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*Attorneys for Plaintiff,*  
Roy Lo

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES– UNLIMITED CIVIL**

**ROY LO, Individually and On Behalf  
Of All Others Similarly Situated,**

Plaintiff,

v.

**NUTRIBULLET LLC,**

Defendant.

**Case No.: 21STCV12852**

**SUPPLEMENTAL DECLARATION OF  
JASON A. IBEY IN SUPPORT OF  
PLAINTIFF'S UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT AND  
CERTIFICATION OF SETTLEMENT  
CLASS**

**Judge:** Hon. William F. Highberger  
**Date:** June 9, 2022  
**Time:** 1:30 p.m.  
**Dept.:** 10

**Action Filed: April 2, 2021**



1 SUPPLEMENTAL DECLARATION OF JASON A. IBEY

2 I, Jason A. Ibey, declare:

- 3 1. I am an attorney admitted to the State Bar of California on November 26, 2012, and have been  
4 a member in good standing since that time. I am also licensed in the states of Utah and  
5 Massachusetts.
- 6 2. I am over the age of 18 and am fully competent to make this declaration.
- 7 3. I have personal knowledge of the following facts and, if called upon as a witness, could and  
8 would competently testify thereto, except as to those matters which are explicitly set forth as  
9 based upon my information and belief and, as to such matters, I am informed and believe that  
10 they are true and correct.
- 11 4. I am partner with the law firm Kazerouni Law Group, APC, and co-counsel for Plaintiff Roy  
12 Lo ("Plaintiff") in the above-captioned action against defendant NutriBullet, LLC  
13 ("Defendant" or "NutriBullet").
- 14 5. I am writing this supplemental declaration in support of the Plaintiffs' Motion for Preliminary  
15 Approval of Class Action Settlement and Certification of Settlement Class, which  
16 supplements my prior declaration signed on April 15, 2022.
- 17 6. On April 26, 2022, as part of confirmatory discovery and pursuant to Section VIII(A) of the  
18 Settlement Agreement (filed as Exhibit 1 to the Declaration of Abbas Kazerounian on April  
19 15, 2022), counsel for NutriBullet provided to Plaintiff's counsel a list of Covered Products  
20 for the proposed class action settlement and indicated that "[a]s of April 25, 2022, the  
21 estimated average price of a Covered Product is \$97.92," which document is attached hereto  
22 as **Exhibit 1**.

23 I declare under penalty of perjury that the foregoing is true and correct, executed on April 27,  
24 2022 pursuant to the laws of the State of California, at St. George, Utah.

25 /s/ Jason A. Ibey  
26 Jason A. Ibey  
27  
28

# EXHIBIT 1

## **ROY LO V. NUTRIBULLET - COVERED PRODUCTS**

All NutriBullet branded products, including without limitation:

1. NUTRIBULLET BABY BULLET BLENDER
2. NUTRIBULLET BABY TURBO STEAMER
3. NUTRIBULLET COMBO BLENDER
4. NUTRIBULLET IMMERSION BLENDER
5. SMART TOUCH BLENDER
6. SMART TOUCH BLENDER COMBO
7. NUTRIBULLET BLENDER
8. NUTRIBULLET 800W JUICER
9. NUTRIBULLET JUICER PRO
10. NUTRIBULLET SLOW JUICER
11. NUTRIBULLET BREW CHOICE POD + CARAFE
12. NUTRIBULLET EVERYGRAIN COOKER
13. NUTRIBULLET GO CORDLESS BLENDER
14. NUTRIBULLET 500 SERIES
15. NUTRIBULLET 600 WATT BLENDER
16. NUTRIBULLET BALANCE
17. NUTRIBULLET LEAN
18. NUTRIBULLET MAX 1200 WATT
19. NUTRIBULLET PRIME 1000 WATT
20. NUTRIBULLET PRO 900
21. NUTRIBULLET PRO+
22. NUTRIBULLET PRO1000 WATT
23. NUTRIBULLET RX
24. NUTRIBULLET SELECT
25. NUTRIBULLET SELECT 2.0
26. NUTRIBULLET 7-CUP FOOD PROCESSOR
27. VEGGIE BULLET
28. NUTRIBULLET COMBO BLENDER *REFURBISHED*
29. NUTRIBULLET BABY FOOD PREP SYSTEM *REFURBISHED*
30. NUTRIBULLET 600 WATT *REFURBISHED*
31. NUTRIBULLET BALANCE *REFURBISHED*
32. NUTRIBULLET PRIME/1000 *REFURBISHED*

All Magic Bullet branded products, including without limitation:

1. MAGIC BULLET
2. MAGIC BULLET AIR FRYER
3. MAGIC BULLET EXPRESS
4. MAGIC BULLET JUICE BULLET
5. MAGIC BULLET DESSERT BULLET
6. MAGIC BULLET KITCHEN EXPRESS

7. MAGIC BULLET KITCHEN EXPRESS BLENDER AND FOOD PROCESSOR COMBO
8. MAGIC BULLET MINI
9. MAGIC BULLET PARTY BULLET
10. MAGIC BULLET *REFURBISHED*

**As of April 25, 2022, the estimated average price of a Covered Product is \$97.92.**