

1 Adrian R. Bacon (SBN 280332)
2 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**
3 23586 Calabasas Rd., Suite 105
4 Calabasas, California 91302
5 Phone: (323) 306-4234
6 abacon@toddfllaw.com

7 Michael R. Reese (SBN 206773)
8 **REESE LLP**
9 100 West 93rd Street, 16th Floor
10 New York, New York 10025
11 mreese@reesellp.com; Phone: (212) 643-0500

12 *Attorneys for Plaintiffs*

13 **SUPERIOR COURT OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**

15 VICTOR GUZMAN, PERRY BRUNO,
16 LAUREN FLEMING, DAVID PLOWDEN,
17 KAREN BETZAG, and JAIME
18 NAPOLITANO, individually, and on behalf
19 of all others similarly situated,

20 Plaintiffs,

21 v.

22 DR. SQUATCH, LLC;

23 Defendant.

Case No.: 25STCV03523

24 **JOINT DECLARATION OF**
25 **CLASS COUNSEL IN SUPPORT OF**
26 **MOTION FOR ATTORNEYS' FEES,**
27 **COSTS, AND INCENTIVE AWARD**

28 Date: March 2, 2027
Time: 10:00 a.m.
Dept.: 11

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1 8. On February 10, 2025, Plaintiffs filed the operative consolidated complaint on
2 behalf of all Plaintiffs in the Superior Court of the State of California, County of Los Angeles,
3 alleging causes of action for violations of California’s Unfair Competition Law, Cal. Bus. & Prof.
4 Code § 17200 et seq. (“UCL”), False Advertising Law, Cal. Bus. & Prof. Code § 17500 et seq.
5 (“FAL”), and Consumers Legal Remedies Act, Cal. Civ. Code § 1750 et seq. (“CLRA”), and for
6 breach of express warranty.

7 9. Plaintiffs’ claims were brought on behalf of themselves and a nationwide class of
8 consumers who purchased Dr. Squatch products labeled as “natural” during the Class Period, based
9 on Dr. Squatch’s alleged false and misleading “natural” labeling.

10 10. After extensive discovery and litigation over several years, including the
11 depositions of named Plaintiffs Bruno and Fleming, and several motions to dismiss, the parties
12 agreed to mediate with the Honorable Wayne Andersen (Ret.) of JAMS.

13 11. Defendant produced numerous pages of documents in discovery, including
14 comprehensive sales data and extensive technical documentation regarding the ingredients
15 challenged in this action. Class Counsel reviewed and analyzed this discovery, along with the
16 depositions of Plaintiffs Bruno and Fleming, in evaluating the strengths and risks of the case.

17 12. In advance of mediation, Class Counsel conducted a thorough investigation of the
18 factual and legal issues underlying Plaintiffs’ claims and evaluation of Dr. Squatch’s defenses.

19 13. Based on Class Counsel’s investigation, including review of Dr. Squatch’s labeling,
20 marketing materials, and ingredient documentation produced in discovery, Class Counsel
21 developed confidence in Plaintiffs’ ability to substantiate their core claim that the “natural”
22 labeling was false and misleading.

23 14. However, Dr. Squatch has vigorously defended itself, denying the allegations and
24 maintaining that the products at issue were properly labeled as “natural.”

25 15. Dr. Squatch’s defenses raised legitimate risks regarding proof of classwide reliance
26 and damages, as well as the ultimate outcome of class certification and trial on the merits. The
27 challenge of proving that the labeling was likely to deceive a reasonable consumer on a classwide
28 basis, and quantifying classwide damages, presented genuine litigation risk.

16. It is undeniable that, based on reviewing the discovery produced and evaluating the risks of continued litigation across multiple jurisdictions, significant challenges to continuing litigation existed. Class Counsel conducted a diligent and thorough examination of the legal, factual, and damages allegations at issue.

17. Throughout the mediation and subsequent discussions, Class Counsel performed an assessment of Dr. Squatch's exposure and potential liability, to which Dr. Squatch responded. Based on their negotiations, the Parties reached an agreement in principle for the class-wide resolution of Plaintiffs' claims. The Settlement has been finalized and fully executed by the Parties.

18. This Court previously granted preliminary approval as to this Settlement. *See* Prelim. Approval Order (July 15, 2026). Pursuant to Cal. Code Civ. P. § 382, the Court conditionally certified the Settlement Class for settlement purposes. The Court appointed Plaintiffs Victor Guzman, Perry Bruno, Lauren Fleming, David Plowden, Karen Betzag, and Jaime Napolitano as Class Representatives, and appointed Adrian R. Bacon of the Law Offices of Todd M. Friedman, P.C. and Michael R. Reese of Reese LLP as Class Counsel. The Court also appointed Eisner Advisory Group, LLC (“EAG”) as Settlement Administrator. The Court approved the Class Notice and the method of distributing the Class Notice as set forth in the Settlement Agreement. The Settlement, as approved by the Court, established various deadlines, directing the Settlement Administrator to disseminate direct notice and publication notice within 45 days after entry of the Preliminary Approval Order, and setting a claim submission deadline of 90 days from the Notice Date and an objection/exclusion deadline of 45 days from the Notice Date. (Settlement §§ 6.2–6.3; Order Granting Preliminary Approval.) The deadline for Class Counsel to file this Motion for Attorneys’ Fees, Costs, and Incentive Award precedes the deadline for the Motion for Final Approval of Class Action Settlement, which is not due until next year.

