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6 Attorneys for Plaintiffs Clint Eastwood  
7 and Garrapata, LLC

8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 CLINT EASTWOOD, an individual;  
12 GARRAPATA, LLC, a California limited  
liability company,

13 Plaintiffs,

14 vs.

15  
16 SERA LABS, INC., a Delaware  
corporation; GREENDIOS dba  
17 EUPHORIC, a California corporation;  
18 FOR OUR VETS, LLC dba PATRIOT  
SUPREME, an Arizona limited liability  
19 company; DOES 1-30, inclusive,

20 Defendants.  
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22  
23  
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25

Case No.:

**COMPLAINT FOR DAMAGES**

1. VIOLATION OF CALIFORNIA  
CIVIL CODE SECTION 3344;  
2. VIOLATION OF COMMON LAW  
RIGHT OF PUBLICITY;  
3. FALSE ENDORSEMENT  
UNDER THE LANHAM ACT  
(15 U.S.C. § 1125(A));  
4. TRADEMARK INFRINGEMENT  
(15 U.S.C. § 1114(1)(A));  
5. COMMON LAW TRADEMARK  
INFRINGEMENT;  
6. DEFAMATION;  
7. FALSE LIGHT INVASION OF  
PRIVACY

**DEMAND FOR JURY TRIAL**

1 Plaintiffs Clint Eastwood and Garrapata, LLC, by and through their  
2 undersigned attorneys, allege upon knowledge as to themselves and their own acts  
3 and allege upon information and belief as to all other matters, bring this Complaint.

#### 4 INTRODUCTION

5 1. For more than 60 years, Clint Eastwood has been one of the most  
6 famous actors, producers, and directors in the world. Mr. Eastwood is fiercely  
7 protective of his name and image, and has rarely licensed either for the promotion of  
8 products outside of the movies he acted in or directed. Like many of his most famous  
9 characters, Mr. Eastwood is not afraid to confront wrongdoing and hold accountable  
10 those that try to illegally profit off his name or likeness. Indeed, Mr. Eastwood  
11 previously litigated and won a jury trial against the National Enquirer, which was  
12 affirmed on appeal, after the tabloid falsely claimed to have exclusively interviewed  
13 Mr. Eastwood and misappropriated his name, likeness, and personality to promote  
14 and sell its product.

15 2. This action arises from an online scam that uses a false, defamatory, and  
16 wholly fabricated “news article” about Mr. Eastwood to promote and sell cannabidiol  
17 (“CBD”) products. Under the headline “Big Pharma In Outrage Over Clint  
18 Eastwood’s CBD: [Name of CBD Product] - He Fires Back With This!”, the  
19 fraudulent “article” prominently features photographs of Mr. Eastwood and  
20 references a fabricated interview with Mr. Eastwood in which he touts his purported  
21 line of CBD products. In truth, Mr. Eastwood has no connection of any kind  
22 whatsoever to any CBD products and never gave such an interview. Examples of the  
23 fraudulent “article” are below and attached hereto as **Exhibits 1 and 2**.



**PARTIES**

7. Plaintiff Clint Eastwood is an individual and resident of Los Angeles County, California.

8. Plaintiff Garrapata, LLC (“Garrapata”) is a California limited liability company with its principal place of business in Los Angeles County, California. By assignment from Mr. Eastwood, Garrapata holds all trademarks related to Mr. Eastwood and Mr. Eastwood’s name and likeness rights apart from those he grants in connection with the promotion and exploitation of the films he makes. Garrapata and Mr. Eastwood are referred to collectively herein as “Plaintiffs.”

9. Defendant Sera Labs, Inc. is a Delaware corporation with its principal place of business in Los Angeles County, California. It is the manufacturer, distributor, and seller of CBD products called Sera Relief.

10. Defendant Greendios is a California corporation that does business as Euphoric with its principal place of business in Los Angeles County, California. It is the manufacturer, distributor, and seller of CBD products called Euphoric CBD.

11. Defendant For Our Vets, LLC is an Arizona limited liability company that does business as Patriot Supreme with its principal place of business in Maricopa County, Arizona. It is the manufacturer, distributor, and seller of CBD products called Patriot Supreme.

12. Plaintiffs are unaware of the true names and capacities of defendants, whether individual, corporate, associate, or otherwise, named herein as Does 1 through 30, inclusive, and therefore sue said defendants by such fictitious names (the “Doe Defendants”). Plaintiffs will seek leave to amend this Complaint to state when their true names and capacities are ascertained. (All of the Defendants, including the Doe Defendants, collectively are referred to herein as “Defendants”).

13. At all times mentioned in this Complaint, all of the Defendants acted in concert to knowingly cause, facilitate, control, induce, or otherwise participate in the



1 wrongful conduct alleged herein.

## 2 **JURISDICTION AND VENUE**

3 14. The Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and  
 4 1338(a). This is a civil action arising under federal law, the Lanham Act of 1946 as  
 5 amended (codified at 15 U.S.C. §§ 1051, *et seq.*). The pendent state law claims are so  
 6 related to the federal claims that they form part of the same case or controversy  
 7 pursuant to Article III of the United States Constitution. The Court therefore has  
 8 supplemental jurisdiction over those claims pursuant to 28 U.S.C. § 1367(a).

