3), and resolves  
9 all claims against Labrada in the litigation.<sup>1</sup>

10          As Plaintiff explained to the Court in her motion for preliminary approval, the  
11 settlement provides meaningful monetary and other equitable relief to the Classes.  
12 Although Labrada continues to deny Plaintiff’s allegations, it has agreed under the  
13 Agreement to pay \$625,000 into a settlement fund. Agreement § 2.1(HH). In  
14 addition, the Agreement provides for valuable injunctive relief whereby Labrada  
15 agreed to cease selling the disputed products by August 1, 2022. Agreement §  
16 5.1(2)(a).

17          The Settlement should now receive the Court’s final approval because it is  
18 demonstrably “fair, reasonable, and adequate” under Federal Rule of Civil Procedure  
19 23(e)(2). For the reasons below, and those stated in Plaintiff’s Motion for  
20 Preliminary Approval of Settlement (ECF No. 468-1), Plaintiff asks that the Court  
21 find that the Settlement is fair, reasonable and adequate under Rule 23(e)(2), and  
22 thus grant final approval of the Settlement.

23  
24  
25  
26  
27       

---

<sup>1</sup> Unless otherwise noted, capitalized terms in this Memorandum of Points and  
28 Authorities have the same meaning as in the Settlement Agreement.

1 **II. THE LITIGATION, SETTLEMENT NEGOTIATIONS, AND**  
2 **PRELIMINARY APPROVAL**

3 On February 2, 2016, Plaintiff Veda Woodard (“Plaintiff”) filed a putative  
4 class action complaint alleging violations of consumer protections laws against  
5 Naturex, Inc. (“Naturex”), Lee Labrada, Labrada Bodybuilding Nutrition, Inc.,  
6 Labrada Nutritional Systems, Inc., (“Labrada Defendants”); InterHealth  
7 Nutraceuticals Inc., (“InterHealth”), Zoco Productions, LLC, Harpo Productions,  
8 Inc., and Dr. Mehmet C. Oz, M.D. (the “Media Defendants”). (ECF No. 1). The  
9 complaint alleged claims arising from the Defendants’ alleged misrepresentations  
10 surrounding the effectiveness of the weight-loss supplement products that are  
11 manufactured by Labrada, including the Labrada Green Coffee Bean Extract Product  
12 and the Labrada Garcinia Cambogia Product.

13 On April 4, 2016, the Media Defendants filed a motion to dismiss, (ECF No.  
14 45), which Plaintiff Woodard opposed on April 18, 2016. (ECF No. 61). On May  
15 12, 2016, the Court granted in part and denied in part the Media Defendants’ motion  
16 to dismiss. (ECF No. 85). Then on June 2, 2016, Plaintiff Veda Woodard, along with  
17 former plaintiffs Teresa Rizzo-Marino and Diane Morrison, filed the operative First  
18 Amended Complaint (“FAC”). (ECF No. 88). On July 21, 2016, Labrada filed a  
19 Motion to Dismiss Plaintiffs’ FAC pursuant to Federal Rule of Civil Procedure  
20 12(b)(6) (ECF No. 105) and on July 31, 2017, the Court issued an Order Denying  
21 Labrada’s Motion to Dismiss the FAC. (ECF No. 190). On August 14, 2017, Labrada  
22 filed an Answer to the FAC. (ECF No. 201).

23 Plaintiff and Labrada have engaged in substantial discovery. All Parties to this  
24 litigation have collectively produced approximately 30,000 pages of documents and  
25 have exchanged approximately 20 sets of formal written discovery. *See* ECF No.  
26 468-2 [Marron Decl., ¶ 5]. In addition, the Defendants have deposed each of the  
27 Class Representatives and Class Counsel has deposed Labrada’s Fed. R. Civ. P.  
28 30(b)(6) designee, Kyle Workman. *Id.* Class Counsel have also taken the deposition

1 of Lee Labrada, the C.E.O. of Labrada Bodybuilding Nutrition, Inc. *Id.* In addition  
2 to deposing the representatives of Labrada, Class Counsel have also taken several  
3 depositions of the representatives of the former defendants in this action relating to,  
4 among other topics, their relationship with Labrada. *Id.* Plaintiff and Labrada have  
5 also exchanged expert reports and have deposed each other's experts. *Id.*

6 On March 2, 2020, Plaintiff filed a Motion for Class Certification (ECF No.  
7 351) and Labrada filed a Motion for Summary Judgment. (ECF No. 352). On August  
8 31, 2021, the Court issued an order granting in part and denying in part Plaintiff's  
9 Motion for Class Certification and granting in part and denying in part Labrada's  
10 Motion for Summary Judgment. (ECF No. 444). The August 31, 2021 Order  
11 dismissed the claims of former plaintiffs Diane Morrison and Teresa Rizzo-Marino  
12 leaving Plaintiff Veda Woodard as the sole remaining named Plaintiff and class  
13 representative. The August 31, 2021 Order also dismissed Plaintiff's claims against  
14 defendants Interhealth Nutraceuticals, Inc., Lee Labrada, and Labrada Nutritional  
15 Systems, Inc. leaving defendant Labrada Bodybuilding Nutrition, Inc. as the sole  
16 remaining defendant in this action.<sup>2</sup> The Court certified the following classes: (1.)  
17 "All persons in California who purchased the Labrada Green Coffee Bean Extract  
18 Product for personal and household use and not for resale from February 2, 2012  
19 until the date class notice is disseminated" and (2.) "All persons in California who  
20 purchased the Labrada Garcinia Cambogia Product for personal and household use  
21 and not for resale from February 2, 2012 until the date notice is disseminated." (ECF  
22 No. 444 at 57).

23 On January 27, 2022, Plaintiff and Labrada attended a full-day mediation  
24 session before the Honorable Judge Leo S. Papas (Ret.). ECF No. 468-2 [Marron  
25 Decl. ¶ 7]. Judge Papas is a highly experienced and well-regarded mediator who

26 \_\_\_\_\_  
27 <sup>2</sup> The Media Defendants were previously dismissed pursuant to a stipulation of the  
28 Parties (ECF No. 418) and defendant Naturex, Inc. was previously dismissed  
pursuant to a class action settlement agreement that was granted final approval by  
this Court. (ECF No. 321).

1 served as a Magistrate Judge for the U.S. District Court, Southern District of  
2 California from 1991 to 2009, including a tenure as the Presiding Judge from 2002  
3 to 2007. *Id.* Plaintiff and Labrada submitted mediation statements and supporting  
4 documents in connection with the mediation. *Id.* Judge Papas’ guidance with the  
5 negotiations between Class Counsel and Labrada resulted in a general framework  
6 for the settlement of this action. ECF No. 468-2 [Marron Decl. ¶ 8]. During the  
7 ensuing months, Class Counsel and Labrada negotiated the remaining terms of the  
8 settlement and reached an agreement in principle, which is now finalized as reflected  
9 in the Settlement Agreement. *Id.*

10 On July 7, 2022, the Court entered an Order Granting Plaintiff’s Motion for  
11 Preliminary Approval of the Settlement. (ECF No. 474). The Court noted that all of  
12 the relevant factors weighed in favor of approval of the Settlement and that the  
13 “Agreement is potentially fair, adequate, and reasonable.” (*Id.* at p. 8). The Court  
14 further found that “the proposed notice to be the best notice practicable under the  
15 circumstances” and directed that notice be disseminated to the Classes. (*Id.* at p. 9).

16 **III. THE SETTLEMENT AGREEMENT**

17 The Settlement is memorialized in the Class Action Settlement filed with this  
18 Court on June 1, 2022. (ECF No. 468-3). The proposed Settlement establishes two  
19 Settlement Classes comprised of:

20 **Green Coffee Bean Extract Class**

21 All persons in California who purchased the Labrada Green Coffee Bean  
22 Extract product for personal and household use and not for resale from  
23 February 2, 2012, until the date class notice is disseminated.

24  
25 **Garcinia Cambogia Class**

26 All persons in California who purchased the Labrada Garcinia Cambogia  
27 product for personal and household use and not for resale from February 2,  
28 2012, until the date notice is disseminated.



1 Agreement § 2.1(II).

2 The Settlement Agreement also provides that Labrada will pay \$625,000 into  
3 a settlement fund. Agreement § 2.1(HH). Class members who submit a claim with a  
4 proof of purchase for one or more Class Products will receive \$5.00 in cash from the  
5 Settlement Fund for each purchase reflected on the proof(s) of purchase for up to ten  
6 products purchased during the class period. Agreement § 5.1(1)(a). Class members  
7 who submit a claim without a proof of purchase will receive \$5.00 in cash from the  
8 Settlement Fund for each product purchased during the class period for up to four  
9 products. Agreement § 5.1(1)(b). In no event shall any class member receive a cash  
10 payment of more than \$50.00 total from the Settlement Fund. Agreement § 5.1(1)(c).  
11 If the amount of valid claims timely submitted by class members exceeds the amount  
12 allocated for cash payments to class members from the Settlement Fund, cash  
13 payments to participating class members who submit timely and valid claims will be  
14 reduced pro rata until the funds allocated for class member cash payments remaining  
15 in the Settlement Fund are exhausted. Agreement § 5.1(1)(d). To the extent that the  
16 payments allocated or made from the Settlement Fund are less than \$625,000, 50%  
17 of the difference, if any, shall revert to Labrada and the remaining 50% of the  
18 difference shall be transmitted to Smile Train or in the alternative, Consumers  
19 Union, as a *cy pres* beneficiary. Agreement § 5.1(3)(c).

20 Additionally, Labrada agreed to the following injunctive relief: Labrada shall  
21 cease selling the Products by August 1, 2022. Agreement § 5.1(2)(a).

22 **IV. NOTICE HAS BEEN FULLY DISSEMINATED TO THE CLASS**

23 The Parties developed a notice program with the assistance of Classaura Class  
24 Action Administration (“Classaura”), a firm that specializes in the development,  
25 design, and implementation of class-action notice plans. The program was executed  
26 in accordance with its design and the terms approved by the Court. In consultation  
27 and collaboration with the parties, Classaura has taken steps to provide the Court-  
28 ordered Notice to Class Members. These notice procedures are consistent with the



1 class-action notice plan that was approved by this Court as being the best notice  
2 practicable under the circumstances.

3 The costs of providing notice to the class members totals \$98,856.<sup>3</sup> See  
4 Declaration of Gajan Retnasaba filed concurrently herewith (“Retnasaba Decl.”), ¶  
5 21. The cost of notice and claims administration account for just 15.6% of the total  
6 settlement fund. The Court should find that these notice and administration costs are  
7 reasonable and can be properly deducted from the Settlement Fund. See *Lo v. Oxnard*  
8 *European Motors, LLC*, 2012 WL 1932283, \*1 n.1 (S.D. Cal. 2012) (deducting the  
9 cost of notice from the settlement fund created by defendant); *Garcia v. Pancho*  
10 *Villa's of Huntington Village, Inc.*, 2012 WL 1843785, \*2 (E.D. N.Y. 2012)  
11 (approving a settlement fund that included the costs of settlement notice). Below is  
12 a summary of the notice that was provided to the class members.

13 **A. Publication Notice**

14 In compliance with the notice requirements of the Consumers Legal Remedies  
15 Act, Cal. Civ. Code § 1781(d), notice was published in the *Press Enterprise*  
16 newspaper for four consecutive weeks on July 29, 2022, August 5, 2022, August 12,  
17 2022, and August 19, 2022. Retnasaba Decl., ¶ 7 & Ex. B.

18 **B. Online Notice**

19 On July 14, 2022, Classaura began an online advertising campaign on the  
20 social media website Facebook.com. Retnasaba Decl., ¶ 8 & Ex. C. The advertising  
21 targeted adults residing in California who were identified as having an interest in  
22 weight loss, weight loss supplements, Vitamin Shoppe, Green Coffee, or Garcinia  
23 Cambogia. *Id.* The Facebook advertising campaign generated 15,020,313  
24

25 \_\_\_\_\_  
26 <sup>3</sup> The costs incurred to provide notice of the settlement via Online Notice, Settlement  
27 Website, Press Release, and CAFA is \$77,135. The cost to administer the settlement,  
28 and process claims is \$7,695. The cost to distribute payment to class members is  
\$14,026. This brings the total cost to \$98,856. Retnasaba Decl., ¶ 21.

1 impressions.<sup>4</sup> Retnasaba Decl., ¶ 9. The Facebook advertising campaign also had a  
2 reach<sup>5</sup> of 14,227,095 unique users. Retnasaba Decl., ¶ 10. The online advertising  
3 campaign also made submissions to the two leading websites that collect and  
4 publicize class notices, ClassActionRebates.com and TopClassActions.com.  
5 Retnasaba Decl., ¶ 11.