The Settlement

19. The Settlement provides for a non-reversionary common fund for the benefit of all Class Members. (Settlement § 2.48).

20. The Settlement Fund is defined as the Settlement Amount of Nine Million Dollars (\$9,000,000.00). (Settlement § 2.48).

1 21. The Class Period runs from November 17, 2018 through the date 45 days after
2 entry of the Preliminary Approval Order. Final figures for the number of Class Members and
3 claims submitted will be reported in connection with the Motion for Final Approval, which
4 is not due until next year.

5 22. “Class” or “Settlement Class” means all persons in the United States who
6 purchased any Dr. Squatch product labeled on the front of the packaging as “natural” on or
7 after November 17, 2018 through the date 45 days after entry of the Court’s preliminary
8 approval order, excluding (a) persons who purchased or acquired the Products for resale, (b)
9 Dr. Squatch and the Released Parties, (c) any person who files a valid, timely opt-out request,
10 and (d) the judges to whom this Action is assigned and their immediate families. (Settlement
11 § 2.49).

12 23. The Class Period is November 17, 2018 through the date 45 days after entry
13 of the Preliminary Approval Order. This action does not involve a claim under the Private
14 Attorneys General Act, and there is no PAGA Period.

15 24. “Participating Class Members” includes all Class Members who submit a valid,
16 timely Claim Form and do not submit a valid and timely Request for Exclusion from the
17 Settlement. Final participation figures will be reported in connection with the Motion for
18 Final Approval, which is not due until next year.

19 25. Each Participating Class Member who submits a valid, timely Claim Form is
20 entitled to a payment from the Net Settlement Amount, which is defined as the Settlement
21 Amount, less:

- 22 a. Service Awards not exceeding \$40,000 in the aggregate, with Plaintiffs Bruno
23 and Fleming, who each sat for a deposition, receiving up to \$10,000 each, and
24 Plaintiffs Guzman, Plowden, Betzag, and Napolitano each receiving up to
25 \$5,000, for their service to the Class as Class Representatives; and
- 26 b. Attorneys’ Fees in the amount of \$3,000,000.00, or one-third (1/3) of the
27 Settlement Amount, plus Class Counsel’s actual litigation costs and expenses
28 of up to \$50,000.00 (Settlement § 5.2).

1 26. The Net Settlement Amount will be paid pro rata to Participating Class
2 Members based on the number of units purchased, subject to a household cap. The final Net
3 Settlement Amount will be reported in connection with the Motion for Final Approval, which
4 is not due until next year.

5 27. Class Members may submit claims online or by mail, and may receive
6 payments based on the number of units purchased, subject to a household cap and pro rata
7 adjustments. (Settlement § 4.1.3).

8 28. The Settlement releases Dr. Squatch and the other Released Parties from all
9 claims, including but not limited to injunctive relief, actual damages, nominal damages,
10 statutory damages, punitive damages, restitution, disgorgement, and attorneys' fees and
11 costs, that have been pled in the Action or that could have been pled in the Action relating
12 to or arising from Dr. Squatch's use of the term "natural" on its Products, excluding claims
13 for personal injury. (Settlement § 2.43).

14 29. Every Class Member who does not request exclusion from the Class will
15 release all such claims against the Released Parties described above.

16 **Basis for the Settlement**

17 30. Rule 3.769 of the California Rules of Court (CRC) sets forth the procedures for
18 settlement of class actions in California. A two-step process is required: first, the court
19 preliminarily approves the settlement and the settlement class members are notified as directed by
20 the court. CRC 3.769(c)-(f). Second, the court conducts a final approval hearing to inquire into the
21 fairness of the proposed settlement. CRC 3.769(g). This Court granted preliminary approval on
22 July 15, 2026, and set a deadline of September 29, 2026 for Class Counsel to file this Motion for
23 Attorneys' Fees, Costs, and Incentive Award, in advance of the Motion for Final Approval of Class
24 Action Settlement, which is not due until January 22, 2027.

25 31. The Settlement that has been reached here is the product of significant effort and
26 tenacious, arm's-length negotiations by the Parties and their counsel over nearly four years of
27 litigation. After extensive discovery and substantial motion practice, including the depositions of
28 Plaintiffs Bruno and Fleming, the Parties participated in an all-day, in-person mediation with the

1 Honorable Wayne Andersen (Ret.) of JAMS, an experienced and respected mediator. After
2 extensive arm's-length negotiation, the Parties reached final agreement to the terms of the
3 Settlement on July 17, 2025. Plaintiffs and Class Counsel concluded, after taking into account the
4 sharply disputed factual and legal issues involved in this Action, the risks attendant to further
5 prosecution, the discovery conducted to date, and the substantial benefits to be received pursuant
6 to the proposed terms, that the Settlement as set forth herein was in the best interests of the Class
7 Members.