9 15. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)  
 10 for several independent reasons, including: several of the Defendants “reside” in this  
 11 judicial district for venue purposes under 28 U.S.C. § 1391(c)(2); a substantial part of  
 12 the events or omissions giving rise to the claims occurred in this district.

## 13 **GENERAL ALLEGATIONS**

### 14 **Clint Eastwood**

15 16. Clint Eastwood is recognized around the world as an icon of the  
 16 entertainment industry. After rising to fame in the 1950s as the star of the TV series  
 17 *Rawhide*, Mr. Eastwood became one of the world’s biggest movie stars with his roles  
 18 as the “Man With No Name” in a series of Westerns in the late 1960s and the *Dirty*  
 19 *Harry* films of the 1970s and 80s. In 1971, Mr. Eastwood directed his first of more  
 20 than 30 motion pictures, including the Academy Award winning Best Pictures  
 21 *Unforgiven* (1992) and *Million Dollar Baby* (2004). In addition to his successful  
 22 career in the entertainment industry, Mr. Eastwood served as the mayor of Carmel-  
 23 by-the-Sea in the late-1980s. In 2006, Mr. Eastwood was inducted into the California  
 24 Hall of Fame located at The California Museum for History, Women, and the Arts.  
 25 According to fellow Academy Award winner Sean Penn, Mr. Eastwood “has become  
 26 cinema’s Mount Rushmore . . . [and] the embodiment of American film.”

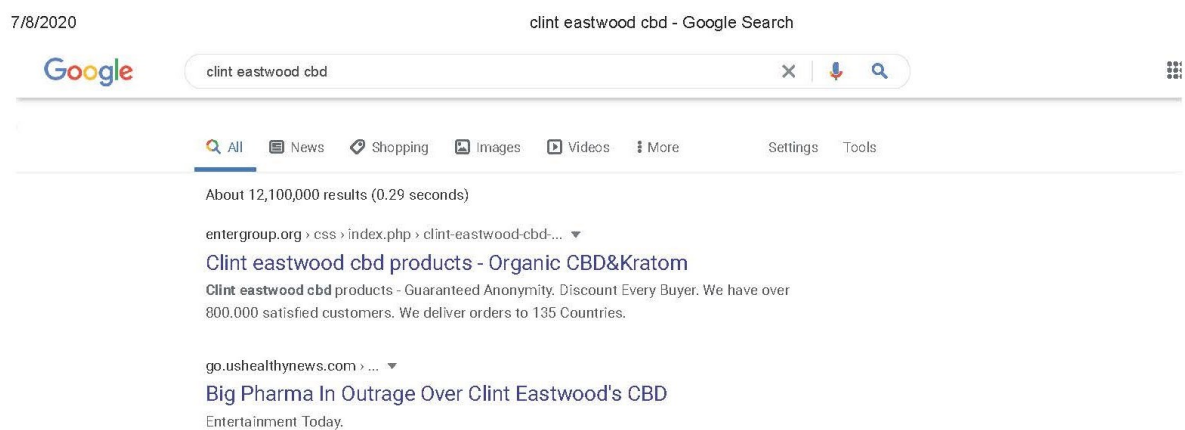
27 17. Mr. Eastwood has a long-standing history of rejecting third party  
 28

1 licenses. With rare exception, Mr. Eastwood reserves the exploitation of his  
 2 personality rights and the goodwill associated therewith for his motion pictures and  
 3 other entertainment related projects, and for business ventures in which he is  
 4 personally involved.

5 18. Mr. Eastwood does not have, and never has had, any association with the  
 6 manufacture, promotion, and/or sale of any CBD products.

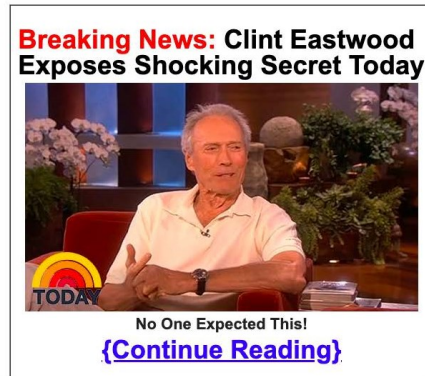
### 7 **The Fraudulent Article**

8 19. Among the top results of an online search for “Clint Eastwood CBD” is  
 9 a website for go.ushealthynews.com, with the headline “Big Pharma in Outrage over  
 10 Clint Eastwood’s CBD.” Below and attached hereto as **Exhibit 3** is a true and  
 11 correct image of such a Google search.



18 20. In addition, Defendants send emails with the subject line, “Clint  
 19 Eastwood Exposes Shocking Secret Today.” In the body of the email is an apparent  
 20 article from NBC’s Today show with a picture of Mr. Eastwood under the headline  
 21 “Breaking News: Clint Eastwood Exposes Shocking Secret Today.” Below and  
 22 attached hereto as **Exhibit 4** is a true and correct copy of one of the spam emails.  
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From: Insider News Channel <subscriptions@shakerica.casa>  
 Sent: Tuesday, July 7, 2020 7:33 AM  
 Subject: Clint Eastwood Exposes Shocking Secret Today



To unsubscribe [click here](#).  
 Or write to:  
 999 Corporate Dr., Suite 100 Ladera Ranch, CA 92694

21. When one clicks on the link for go.ushealthynews.com in the online search results or the purported Today show report in the spam email, it takes the consumer to a website featuring a fraudulent “news article” purportedly written by a journalist named Alice Palmer that is automatically programmed to appear as if the article was published on the date that a user views the website. The content of the article generally remains the same, even when the header of the website varies. For example, the website URL is sometimes allocated to www.go.ushealthynews.com, but the header of the website sometimes makes it appear as if it was published by “Entertainment Today.” Other times, the website URL is allocated to usmagazine-trending-news.com to make it appear that the article is associated with US Weekly magazine. Attached as **Exhibits 1, 2, 5, 6, 7, 8, 9** are examples of the fraudulent “article”.