6 **C. Direct Email Notice**

7 Labrada provided a list of direct purchasers in California who purchased the  
8 Products during the Class Period. Retnasaba Decl., ¶ 12. The list contained 656  
9 entries and 256 unique purchaser email addresses. *Id.* Classaura emailed notice to  
10 all 256 of these individuals along with a link to the class website. *Id.* & Ex. D. 235  
11 emails were successfully delivered. *Id.*

12 **D. Press Release**

13 Classaura crafted a neutral informational press release, providing a summary  
14 of the settlement. Retnasaba Decl., ¶ 13 & Ex. E. On July 15, 2022, the press release  
15 was released using the PR Newswire’s California Distribution List. *Id.* The  
16 California Distribution List provides the press release to thousands of media outlets  
17 that cover California, including national and local newspapers, websites, and  
18 television and radio stations. *Id.* The press release was picked up and republished by  
19 at least 301 media outlets. *Id.*

20  
21  
22 <sup>4</sup> An “impression” (in the context of online advertising) is the number of times an  
23 advertisement was displayed to an individual. The impression is displayed and gives  
24 an individual the opportunity to click on the advertisement and be directed to the  
25 Settlement Website for more information. Each time an ad is displayed to a visitor,  
it is counted as one impression. Retnasaba Decl., ¶ 9.

26 <sup>5</sup> “Reach” is defined as the number of different people that the advertisement was  
27 exposed to. Each time an ad is displayed to a user that has not previously been  
28 exposed to the advertisement through that medium, it is counted as adding one to the  
reach. Retnasaba Decl., ¶ 10.

1           **E. Settlement Website, Email, and Phone Line**

2           The Settlement Website (labradaaction.com) was set up on July 11, 2022,  
3 providing information on the lawsuit and access to case documents. Retnasaba Decl.,  
4 ¶ 15. The website includes a summary of the case, a list of important dates, answers  
5 to frequently asked questions, key case filings, and contact information. *Id.* The  
6 Settlement Website also displayed the claim filing deadline; the deadline to opt-out  
7 of the class settlement; the deadline to submit an objection; and the date of the  
8 Fairness Hearing. *Id.* The website address was set forth in all of the public notices  
9 described above, as well as on the Claim Form. *Id.* As of the date of this filing, the  
10 website has been visited 162,377 times. *Id.*

11           A dedicated email address (contact@labradaaction.com) was also set up  
12 on July 11, 2022 to answer questions from potential class members. Retnasaba Decl.,  
13 ¶ 16. To date, Classuara has received and answered 36 emails. *Id.* Additionally, a  
14 dedicated toll-free number (800-801-7097) was set up on July 11, 2022 providing  
15 pre-recorded information and allowing class members to leave a voicemail  
16 requesting further information. Retnasaba Decl., ¶ 14. To date, Classaura received  
17 eight calls and answered six voicemails. *Id.*

18           **F. CAFA Notice**

19           In accordance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. §  
20 1715, Classuara compiled a CAFA Notice Packet containing a CD-ROM with the  
21 necessary case documents as well as a cover letter. Retnasaba Decl., ¶¶ 3-4 & Ex.  
22 A. 5. On June 27, 2022 CAFA Notice was mailed via United States Postal Service  
23 (USPS), Priority Mail Service, to the U.S. Attorney General and the California  
24 Attorney General. Retnasaba Decl., ¶ 5. More than 90 days have now passed since  
25 the date of the CAFA notice (28 U.S.C. § 1715(d)), and no objections have been  
26 received by the U.S. Attorney General or the California Attorney General.  
27  
28

1 **V. CLAIMS RATE, OPT-OUTS, AND OBJECTIONS**

2 Classuara has received 18,702 valid claim forms from settlement class  
3 members.<sup>6</sup> Retnasaba Decl., ¶ 19. This represents a total of 73,710 product purchase  
4 claims, which is an average of 3.9 products claimed per valid claim form. *Id.* In  
5 addition, there have only been three requests for exclusion from the settlement  
6 (Retnasaba Decl., ¶ 20) and no class members have objected to the settlement.

7 **VI. THE SETTLEMENT SHOULD RECEIVE FINAL APPROVAL**

8 “[T]here is a strong judicial policy that favors settlements, particularly where  
9 complex class action litigation is concerned.” *In re Syncor ERISA Litig.*, 516 F.3d  
10 1095, 1101 (9th Cir. 2008). Approval of a proposed class action settlement is  
11 governed by Federal Rule of Civil Procedure 23(e). “The primary concern of [Rule  
12 23(e)] is the protection of those class members, including the named plaintiffs,  
13 whose rights may not have been given due regard by the negotiating parties.”  
14 *Officers for Justice v. Civil Serv. Comm'n of City & Cnty. of San Francisco*, 688  
15 F.2d 615, 624 (9th Cir. 1982).

16 In determining whether a settlement agreement is fair, adequate, and  
17 reasonable to all concerned, the Court may consider some or all of the following  
18 factors:

- 19 (1) the strength of the plaintiff's case;  
20 (2) the risk, expense, complexity, and likely duration of further litigation;  
21 (3) the risk of maintaining class action status throughout the trial;  
22 (4) the amount offered in settlement;  
23 (5) the extent of discovery completed, and the stage of the proceedings;

24 \_\_\_\_\_  
25 <sup>6</sup> A total of 119,951 claim forms were received. Retnasaba Decl., ¶ 18. However,  
26 101,249 claims forms were found to be invalid due to being duplicative, not meeting  
27 the settlement criteria, or fraudulent. *Id.* There was an unusually high number of  
28 fraudulent claims submitted in this case, driven primarily by what appeared to be a  
bot that filed approximately 43,000 machine-generated claims with a distinctive and  
unusual claim pattern. *Id.*

- 1 (6) the experience and views of counsel;
- 2 (7) the presence of a governmental participant; and
- 3 (8) any opposition by class members.

4 *Linney v. Cellular Alaska P’ship*, 151 F.3d 1234, 1242 (9th Cir. 1998); *Staton v.*  
5 *Boeing Co.*, 327 F.3d 938, 959 (9th Cir. 2003). This list of factors is not exhaustive,  
6 and a court may balance and weigh different factors depending on the circumstances  
7 of each case. *See Torrissi v. Tucson Elec. Power Co.*, 8 F.3d 1370, 1376 (9th Cir.  
8 1993).

9 Additionally, Rule 23(e) provides that the court must consider whether (A)  
10 the class representatives and class counsel have adequately represented the class; (B)  
11 the proposal was negotiated at arm's length; (C) the relief provided for the class is  
12 adequate, taking into account: (i) the costs, risks, and delay of trial and appeal; (ii)  
13 the effectiveness of any proposed method of distributing relief to the class, including  
14 the method of processing class-member claims; (iii) the terms of any proposed award  
15 of attorney's fees, including timing of payment; and (iv) any agreement required to  
16 be identified under Rule 23(e)(3); and (D) the proposal treats class members  
17 equitably relative to each other.” Fed. R. Civ. P. 23(e)(2).<sup>7</sup> However, there is  
18 “substantial overlap between these factors” and the factors considered by the Ninth  
19 Circuit. *Beirne v. Trepco Imports & Distribution, Ltd.*, 2020 WL 8669828, at \*3  
20 (C.D. Cal. Nov. 16, 2020).

21 **A. Amount Offered in the Settlement**

22 To determine whether the amount offered in settlement is fair, a court  
23 compares the settlement amount to the parties’ estimates of the maximum amount  
24 of damages recoverable in a successful litigation. *In re Mego Fin, Corp. Sec. Litig.*,  
25 213 F.3d 454, 459 (9th Cir. 2000). Here, the Court previously analyzed the expert  
26

---

27 <sup>7</sup> Plaintiff addressed each of the Rule 23(e) factors in her motion for preliminary  
28 approval (ECF No. 468-1) and the same arguments will not be repeated here.

1 report of Charlene Podlipna that provides a classwide damages calculation. (ECF  
2 No. 474 at 7). The Court found that “the \$625,000 settlement fund constitutes a  
3 reasonable percentage of the estimated damages recoverable at trial.” *Id.* (citing  
4 *Stovall-Gusman v. W.W. Granger, Inc.*, 2015 WL 3776765, at \*4 (N.D. Cal. June  
5 17, 2015) (granting final approval of a net settlement amount representing 7.3% of  
6 the plaintiffs’ potential recovery at trial); *Balderas v. Massage Envy Franchising,*  
7 *LLC*, 2014 WL 3610945, at \*5 (N.D. Cal. July 21, 2014) (granting preliminary  
8 approval of a net settlement amount representing 5% of the projected maximum  
9 recovery at trial); *Ma v. Covidien Holding, Inc.*, 2014 WL 360196, at \*5 (C.D. Cal.  
10 Jan. 31, 2014) (finding a settlement worth 9.1% of the total value of the action  
11 “within the range of reasonableness”). The same analysis continues to apply.

12 The amount offered in the settlement is also reasonable based on the number  
13 of claims received and the estimated per-class member recovery. Here, there were  
14 18,702 valid claim forms received and class members claimed a total of 73,710  
15 products purchased. Retnasaba Decl., ¶ 19. On average, class members claimed 3.9  
16 products purchased. *Id.* After notice and administration costs, class counsel’s costs,  
17 and an incentive award for Plaintiff are deducted from the \$625,000 Settlement  
18 Fund<sup>8</sup>, there will be \$333,644 available for distribution to the settlement class  
19 members.

20 Under the terms of the Settlement, class members without proof of purchase  
21 can claim \$5.00 per product for up to four products purchased and settlement class  
22 members with proof of purchase can claim \$5.00 per product for up to ten products  
23 purchased, subject to *pro rata* reductions. Agreement § 5.1(1). Because class

---

24 <sup>8</sup> The total cost of notice and claims administration is \$98,856. Retnasaba Decl., ¶  
25 21. Class Counsel is also requesting \$187,500 in litigation costs and Plaintiff is  
26 requesting an incentive award in the amount of \$5,000 as explained in Plaintiff’s  
27 Motion for Costs and Incentive Award filed on November 3, 2022. (ECF No. 475-  
28 1). Accordingly, an estimated \$291,356 will be deducted from the Settlement Fund  
subject to this Court’s approval.



1 members claimed a total of 73,710 products purchased, each class member will  
2 receive approximately \$4.52 per product claimed (\$333,644 available for  
3 distribution divided by 73,710 products claimed). Moreover, the average number of  
4 products claimed was 3.9 (Retnasaba Decl., ¶ 19) and therefore class members will  
5 receive an average payout of approximately \$17.62. This amount is reasonable  
6 considering that the average retail prices of the products range from approximately  
7 \$18.00 to \$24.00 (ECF No. 445-13 [Podlipna Expert Rpt. at ¶ 20]). Applying the  
8 high-end average retail price of about \$24.00, settlement class members will receive  
9 approximately 18.8% of their purchase price per product claimed. Additionally, the  
10 Settlement provides for injunctive relief whereby Labrada has agreed to stop selling  
11 the Products as of August 1, 2022. Agreement § 5.1(2)(a).

12 **B. Extent of Discovery and Stage of Proceedings**

13 To receive settlement approval, “[t]he parties must . . . have engaged in  
14 sufficient investigation of the facts to enable the court to intelligently make an  
15 appraisal of the settlement.” *Acosta v. Trans Union, LLC*, 243 F.R.D. 377, 396 (C.D.  
16 Cal. 2007). As this Court has already recognized, “the parties have vigorously  
17 litigated the action for over six years, and they reached this settlement after intensive  
18 arms-lengths negotiation under the supervision of the Honorable Leo S. Papas  
19 (Ret.)” (ECF No. 474 at 6). Moreover, “the parties did not settle until they had  
20 briefed class certification and summary judgment motions” (*id.*) and this factor  
21 weighs in favor of final approval.

22 **C. Strength of Case and Likely Duration of Further Litigation**

23 “[U]nless the settlement is clearly inadequate, its acceptance and approval are  
24 preferable to lengthy and expensive litigation with uncertain results.” *Nat’l Rural*  
25 *Telecomms. Coop. v. DIRECTV, Inc.*, 221 F.R.D. 523, 526 (C.D. Cal. 2004) (quoting  
26 3 Newberg on Class Actions § 11:50 (4th ed. 2012)). The Court has recognized that  
27 “[w]ithout the settlement, the parties must litigate the ultimate merits of the case—a  
28 ‘long, complex, and expensive’ process.” (ECF No. 474 at 7). Moreover,

1 determining whether the products at issue are actually ineffective “would like[ly]  
2 devolve into an expensive and uncertain ‘battle of the experts.’” *Woodard v.*  
3 *Labrada*, 2019 WL 4509301, at \*10 (C.D. Cal. Apr. 23, 2019). Accordingly, these  
4 factors weigh in favor of settlement approval.

5 **D. Absence of Collusion**

6 “To determine whether there has been any collusion between the parties,  
7 courts must evaluate whether ‘fees and relief provisions clearly suggest the  
8 possibility that class interests gave way to self interests,’ thereby raising the  
9 possibility that the settlement agreement is the result of overt misconduct by the  
10 negotiators or improper incentives for certain class members at the expense of  
11 others.” *Litty v. Merrill Lynch & Co.*, 2015 WL 4698475, at \*10 (C.D. Cal. Apr. 27,  
12 2015).