8 32. In our prior declarations before the Court during preliminary approval, we laid out
9 in substantial detail my evaluation of the factual and legal risks in the case, as well as a prospective
10 damages analysis. We stand by those statements and calculations and incorporate them by
11 reference. Nothing has changed since that time such that the analysis would differ materially from
12 our prior statements.

13 **Attorneys' Fees and Litigation Costs**

14 33. The Law Offices of Todd M. Friedman, P.C. and Reese LLP have maintained
15 records of activity in this matter since the commencement of this action. Class Counsel have
16 worked completely on a contingency basis and have not been paid anything to date for their work
17 and expenses. To date, Class Counsel have incurred approximately 2,360 hours for this case, with
18 a total lodestar \$2,856,500. This represents a multiplier of approximately 1.05.

19 34. The billing rate of Todd M. Friedman is \$1150 per hour in this case, the billing rate
20 of Adrian Bacon is \$975 per hour, Steven Perry's billing rate is \$750 per hour, the billing rate for
21 Michael R. Reese is \$1675 per hour, and the billing rates for our associates, paralegals, and law
22 clerks range from \$295 to \$508 per hour.

23 35. The Law Offices of Todd M. Friedman, P.C. and Reese LLP's hourly rates are
24 reasonable in respect to the ranges charged by comparable nationwide law firms and have been
25 approved by other courts.

26 36. With respect to the attorneys of Reese LLP, the hourly rates charged by their
27 attorneys in this case are the same as the regular, current rates (adjusted for the annual increases)
28 that have been used in the lodestar cross-check accepted by courts in other class litigation. *See,*

1 *e.g., Santiago v. American Textile Company, Inc.*, case no. 2:23-cv-01811-CCW (W.D. Pa. Feb.
2 11, 2026) (order granting class counsel’s fee request in total based upon 2026 calendar year hourly
3 rate for Michael R. Reese of \$1,650 per hour); *McKinley v. Conopco, Inc.*, Index No.
4 805260/2024E (Bronx County Supreme Court, Nov. 22, 2024) (order granting class counsel’s fee
5 request in total based upon 2024 calendar year hourly rate for Michael R. Reese of \$1,600 per
6 hour); *Counts v. Arkk Food Company*, No. 1:23-cv-00236 (N.D. Ill. Sept. 26, 2024) (granting class
7 counsel’s fee request in total based upon 2024 calendar year hourly rate for Michael R. Reese of
8 \$1,600 per hour); *Vela v. AMC Networks, Inc.*, No. 1:23-CV-02524- ALC (S.D.N.Y. May 16,
9 2024) (granting class counsel’s fee request in total based upon 2024 calendar year hourly rate for
10 Michael R. Reese of \$1,600 per hour); *Sharpe v. A&W Concentrate Co.*, No. 1:19-cv-00768-BMC
11 (Nov. 16, 2023 E.D.N.Y.) (granting class counsel’s motion for payment of fees based upon 2023
12 calendar rates of \$1,500 per hour for class counsel Michael R. Reese and stating: “Class Counsel
13 have done excellent work in this matter and have achieved a substantial benefit for the Class. Class
14 Counsel are very experienced, both in class actions and in this kind of consumer litigation.
15 Moreover, their hourly rates are commensurate with the highest quality of practice in this District
16 and are hereby approved.”).

17 37. With regard to the lodestar amount, our current records reflect approximately 2,360
18 hours of work split between Class Counsel at the Law Offices of Todd M. Friedman, P.C. and
19 Reese LLP as detailed below.

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

Name	Hours	Hourly Rate	Total
Todd Friedman (Managing Partner)	167.3	\$1150/hr	\$192,395
Adrian Bacon (Partner)	542.7	\$975/hr	\$529,132.50
Steven Perry (Partner)	638.2	\$750/hr	\$478,650
Patria Hammer (Paralegal)	3.7	\$ 295/hr	\$1091.5
Heather Burns (Paralegal)	1.6	\$295/hr	\$472
Helen Seely (Paralegal)	.2	\$295/hr	\$59
GRAND TOTAL:	1,353.7		\$1,201,800

REESE LLP

Name	Hours	Hourly Rate	Total
Michael Reese (Managing Partner)	987.8	\$1650/hr	\$1,629,870
George Granade (Partner)	19.1	\$1300/hr	\$24,830
GRAND TOTAL:	1,006.9		\$1,654,700

38. Based on the foregoing, we submit that Class Counsel's collective request for an award of \$3,000,000.00 is reasonable. This represents a multiplier of approximately 1.05 given the work performed to date. Thus, under either the percentage of the fund method or the lodestar method, the amount requested is reasonable.

39. The proposed awards of attorneys' fees and costs are well within the range of reasonableness and warrant this Court's approval. This is especially so in view of Class Counsel's efforts and risks in pursuing this case over nearly four years of litigation across multiple jurisdictions, and the results achieved (i.e., obtaining a favorable class-wide resolution in the face of uncertain factual and legal questions as to core issues in this case). Fee awards of one-third of

the maximum Settlement Amount have been consistently approved as reasonable based on my experience in class action matters.