22. The CBD products advertised and sold on the fraudulent “article” include Sera Relief (**Exhibit 1**), Euphoric CBD (**Exhibit 2, 5, 6**), and Patriot Supreme (**Exhibit 8**).

23. Other than the names of the products being advertised and sold, the verbiage of the fraudulent “article” does not change substantially, stating among

1 other things:

2 In an emotional 1-on-1 interview, one of America's most  
3 respected icons revealed that he wouldn't be where he is without  
4 CBD. We all know and love Clint Eastwood as the charismatic  
5 actor and director who has never been shy about advocating for  
6 marijuana use. He has always been focused on making movies,  
7 going on tour, and promoting America. However, he shocked  
8 everyone when he announced his new CBD line, [CBD product],  
9 would be the next step in his career.

10 In recent developments, Eastwood revealed that he would be  
11 stepping away from the spotlight to put more time into his  
12 wellness business, now that it has grown so fast:

13 “This was a really, really difficult decision for me. When I started  
14 this whole thing back in 2015, it really was just a part time  
15 passion project and a way for me to give back. Now here we are  
16 almost 5 years later and [CBD product] has steadily grown into  
17 a full-fledged business that’s helped thousands of people become  
18 pain free and much happier. My line gives me a chance to do  
19 something bigger than movies and I knew I would regret it for  
20 the rest of my life if I let that opportunity pass me by.”

21 Eastwood went on to say that he never really expected things to  
22 get this big and that several studios and sponsors were furious  
23 that he was splitting up his time. In fact, relations with some  
24 studios grew so tense that they ended up giving him an ultimatum  
25 - acting or his wellness line. . . .

26 The product Eastwood is referring to is his breakthrough CBD  
27 wellness line [CBD product]. The star has spent the past four  
28 years developing a line of highly effective and highly potent  
wellness products that he claims are the solution for those who  
don’t want to resort to using opiates.

His product [CBD product] sold out within ten minutes when  
first launched and it seems the world can’t get enough of the  
benefits and results.

1 Eastwood even admitted that big pharma companies are furious  
2 with him after noticing a large decline in sales since [CBD  
3 product] was launched on the market.

4 “Users of [CBD product] are experiencing results that before  
5 now were only possible through prescription medication. It’s  
6 obviously a much cheaper, and safer alternative and because of  
7 that pharmaceutical companies are finding it harder to keep  
8 patients using their prescriptions.”

9 Having a crowd of angry pharmaceutical companies is a unique  
10 and effective endorsement for [CBD product], but Eastwood has  
11 still been proactive in getting [CBD product] into the hands of  
12 those who need it. . . .

13 While making an appearance on ‘TV Show’ he gifted the cast  
14 and crew with [CBD product] products and made sure every  
15 guest was given a sample of the life changing supplement. Since  
16 then, he has cultivated a huge celebrity clientele who are  
17 regularly reordering the products. See for yourself!

18 24. The fraudulent “article” further states: “Eastwood’s new line has been a  
19 huge hit amongst fellow celebs who got to try the initial launch of [CBD product]”  
20 followed by a series of false testimonials from Terry Bradshaw, Sam Elliott, Michael  
21 J. Fox, and Garth Brooks about Mr. Eastwood’s purported CBD product. The  
22 fraudulent “article” concludes with a false claim that “Eastwood is offering our lucky  
23 readers the chance to try [CBD product]!” and urging people to purchase the product.

24 25. Links on the webpage allow the viewer to purchase the CBD products  
25 being touted by Mr. Eastwood.

### 26 **FIRST CLAIM FOR RELIEF**

#### 27 **(Violation of Cal. Civ. Code § 3344 – Garrapata Against All Defendants)**

28 26. Plaintiffs incorporate all prior allegations of this Complaint by this  
reference.

27 27. Garrapata is the owner of the rights of publicity in Mr. Eastwood’s

1 name, image, likeness, and persona for all purposes, other than those related to the  
2 promotion and exploitation of the motion pictures Mr. Eastwood makes.

3 28. Defendants have willfully and without authorization used Mr.  
4 Eastwood's name, image, likeness, and persona for commercial purposes, to advertise  
5 CBD products including Sera Relief, Euphoric CBD, and Patriot Supreme, which are  
6 manufactured, distributed and/or sold by Defendants and each of them.

7 29. Defendants' unauthorized use of Mr. Eastwood's name, image, likeness,  
8 and persona constitute a commercial misappropriation in violation of Section 3344 of  
9 the California Civil Code.

10 30. As a direct and proximate result of Defendants' wrongful conduct,  
11 Garrapata has suffered, and will continue to suffer, damages in an amount to be  
12 proven at trial.