13 Here, the settlement was negotiated at arm’s length with the assistance of an  
14 experienced mediator. Class Counsel is also not requesting an award of attorneys’  
15 fees in connection with this settlement. As explained in Plaintiff’s Motion for Costs  
16 and Incentive Award, Class Counsel is seeking \$187,500 in litigation costs that  
17 account for just 66.6% of their total costs incurred that have not been reimbursed.  
18 (ECF No. 475-1). Class Counsel are putting the interests of the class members first  
19 by not requesting full reimbursement of their costs or their attorneys’ fees.

20 **E. Absence of Governmental Participation**

21 Although CAFA does not create an affirmative duty for either state or federal  
22 officials to take any action in response to a class-action settlement, CAFA presumes  
23 that—once put on notice—state or federal officials will “raise any concerns that they  
24 may have during the normal course of the class action settlement procedures.”  
25 *Garner v. State Farm Mut. Auto. Ins. Co.*, 2010 WL 1687832, at \*14 (N.D. Cal. Apr.  
26 22, 2010); *see also LaGarde v. Support.com, Inc.*, 2013 WL 1283325, at \*7 (N.D.  
27 Cal. Mar. 26, 2013) (same); *In re Netflix Privacy Litig.*, 2013 WL 1120801 at \*8  
28



1 (N.D. Cal. Mar. 18, 2013) (same). To date, no state or federal official has raised any  
2 objection to the settlement.

3 **F. The Reaction of the Class**

4 It is well established that “the absence of a large number of objections to a  
5 proposed class action settlement raises a strong presumption that the terms of a  
6 proposed class settlement action are favorable to the class members.” *Nat’l Rural*  
7 *Telecomms. Coop.*, 221 F.R.D. at 529 (collecting cases). Here, the response from  
8 Class members has been overwhelmingly positive.

9 There have been only three requests for exclusion (Retnasaba Decl., ¶ 20),  
10 and no objections have been filed. This positive reaction to the Settlement indicates  
11 the Court should grant final approval, as the Court ““may appropriately infer that a  
12 class action settlement is fair, adequate, and reasonable when few class members  
13 object to it.”” *Garner*, 2010 WL 1687832, at \*14. The absence of objections is  
14 particularly noteworthy here, where notice of the settlement was disseminated to  
15 millions of consumers. ““It is established that the absence of a large number of  
16 objections to a proposed class action settlement raises a strong presumption that the  
17 terms of a proposed class settlement action are favorable to the class members.”” *In*  
18 *re Omnivision Techs., Inc.*, 559 F. Supp. 2d 1036, 1043 (N.D. Cal. 2008) (quoting  
19 *Nat’l Rural Telecomms. Coop.*, 221 F.R.D. at 528-29); *see also Dupler v. Costco*  
20 *Wholesale Corp.*, 705 F. Supp. 2d 231, 239 (E.D.N.Y. 2010) (“[A] small number of  
21 class members seeking exclusion or objecting indicates an overwhelming positive  
22 reaction of the class.”). That presumption applies with full force here.

23 **VII. CONCLUSION**

24 For the reasons set forth above, the Court should grant final approval of the  
25 proposed settlement.  
26  
27  
28

1 DATED: November 21, 2022 Respectfully submitted,

2  
3 /s/ Ronald A. Marron

4 RONALD A. MARRON

5 **LAW OFFICES OF**  
6 **RONALD A. MARRON**

7 RONALD A. MARRON

8 *ron@consumersadvocates.com*

9 Michael T. Houchin

10 *mike@consumersadvocates.com*

11 651 Arroyo Drive

12 San Diego, California 92103

13 Telephone: (619) 696-9006

14 Facsimile: (619) 564-6665

15 **COHELAN KHOURY & SINGER**

16 TIMOTHY D. COHELAN

17 *TCohelan@CKSLaw.com*

18 ISAM C. KHOURY

19 *IKhoury@CKSLaw.com*

20 MICHAEL D. SINGER

21 *msinger@ckslaw.com*

22 JAMES J. HILL

23 *JHill@CKSLaw.com*

24 605 C St #200

25 San Diego, California 92101

26 Telephone: (619) 239-8148

27 Facsimile: (619) 595-3000

28 ***Class Counsel***

**LAW OFFICES OF RONALD A. MARRON**

RONALD A. MARRON (SBN 175650)  
*ron@consumersadvocates.com*  
MICHAEL T. HOUCHIN (SBN 305541)  
*mike@consumersadvocates.com*  
LILACH HALPERIN (SBN 323202)  
*lilach@consumersadvocates.com*  
651 Arroyo Drive  
San Diego, California 92103  
Telephone: (619) 696-9006  
Facsimile: (619) 564-6665

*Class Counsel*

**COHELAN KHOURY & SINGER**

TIMOTHY D. COHELAN (SBN 60827)  
*TCohelan@CKSLaw.com*  
ISAM C. KHOURY (SBN 58759)  
*IKhoury@CKSLaw.com*  
MICHAEL D. SINGER (SBN 115301)  
*msinger@ckslaw.com*  
J. JASON HILL (SBN 179630)  
*JHill@CKSLaw.com*  
605 C Street, Suite 200  
San Diego, California 92101  
Telephone: (619) 239-8148  
Facsimile: (619) 595-3000

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

VEDA WOODARD, TERESA RIZZO-MARINO, and DIANE MORRISON on behalf of themselves, all others similarly situated, and the general public,

Plaintiffs,

v.

LEE LABRADA; LABRADA BODYBUILDING NUTRITION, INC.; LABRADA NUTRITIONAL SYSTEMS, INC.; DR. MEHMET C. OZ, M.D.; ENTERTAINMENT MEDIA VENTURES, INC. d/b/a OZ MEDIA; ZOCO PRODUCTIONS, LLC; HARPO PRODUCTIONS, INC; SONY PICTURES TELEVISION, INC; NATUREX, INC.; and INTERHEALTH NUTRACEUTICALS, INC.;

Defendants.

Case No.: 5:16-cv-00189-JGB-SP

**CLASS ACTION**

**DECLARATION OF GAJAN RETNASABA IN SUPPORT OF PLAINTIFF VEDA WOODARD'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Date: December 19, 2022

Time: 9:00 a.m.

Ctrlm: 1

Judge: Hon. Jesus G. Bernal

1 I, Gajan Retnasaba, declare:

2 1. I am a Partner at Classaura LLC (“Classaura”), a class action administration  
3 firm, located at 1718 Peachtree St #1080, Atlanta, Georgia. I am over 21 years of age and  
4 am not a party to this action. I have personal knowledge of the facts set forth herein and,  
5 if called as a witness, could and would testify competently thereto.

6 2. Classaura was retained by Plaintiff, and appointed by this Court, to serve as  
7 the Claims Administrator to, among other tasks, publish notice of the proposed class action  
8 settlement; receive and process Claim Forms; respond to Class Member inquiries;  
9 establish and maintain the settlement website (labradaaction.com) (hereinafter, “the  
10 Settlement Website”) and perform other duties as specified in the Settlement Agreement  
11 preliminarily approved by this Court on June 1, 2022.

12 **CAFA NOTICE**

13 3. In compliance with the Class Action Fairness Act (“CAFA”), 28 U.S.C.  
14 §1715, Classaura compiled a CD-ROM containing the following documents:

- 15 a. The Complaint, Amended Complaint, and associated exhibits in the  
16 litigation;  
17 b. The Motion for Preliminary Approval of Settlement;  
18 c. The Long-Form and Short-Form Notifications;  
19 d. The court’s ruling on Class Certification and Summary Judgment;  
20 e. The parties’ proposed class action Settlement Agreement and exhibits.

21 4. The CD-ROM was accompanied by a cover letter (collectively, the “CAFA  
22 Notice Packet”). A true and correct copy of the cover letter is attached hereto as **Exhibit**  
23 **A**.

24 5. On June 27, 2022 CAFA Notice was mailed via United States Postal Service  
25 (USPS), Priority Mail Service, to the U.S. Attorney General and the California Attorney  
26 General.

27 6. We have retained copies of the CD. Copies of the CD will be made available  
28 to the court on request.

1 **CLRA NOTICE**

2 7. We published notice in the *Press Enterprise*, a newspaper of general  
3 circulation in the county where the case is pending, as specified by the CLRA and the  
4 settlement agreement. Notice was published on July 29, August 5, August 12, and August  
5 19, 2022. The Affidavit of Publication is attached hereto as **Exhibit B**.

6 **ONLINE NOTICE**

7 8. On July 14, 2022, Classaura began an online advertising campaign on the  
8 social media website Facebook. The advertising targeted adults residing in California who  
9 were identified as having an interest in weight loss, weight loss supplements, Vitamin  
10 Shoppe, Green Coffee, or Garcinia Cambogia.

11 9. The Facebook advertising campaign generated 15,020,313 impressions. An  
12 “impression” (in the context of online advertising) is the number of times an advertisement  
13 was displayed to an individual. The impression is displayed and gives an individual the  
14 opportunity to click on the advertisement and be directed to the Settlement Website for  
15 more information. Each time an ad is displayed to a visitor, it is counted as one impression.  
16 A true and correct copy of the advertisement, as it appeared on Facebook, is attached  
17 hereto as **Exhibit C**.

18 10. The Facebook advertising campaign had a reach of 14,227,095 unique users.  
19 “Reach” is defined as the number of different people that the advertisement was exposed  
20 to. Each time an ad is displayed to a user that has not previously been exposed to the  
21 advertisement through that medium, it is counted as adding one to the reach.

22 11. The online advertising campaign also made submissions to the two leading  
23 websites that collect and publicize class notices, ClassActionRebates.com and  
24 TopClassActions.com.

25 **EMAIL NOTICE**

26 12. Defendant provided a list of direct purchasers during the class period who  
27 purchased the products from the Labrada.com website. The list contained 656 entries and  
28 256 unique purchaser email addresses. Classaura emailed notice to all 256 of these

1 individuals along with a link to the class website. 235 emails were successfully delivered.  
2 A true and correct copy of the email is attached hereto as **Exhibit D**.

### 3 **PRESS RELEASE**

4 13. Classaura crafted a neutral informational press release, providing a summary  
5 of the settlement. On July 15, 2022, the press release was released using the PR  
6 Newswire's California Distribution List. The California Distribution List provides the  
7 press release to thousands of media outlets that cover California, including national and  
8 local newspapers, websites, and television and radio stations. The press release was picked  
9 up and republished by at least 301 media outlets. A true and correct copy of the press  
10 release along with a summary report of outlets that picked up the release is attached hereto  
11 as **Exhibit E**.

### 12 **PHONE LINE**

13 14. A dedicated toll-free number (800-801-7097) was set up on July 11, 2022  
14 providing pre-recorded information and allowing class members to leave a voicemail  
15 requesting further information. To date, we have received 8 calls and answered 6  
16 voicemails.

### 17 **WEBSITE & EMAIL**

18 15. The Settlement Website (labradaclassaction.com) was set up on July 11,  
19 2022, providing information on the lawsuit and access to case documents. The website  
20 includes a summary of the case, a list of important dates, answers to frequently asked  
21 questions, key case filings, and contact information. The Settlement Website also  
22 displayed the claim filing deadline; the deadline to opt-out of the class settlement; the  
23 deadline to submit an objection; and the date of the Fairness Hearing. The website address  
24 was set forth in all of the public notices described above, as well as on the Claim Form.  
25 To date the website has been visited 162,377 times.

26 16. A dedicated email address (contact@labradaclassaction.com) was set up on  
27 July 11, 2022 to answer questions from potential class members. To date, we have  
28 received and answered 36 emails.

**CLAIMS AND REQUESTS FOR EXCLUSION**

1  
2 17. To date, we have received 119,951 claim forms from prospective class  
3 members. Of these claims, 119,741 forms were submitted electronically and 210 claim  
4 forms were submitted via mail.

5 18. Based on a review of claims submitted, we found 101,249 claims forms to be  
6 invalid due to being duplicative, not meeting the settlement criteria, or fraudulent. A claim  
7 was judged duplicative if multiple identical or near-identical claims were filed. A claim  
8 was judged as not meeting the settlement criteria if the dates stated on the claim form were  
9 outside the class date, the place of purchase was outside California, or the place of  
10 purchase was not one known to sell the covered products. A claim was judged as  
11 fraudulent if signs associated with multiple submissions from the same person were  
12 detected. Signs of fraud include large numbers of claims from the same IP address or  
13 postal address, large numbers of similar claims with small variations in claim details, or  
14 large numbers of claims submitted with similar distinctive claim details. There was an  
15 unusually high number of fraudulent claims submitted in this case, driven primarily by  
16 what appeared to be a bot that filed approximately 43,000 machine-generated claims with  
17 a distinctive and unusual claim pattern.

18 19. After removing duplicative, invalid, and fraudulent claims, there were 18,702  
19 valid claim forms. This represents a total of 73,710 product purchase claims, an average  
20 of 3.9 products claimed per valid claim form.