40. With respect to costs, Class Counsel has incurred litigation costs in this matter in the amount of \$42,219.68 to date, including filing and serving the pleadings, transmitting copies of filings to the Court, payment of mediation fees, and other litigation expenses. Class Counsel have not sought reimbursement of miscellaneous expenses such as legal research expenses, printing expenses, or postage. All of the costs sought were necessarily incurred in the course of this litigation and should be reimbursed. Below is a summary of the costs Class Counsel has incurred to date.

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

Category	Amount
Fees (Filing, E-Filing and Service Fees)	\$6,556.22
Mediation Fees and associated travel for mediation	\$11,059.99
Discovery (including depositions)	\$1,148.50
Court appearances	\$431.42
TOTAL:	\$19,196.13

REESE LLP

Category	Amount
Fees (Filing, E-Filing and Service Fees)	\$1,641.48
Mediation Fees and associated travel for mediation	\$14,021.56
Discovery (including depositions)	\$5,859.30
Court appearances	\$1,501.21
TOTAL:	\$23,023.55

41. Attached hereto as Exhibits A-F are true and correct copies of the declarations of

1 the Plaintiffs detailing their work in this matter.

2
3 I declare under penalty of perjury under the laws of California and the United States that
4 the foregoing is true and correct. Executed on, September 29, 2026 in California.

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6 Adrian R. Bacon

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8 Michael R. Reese
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EXHIBIT A

Todd M. Friedman (California SBN 216752)
Adrian R. Bacon (California SBN 280332)

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

23586 Calabasas Road, Suite 105

Calabasas, California 91302

Phone: 323-306-4234

Fax: 866-633-0228

tfriedman@toddfllaw.com

abacon@toddfllaw.com

Michael R. Reese (California SBN 206773)

REESE LLP

100 West 93rd Street, 16th Floor

New York, New York 10025

Phone: 212-643-0500

Fax: 212-253-4272

mreese@reesellp.com

Proposed Co-Lead Counsel for the Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

**VICTOR GUZMAN, PERRY
BRUNO, LAUREN FLEMING,
DAVID PLOWDEN, KAREN
BETZAG, and JAIME
NAPOLITANO**, *individually and on
behalf of all others similarly situated,*

Plaintiffs,

vs.

DR. SQUATCH, LLC,

Defendant.

Case No. 25STCV03523

CLASS ACTION

**DECLARATION OF KAREN BETZAG IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

1 I, Karen Betzag, declare:

2 1. I am a named plaintiff and proposed class representative in this action. I have
3 personal knowledge of the following facts and, if called upon as a witness, could and would
4 competently testify thereto, except as to those matters which are explicitly set forth as based
5 upon my information and belief and, as to such matters, I am informed and believe they are true
6 and correct.

7 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
8 of Class Action Settlement in the above-captioned action.

9 3. I purchased the Dr. Squatch personal care products at at a premium price in
10 reliance on the "natural" representation on their labeling. I would not have been willing to pay
11 as much for the products had I known the truth that they are not in fact "natural" because they
12 contain synthetic ingredients.

13 4. To the best of my knowledge, I have no interests that conflict with the interests of
14 the other class members.

15 5. My attorneys have informed me of the responsibilities of a class representative. I
16 understand these responsibilities, including that I have a fiduciary duty to assert and protect the
17 interests of the absent class members, and I am willing and prepared to put the interest of the
18 class members before my own.

19 6. Throughout this case, I believe that I served as an adequate class representative,
20 and I acted to assert and protect the interests of the other class members. I worked with my
21 attorneys throughout the case, and assisting in drafting the complaint. In fact, I was an integral
22 part in assisting my attorneys in developing the case theory that was ultimately litigated. I
23 regularly discussed the case with my attorneys when they had questions, and also participated in
24 the settlement discussions, by speaking with my attorneys about the status of settlement
25 discussions, participating in mediation, and providing documents for my attorneys to advance
26 the interests of the Class Members. I also reviewed the settlement agreements in this case and
27 had several discussions with my attorneys regarding settlement on behalf of the class in my role
28 as a class representative.

7. The activities I have performed have included, but have not been limited to: obtaining legal counsel, numerous communications with my attorneys, gathering documents relating to the claims at issue in this case for my attorneys, reviewing documents with my attorneys and assisting them in developing the claims in this case, being actively involved in the settlement process to ensure a fair result for the Class as a whole, and spending time carefully reviewing the Settlement, and other case related documents on my own and with my attorneys to make sure that Settlement and the other work my attorneys performed are in the best interests of the Class.

8. I also understand that my attorneys have submitted an application to this Court for a Service Award to compensate me for my unique contributions to the success of this action in the amount of \$5,000. I believe this amount is fair and reasonable compensation for my efforts in this case and the risks I have taken in pursuing a fair recovery for the Class. There is now a public record - this publicly filed lawsuit - that I served as a class representative in a consumer class action lawsuit. Further, before I filed this case, my counsel also advised me of the possibility that, if the case was lost, I could have been ordered to pay Defendant's costs, which could have totaled tens of thousands of dollars, if not more, by the end.