13 31. Defendants have further been unjustly enriched by their  
14 misappropriation of Mr. Eastwood's statutory right of publicity. Accordingly,  
15 Garrapata is entitled to restitution of all income, profits, and other benefits resulting  
16 from Defendants' conduct, in an amount to be determined according to proof at trial.

17 32. Defendants' actions as alleged herein were malicious, oppressive, and  
18 fraudulent, and done with the intent to injure Plaintiffs and with a willful and  
19 conscious disregard for Garrapata's rights. As a result, Garrapata is entitled to  
20 recover from Defendants punitive and exemplary damages in an amount sufficient to  
21 punish and deter them and others from engaging in such acts in the future.

## 22 **SECOND CLAIM FOR RELIEF**

### 23 **(Violation of Common Law Right of Publicity – Garrapata Against All** 24 **Defendants)**

25 33. Plaintiffs incorporate all prior allegations of this Complaint by this  
26 reference.

27 34. Garrapata is the owner of the common law rights of publicity in Mr.  
28

1 Eastwood's name, image, likeness, and persona necessary for endorsement deals.

2 35. Defendants have willfully and without authorization used Mr.  
3 Eastwood's name, image, likeness, and persona for commercial purposes, to advertise  
4 and promote the sale of CBD products including Sera Relief, Euphoric CBD, and  
5 Patriot Supreme, which are manufactured, distributed and/or sold by Defendants and  
6 each of them.

7 36. Defendants' unauthorized use of Mr. Eastwood's name, image, likeness,  
8 and persona constitutes a violation of California's common law right of publicity.

9 37. As a direct and proximate result of Defendants' wrongful conduct,  
10 Garrapata has suffered, and will continue to suffer, damages in an amount to be  
11 proven at trial.

12 38. Defendants have further been unjustly enriched by their infringement of  
13 Plaintiffs' common law right of publicity. Accordingly, Garrapata is entitled to  
14 restitution of all income, profits, and other benefits resulting from Defendants'  
15 conduct, in an amount to be determined according to proof at trial.

16 39. Defendants' actions as alleged above were malicious, oppressive, and  
17 fraudulent, and done with the intent to injure Plaintiffs and with a willful and  
18 conscious disregard for Garrapata's rights. As a result, Garrapata is entitled to  
19 recover from Defendants punitive and exemplary damages in an amount sufficient to  
20 punish and deter Defendants and others from engaging in such acts in the future.

### 21 **THIRD CLAIM FOR RELIEF**

#### 22 **(False Endorsement (15 U.S.C. § 1125(a)) – Garrapata Against All Defendants)**

23 40. Plaintiffs incorporate all prior allegations of this Complaint by this  
24 reference.

25 41. Garrapata is the owner of the statutory and common law rights  
26 associated with Mr. Eastwood's name, image, likeness, and persona necessary for  
27 endorsement deals, including Mr. Eastwood's right to decide whether to associate  
28



1 Mr. Eastwood's name, image, likeness, or persona with any third party for purposes  
2 relating to sponsorship and/or endorsement.

3 42. Defendants used distinctive attributes of Mr. Eastwood's persona,  
4 including his name, image, and likeness without permission by posting online a false  
5 "news article" that included images of Mr. Eastwood and false quotes from Mr.  
6 Eastwood and other celebrities regarding a purported line of CBD products created  
7 by Mr. Eastwood.

8 43. Defendants' unauthorized uses constitute false or misleading  
9 representations of fact to falsely imply the endorsement of Defendants' businesses  
10 and products by Mr. Eastwood.

11 44. Defendants' unauthorized uses of Mr. Eastwood's persona are likely to  
12 confuse and deceive consumers as to Mr. Eastwood's sponsorship and/or  
13 endorsement of Defendants' CBD products. Specifically, Defendants' use of Mr.  
14 Eastwood's name, image, and likeness is likely to cause consumers to mistakenly  
15 believe that Mr. Eastwood is associated with Defendants' CBD products, or that he  
16 sponsors or endorses Defendants' products.

17 45. As a direct and proximate result of the acts of false endorsement set  
18 forth above, Garrapata has suffered actual damages in an amount to be proven at trial.

19 46. Garrapata is entitled to the full range of relief available under the  
20 Lanham Act, 15 U.S.C. § 1117, including, without limitation, an award of actual  
21 damages and the disgorgement of Defendants' profits arising from their false or  
22 misleading acts.

23 47. Defendants' conduct further renders this an "exceptional" case within  
24 the meaning of the Lanham Act, thus entitling Garrapata to an award of attorneys'  
25 fees and costs.

26 48. Defendants committed the unauthorized acts described above knowing  
27 that they are likely to cause consumers to falsely believe that Mr. Eastwood endorses  
28

1 Defendants' brands and products. Defendants have thus willfully, knowingly, and  
2 maliciously deceived and confused the relevant consuming public, such that  
3 Garrapata is entitled to an award of treble damages.

4 **FOURTH CLAIM FOR RELIEF**

5 **(Trademark Infringement (15 U.S.C. § 1114(1)) – Garrapata Against All**  
6 **Defendants)**

7 49. Plaintiffs incorporate all prior allegations of this Complaint by this  
8 reference.

9 50. Garrapata has selectively used the trademark CLINT EASTWOOD in  
10 commerce in connection with products and services.

