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

RENEE YOUNG and JOYCETTE GOODWIN,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

NEUROBRANDS, LLC, a Delaware limited  
liability company;

Defendant.

Case No. 4:18-cv-05907-JSW

CLASS ACTION

**DECLARATION OF RENEE YOUNG IN  
SUPPORT OF PLAINTIFFS'  
UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

1 I, Renee Young, declare:

2 1. I am a named Plaintiff and proposed class representative in the above-titled action.  
3 I submit this Declaration in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of  
4 Class Action Settlement. I make this declaration based on my personal knowledge and if called to  
5 testify, I could and would competently testify to the matters contained herein.

6 2. I purchased the Neurobrands Products multiple times in 2016 at various locations  
7 in California, including a Rite Aid store in Santa Rosa, California and a Walmart store in Windsor,  
8 California. In purchasing the Neurobrands products, I read and relied on the labeling claims stating  
9 that the Products contained no artificial flavors.

10 3. I joined this litigation on September 26, 2018 when my counsel filed the Complaint  
11 on my behalf. During the course of this litigation, I was dedicated to vigorously pursuing the claims  
12 on behalf of the Class. I have reviewed copies of all material filings in the action including a copy  
13 of the Complaint, the First Amended Complaint, and Plaintiffs' Motion for Class Certification. I  
14 was also willing to testify at trial in this matter.

15 4. I have actively participated in the discovery process. On July 26, 2019, Defendant  
16 served me with discovery requests consisting of nine (9) requests for production of documents and  
17 fifteen (15) interrogatories. I worked with my counsel to provide responses to these discovery  
18 requests. My responses were served on September 5, 2019 and amended responses were served on  
19 October 17, 2019.

20 5. On approximately September 27, 2019, Defendant took my deposition. Prior to my  
21 deposition, I spent several hours preparing for the deposition by meeting with my counsel in-  
22 person and by reviewing case filings and discovery responses.

23 6. I have remained in contact with my Counsel throughout the course of this litigation  
24 and have kept myself informed about the status of the proceedings and discovery.

25 7. It is my understanding that my counsel attended a settlement conference with  
26 Neurobrands on February 2, 2021. During this settlement conference, I made myself available by  
27 telephone to discuss settlement proposals with my counsel.

28 8. I have reviewed the settlement agreement with Neurobrands and I believe that the

1 terms of the settlement are fair, reasonable, and adequate for the Class.

2 9. It is my understanding that my claims in this action are the same as the claims of  
3 the other class members and I am not aware of any conflicts of interest that I would have with any  
4 other member of the Class.

5 10. I understand the responsibilities expected of a class representative, such as acting  
6 on behalf of the Class's best interests and staying involved and informed about the case and the  
7 settlement approval process. I believe that I have fulfilled these duties and that I am an adequate  
8 class representative.

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

11  
12  
13  
14  
15 Executed on this 17<sup>th</sup> day of May, 2021 at Santa Rosa California.  
16 [day] [month] [city]

17  
18  
19 Renee Young  
20 [signature]