9. For these reasons, I believe the Service Award requested is fair and reasonable. I respectfully request the Court approve the Motion for Preliminary Approval of Class Action Settlement, and the requested Incentive Award.

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct. Executed on April 25, 2026.

Karen Betzag

Karen Betzag

EXHIBIT B

Todd M. Friedman (SBN 216752)
Adrian R. Bacon (SBN 280332)

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

23586 Calabasas Road, Suite 105

Calabasas, California 91302

Phone: 323-306-4234

Fax: 866-633-0228

tfriedman@toddfllaw.com

abacon@toddfllaw.com

Michael R. Reese (SBN 206773)

REESE LLP

100 West 93rd Street, 16th Floor

New York, New York 10025

Phone: 212-643-0500

Fax: 212-253-4272

mreese@reesellp.com

Proposed Co-Lead Counsel for the Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

**VICTOR GUZMAN, PERRY
BRUNO, LAUREN FLEMING,
DAVID PLOWDEN, KAREN
BETZAG, and JAIME
NAPOLITANO**, *individually and on
behalf of all others similarly situated,*

Plaintiffs,

vs.

DR. SQUATCH, LLC,

Defendant.

Case No. 25STCV03523

CLASS ACTION

**DECLARATION OF PERRY BRUNO IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date filed: February 10, 2025

Trial date: Not set

1 I, Perry Bruno, declare:

2 1. I am a named plaintiff and proposed class representative in this action. I have
3 personal knowledge of the following facts and, if called upon as a witness, could and would
4 competently testify thereto, except as to those matters which are explicitly set forth as based
5 upon my information and belief and, as to such matters, I am informed and believe they are true
6 and correct.

7 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
8 of Class Action Settlement in the above-captioned action.

9 3. I purchased the Dr. Squatch personal care products at issue at a premium price in
10 reliance on the "natural" representation on their labeling. I would not have been willing to pay
11 as much for the products had I known the truth that they are not in fact "natural" because they
12 consisted of mostly non-natural, synthetic ingredients.

13 4. To the best of my knowledge, I have no interests that conflict with the interests of
14 the other class members.

15 5. My attorneys have informed me of the responsibilities of a class representative. I
16 understand these responsibilities, including that I have a fiduciary duty to assert and protect the
17 interests of the absent class members, and I am willing and prepared to put the interest of the
18 class members before my own.

19 6. Throughout this case, I believe that I served as an adequate class representative,
20 and I acted to assert and protect the interests of the other class members. I worked with my
21 attorneys throughout the case, responding to written discovery that was served on me, sitting for
22 a deposition, and assisting in drafting the complaint. In fact, I was an integral part in assisting
23 my attorneys in developing the case theory that was ultimately litigated. I regularly discussed
24 the case with my attorneys when they had questions, and also participated in the settlement
25 discussions, by speaking with my attorneys about settlement discussions, participating in
26 mediation, and providing documents for my attorneys to advance the interests of the Class
27 Members. I also reviewed the settlement agreements in this case and had several discussions
28 with my attorneys regarding settlement on behalf of the class in my role as a class representative.

7. The activities I have performed have included, but have not been limited to: obtaining legal counsel, numerous communications with my attorneys, gathering documents relating to the claims at issue in this case for my attorneys, reviewing documents with my attorneys and assisting them in developing the claims in this case, sitting for a deposition, responding to written discovery, being actively involved in the settlement process to ensure a fair result for the Class as a whole, and spending time carefully reviewing the Settlement, and other case related documents on my own and with my attorneys to make sure that Settlement and the other work my attorneys performed are in the best interests of the Class.

8. I also understand that my attorneys have submitted an application to this Court for a Service Award to compensate me for my unique contributions to the success of this action in the amount of \$10,000. I believe this amount is fair and reasonable compensation for my efforts in this case, including traveling to and sitting for my deposition, and the risks I have taken in pursuing a fair recovery for the Class. There is now a public record - this publicly filed lawsuit - that I served as a class representative in a consumer class action lawsuit. Further, before I filed this case, my counsel also advised me of the possibility that, if the case was lost, I could have been ordered to pay Defendant's costs, which could have totaled tens of thousands of dollars, if not more, by the end.

9. For these reasons, I believe the Service Award requested is fair and reasonable. I respectfully request the Court approve the Motion for Preliminary Approval of Class Action Settlement, and the requested Incentive Award.

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct. Executed on April 28, 2026.

Perry Bruno
Perry Bruno

EXHIBIT C

Todd M. Friedman (SBN 216752)
Adrian R. Bacon (SBN 280332)
LAW OFFICES OF TODD M. FRIEDMAN, P.C.
23586 Calabasas, Suite 105
Calabasas, California 91302
Phone: 323-306-4234
Fax: 866-633-0228
tfriedman@toddfllaw.com
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Proposed Co-Lead Counsel for the Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

**VICTOR GUZMAN, PERRY
BRUNO, LAUREN FLEMING,
DAVID PLOWDEN, KAREN
BETZAG, and JAIME
NAPOLITANO**, *individually and on
behalf of all others similarly situated,*

Plaintiffs,

vs.

DR. SQUATCH, LLC,

Defendant.