11 51. Garrapata owns a federally registered trademark U.S. Registration No.  
12 3265483 in Mr. Eastwood's name for "Entertainment services, namely, personal  
13 appearances and live performance and live recorded performances by a movie star  
14 and actor" (the "Registered Mark"). A true and correct copy of Garrapata's  
15 Trademark Certificate from the United States Patent and Trademark Office is  
16 attached hereto as **Exhibit 10**.

17 52. The Registered Mark is a valid trademark owned by Garrapata.  
18 Additionally, by virtue of Mr. Eastwood's longstanding and continuous use of the  
19 Registered Mark in commerce, Garrapata has acquired a valid common law  
20 trademark in Mr. Eastwood's name. The public has come to recognize the Registered  
21 Mark as exclusively identifying Mr. Eastwood, and the mark is famous worldwide.

22 53. Defendants infringed Garrapata's registered and common law  
23 trademarks by using the mark on the internet, including the fraudulent "article," to  
24 promote Defendants' brands and to sell their CBD products.

25 54. Defendants' unauthorized use of Garrapata's registered and common  
26 law trademarks are likely to confuse and deceive consumers as to the origin,  
27 sponsorship, and/or endorsement of Defendants' CBD brands and products.

Specifically, Defendants' use of Mr. Eastwood's name and mark is likely to cause consumers to mistakenly believe that Mr. Eastwood is associated with Defendants, or that he sponsors or endorses Defendants' products.

55. As a direct and proximate result of the acts of trademark infringement set forth above, Garrapata has suffered actual damages in an amount to be proven at trial.

56. Garrapata is entitled to the full range of relief available under the Lanham Act, 15 U.S.C. § 1117, including, without limitation, an award of actual damages and the disgorgement of Defendants' profits arising from the acts of trademark infringement.

57. Defendants' conduct further renders this an "exceptional" case within the meaning of the Lanham Act, thus entitling Garrapata to an award of attorneys' fees and costs.

58. Defendants committed the infringement described above knowing that their unauthorized use of the CLINT EASTWOOD trademark is likely to cause consumer confusion. Defendants have thus willfully, knowingly, and maliciously deceived and confused the relevant consuming public, such that Garrapata is entitled to an award of treble damages.

#### **FIFTH CLAIM FOR RELIEF**

##### **(Common Law Trademark Infringement – Garrapata Against All Defendants)**

59. Plaintiffs incorporate all prior allegations of this Complaint by this reference.

60. Garrapata owns a valid common law trademarks in CLINT EASTWOOD for use in connection with the promotion of products and services in the entertainment industry.

61. The Registered Trademark is likewise a valid trademark owned by Garrapata.



- 1 line, [CBD product], would be the next step in his career”;
- 2 d. “Eastwood revealed that he would be stepping away from the spotlight
- 3 to put more time into his wellness business”;
- 4 e. “several studios and sponsors were furious that he was splitting up his
- 5 time”;
- 6 f. “relations with some studios grew so tense that they ended up giving
- 7 him an ultimatum - acting or his wellness line”;
- 8 g. “The product Eastwood is referring to is his breakthrough CBD wellness
- 9 line [CBD product]”;
- 10 h. “The star has spent the past four years developing a line of highly
- 11 effective and highly potent wellness products that he claims are the
- 12 solution for those who don’t want to resort to using opiates”;
- 13 i. “Eastwood even admitted that big pharma companies are furious with
- 14 him after noticing a large decline in sales since [CBD product] was
- 15 launched on the market”;
- 16 j. “Eastwood has still been proactive in getting [CBD product] into the
- 17 hands of those who need it”;
- 18 k. “While making an appearance on ‘TV Show’ he gifted the cast and crew
- 19 with [CBD product] and made sure every guest was given a sample of
- 20 the life changing supplement”;
- 21 l. “he has cultivated a huge celebrity clientele who are regularly reordering
- 22 the products”;
- 23 m. “Eastwood’s new line has been a huge hit amongst fellow celebs who
- 24 got to try the initial launch of [CBD product]”;
- 25 n. “Eastwood didn’t want our readers to miss out on experiencing the
- 26 benefits of [CBD product] for themselves”;
- 27 o. “Eastwood is offering our lucky readers the chance to try [CBD
- 28

1 product]!”;

2 p. “Eastwood can only offer a limited amount of special bottles so you’ll  
3 need to act quickly to take advantage of this amazing offer”.

4 69. The fraudulent “article” also contains false statements of fact that are  
5 attributed to Mr. Eastwood himself, including: ““When I started this whole thing back  
6 in 2015, it really was just a part time passion project and a way for me to give back.  
7 Now here we are almost 5 years later and [CBD product] has steadily grown into a  
8 full-fledged business that’s helped thousands of people become pain free and much  
9 happier. My line gives me a chance to do something bigger than movies and I knew I  
10 would regret it for the rest of my life if I let that opportunity pass me by.””

11 70. The fraudulent “article” also contains false statements of fact that are  
12 attributed to other celebrities including, Terry Bradshaw (““Eastwood gave me a  
13 sample of [CBD product]”) and Michael J. Fox (““The advances Eastwood has made  
14 in the CBD industry are remarkable.””).

15 71. The statements in the foregoing paragraphs 68 through 70, which are  
16 referred to collectively herein as the “False Statements,” are unprivileged, false, and  
17 defamatory.