21 20. The deadline for Class Members to request to be excluded from the class  
22 was a postmarked deadline of November 11, 2022. To date, we have received 3 requests  
23 to opt-out of the settlement. The three individuals who opted out before the deadline are:

24 Patrick Contreras, Anaheim, CA

25 Holno Field, Los Angeles, CA

26 Amber Haim, Los Angeles, CA

27 //

28 //

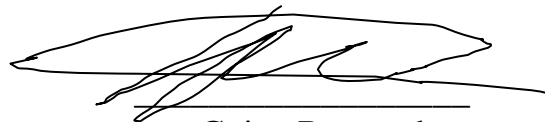


**COSTS**

21. The costs incurred to provide notice of the settlement via Online Notice, Settlement Website, Press Release, and CAFA is \$77,135. The cost to administer the settlement, and process claims is \$7,695. The cost to distribute payment to class members is \$14,026. This brings the total cost to \$98,856.

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

Executed on November 21, 2022 in Atlanta, Georgia.



Gajan Retnasaba



# Exhibit A



1718 Peachtree St #1080  
Atlanta, GA 30309

214.502.9376  
gajan@classaura.com

**By Priority Mail**

United States Attorney General,  
California Attorney General

June 27, 2022

**Re: CAFA Notice of Proposed Settlement: *Woodard et al. vs. Labrada et al.*,  
Southern District of California, Case No. 5:16-cv-00189-JGB-SP**

Dear Sir or Madam:

Pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1711 et seq. ("CAFA"), and on behalf of Defendant Labrada, Inc. ("Labrada") in the above-referenced action, this letter provides notice of a proposed partial class action settlement of the above-captioned matter. Toward that end, and in accordance with CAFA, please find enclosed a CD containing the following documents:

1. The complaint, amended complaints, and associated exhibits.
2. The Motion for Preliminary Approval of Settlement;
3. The Longform and Shortform notifications that are being provided to class members to inform them of the proposed settlement and their right to be excluded from the class;
4. The parties' proposed class action Settlement Agreement and exhibits.
5. The court's ruling on Class Certification and Summary Judgment.

Labrada sold a dietary supplement primarily through retailers to end consumers. Labrada is thus unable to provide the number, names, nor state of residence of any class member because the subject products were sold by independently operated retail stores and, thus, such information is not in Labrada's possession, custody or control. Accordingly, there is no precise tally of the number of class members in each state, nor is there available a list of class members in each state, nor is it feasible to provide an estimate of the number of class members residing in each state.

We hereby advise you that no agreements of any kind were made contemporaneously between class counsel and Labrada or its counsel (other than the Settlement Agreement, which is attached as an exhibit to the Motion for Preliminary Approval of Settlement).

A preliminary approval hearing for the case has been scheduled for July 11, 2022 at 9:00a.m. before Judge Jesus Bernal, at the U.S. District Court for the Central District of California – Eastern Division, 3470 Twelfth Street, Riverside, CA 92501-3801.

If you have questions about this notice, the lawsuit, or the enclosed materials, please contact me at the address below.

Sincerely,

Gajan Retnasaba

Settlement Class Action Administrator

Classaura LLC  
1718 Peachtree St #1080  
Atlanta, GA 30309

214.502.9376  
gajan@classaura.com

# Exhibit B

# THE PRESS-ENTERPRISE

KEEP YOUR EYES ON THE 'PRISE  
pe.com

(formerly The Daily Report)

1

Riverside, California 92501

(123) 123-4567

legals@inlandnewspapers.com

Classaura LLC  
1718 Peachtree St NW  
Atlanta, Georgia 30309

<i>Account Number:</i>	5272431
<i>Ad Order Number:</i>	0011550679
<i>Customer's Reference/PO Number:</i>	
<i>Publication:</i>	The Press-Enterprise
<i>Publication Dates:</i>	07/29/2022, 08/05/2022, 08/12/2022 and 08/19/2022
<i>Total Amount:</i>	\$1845.38
<i>Payment Amount:</i>	\$0.00
<i>Amount Due:</i>	\$1845.38
<i>Notice ID:</i>	VqIWYLGmPmZ3sv4kKgTg
<i>Invoice Text:</i>	Notice to California Purchasers of Labrada Green Coffee Bean Extract or Garcinia Cambogia Woodard v. Labrada, No. 5:16-cv-000189-JGB-SP (C.D. Cal.) If you purchased Labrada Green Coffee Bean Extract and/or Labrada Garcinia Cambogia product in California between February 2, 2012 and July 15, 2015, please read this notice. A class action settlement gives you certain rights, including the right to make a claim for your share of a cash settlement fund, and also has certain deadlines. The class action claims that Labrada violated California's consumer protection laws by misleadingly marketing the Labrada Green Coffee Bean Extract product and the Labrada Garcinia Cambogia product. The defendant denies this, and the Court has made no decision on these issues. The two sides have agreed to a class action settlement. You now have the following options. First, the attorney who filed the case and was appointed to represent you recommends that you go to the settlement website (LabradaClassAction.com) and file a claim, and then receive a payment estimated at \$5.00 per purchase if the court approves this settlement – up to a limit of ten products if you have a proof of purchase and up to a limit of four products if you do not have proof of purchase. Second, you can ignore this notice and do nothing. You will not get a settlement payment, but you will give up the right to sue Labrada over claims related to the products. Third, you can exclude yourself. If you exclude yourself, you get no settlement payment but keep the right to sue over these claims at your own expense. Finally, you can object to the settlement and tell the judge why you do not want the settlement to be approved. You can make a claim at LabradaClassAction.com, as well as get more detailed information about this case,

THE PRESS-ENTERPRISE  
KEEP YOUR EYES ON THE PRIZE  
pe.com

The Press-Enterprise  
1  
Riverside, California 92501  
(123) 123-4567

**Notice to California Purchasers of  
Labrada Green Coffee Bean Extract or Garcinia Cambogia**

Woodard v. Labrada, No. 5:16-cv-000189-JGB-SP (C.D. Cal.)

Classaura LLC  
1718 Peachtree St NW, #1080  
Atlanta, Georgia 30309

Publication: The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc: 0011550679

**FILE NO. 0011550679**

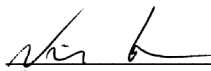
**PROOF OF PUBLICATION**

I am a citizen of the United States. I am over the age of eighteen years and not party to or interested in the above-entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper of general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

**07/29/2022, 08/05/2022, 08/12/2022,  
08/19/2022**

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Date: August 19, 2022.  
At: Riverside, California

  
\_\_\_\_\_  
Signature

If you purchased Labrada Green Coffee Bean Extract and/or Labrada Garcinia Cambogia product in California between February 2, 2012 and July 15, 2015, please read this notice. A class action settlement gives you certain rights, including the right to make a claim for your share of a cash settlement fund, and also has certain deadlines. The class action claims that Labrada violated California's consumer protection laws by misleadingly marketing the Labrada Green Coffee Bean Extract product and the Labrada Garcinia Cambogia product. The defendant denies this, and the Court has made no decision on these issues. The two sides have agreed to a class action settlement.

You now have the following options. First, the attorney who filed the case and was appointed to represent you recommends that you go to the settlement website (LabradaClassAction.com) and file a claim, and then receive a payment estimated at \$5.00 per purchase if the court approves this settlement – up to a limit of ten products if you have a proof of purchase and up to a limit of four products if you do not have proof of purchase. Second, you can ignore this notice and do nothing. You will not get a settlement payment, but you will give up the right to sue Labrada over claims related to the products. Third, you can exclude yourself. If you exclude yourself, you get no settlement payment but keep the right to sue over these claims at your own expense. Finally, you can object to the settlement and tell the judge why you do not want the settlement to be approved.

You can make a claim at [LabradaClassAction.com](http://LabradaClassAction.com), as well as get more detailed information about this case, the settlement, and your options, as this is a summary only. You can also ask questions by mail by writing to Labrada Products Class Action Settlement, c/o Classaura, 1718 Peachtree St NW #1080, Atlanta, GA 30309 or call 1-800-801-7097. Do not contact Labrada or the Court, except if you are serving and filing an objection. The deadline to file a claim form is November 11, 2022.

Website: [LabradaClassAction.com](http://LabradaClassAction.com)  
Telephone: 1-800-801-7097  
**The Press-Enterprise**  
Published: 7/29, 8/5, 8/12, 8/19/22

# Exhibit C



**Labrada Class Action  
Litigation**

Sponsored ·



You may be entitled to a cash payment if you purchased Labrada Garcinia Cambogia or Green Coffee Extract in California ...See more



labradaclassaction.com

**Labrada Class Action |**

Woodard v. Labrada Case...

[Learn more](#)



Like



Comment



Share



# Exhibit D



*Woodard et al. v. Labrada, et al.,*  
Case No. 5:16-cv-00189-JGB-SP (C.D. Cal.)

This Notice is to inform you of a proposed class action settlement.

**If you purchased Labrada Green Coffee Bean Extract product and/or the Labrada Garcinia Cambogia product in California, between February 2, 2012 until July 15, 2022, you may be entitled to a cash payment.**

#### What Is This Notice About?

A proposed Settlement has been reached in a class action lawsuit pending in the United States District Court for the Central District of California between Veda Woodard, on the one hand as the Plaintiff, and Labrada Bodybuilding Nutrition, Inc. ("Labrada") as a Defendant.

It is alleged in the lawsuit that Labrada violated California's consumer protection laws by misleadingly marketing the Labrada Green Coffee Bean Extract product and the Labrada Garcinia Cambogia product. Labrada denies the allegations and any wrongdoing. The settling parties have reached a class action settlement.

#### Am I a Member of the Class?

You are a Class Member if you purchased, in California, the Labrada Green Coffee Bean Extract product and/or the Labrada Garcinia Cambogia product, for personal or household use and not for resale, during the time period **between February 2, 2012 until July 15, 2022**.

#### What Benefits Could I Receive?

Labrada will cause to be paid the amount of Six Hundred and Twenty-Five Thousand Dollars into a settlement fund.

For class members who submit a timely and valid claim, Labrada will pay an estimated \$5.00 in cash from the Settlement Fund for each purchase reflected on the proof(s) of purchase for up to ten Products purchased during the class period, or an estimated \$5.00 in cash for each product purchased without proof of purchase during the class period for up to four products.

File a Claim

#### What Are My Rights?

You have a choice of whether to stay in the Class and participate in the Settlement or not, and you must decide this now. If you stay in the Class, you will be legally bound by all orders and judgments of the Court, and you will not be able to sue, or continue to sue Labrada as part of any other lawsuit involving the same claims that are in this lawsuit. This is true even if you do nothing by not submitting a claim.

1. **Accept the Settlement:** If you wish to receive the benefits under the Settlement, you **MUST** submit a Claim Form by no later than November 11, 2022.
2. **Object to the Settlement:** If you believe the Settlement is unsatisfactory, you may file a written objection no later than November 11, 2022.
3. **"Opt out" of the Settlement:** If you do not object to the Settlement but, nevertheless, simply do not want to participate in this Settlement, you must provide written notice no later than November 11, 2022.

#### How Can I Get More Information?

This is a summary only. If you have questions or would like more information about this lawsuit and your rights, visit [www.labradaaction.com](http://www.labradaaction.com). You may also contact the Settlement Administrator by emailing [contact@labradaaction.com](mailto:contact@labradaaction.com), or by writing to: Labrada Products Class Action Settlement, c/o Classaura Class Action Administration, 1718 Peachtree St NW #1080, Atlanta, GA 30309, or by calling 1-800-801-7097. Please do not contact the Court or Clerk for information.

This email was sent to <<Email Address>>

[why did I get this?](#) [unsubscribe from this list](#) [update subscription preferences](#)

Classaura Class Action Administration · 1718 Peachtree St NE · Suite 1080 · Atlanta, GA 30309 · USA

# Exhibit E

# Classaura Announces Labrada Products Class Action Settlement

---

NEWS PROVIDED BY

**Classaura** →

Jul 15, 2022, 23:15 ET

---

SAN DIEGO, July 15, 2022 /PRNewswire/ -- A proposed settlement has been reached in the case of Woodard v. Labrada, a class action lawsuit. The proposed settlement establishes a \$625,000 settlement fund.

On July 7, 2021, United States District Court for the Central District of California, Judge Jesus G. Bernal, preliminarily approved a settlement of a lawsuit between Labrada and California purchasers of Labrada's Green Coffee Bean Extract and Labrada Garcinia Cambogia. The class action claims that Labrada violated California's consumer protection laws with misleading marketing of these products. The defendant denies this, and the Court has made no decision on these issues. Rather than continue litigating the case in court, the two sides have agreed to a class action settlement.

The proposed settlement establishes a \$625,000 settlement fund and eligible class members may be eligible for estimated cash payments of up to \$5 for each product purchased up to a maximum of ten products if they have a proof of purchase, and with a maximum of four products if they have no proof of purchase.

You are a Class Member if you purchased, in California, the Labrada Green Coffee Bean Extract product and/or the Labrada Garcinia Cambogia product, for personal or household use and not for resale, during the time period between February 2, 2012 until July 15, 2022.

