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

SHARAE CASEY,

 Plaintiffs,

 v.

DOCTOR’S BEST, INC.

 Defendant.

Civil Action No. 8:20-CV-01325

**DECLARATION ON BEHALF OF
AMAZON.COM, INC. REGARDING
EMAIL NOTICE**

I, Clarice Cohn, hereby declare as follows:

1. I am over the age of 18 years. I am a Litigation Paralegal at Amazon.com., Inc. (“Amazon”). My responsibilities include investigating, responding to, and managing lawsuits and other legal matters involving Amazon. I make this declaration based on my personal knowledge of the facts contained herein, and, if called as a witness, I could and would competently testify to those facts.

2. Amazon received a subpoena from Plaintiffs in the above-captioned matter seeking, among other things, the production of customer name and contact information for purchasers of certain Doctors Best supplements¹ (the “Supplements”) for the purpose of providing notice of the class action settlement.

¹ The supplements at issue are associated with Amazon Standard Identification Numbers

1 3. To protect its customers' privacy and information, Plaintiffs' counsel and Amazon
2 agreed that Amazon would provide notice of the class action settlement to its customers.

3 4. I am well versed and experienced at searching Amazon's databases and using
4 Amazon's tools to collect sales and customer data. I collected the sales and customer data associated
5 with customers that Amazon's records indicate purchased the Supplements from Amazon's website,
6 in the U.S. marketplace, between July 22, 2016 and February 28, 2022 (the "Purchasers").

7 5. As reflected in Amazon's records, on March 30, 2022, an email was sent out on
8 behalf of, and in the name of, Amazon to those Purchasers (the "Email Message").

9 6. The subject of the Email Message was "Notice Regarding Class Action Settlement."
10 The body of the Email Message was in the following form:

11 Amazon is emailing you because our records indicate that you may have
12 purchased DOCTOR'S BEST GLUCOSAMINE SULFATE 750MG, VEGAN GLUCOSAMINE SULFATE 750MG, SYNERGISTIC
13 GLUCOSAMINE MSM, GLUCOSAMINE CHONDROITIN MSM, VEGAN GLUCOSAMINE CHONDROITIN MSM, AND/OR
14 GLUCOSAMINE CHONDROITIN MSM + HYALURONIC ACID (collectively, the "Products") between July 22, 2016 and February 28, 2022
15 (the "Class Period"). If so, you may be a Settlement Class Member who is entitled to a monetary payment as part of a class action settlement. In *Sharae*
16 *Casey v. Doctor's Best, Inc.*, Case No. 8:20-cv-01325 (C.D. Cal.), a federal court preliminarily approved the settlement of a class action lawsuit
17 involving claims that the Products listed above, sold by Doctor's Best, Inc. ("Doctor's Best"), contain glucosamine hydrochloride and potassium sulfate
18 and are mislabeled as containing Glucosamine Sulfate. Doctor's Best denies all of these claims, denies that it has engaged in any wrongdoing, and claims
19 that the Products were properly labeled in accordance with the Official Methods of Analysis of the Association of Official Analytic Collaboration.
20 Amazon is sending this email as part of notice required by the Court for purchasers of the Products. But because we are not involved in the lawsuit,
21 we cannot assist you directly.

22 As part of the settlement, Doctor's Best has agreed not to represent that the Products contain Glucosamine Sulfate unless they actually contain
23 Glucosamine Sulfate. Doctor's Best will pay Settlement Class Members a partial refund of either:

- 24 • FIVE DOLLARS (\$5.00) per Product package purchased during the Class Period WITHOUT proof of purchase, up to a maximum of twenty-five
25 dollars (\$25.00) per Household; OR
- 26 • an amount equal to 60% OF THE PURCHASE PRICE for each Product package purchased during the Class Period WITH proof of purchase, for

27 B000I4C0J2, B00IA4PCQU, B01IL2GI4U, B000LOXX6S, B004GW65ZM, B00NO04OPA,
28 B000NRYU4W, B000I4DFAK, B01066KSOA, B00KH6Q8X0, B07MPZF8C9, B006UDGRAS, and B07T7VH6KK.

1 8. As reported by Amazon's database, the Email Message was successfully delivered
2 1,037,466 times -- equating to a 99.9% successful delivery rate.

3

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct, and this declaration was executed this ____ day of May 2022, in
6 Seattle, Washington.

7

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By:

9

DocuSigned by:

Clarice Cohn

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Clarice Cohn 915E52F418C04C0...
Litigation Paralegal

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