18 72. The False Statements are of and concerning Mr. Eastwood in that they  
19 falsely allege that Mr. Eastwood (1) uses CBD products; (2) attributes his health  
20 and/or successful career to his purported use of CBD products; (3) developed and  
21 announced a line of CBD products; (4) CBD products would be the next step in Mr.  
22 Eastwood’s career; (5) will step away from his entertainment career to put more time  
23 into his purported wellness business; (6) started a purported CBD business in 2015 as  
24 a passion project; (7) his purported CBD products are a full-fledged business; (8) film  
25 studios and sponsors are angry that Mr. Eastwood is splitting his time on his  
26 purported CBD business; (8) some film studios gave Mr. Eastwood an ultimatum; (9)  
27 pharmaceutical companies are angry with Mr. Eastwood because of his purported  
28

1 CBD products; (10) has been proactive in delivering his purported CBD products to  
2 people including other celebrities; (11) is selling his purported CBD products online  
3 through the fraudulent “article’s” websites.

4 73. The False Statements were made with actual malice in that they were  
5 made with knowledge of their falsity and/or in reckless disregard for the truth.

6 74. The False Statements exposed Mr. Eastwood to hatred, contempt,  
7 ridicule, and obloquy and/or harmed Mr. Eastwood in his trade or profession.

8 75. As a direct and proximate result of Defendants’ conduct, Mr. Eastwood  
9 has suffered general and special damages in an amount to be determined at trial.

10 76. The creators and publishers of the False Statements acted with malice or  
11 reckless disregard for Mr. Eastwood’s rights, thereby justifying an award of punitive  
12 damages.

13 77. Unless enjoined and restrained by the Court, Defendants will republish,  
14 repeat and continue to disseminate the False Statements to the continuing injury of  
15 Mr. Eastwood. Such continued republication, repetition, and dissemination of the  
16 False Statements will cause irreparable harm to Mr. Eastwood. Mr. Eastwood lacks  
17 an adequate remedy at law insofar as damages will be very difficult to calculate for  
18 such on-going injuries. By reason of the foregoing, Mr. Eastwood is entitled to  
19 preliminary and permanent injunctions enjoining and restraining Defendants, and all  
20 persons acting in concert with them, from republishing, repeating, distributing or  
21 otherwise disseminating the False Statements set forth herein.

## 22 **SIXTH CLAIM FOR RELIEF**

### 23 **(False Light Invasion of Privacy – Mr. Eastwood Against All Defendants)**

24 78. Mr. Eastwood incorporates all prior allegations of this Complaint by  
25 this reference.

26 79. Defendants published the False Statements set forth in Paragraphs 68  
27 through 70 herein.



1           80. The False Statements are of and concerning Mr. Eastwood in that they  
2 allege that Mr. Eastwood (1) uses CBD products; (2) attributes his health and/or  
3 successful career to his purported use of CBD products; (3) developed and announced  
4 a line of CBD products; (4) CBD products would be the next step in Mr. Eastwood's  
5 career; (5) will step away from his entertainment career to put more time into his  
6 purported wellness business; (6) started a purported CBD business in 2015 as a  
7 passion project; (7) his purported CBD products are a full-fledged business; (8) film  
8 studios and sponsors are angry that Mr. Eastwood is splitting his time on his  
9 purported CBD business; (8) some film studios gave Mr. Eastwood an ultimatum; (9)  
10 pharmaceutical companies are angry with Mr. Eastwood because of his purported  
11 CBD products; (10) has been proactive in delivering his purported CBD products to  
12 people including other celebrities; (11) is selling his purported CBD products online  
13 through the fraudulent "article's" websites.

14           81. The False Statements are unprivileged and false.

15           82. To the extent that all or any of the False Statements are found not to be  
16 defamatory of Mr. Eastwood, the False Statements place Mr. Eastwood in a false  
17 light which would be highly offensive to a reasonable person in Mr. Eastwood's  
18 position.

19           83. The False Statements were made with actual malice in that they were  
20 made with knowledge of their falsity and/or in reckless disregard for the truth.

21           84. As a direct and proximate result of Defendants' conduct, Mr. Eastwood  
22 has suffered general and special damages in an amount to be determined at trial.

23           85. The creators and publishers of the False Statements acted with malice or  
24 reckless disregard for Mr. Eastwood's rights, thereby justifying an award of punitive  
25 damages.

26           86. Unless enjoined and restrained by the Court, Defendants will republish,  
27 repeat and continue to disseminate the False Statements to the continuing injury of  
28

1 Mr. Eastwood. Such continued republication, repetition, and dissemination of the  
2 False Statements will cause irreparable harm to Mr. Eastwood. Mr. Eastwood lacks  
3 an adequate remedy at law insofar as damages will be very difficult to calculate for  
4 such on-going injuries. By reason of the foregoing, Mr. Eastwood is entitled to  
5 preliminary and permanent injunctions enjoining and restraining Defendants, and all  
6 persons acting in concert with them, from republishing, repeating, distributing or  
7 otherwise disseminating the False Statements set forth herein.