You have a choice of whether to stay in the Class and participate in the Settlement or not, and you must decide this now. If you stay in the Class, you will be legally bound by all orders and judgments of the Court, and you will not be able to sue, or continue to sue Labrada as part of any other lawsuit involving the same claims that are in this lawsuit. This is true even if you do nothing by not submitting a claim. You can exclude

Case 5:16-cv-00189-JGB-SP Document 476-7 Filed 11/21/22 Page 3 of 25 Page ID #10057  
yourself from the class, in which case you get no settlement payment but keep the right to sue over these claims at your own expense. You can object to the settlement and tell the judge why you do not want the settlement to be approved.

You can file a claim to receive payment from the settlement fund at [LabradaClassAction.com](http://LabradaClassAction.com), as well as get more detailed information about this case, the settlement, and your options. If you need help, you can also ask questions by mail by writing to Labrada Products Class Action Settlement, c/o Classaura, 1718 Peachtree St NW #1080, Atlanta, GA 30309 or call 1-800-801-7097

Your rights and options – and the deadlines to exercise them – are only summarized in this press release. A Longform Notice describes, in full, how to file a claim, object, or exclude yourself, and provides other important information. For more information and to obtain a Longform Notice, claim form or other documents, visit [LabradaClassAction.com](http://LabradaClassAction.com).

Filed by: Classaura LLC

Phone: 800-801-7097

SOURCE Classaura

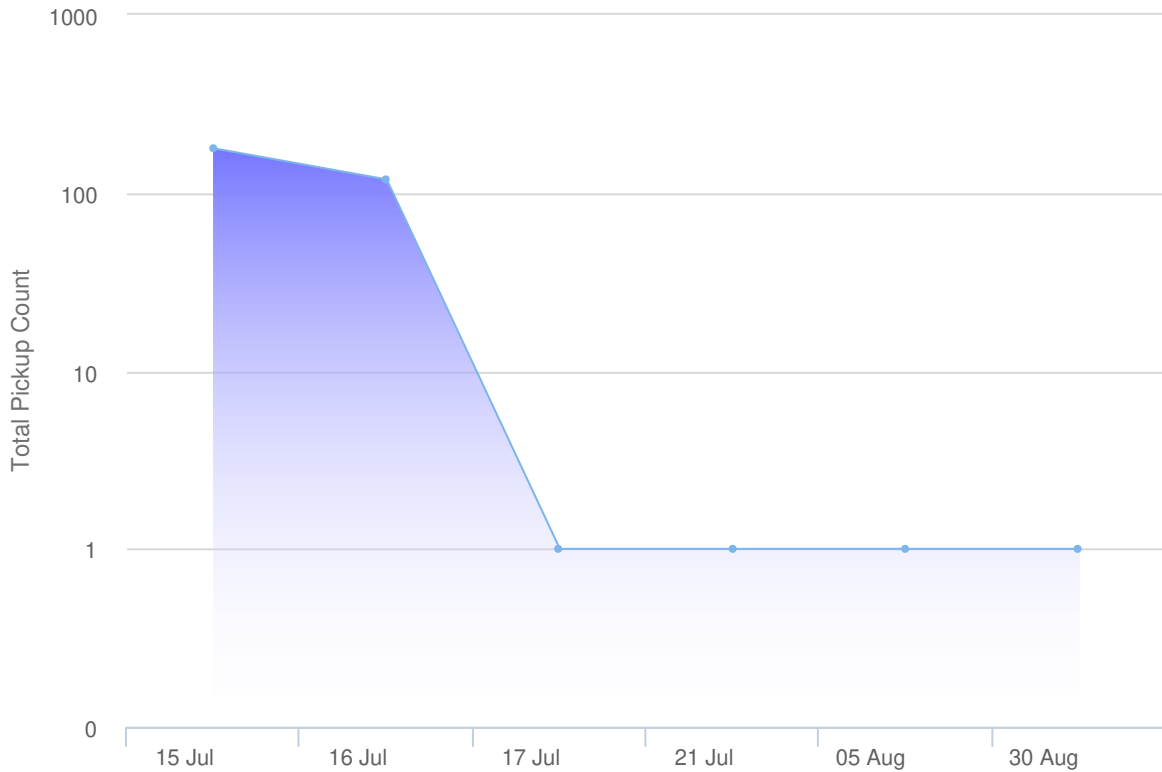
# Pickup

## Overview

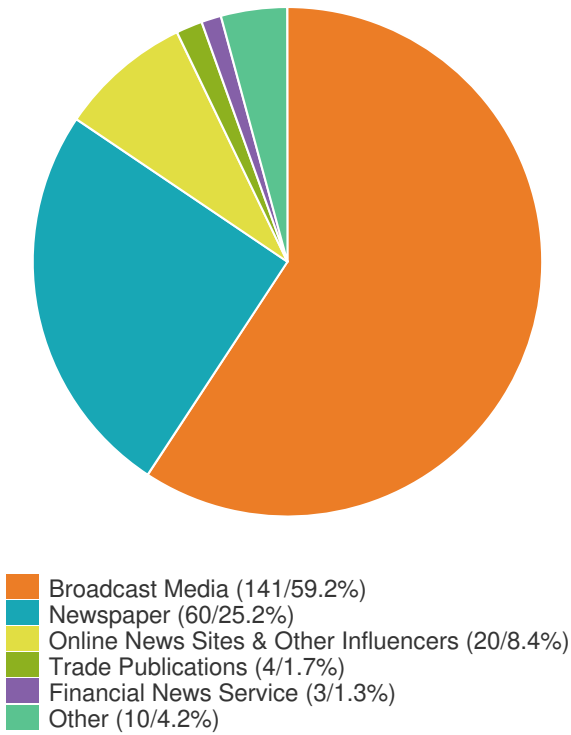
<b>TOTAL PICKUP</b>	<b>301</b>	<b>TOTAL POTENTIAL AUDIENCE</b>	<b>99M</b>
Exact Match	301 postings	Exact Match	99M visitors

## Total Pickup Over Time

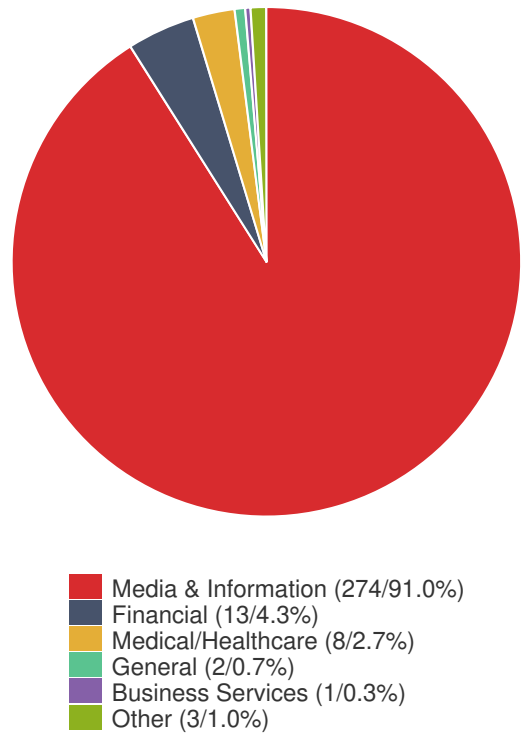
Total pickup since your content was distributed



### Total Pickup by Source Type



### Total Pickup by Industry













### Exact Match Pickup





























Exact matches are full text postings of your content which we have found in the online and social media that we monitor. Understand how it is calculated.

Total Exact Matches: **301**































Total Potential Audience: **98,993,375**

Logo	Outlet Name	Location	Source Type	Industry	Potential Audience
	MarketWatch Online  <a href="#">View Release</a>	United States	Online News Sites & Other Influencers	Financial	21,991,539 <sup>[1]</sup> visitors/month
	PR Newswire Online  <a href="#">View Release</a>	Global	PR Newswire	Media & Information	7,560,415 <sup>[1]</sup> visitors/month
	Benzinga Online  <a href="#">View Release</a>	United States	Online News Sites & Other Influencers	Financial	3,450,458 <sup>[1]</sup> visitors/month
	KTLA [Los Angeles, CA] Online  <a href="#">View Release</a>	United States	Broadcast Media	Media & Information	2,988,825 <sup>[1]</sup> visitors/month
	Morningstar Online  <a href="#">View Release</a>	Global	Financial Data, Research & Analytics	Financial	2,324,616 <sup>[1]</sup> visitors/month





























































	KXAN-TV NBC-36 [Austin, TX] Online  View Release	United States	Broadcast Media	Media & Information	2,035,709 <sup>[1]</sup> visitors/month
	WJW-TV FOX-8 [Cleveland, OH] Online  View Release	United States	Broadcast Media	Media & Information	1,762,315 <sup>[1]</sup> visitors/month
	WFMZ-TV IND-69 [Allentown, PA] Online  View Release	United States	Broadcast Media	Media & Information	1,501,110 <sup>[1]</sup> visitors/month
	WXIN-TV FOX-59 [Indianapolis, IN] Online  View Release	United States	Broadcast Media	Media & Information	1,443,768 <sup>[1]</sup> visitors/month
	KHNL-TV Hawaii News Now [Honolulu, HI] Online  View Release	United States	Broadcast Media	Media & Information	1,307,915 <sup>[1]</sup> visitors/month
	KTVI-TV FOX-2 [St. Louis, MO] Online  View Release	United States	Broadcast Media	Media & Information	1,279,996 <sup>[1]</sup> visitors/month
	WLBT-TV [Jackson, MS] Online  View Release	United States	Broadcast Media	Media & Information	1,048,036 <sup>[1]</sup> visitors/month
	KWTX-TV [Waco, TX] Online  View Release	United States	Broadcast Media	Media & Information	1,030,637 <sup>[1]</sup> visitors/month
	KRQE [Albuquerque, NM] Online  View Release	United States	Broadcast Media	Media & Information	986,140 <sup>[1]</sup> visitors/month
	KY3-TV [Springfield, TX] Online  View Release	United States	Broadcast Media	Media & Information	981,091 <sup>[1]</sup> visitors/month
	WBTV-TV [Charlotte, NC] Online  View Release	United States	Broadcast Media	Media & Information	975,562 <sup>[1]</sup> visitors/month
	KSWB [San Diego, CA] Online  View Release	United States	Broadcast Media	Media & Information	949,528 <sup>[1]</sup> visitors/month
	WGHP [Greensboro, NC] Online  View Release	United States	Broadcast Media	Media & Information	922,100 <sup>[1]</sup> visitors/month
	KLAS-TV CBS-8 [Las Vegas, NV] Online  View Release	United States	Broadcast Media	Media & Information	897,480 <sup>[1]</sup> visitors/month

#19961































	WOOD [Grand Rapids, MI] Online  View Release	United States	Broadcast Media	Media & Information	894,836 <sup>[1]</sup> visitors/month
	WOIO-TV [Cleveland, OH] Online  View Release	United States	Broadcast Media	Media & Information	862,850 <sup>[1]</sup> visitors/month
	WXIX-TV FOX-19 [Cincinnati, OH] Online  View Release	United States	Broadcast Media	Media & Information	843,626 <sup>[1]</sup> visitors/month
	WXIX-TV FOX-19 [Cincinnati, OH] Online  View Release	United States	Broadcast Media	Media & Information	843,626 <sup>[1]</sup> visitors/month
	WAVY-TV NBC-10 [Portsmouth, VA] Online  View Release	United States	Broadcast Media	Media & Information	841,358 <sup>[1]</sup> visitors/month
	WMTV-TV NBC-15 [Madison, WI] Online  View Release	United States	Broadcast Media	Media & Information	826,055 <sup>[1]</sup> visitors/month
	WWBT-TV NBC-12 [Richmond, VA] Online  View Release	United States	Broadcast Media	Media & Information	797,622 <sup>[1]</sup> visitors/month
	WVLT-TV [Knoxville, TN] Online  View Release	United States	Broadcast Media	Media & Information	761,410 <sup>[1]</sup> visitors/month
	WAFB-TV [Midland, TX] Online  View Release	United States	Broadcast Media	Media & Information	754,775 <sup>[1]</sup> visitors/month
	WWSB-TV ABC-7 [Sarasota, FL] Online  View Release	United States	Broadcast Media	Media & Information	733,847 <sup>[1]</sup> visitors/month
	WRDW-TV [Augusta, GA ] Online  View Release	United States	Broadcast Media	Media & Information	731,494 <sup>[1]</sup> visitors/month
	KKTU-TV CBS-11 [Colorado Springs, CO] Online  View Release	United States	Broadcast Media	Media & Information	712,044 <sup>[1]</sup> visitors/month
	WATE [Knoxville, TN] Online  View Release	United States	Broadcast Media	Media & Information	681,060 <sup>[1]</sup> visitors/month
	WREG [Memphis, TN] Online  View Release	United States	Broadcast Media	Media & Information	674,935 <sup>[1]</sup> visitors/month
	KCRG-TV ABC-9 [Cedar Rapids, IA] Online  View Release	United States	Broadcast Media	Media & Information	674,451 <sup>[1]</sup> visitors/month