Case No. 25STCV03523

CLASS ACTION

**DECLARATION OF LAUREN FLEMING
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

1 I, Lauren Fleming, declare:

2 1. I am a named plaintiff and proposed class representative in this action. I have
3 personal knowledge of the following facts and, if called upon as a witness, could and would
4 competently testify thereto, except as to those matters which are explicitly set forth as based
5 upon my information and belief and, as to such matters, I am informed and believe they are true
6 and correct.

7 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
8 of Class Action Settlement in the above-captioned action.

9 3. I purchased the Dr. Squatch personal care products at issue at a premium price in
10 reliance on the "natural" representation on their labeling. I would not have been willing to pay
11 as much for the products had I known the truth that they are not in fact "natural" because they
12 consisted of mostly non-natural, synthetic ingredients.

13 4. To the best of my knowledge, I have no interests that conflict with the interests of
14 the other class members.

15 5. My attorneys have informed me of the responsibilities of a class representative. I
16 understand these responsibilities, including that I have a fiduciary duty to assert and protect the
17 interests of the absent class members, and I am willing and prepared to put the interest of the
18 class members before my own.

19 6. Throughout this case, I believe that I served as an adequate class representative,
20 and I acted to assert and protect the interests of the other class members. I worked with my
21 attorneys throughout the case, responding to written discovery that was served on me, sitting for
22 a deposition, and assisting in drafting the complaint. I was an integral part in assisting my
23 attorneys in developing the case theory that was ultimately litigated. I regularly discussed the
24 case with my attorneys, and also participated in the settlement discussions, by speaking with my
25 attorneys about the status of settlement discussions, participating in mediation, and providing
26 documents for my attorneys to advance the interests of the Class Members. I also reviewed the
27 settlement agreements in this case and had several discussions with my attorneys regarding
28 settlement on behalf of the class in my role as a class representative.

8. I also understand that my attorneys have submitted an application to this Court for a Service Award to compensate me for my unique contributions to the success of this action in the amount of \$10,000. I believe this amount is fair and reasonable compensation for my efforts in this case, including traveling to and sitting for my deposition, and the risks I have taken in pursuing a fair recovery for the Class. There is now a public record - this publicly filed lawsuit - that I served as a class representative in a consumer class action lawsuit. Further, before I filed this case, my counsel also advised me of the possibility that, if the case was lost, I could have been ordered to pay Defendant's costs, which could have totaled tens of thousands of dollars, if not more, by the end.

9. For these reasons, I believe the Service Award requested is fair and reasonable. I respectfully request the Court approve the Motion for Preliminary Approval of Class Action Settlement, and the requested Incentive Award.

23 I declare under penalty of perjury under the laws of California and the United States that
24 the foregoing is true and correct. Executed on April 24, 2026.

DocuSigned by:

ACB1919348914BF...

EXHIBIT D

Todd M. Friedman (SBN 216752)
Adrian R. Bacon (SBN 280332)
LAW OFFICES OF TODD M. FRIEDMAN, P.C.
23586 Calabasas Road, Suite 105
Calabasas, California 91302
Phone: 323-306-4234
Fax: 866-633-0228
tfriedman@toddfllaw.com
abacon@toddfllaw.com

Michael R. Reese (SBN 206773)
REESE LLP
100 West 93rd Street, 16th Floor
New York, New York 10025
Phone: 212-643-0500
Fax: 212-253-4272
mreese@reesellp.com

Proposed Co-Lead Counsel for the Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

**VICTOR GUZMAN, PERRY BRUNO,
LAUREN FLEMING,
DAVID PLOWDEN, KAREN BETZAG,
and JAIME NAPOLITANO, individually
and on behalf of all others similarly
situated,**

Plaintiffs,

vs.

DR. SQUATCH, LLC,
Defendant.

Case No. 25STCV03523

CLASS ACTION

**DECLARATION OF VICTOR GUZMAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

1 I, Victor Guzman, declare:

2 1. I am a named plaintiff and proposed class representative in this action. I have
3 personal knowledge of the following facts and, if called upon as a witness, could and would
4 competently testify thereto, except as to those matters which are explicitly set forth as based
5 upon my information and belief and, as to such matters, I am informed and believe they are true
6 and correct.

7 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
8 of Class Action Settlement in the above-captioned action.

9 3. I purchased the Dr. Squatch personal care products at issue at a premium price in
10 reliance on the "natural" representation on their labeling. I would not have been willing to pay
11 as much for the products had I known the truth that they are not in fact "natural" because they
12 consisted of mostly non-natural, synthetic ingredients.

13 4. To the best of my knowledge, I have no interests that conflict with the interests of
14 the other class members.

15 5. My attorneys have informed me of the responsibilities of a class representative. I
16 understand these responsibilities, including that I have a fiduciary duty to assert and protect the
17 interests of the absent class members, and I am willing and prepared to put the interest of the
18 class members before my own.