8  
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiffs pray for judgment as follows:

- 11 1. On all Claims for Relief, for an award of actual and compensatory  
12 damages in the millions of dollars according to proof;
- 13 2. On the First through Fifth Claims for Relief, for the disgorgement of  
14 Defendants' profits attributable to the infringement of Garrapata's intellectual  
15 property rights and rights of publicity;
- 16 3. On the First, Second, Sixth, and Seventh Claims for Relief, for an award  
17 of punitive damages in an amount sufficient to deter unlawful conduct by Defendants  
18 in the future;
- 19 4. On the Third and Fourth Claims for Relief, for treble damages;
- 20 5. For preliminary and permanent injunctions restraining and enjoining  
21 Defendants, and all persons acting in concert with them, from using Mr. Eastwood's  
22 name, images, likeness, persona, and trademarks;
- 23 6. For preliminary and permanent injunctions restraining and enjoining  
24 Defendants, and all persons acting in concert with them, from republishing,  
25 repeating, distributing, or otherwise disseminating the False Statements set forth  
26 herein;
- 27 7. For pre-judgment and post-judgment interest according to proof and to  
28


1 the maximum extent allowed by law;

2 8. For attorneys' fees and costs; and

3 9. For such other and further relief as the Court may deem just and proper.

4  
5 Dated: July 22, 2020

NOLAN HEIMANN LLP


6  
7 By:   
8 Jordan Susman  
9 Attorneys for Plaintiffs  
Clint Eastwood  
and Garrapata, LLC

**DEMAND FOR JURY TRIAL**

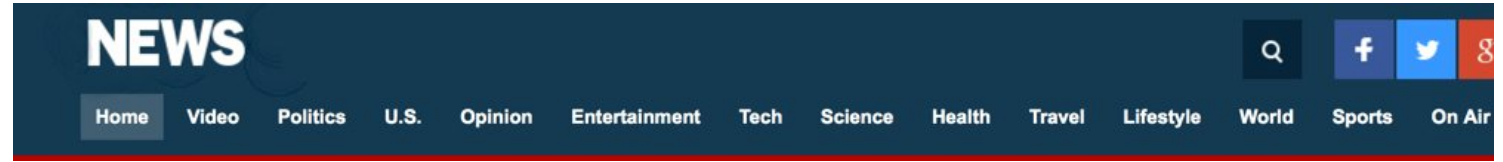
Pursuant to Local Rule 38-1, Plaintiffs hereby demand a trial by jury on all issues so triable.

Dated: July 22, 2020

NOLAN HEIMANN LLP

By:   
Jordan Susman  
Attorneys for Plaintiffs  
Clint Eastwood  
and Garrapata, LLC

# EXHIBIT 1



HEALTH

# Big Pharma In Outrage Over Clint Eastwood's CBD: Sera Relief CBD Gummies - He Fires Back With This!



By Alice Palmer, Wednesday, May 6, 2020



In an emotional 1-on-1 interview, one of America's most respected icons revealed that he wouldn't be where he is without CBD.

We all know and love Clint Eastwood as the charismatic actor and director who has never been shy about advocating for marijuana use. He has always been focused on making movies, going on tour, and promoting America. However, he shocked everyone when he announced his new CBD line, **Sera Relief CBD Gummies**, would be the next step in his career.

In recent developments, Eastwood revealed that he would be stepping away from the spotlight to put more time into his wellness business, now that it has grown so fast:

*"This was a really, really difficult decision for me. When I started this whole thing back in 2015, it really was just a part time passion project and a way for me to give back. Now here we are almost 5 years later and **Sera Relief CBD Gummies** has steadily grown into a full-fledged business that's helped thousands of people become pain free and much happier. My line gives*

*I would regret it for the rest of my*



Mariane from Chicago, US ordered:  
**Sera Relief CBD Gummies Bottle - 8 seconds ago**

things to get this big and that splitting up his time. In fact, relations with some studios grew so tense that **they ended up giving him an ultimatum -**

## YOU MAY ALSO LIKE

We Say Goodbye To LeBron James



**BREAKING NEWS**

Fans in mourning as tragedy comes to Hollywood... [\[READ MORE\]](#)

## READERS RESULTS



"The **Sera Relief CBD Gummies** are the absolute best CBD product I've ever tried. Thought my days of feeling young were long gone. I can't thank you enough for this!"

**Lacey Johnson, New York, NY**



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relationships with some studies grow so close that they ended up giving him an ultimatum: acting or his wellness line.

He knew he would receive scrutiny from fans and sponsors for quitting, but he felt it was time to work on something that would positively change the lives of millions of people.



Eastwood appears on *TV Show* to announce his biggest project yet

The product Eastwood is referring to is his breakthrough CBD wellness line **Sera Relief CBD Gummies**. The star has spent the past four years developing a line of highly effective and highly potent wellness products that he claims are the solution for those who don't want to resort to using opiates.

**His product Sera Relief CBD Gummies sold out within ten minutes when first launched** and it seems the world can't get enough of the benefits and results.

Eastwood even admitted that big pharma companies are furious with him after noticing a large decline in sales since **Sera Relief CBD Gummies** was launched on the market.

*"Users of Sera Relief CBD Gummies are experiencing results that before now were only possible through prescription medication. It's obviously a much cheaper, and safer alternative and because of that pharmaceutical companies are finding it harder to keep patients using their prescriptions."*

Having a crowd of angry pharmaceutical companies is a unique and effective endorsement for **Sera Relief CBD Gummies**, but Eastwood has still been proactive in getting **Sera Relief CBD Gummies** into the hands of those who need it.