#19962































	WISTV-TV [Columbia, SC] Online  View Release	United States	Broadcast Media	Media & Information	667,347 <sup>[1]</sup> visitors/month
	WKRN [Nashville, TN] Online  View Release	United States	Broadcast Media	Media & Information	666,630 <sup>[1]</sup> visitors/month
	WCAX-TV [South Burlington, VT] Online  View Release	United States	Broadcast Media	Media & Information	652,610 <sup>[1]</sup> visitors/month
	WHSV-TV [Harrisonburg, VA] Online  View Release	United States	Broadcast Media	Media & Information	645,324 <sup>[1]</sup> visitors/month
	WCTV-TV [Tallahassee, FL] Online  View Release	United States	Broadcast Media	Media & Information	630,974 <sup>[1]</sup> visitors/month
	WLOX-TV [Biloxi, MS] Online  View Release	United States	Broadcast Media	Media & Information	611,453 <sup>[1]</sup> visitors/month
	WANE [Fort Wayne, IN] Online  View Release	United States	Broadcast Media	Media & Information	610,156 <sup>[1]</sup> visitors/month
	WSFA-TV [Montgomery, AL ] Online  View Release	United States	Broadcast Media	Media & Information	603,823 <sup>[1]</sup> visitors/month
	WIBW-TV [Topeka, KS] Online  View Release	United States	Broadcast Media	Media & Information	598,057 <sup>[1]</sup> visitors/month
	WCSC-TV CBS-5 [Charleston, SC] Online  View Release	United States	Broadcast Media	Media & Information	596,542 <sup>[1]</sup> visitors/month
	WBRC-TV [Birmingham, AL] Online  View Release	United States	Broadcast Media	Media & Information	590,716 <sup>[1]</sup> visitors/month
	WDBJ7-TV [Roanoke, VA] Online  View Release	United States	Broadcast Media	Media & Information	589,985 <sup>[1]</sup> visitors/month
	KHON [Honolulu, HI] Online  View Release	United States	Broadcast Media	Media & Information	586,365 <sup>[1]</sup> visitors/month
	WBAY-TV [Green Bay, WI] Online  View Release	United States	Broadcast Media	Media & Information	573,162 <sup>[1]</sup> visitors/month
	KBTX-TV News 3 [Bryan, TX] Online  View Release	United States	Broadcast Media	Media & Information	566,129 <sup>[1]</sup> visitors/month

	WAVE-TV [Louisville, KY] Online  View Release	United States	Broadcast Media	Media & Information	564,836 <sup>[1]</sup> visitors/month
	WSAW-TV [Wausau, WI] Online  View Release	United States	Broadcast Media	Media & Information	562,821 <sup>[1]</sup> visitors/month
	WSAZ-TV [Huntington, WV] Online  View Release	United States	Broadcast Media	Media & Information	541,002 <sup>[1]</sup> visitors/month
	WTEN/ WXXA-TV [Albany, NY] Online  View Release	United States	Broadcast Media	Media & Information	530,731 <sup>[1]</sup> visitors/month
	WKYT-TV [Lexington, KY] Online  View Release	United States	Broadcast Media	Media & Information	525,912 <sup>[1]</sup> visitors/month
	KOLN-TV [Lincoln, NE] Online  View Release	United States	Broadcast Media	Media & Information	522,488 <sup>[1]</sup> visitors/month
	WTVG-TV ABC-13 [Toledo, OH] Online  View Release	United States	Broadcast Media	Media & Information	512,263 <sup>[1]</sup> visitors/month
	WECT-TV [Wilmington, NC] Online  View Release	United States	Broadcast Media	Media & Information	511,158 <sup>[1]</sup> visitors/month
	WITN-TV [Greenville, NC] Online  View Release	United States	Broadcast Media	Media & Information	477,546 <sup>[1]</sup> visitors/month
	WILX-TV [Lansing, MI] Online  View Release	United States	Broadcast Media	Media & Information	466,018 <sup>[1]</sup> visitors/month
	WVUE-TV FOX-8 [New Orleans, LA] Online  View Release	United States	Broadcast Media	Media & Information	458,688 <sup>[1]</sup> visitors/month
	WOWT-TV [Omaha, NE] Online  View Release	United States	Broadcast Media	Media & Information	457,108 <sup>[1]</sup> visitors/month
	WNDU-TV [South Bend, IN] Online  View Release	United States	Broadcast Media	Media & Information	453,928 <sup>[1]</sup> visitors/month
	WEAU-TV [Eau Claire, WI] Online  View Release	United States	Broadcast Media	Media & Information	450,125 <sup>[1]</sup> visitors/month

#19964































	WTOC-TV [Savannah, GA] Online  View Release	United States	Broadcast Media	Media & Information	427,787 <sup>[1]</sup> visitors/month
	KOLD-TV [Tucson, AZ] Online  View Release	United States	Broadcast Media	Media & Information	402,930 <sup>[1]</sup> visitors/month
	KWCH-TV [Wichita, KS] Online  View Release	United States	Broadcast Media	Media & Information	393,169 <sup>[1]</sup> visitors/month
	WAFF-TV [Huntsville, AL] Online  View Release	United States	Broadcast Media	Media & Information	388,746 <sup>[1]</sup> visitors/month
	WSYR-TV ABC-9 NewsChannel [Syracuse, NY] Online  View Release	United States	Broadcast Media	Media & Information	375,643 <sup>[1]</sup> visitors/month
	WCJB-TV [Gainesville, FL] Online  View Release	United States	Broadcast Media	Media & Information	364,263 <sup>[1]</sup> visitors/month
	WMBF-TV [Myrtle Beach, SC] Online  View Release	United States	Broadcast Media	Media & Information	362,216 <sup>[1]</sup> visitors/month
	WLUC-TV [Negaunee, MI] Online  View Release	United States	Broadcast Media	Media & Information	354,344 <sup>[1]</sup> visitors/month
	WSYR-TV ABC-9 NewsChannel [Syracuse, NY] Online  View Release	United States	Broadcast Media	Media & Information	353,477 <sup>[1]</sup> visitors/month
	KTXL [Sacramento, CA] Online  View Release	United States	Broadcast Media	Media & Information	349,284 <sup>[1]</sup> visitors/month
	KTUU-TV [Anchorage, AK] Online  View Release	United States	Broadcast Media	Media & Information	347,772 <sup>[1]</sup> visitors/month
	KVLY-TV [ Fargo, ND] Online  View Release	United States	Broadcast Media	Media & Information	347,251 <sup>[1]</sup> visitors/month
	WFIE-TV NBC-14 [Evansville, IN] Online  View Release	United States	Broadcast Media	Media & Information	343,673 <sup>[1]</sup> visitors/month
	KLTV-TV [Tyler, TX] Online  View Release	United States	Broadcast Media	Media & Information	340,350 <sup>[1]</sup> visitors/month
	KOSA-TV CBS-7 [Odessa, TX] Online  View Release	United States	Broadcast Media	Media & Information	340,069 <sup>[1]</sup> visitors/month

#19965

	KOLO-TV [Reno, NV] Online  View Release	United States	Broadcast Media	Media & Information	334,802 <sup>[1]</sup> visitors/month
	WJHG-TV [Panama City Beach, FL] Online  View Release	United States	Broadcast Media	Media & Information	307,516 <sup>[1]</sup> visitors/month
	KFVS-TV [Cape Girardeau, MO] Online  View Release	United States	Broadcast Media	Media & Information	306,256 <sup>[1]</sup> visitors/month
	WIFR-TV [Rockford, IL] Online  View Release	United States	Broadcast Media	Media & Information	293,127 <sup>[1]</sup> visitors/month
	KOLR/KOZL [Springfield, MO] Online  View Release	United States	Broadcast Media	Media & Information	289,825 <sup>[1]</sup> visitors/month
	WWNY-TV [Watertown, NY] Online  View Release	United States	Broadcast Media	Media & Information	280,726 <sup>[1]</sup> visitors/month
	KARK-TV NBC-4 [Little Rock, AR] Online  View Release	United States	Broadcast Media	Media & Information	275,113 <sup>[1]</sup> visitors/month
	KVEO-TV CBS-4 [Harlingen, TX] Online  View Release	United States	Broadcast Media	Media & Information	273,895 <sup>[1]</sup> visitors/month
	WALB-TV [Albany, GA] Online  View Release	United States	Broadcast Media	Media & Information	262,719 <sup>[1]</sup> visitors/month
	WCBD-TV NBC-2 [Charleston, SC] Online  View Release	United States	Broadcast Media	Media & Information	261,686 <sup>[1]</sup> visitors/month
	StreetInsider Online  View Release	United States	Online News Sites & Other Influencers	Financial	256,981 <sup>[1]</sup> visitors/month
	KFYR-TV [Bismarck, ND] Online  View Release	United States	Broadcast Media	Media & Information	256,099 <sup>[1]</sup> visitors/month
	KXII-TV [Sherman, TX] Online  View Release	United States	Broadcast Media	Media & Information	255,891 <sup>[1]</sup> visitors/month
	KWQC-TV [Davenport, IA] Online  View Release	United States	Broadcast Media	Media & Information	250,040 <sup>[1]</sup> visitors/month
	WBKO-TV [Bowling Green, KY] Online  View Release	United States	Broadcast Media	Media & Information	244,385 <sup>[1]</sup> visitors/month

































#19966































	WTVM-TV [Columbus, GA] Online  View Release	United States	Broadcast Media	Media & Information	241,290 <sup>[1]</sup> visitors/month
	WETM-TV NBC-18 [Elmira, NY] Online  View Release	United States	Broadcast Media	Media & Information	227,602 <sup>[1]</sup> visitors/month
	WABI-TV [Bangor, ME] Online  View Release	United States	Broadcast Media	Media & Information	217,782 <sup>[1]</sup> visitors/month
	WDAM-TV [Moselle, MS] Online  View Release	United States	Broadcast Media	Media & Information	216,702 <sup>[1]</sup> visitors/month
	WSAV [Savannah, GA] Online  View Release	United States	Broadcast Media	Media & Information	215,266 <sup>[1]</sup> visitors/month
	KSLA-TV [Shreveport, LA] Online  View Release	United States	Broadcast Media	Media & Information	206,167 <sup>[1]</sup> visitors/month
	KPLC-TV [Lake Charles, LA] Online  View Release	United States	Broadcast Media	Media & Information	204,543 <sup>[1]</sup> visitors/month
	WTVY-TV [Dothan, AL] Online  View Release	United States	Broadcast Media	Media & Information	203,212 <sup>[1]</sup> visitors/month
	KLRT-TV FOX-16 [Little Rock, AR] Online  View Release	United States	Broadcast Media	Media & Information	199,455 <sup>[1]</sup> visitors/month
	KSFY-TV [Sioux Falls, SD] Online  View Release	United States	Broadcast Media	Media & Information	199,242 <sup>[1]</sup> visitors/month
	KALB-TV [Alexandria, LA] Online  View Release	United States	Broadcast Media	Media & Information	198,279 <sup>[1]</sup> visitors/month
	KGNS-TV NBC/ABC/Telemundo-8 [Laredo, TX] Online  View Release	United States	Broadcast Media	Media & Information	192,652 <sup>[1]</sup> visitors/month
	KNOE-TV [Monroe, LA] Online  View Release	United States	Broadcast Media	Media & Information	187,445 <sup>[1]</sup> visitors/month
	KAIT-TV [Jonesboro, AR] Online  View Release	United States	Broadcast Media	Media & Information	182,534 <sup>[1]</sup> visitors/month
	WVIR-TV NBC-29 [Charlottesville, VA] Online  View Release	United States	Broadcast Media	Media & Information	179,617 <sup>[1]</sup> visitors/month

































#19967

	KOTA-TV [Rapid City, SD] Online  View Release	United States	Broadcast Media	Media & Information	178,555 <sup>[1]</sup> visitors/month
	KFDA-TV [Amarillo, TX] Online  View Release	United States	Broadcast Media	Media & Information	174,047 <sup>[1]</sup> visitors/month
	KCBD-TV [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	171,641 <sup>[1]</sup> visitors/month
	WLNS-TV CBS-6 [Lansing, MI] Online  View Release	United States	Broadcast Media	Media & Information	169,816 <sup>[1]</sup> visitors/month
	WMBB-TV ABC-13 [Panama City, FL] Online  View Release	United States	Broadcast Media	Media & Information	161,249 <sup>[1]</sup> visitors/month
	KTRE-TV [Pollok, TX] Online  View Release	United States	Broadcast Media	Media & Information	157,501 <sup>[1]</sup> visitors/month
	KXMA/KXMB [Bismark, ND] Online  View Release	United States	Broadcast Media	Media & Information	156,262 <sup>[1]</sup> visitors/month
	WDTV-TV [Bridgeport, WV] Online  View Release	United States	Broadcast Media	Media & Information	147,035 <sup>[1]</sup> visitors/month
	KGWN-TV CBS-5 [Cheyenne, WY] Online  View Release	United States	Broadcast Media	Media & Information	144,725 <sup>[1]</sup> visitors/month
	KJCT-TV ABC-8 [Grand Junction, CO] Online  View Release	United States	Broadcast Media	Media & Information	135,650 <sup>[1]</sup> visitors/month
	WVLA [Baton Rouge, LA] Online  View Release	United States	Broadcast Media	Media & Information	130,855 <sup>[1]</sup> visitors/month
	WTAJ [Altoona, PA] Online  View Release	United States	Broadcast Media	Media & Information	129,409 <sup>[1]</sup> visitors/month
	Longview News-Journal [Longview, TX] Online  View Release	United States	Newspaper	Media & Information	126,819 <sup>[1]</sup> visitors/month
	WTOK-TV [Meridian, MS] Online  View Release	United States	Broadcast Media	Media & Information	117,771 <sup>[1]</sup> visitors/month
	KMVT-TV News-11 / KSVT-14 FOX [Twin Falls, ID] Online  View Release	United States	Broadcast Media	Media & Information	114,456 <sup>[1]</sup> visitors/month