19 6. Throughout this case, I believe that I served as an adequate class representative,
20 and I acted to assert and protect the interests of the other class members. I worked with my
21 attorneys throughout the case and assisting in drafting the complaint. In fact, I was an integral
22 part in assisting my attorneys in developing the case theory that was ultimately litigated. I
23 regularly discussed the case with my attorneys when they had questions, and also participated in
24 the settlement discussions, by speaking with my attorneys about the status of settlement
25 discussions, participating in mediation, and providing documents for my attorneys to advance
26 the interests of the Class Members. I also reviewed the settlement agreements in this case and
27 had several discussions with my attorneys regarding settlement on behalf of the class in my role
28 as a class representative.

1 7. The activities I have performed have included, but have not been limited to:
2 obtaining legal counsel, numerous communications with my attorneys, gathering documents
3 relating to the claims at issue in this case for my attorneys, reviewing documents with my
4 attorneys and assisting them in developing the claims in this case, being actively involved in the
5 settlement process to ensure a fair result for the Class as a whole, and spending time carefully
6 reviewing the Settlement, and other case related documents on my own and with my attorneys
7 to make sure that Settlement and the other work my attorneys performed are in the best interests
8 of the Class.

9 8. I also understand that my attorneys have submitted an application to this Court
10 for a Service Award to compensate me for my unique contributions to the success of this action
11 in the amount of \$5,000. I believe this amount is fair and reasonable compensation for my
12 efforts in this case and the risks I have taken in pursuing a fair recovery for the Class. There is
13 now a public record - this publicly filed lawsuit - that I served as a class representative in a
14 consumer class action lawsuit. Further, before I filed this case, my counsel also advised
15 me of the possibility that, if the case was lost, I could have been ordered to pay Defendant's
16 costs, which could have totaled tens of thousands of dollars, if not more, by the end.

17 9. For these reasons, I believe the Service Award requested is fair and reasonable. I
18 respectfully request the Court approve the Motion for Preliminary Approval of Class Action
19 Settlement, and the requested Incentive Award.

20
21 I declare under penalty of perjury under the laws of California and the United States that
22 the foregoing is true and correct. Executed on April 26, 2026.

23 

24 _____
Victor Guzman

EXHIBIT E

Todd M. Friedman (SBN 216752)
Adrian R. Bacon (SBN 280332)

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

23586 Calabasas, Suite 105

Calabasas, California 91302

Phone: 323-306-4234

Fax: 866-633-0228

tfriedman@toddfllaw.com

abacon@toddfllaw.com

Michael R. Reese (SBN 206773)

REESE LLP

100 West 93rd Street, 16th Floor

New York, New York 10025

Phone: 212-643-0500

Fax: 212-253-4272

mreese@reesellp.com

Proposed Co-Lead Counsel for the Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

**VICTOR GUZMAN, PERRY
BRUNO, LAUREN FLEMING,
DAVID PLOWDEN, KAREN
BETZAG, and JAIME
NAPOLITANO**, *individually and on
behalf of all others similarly situated,*

Plaintiffs,

vs.

DR. SQUATCH, LLC,

Defendant.

Case No. 25STCV03523

CLASS ACTION

**DECLARATION OF JAIME
NAPOLITANO IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 I, Jaime Napolitano, declare:

2 1. I am a named plaintiff and proposed class representative in this action. I have
3 personal knowledge of the following facts and, if called upon as a witness, could and would
4 competently testify thereto, except as to those matters which are explicitly set forth as based
5 upon my information and belief and, as to such matters, I am informed and believe they are true
6 and correct.

7 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
8 of Class Action Settlement in the above-captioned action.

9 3. I purchased the Dr. Squatch personal care products at issue at a premium price in
10 reliance on the "natural" representation on their labeling. I would not have been willing to pay
11 as much for the products had I known the truth that they are not in fact "natural" because they
12 consisted of mostly non-natural, synthetic ingredients.

13 4. To the best of my knowledge, I have no interests that conflict with the interests of
14 the other class members.

15 5. My attorneys have informed me of the responsibilities of a class representative. I
16 understand these responsibilities, including that I have a fiduciary duty to assert and protect the
17 interests of the absent class members, and I am willing and prepared to put the interest of the
18 class members before my own.

19 6. Throughout this case, I believe that I served as an adequate class representative,
20 and I acted to assert and protect the interests of the other class members. I worked with my
21 attorneys throughout the case. In fact, I was an integral part in assisting my attorneys in
22 developing the case theory that was ultimately litigated. I regularly discussed the case with my
23 attorneys when they had questions, assisted in the drafting on the class action complaint that
24 named me as a class representative, and also participated in the settlement discussions, by
25 speaking with my attorneys about the status of settlement discussions, participating in mediation,
26 and providing documents for my attorneys to advance the interests of the Class Members. I also
27 reviewed the settlement agreements in this case and had several discussions with my attorneys
28 regarding settlement on behalf of the class in my role as a class representative.

7. The activities I have performed have included, but have not been limited to: obtaining legal counsel, numerous communications with my attorneys, gathering documents relating to the claims at issue in this case for my attorneys, reviewing documents with my attorneys and assisting them in developing the claims in this case, being actively involved in the settlement process, to ensure a fair result for the Class as a whole, and spending time carefully reviewing the Settlement, and other case related documents on my own and with my attorneys to make sure that Settlement and the other work my attorneys performed are in the best interests of the Class.