#19968

	WTAP-TV [Parkersburg, WV] Online  View Release	United States	Broadcast Media	Media & Information	113,950 <sup>[1]</sup> visitors/month
	KKCO-TV NBC-11 [Grand Junction, CO] Online  View Release	United States	Broadcast Media	Media & Information	112,168 <sup>[1]</sup> visitors/month
	WJET-TV ABC-24 / WFXP-TV FOX-44 [Erie, PA] Online  View Release	United States	Broadcast Media	Media & Information	108,116 <sup>[1]</sup> visitors/month
	KSWO-TV [Lawton, OK] Online  View Release	United States	Broadcast Media	Media & Information	100,290 <sup>[1]</sup> visitors/month
	WTWO-TV NBC-2/WAWV-TV ABC-38 MyWabashValley [Terre Haute IN] Online  View Release	United States	Broadcast Media	Media & Information	98,472 <sup>[1]</sup> visitors/month
	KSNB-TV [Hastings, NE] Online  View Release	United States	Broadcast Media	Media & Information	93,289 <sup>[1]</sup> visitors/month
	WFXR [Roanoke, VA] Online  View Release	United States	Broadcast Media	Media & Information	93,245 <sup>[1]</sup> visitors/month
	QuadCities WHBF-TV CBS-4 / KLJB-TV FOX-18 [Rock Island, IL] Online  View Release	United States	Broadcast Media	Media & Information	92,056 <sup>[1]</sup> visitors/month
	User Walls Online  View Release	Global	Online News Sites & Other Influencers	General	92,024 <sup>[1]</sup> visitors/month
	WFFF-TV FOX 44 / WVNY-TV ABC-22 [Colchester, VT] Online  View Release	United States	Broadcast Media	Media & Information	86,658 <sup>[1]</sup> visitors/month
	KEYC-TV [North Mankato, MN] Online  View Release	United States	Broadcast Media	Media & Information	82,093 <sup>[1]</sup> visitors/month
	KCAU-TV ABC-9 Siouxland Proud [Sioux City, IA] Online  View Release	United States	Broadcast Media	Media & Information	78,558 <sup>[1]</sup> visitors/month
	KARD/KTVE [West Monroe, LA] Online  View Release	United States	Broadcast Media	Media & Information	73,755 <sup>[1]</sup> visitors/month
	WAGM-TV [Presque Isle, ME] Online  View Release	United States	Broadcast Media	Media & Information	64,097 <sup>[1]</sup> visitors/month
	WVNS [Beckley, WV] Online  View Release	United States	Broadcast Media	Media & Information	61,117 <sup>[1]</sup> visitors/month































#19969

	The State Journal Online  View Release	United States	Newspaper	Media & Information	56,231 <sup>[1]</sup> visitors/month
	The State Journal Online  View Release	United States	Newspaper	Media & Information	56,231 <sup>[1]</sup> visitors/month
	Spoke Online  View Release	United States	News & Information Service	Business Services	51,366 <sup>[1]</sup> visitors/month
	KEVN-TV [Rapid City, SD] Online  View Release	United States	Broadcast Media	Media & Information	49,758 <sup>[1]</sup> visitors/month
	KWKT-TV FOX-44 / KYLE-TV MyNetworkTV [Woodway, TX] Online  View Release	United States	Broadcast Media	Media & Information	47,791 <sup>[1]</sup> visitors/month
	WDHN-TV ABC [Webb, AL] Online  View Release	United States	Broadcast Media	Media & Information	45,504 <sup>[1]</sup> visitors/month
	Canadian Insider Online  View Release	Canada	Financial News Service	Financial	40,993 <sup>[1]</sup> visitors/month
	One News Page Global Edition Online  View Release	Global	Online News Sites & Other Influencers	Media & Information	35,197 <sup>[1]</sup> visitors/month
	WWTI-TV ABC-50 [Watertown, NY] Online  View Release	United States	Broadcast Media	Media & Information	33,174 <sup>[1]</sup> visitors/month
	KTVF/KXDF-TV [Fairbanks, AK] Online  View Release	United States	Broadcast Media	Media & Information	32,092 <sup>[1]</sup> visitors/month
	The Headlines of Today Online  View Release	India	Online News Sites & Other Influencers	Financial	30,329 <sup>[1]</sup> visitors/month
	Insider Tracking Online  View Release	Canada	Financial News Service	Financial	29,564 <sup>[1]</sup> visitors/month
	KNOP-TV [North Platte, NE] Online  View Release	United States	Broadcast Media	Media & Information	27,880 <sup>[1]</sup> visitors/month
	KYOU-TV [Ottumwa, IA] Online  View Release	United States	Broadcast Media	Media & Information	21,350 <sup>[1]</sup> visitors/month
	KNEP-TV NBC-4 [Scottsbluff, NE] Online  View Release	United States	Broadcast Media	Media & Information	16,422 <sup>[1]</sup> visitors/month































#19970

	ADVFN Germany Online  View Release	Germany	Financial News Service	Financial	15,954 <sup>[1]</sup> visitors/month
	CreditRiskMonitor Online  View Release	United States	Financial Data, Research & Analytics	Financial	13,427 <sup>[1]</sup> visitors/month
	DIY Active Online  View Release	United States	Online News Sites & Other Influencers	Medical/Healthcare	10,129 <sup>[1]</sup> visitors/month
	Lang1234.com Online  View Release	Global	Online News Sites & Other Influencers	Media & Information	6,667 <sup>[1]</sup> visitors/month
	The Podcast Park Online  View Release	United States	Broadcast Media	Media & Information	6,623 <sup>[1]</sup> visitors/month
	BambuUP Online  View Release	Vietnam	Blog	Financial	6,235 <sup>[1]</sup> visitors/month
	CEF [Closed End Funds] Channel Online  View Release	United States	Online News Sites & Other Influencers	Financial	5,063 <sup>[1]</sup> visitors/month
	NewsBlaze US Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	4,309 <sup>[1]</sup> visitors/month
	WMC-TV Action News 5 [Memphis, TN] Online  View Release	United States	Broadcast Media	Media & Information	4,152 <sup>[1]</sup> visitors/month
	Natural Practitioner Online  View Release	United States	Trade Publications	Medical/Healthcare	3,544 <sup>[1]</sup> visitors/month
	Magazines Today Online  View Release	Global	Trade Publications	Media & Information	3,108 <sup>[1]</sup> visitors/month
	Latin Business Today Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	2,520 <sup>[1]</sup> visitors/month
	One News Page United States Edition Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	2,468 <sup>[1]</sup> visitors/month
	Nutrition Industry Executive Online  View Release	United States	Trade Publications	Medical/Healthcare	1,417 <sup>[1]</sup> visitors/month
	The Vicksburg Post Online  View Release	United States	Newspaper	Media & Information	789 <sup>[1]</sup> visitors/month































#19971

	The Vicksburg Post Online  View Release	United States	Newspaper	Media & Information	789 <sup>[1]</sup> visitors/month
	Quertle Online  View Release	United States	Online News Sites & Other Influencers	Medical/Healthcare	761 <sup>[1]</sup> visitors/month
	Quertle Online  View Release	United States	Online News Sites & Other Influencers	Medical/Healthcare	761 <sup>[1]</sup> visitors/month
	My Silly Little Gang Online  View Release	United States	Blog-Parental Influencers	Retail & Consumer	751 <sup>[1]</sup> visitors/month
	Elizabethton Star Online  View Release	United States	Newspaper	Media & Information	683 <sup>[1]</sup> visitors/month
	Elizabethton Star Online  View Release	United States	Newspaper	Media & Information	683 <sup>[1]</sup> visitors/month
	WKSK 101.9 FM [South Boston, VA] Online  View Release	United States	Broadcast Media	Media & Information	599 <sup>[1]</sup> visitors/month
	KMLK 98.7-FM [El Dorado, AR] Online  View Release	United States	Broadcast Media	Media & Information	543 <sup>[1]</sup> visitors/month
	Forefront Media News Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	488 <sup>[1]</sup> visitors/month
	Southwest Daily News Online  View Release	United States	Newspaper	Media & Information	428 <sup>[1]</sup> visitors/month
	Southwest Daily News Online  View Release	United States	Newspaper	Media & Information	428 <sup>[1]</sup> visitors/month
	The Oxford Eagle Online  View Release	United States	Newspaper	Media & Information	423 <sup>[1]</sup> visitors/month
	The Oxford Eagle Online  View Release	United States	Newspaper	Media & Information	423 <sup>[1]</sup> visitors/month
	The Panolian Online  View Release	United States	Newspaper	Media & Information	410 <sup>[1]</sup> visitors/month
	The Panolian Online  View Release	United States	Newspaper	Media & Information	410 <sup>[1]</sup> visitors/month

#19972































	World bfn Online  View Release	Global	News & Information Service	Media & Information	401 <sup>[1]</sup> visitors/month
	Orange Leader Online  View Release	United States	Newspaper	Media & Information	387 <sup>[1]</sup> visitors/month
	Orange Leader Online  View Release	United States	Newspaper	Media & Information	387 <sup>[1]</sup> visitors/month
	Business Class News Online  View Release	United States	Blog	Media & Information	376 <sup>[1]</sup> visitors/month
	Picayune Item Online  View Release	United States	Newspaper	Media & Information	342 <sup>[1]</sup> visitors/month
	Picayune Item Online  View Release	United States	Newspaper	Media & Information	342 <sup>[1]</sup> visitors/month
	Intern Daily Online  View Release	United States	Trade Publications	Medical/Healthcare	341 <sup>[1]</sup> visitors/month
	American Press Online  View Release	United States	Newspaper	Media & Information	332 <sup>[1]</sup> visitors/month
	American Press Online  View Release	United States	Newspaper	Media & Information	332 <sup>[1]</sup> visitors/month
	Albert Lea Tribune [Albert Lea, MN] Online  View Release	United States	print media	Media & Information	317 <sup>[1]</sup> visitors/month
	Daily Leader Online  View Release	United States	Newspaper	Media & Information	309 <sup>[1]</sup> visitors/month
	Daily Leader Online  View Release	United States	Newspaper	Media & Information	309 <sup>[1]</sup> visitors/month
	LaGrange Daily News Online  View Release	United States	Newspaper	Media & Information	304 <sup>[1]</sup> visitors/month
	LaGrange Daily News Online  View Release	United States	Newspaper	Media & Information	304 <sup>[1]</sup> visitors/month
	Leader Publications Online  View Release	United States	Newspaper	Media & Information	294 <sup>[1]</sup> visitors/month

#19973































	Leader Publications Online  View Release	United States	Newspaper	Media & Information	294 <sup>[1]</sup> visitors/month
	Valley Times-News Online  View Release	United States	Newspaper	Media & Information	291 <sup>[1]</sup> visitors/month
	Valley Times-News Online  View Release	United States	Newspaper	Media & Information	291 <sup>[1]</sup> visitors/month
	Natchez Democrat Online  View Release	United States	Newspaper	Media & Information	267 <sup>[1]</sup> visitors/month
	Natchez Democrat Online  View Release	United States	Newspaper	Media & Information	267 <sup>[1]</sup> visitors/month
	The Andalusia Star-News Online  View Release	United States	Newspaper	Media & Information	267 <sup>[1]</sup> visitors/month
	The Andalusia Star-News Online  View Release	United States	Newspaper	Media & Information	267 <sup>[1]</sup> visitors/month
	The Clanton Advertiser Online  View Release	United States	Newspaper	Media & Information	263 <sup>[1]</sup> visitors/month
	The Clanton Advertiser Online  View Release	United States	Newspaper	Media & Information	263 <sup>[1]</sup> visitors/month
	Ironton Tribune Online  View Release	United States	Newspaper	Media & Information	260 <sup>[1]</sup> visitors/month
	Ironton Tribune Online  View Release	United States	Newspaper	Media & Information	260 <sup>[1]</sup> visitors/month
	Smithfield Times Online  View Release	United States	Newspaper	Media & Information	242 <sup>[1]</sup> visitors/month
	Smithfield Times Online  View Release	United States	Newspaper	Media & Information	242 <sup>[1]</sup> visitors/month
	Salisbury Post Online  View Release	United States	Newspaper	Media & Information	241 <sup>[1]</sup> visitors/month
	Salisbury Post Online  View Release	United States	Newspaper	Media & Information	241 <sup>[1]</sup> visitors/month

































#19974

	L'Observateur Online  View Release	United States	Newspaper	Media & Information	236 <sup>[1]</sup> visitors/month
	L'Observateur Online  View Release	United States	Newspaper	Media & Information	236 <sup>[1]</sup> visitors/month
	Alabama Now Online  View Release	United States	Newspaper	Media & Information	233 <sup>[1]</sup> visitors/month
	Alabama Now Online  View Release	United States	Newspaper	Media & Information	233 <sup>[1]</sup> visitors/month
	Shelby County Reporter Online  View Release	United States	Newspaper	Media & Information	232 <sup>[1]</sup> visitors/month
	Shelby County Reporter Online  View Release	United States	Newspaper	Media & Information	232 <sup>[1]</sup> visitors/month
	Magnolia State Live Online  View Release	United States	Newspaper	Media & Information	226 <sup>[1]</sup> visitors/month
	Magnolia State Live Online  View Release	United States	Newspaper	Media & Information	226 <sup>[1]</sup> visitors/month
	Manhattanweek Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	209 <sup>[1]</sup> visitors/month
	Port Arthur News Online  View Release	United States	Newspaper	Media & Information	196 <sup>[1]</sup> visitors/month
	Port Arthur News Online  View Release	United States	Newspaper	Media & Information	196 <sup>[1]</sup> visitors/month
	Jessamine Journal Online  View Release	United States	Newspaper	Media & Information	195 <sup>[1]</sup> visitors/month
	Jessamine Journal Online  View Release	United States	Newspaper	Media & Information	195 <sup>[1]</sup> visitors/month
	The Suffolk News-Herald Online  View Release	United States	Newspaper	Media & Information	185 <sup>[1]</sup> visitors/month
	The Suffolk News-Herald Online  View Release	United States	Newspaper	Media & Information	185 <sup>[1]</sup> visitors/month































#19975

	The Interior Journal Online  View Release	United States	Newspaper	Media & Information	173 <sup>[1]</sup> visitors/month
	The Interior Journal Online  View Release	United States	Newspaper	Media & Information	173 <sup>[1]</sup> visitors/month
	Folsom Local News [Folsom, CA] Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	153 <sup>[1]</sup> visitors/month
	The Bogalusa Daily News Online  View Release	United States	Newspaper	Media & Information	148 <sup>[1]</sup> visitors/month
	The Bogalusa Daily News Online  View Release	United States	Newspaper	Media & Information	148 <sup>[1]</sup> visitors/month
	The Farmville Herald Online  View Release	United States	Newspaper	Media & Information	144 <sup>[1]</sup> visitors/month
	The Farmville Herald Online  View Release	United States	Newspaper	Media & Information	144 <sup>[1]</sup> visitors/month
	Sangri Times Online  View Release	India	Online News Sites & Other Influencers	General	139 <sup>[1]</sup> visitors/month
	About Pain Online  View Release	Australia	Online News Sites & Other Influencers	Medical/Healthcare	138 <sup>[1]</sup> visitors/month
	The Clemmons Courier Online  View Release	United States	Newspaper	Media & Information	127 <sup>[1]</sup> visitors/month
	The Clemmons Courier Online  View Release	United States	Newspaper	Media & Information	127 <sup>[1]</sup> visitors/month
	Claiborne Progress Online  View Release	United States	Newspaper	Media & Information	127 <sup>[1]</sup> visitors/month
	Claiborne Progress Online  View Release	United States	Newspaper	Media & Information	127 <sup>[1]</sup> visitors/month
	Winchester Sun Online  View Release	United States	Newspaper	Media & Information	125 <sup>[1]</sup> visitors/month
	Winchester Sun Online  View Release	United States	Newspaper	Media & Information	125 <sup>[1]</sup> visitors/month































#19976

	The Wetumpka Herald Online  View Release	United States	Newspaper	Media & Information	125 <sup>[1]</sup> visitors/month
	The Wetumpka Herald Online  View Release	United States	Newspaper	Media & Information	125 <sup>[1]</sup> visitors/month
	Alexander City Outlook Online  View Release	United States	Newspaper	Media & Information	108 <sup>[1]</sup> visitors/month
	Alexander City Outlook Online  View Release	United States	Newspaper	Media & Information	108 <sup>[1]</sup> visitors/month
	The Brewton Standard Online  View Release	United States	Newspaper	Media & Information	105 <sup>[1]</sup> visitors/month
	The Brewton Standard Online  View Release	United States	Newspaper	Media & Information	105 <sup>[1]</sup> visitors/month
	Washington Daily News Online  View Release	United States	Newspaper	Media & Information	89 <sup>[1]</sup> visitors/month
	Washington Daily News Online  View Release	United States	Newspaper	Media & Information	89 <sup>[1]</sup> visitors/month
	The Selma Times-Journal Online  View Release	United States	Newspaper	Media & Information	61 <sup>[1]</sup> visitors/month
	The Selma Times-Journal Online  View Release	United States	Newspaper	Media & Information	61 <sup>[1]</sup> visitors/month
	Coastal Today Magazine Online  View Release	United States	Magazine	Travel & Leisure	Not Available
	The Tryon Daily Bulletin Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Tryon Daily Bulletin Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Troy Messenger Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Troy Messenger Online  View Release	United States	Newspaper	Media & Information	Not Available



























#19977


	The Tidewater News Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Tidewater News Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Stanly News & Press Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Stanly News & Press Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Post-Searchlight Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Post-Searchlight Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Coastland Times Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Coastland Times Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Charlotte Gazette Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Charlotte Gazette Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Roanoke Chowan News Herald Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Roanoke Chowan News Herald Online  View Release	United States	Newspaper	Media & Information	Not Available
	Davie County Enterprise Record Online  View Release	United States	Newspaper	Media & Information	Not Available
	Davie County Enterprise Record Online  View Release	United States	Newspaper	Media & Information	Not Available
	Middlesboro News Online  View Release	United States	Newspaper	Media & Information	Not Available

#19978

	Middlesboro News Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Luverne Journal Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Luverne Journal Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Lowndes Signal Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Lowndes Signal Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Kenbridge Victoria Dispatch Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Kenbridge Victoria Dispatch Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Harlan Enterprise Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Harlan Enterprise Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Greenville Advocate Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Greenville Advocate Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Demopolis Times Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Demopolis Times Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Cordele Dispatch Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Cordele Dispatch Online  View Release	United States	Newspaper	Media & Information	Not Available

#19979

	Bluegrass Live Online  View Release	United States	Newspaper	Media & Information	Not Available
	Bluegrass Live Online  View Release	United States	Newspaper	Media & Information	Not Available
	Austin Daily Herald Online  View Release	United States	Newspaper	Media & Information	Not Available
	Austin Daily Herald Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Atmore Advance Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Atmore Advance Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Advocate-Messenger Online  View Release	United States	Newspaper	Media & Information	Not Available
	The Advocate-Messenger Online  View Release	United States	Newspaper	Media & Information	Not Available
	Americus Times-Recorder Online  View Release	United States	Newspaper	Media & Information	Not Available
	Americus Times-Recorder Online  View Release	United States	Newspaper	Media & Information	Not Available
	Grit Daily Online  View Release	United States	Online News Sites & Other Influencers	Financial	Not Available
	Grit Daily Online  View Release	United States	Online News Sites & Other Influencers	Financial	Not Available
	Mazda Pharma Guide Online  View Release	India	Online News Sites & Other Influencers	Medical/Healthcare	Not Available

\*Data sources: [1]  similarweb [2] Alexa, [3] siteworthtraffic.com [4] Cision Digital Reach

\*The data cited here by SimilarWeb represents site traffic data of worldwide unique visitors on desktop and mobile devices. Data is updated monthly.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

VEDA WOODARD, TERESA RIZZO-  
MARINO, and DIANE MORRISON,  
on behalf of themselves, all others  
similarly situated, and the general  
public,

Plaintiffs,

vs.

LEE LABRADA; LABRADA  
BODYBUILDING NUTRITION, INC.;  
LABRADA NUTRITIONAL  
SYSTEMS, INC.; DR. MEHMET C.  
OZ, M.D.; ENTERTAINMENT  
MEDIA VENTURES, INC. d/b/a OZ  
MEDIA; ZOCO PRODUCTIONS,  
LLC; HARPO PRODUCTIONS, INC;  
SONY PICTURES TELEVISION, INC;  
NATUREX, INC.; and  
INTERHEALTH  
NUTRACEUTICALS, INC.,

Defendants.

CASE NO. 5:16-cv-00189-JGB-SP

CLASS ACTION

**[PROPOSED] ORDER  
GRANTING MOTION FOR  
FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**



1 This matter having been submitted to the Court by Plaintiff Veda Woodard,  
2 on her own behalf and on behalf of the Class defined below (hereafter referred to as  
3 “Plaintiff” or “Class Representative”) and Law Offices of Ronald A. Marron, APLC  
4 and Cohelan, Khoury, and Singer (together, “Class Counsel”) on behalf of the  
5 Plaintiff and by Defendant Labrada Bodybuilding Nutrition, Inc. (“Labrada” or  
6 “Defendant”) through its Counsel, by way of Plaintiff’s motion for final approval of  
7 the proposed settlement in the above captioned action;

8 WHEREAS, the Court having reviewed and considered the Plaintiff’s motion  
9 for final approval and supporting materials filed by Class Counsel; and

10 WHEREAS, this Court has fully considered the record and the requirements  
11 of law; and good cause appearing;

12 **IT IS THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2022**

13 **ORDERED** that the settlement (including all terms of the Settlement  
14 Agreement and exhibits thereto) is hereby **GRANTED FINAL APPROVAL**. The  
15 Court further finds and orders as follows:

16 1. The Court has subject matter jurisdiction under 28 U.S.C. § 1331 and  
17 venue is proper in this district.

18 2. The Court has personal jurisdiction over the Class Representative,  
19 Settlement Class Members, and the Defendant.

20 3. The settlement is the product of arm’s length bargaining conducted by  
21 experienced legal counsel after extensive discovery and with the assistance of an  
22 impartial mediator. The Settlement Agreement is not the result of collusion.

23 4. The proceedings that occurred before the parties reached the Settlement  
24 Agreement gave counsel and the parties an opportunity to adequately assess the  
25 strengths and weaknesses of their respective positions in this case, and, thus, to  
26 structure the settlement in a way that adequately accounts for those strengths and  
27 weaknesses.

28 5. The settlement satisfies the criteria of Federal Rule of Civil Procedure  
23(e) and is fair, reasonable, and adequate.

1           6.     Because the settlement meets the standards for final approval, the Court  
2 grants final approval of all terms of the settlement, including the Settlement  
3 Agreement and all of its exhibits.

4           7.     The Court finds that the Class has received the best practicable under  
5 the circumstances. The Parties' selection and retention of Classaura LLC as the  
6 Notice Administrator was reasonable and appropriate. Based on the Declaration of  
7 Gajan Retnasaba, the Court hereby finds that the Settlement Notices were published  
8 to the Class Members substantially in the form and manner approved by the Court  
9 in its Preliminary Approval Order. The Settlement Notices provided fair, effective  
10 and the best practicable notice to the Class of the Settlement and the terms thereof.  
11 The Notices also informed the Class of Plaintiff's intent to seek attorneys' fees,  
12 costs, and an incentive payment, and set forth the date, time, and place of the Fairness  
13 Hearing and Class Members' rights to object to the Settlement and to appear at the  
14 Fairness Hearing. The Court further finds that the Settlement afforded Class  
15 members a reasonable period of time to exercise such rights. The Settlement Notices  
16 fully satisfied all notice requirements under the law, including the Federal Rules of  
17 Civil Procedure, the requirements of the California Legal Remedies Act, Cal. Civ.  
18 Code § 1781, and all due process rights under the U.S. Constitution and California  
19 Constitutions.

20           8.     The Court finds that the Parties have satisfied all notice requirements  
21 of the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, as attested  
22 to by the Retnasaba Declaration. On June 27, 2022, Classaura LLC served the  
23 notices required by 28 U.S.C. § 1715(b), which included a copy of the Settlement  
24 Agreement and other required documents. The Court has received no objection or  
25 response to the Settlement agreement by any federal or state official, including any  
26 recipient of the foregoing notices. This fact further supports the fairness of the  
27 Settlement.

28           9.     The Parties are directed to implement the Settlement according to its  
terms and conditions.

1           10. The claims against Labrada in this action, including all individual and  
2 Class claims resolved in it, shall be dismissed on the merits and with prejudice.

3  
4 **IT IS SO ORDERED.**

5  
6  
7 DATED: \_\_\_\_\_, 2022

\_\_\_\_\_

8 HON. JESUS G. BERNAL  
9 United States District Judge