8. I also understand that my attorneys have submitted an application to this Court for a Service Award to compensate me for my unique contributions to the success of this action in the amount of \$5,000. I believe this amount is fair and reasonable compensation for my efforts in this case and the risks I have taken in pursuing a fair recovery for the Class. There is now a public record - this publicly filed lawsuit - that I served as a class representative in a consumer class action lawsuit. Further, before I filed this case, my counsel also advised me of the possibility that, if the case was lost, I could have been ordered to pay Defendant's costs, which could have totaled tens of thousands of dollars, if not more, by the end.

9. For these reasons, I believe the Service Award requested is fair and reasonable. I respectfully request the Court approve the Motion for Preliminary Approval of Class Action Settlement, and the requested Incentive Award.

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct. Executed on April 27, 2026.

Jaime Napolitano

Jaime Napolitano

EXHIBIT F

Todd M. Friedman (SBN 216752)
Adrian R. Bacon (SBN 280332)
LAW OFFICES OF TODD M. FRIEDMAN, P.C.
23586 Calabasas Road, Suite 105
Calabasas, California 91302
Phone: 323-306-4234
Fax: 866-633-0228
tfriedman@toddfllaw.com
abacon@toddfllaw.com

Michael R. Reese (SBN 206773)
REESE LLP
100 West 93rd Street, 16th Floor
New York, New York 10025
Phone: 212-643-0500
Fax: 212-253-4272
mreese@reesellp.com

Proposed Co-Lead Counsel for the Settlement Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

**VICTOR GUZMAN,
PERRY BRUNO, LAUREN FLEMING,
DAVID PLOWDEN, KAREN BETZAG,
and JAIME NAPOLITANO, individually
and on behalf of all others similarly
situated,**

Plaintiffs,

vs.

DR. SQUATCH, LLC,
Defendant.

Case No. 25STCV03523

CLASS ACTION

**DECLARATION OF DAVID PLOWDEN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date filed: February 10, 2025
Trial date: Not set

1 I, David Plowden, declare:

2 1. I am a named plaintiff and proposed class representative in this action. I have
3 personal knowledge of the following facts and, if called upon as a witness, could and would
4 competently testify thereto, except as to those matters which are explicitly set forth as based
5 upon my information and belief and, as to such matters, I am informed and believe they are true
6 and correct.

7 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
8 of Class Action Settlement in the above-captioned action.

9 3. I purchased the Dr. Squatch personal care products at issue at a premium price in
10 reliance on the "natural" representation on their labeling. I would not have been willing to pay
11 as much for the products had I known the truth that they are not in fact "natural" because they
12 consisted of mostly non-natural, synthetic ingredients.

13 4. To the best of my knowledge, I have no interests that conflict with the interests of
14 the other class members.

15 5. My attorneys have informed me of the responsibilities of a class representative. I
16 understand these responsibilities, including that I have a fiduciary duty to assert and protect the
17 interests of the absent class members, and I am willing and prepared to put the interest of the
18 class members before my own.

19 6. Throughout this case, I believe that I served as an adequate class representative,
20 and I acted to assert and protect the interests of the other class members. I worked with my
21 attorneys throughout the case. In fact, I was an integral part in assisting my attorneys in
22 developing the case theory that was ultimately litigated. I regularly discussed the case with my
23 attorneys when they had questions, and also participated in the settlement discussions, by
24 speaking with my attorneys about the status of settlement discussions, participating in mediation,
25 and providing documents for my attorneys to advance the interests of the Class Members. I also
26 reviewed the settlement agreements in this case and had several discussions with my attorneys
27 regarding settlement on behalf of the class in my role as a class representative.
28

1 7. The activities I have performed have included, but have not been limited to:
2 obtaining legal counsel, numerous communications with my attorneys, gathering documents
3 relating to the claims at issue in this case for my attorneys, reviewing documents with my
4 attorneys and assisting them in developing the claims in this case, being actively involved in the
5 settlement process to ensure a fair result for the Class as a whole, and spending time carefully
6 reviewing the Settlement, and other case related documents on my own and with my attorneys
7 to make sure that Settlement and the other work my attorneys performed are in the best interests
8 of the Class.

9 8. I also understand that my attorneys have submitted an application to this Court for
10 a Service Award to compensate me for my unique contributions to the success of this action in
11 the amount of \$5,000. I believe this amount is fair and reasonable compensation for my efforts
12 in this case and the risks I have taken in pursuing a fair recovery for the Class. There is now a
13 public record - this publicly filed lawsuit - that I served as a class representative in a consumer
14 class action lawsuit. Further, before I filed this case, my counsel also advised me of the
15 possibility that, if the case was lost, I could have been ordered to pay Defendant's costs, which
16 could have totaled tens of thousands of dollars, if not more, by the end.

17 9. For these reasons, I believe the Service Award requested is fair and reasonable. I
18 respectfully request the Court approve the Motion for Preliminary Approval of Class Action
19 Settlement, and the requested Service Award.

20
21 I declare under penalty of perjury under the laws of California and the United States that
22 the foregoing is true and correct. Executed on April 27, 2026.

23 

24 _____
David Plowden