**Sera Relief CBD Gummies has been found to have a positive impact on key body functions including - neurological, physical, and psychological.**

Th



Mariane from Chicago, US ordered:  
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- Supports Joint Health

"I've been trying to get rid of my joint pain for decades. I can finally live a normal life thanks to this!"

**Clifton Carter, Austin, TX**

### Sera Relief CBD Gummies

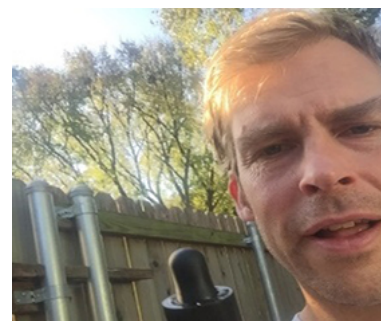


Try Sera Relief CBD Gummies n



"For the first time in forever I am finally happy when I look in the mirror every morning. I haven't felt this good in decades!"

**Lucas Gordon, Philadelphia, PA**



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- Reduces Anxiety
- Reduces Headaches
- Reduces Blood Sugar
- Supports Cognitive Health
- Antioxidant Support

While making an appearance on 'TV Show' he gifted the cast and crew with **Sera Relief CBD Gummies** products and made sure every guest was given a sample of the life changing supplement. Since then, he has cultivated a huge celebrity clientele who are regularly reordering the products. See for yourself!

**Eastwood's new line has been a huge hit amongst fellow celebs who got to try the initial launch of **Sera Relief CBD Gummies**.**

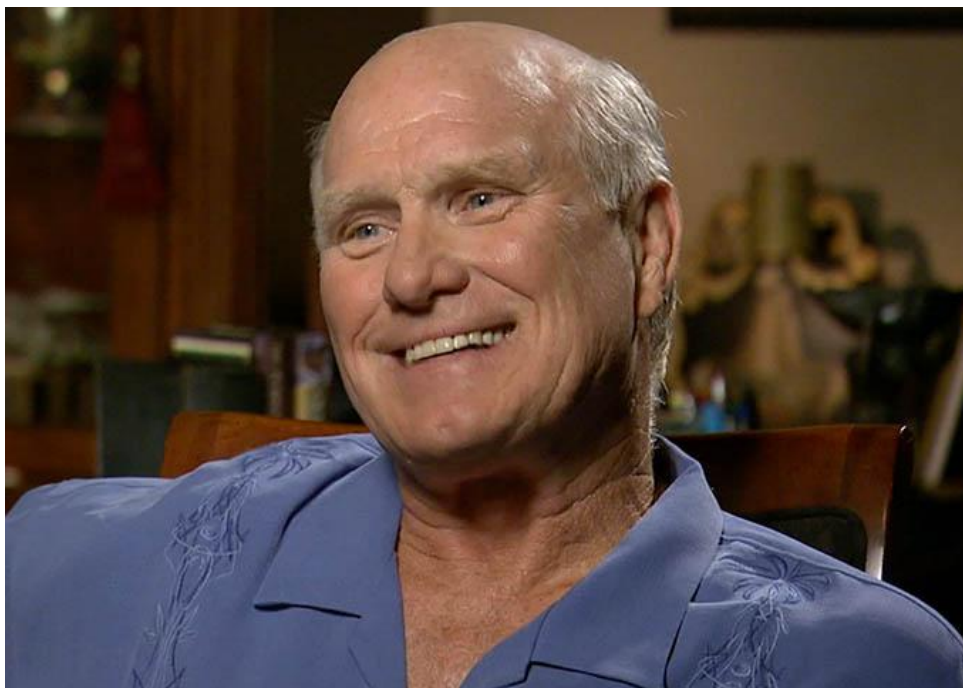
"Thank God I didn't go through w that surgery... I got the same results, for less than a cup of coffee!"

**Jim McKale, Seattle, WA**



"I've only been using **Sera Relief CBD Gummies** for 2 weeks, and love it!!!!!! I have seen a visible change in my appearance and physical health, best of all my husband complimented me after just 2 weeks!!!!"

**Carol Keeton, Denver, CO**

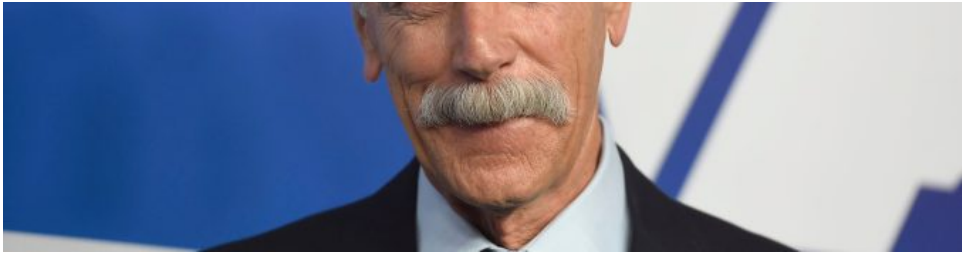


### **Terry Bradshaw**

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### Sam Elliott

"The absolute CURE for aching feet on the red carpet. This miracle makes a long evening or day much more fun. Every night that I use **Sera Relief CBD Gummies** I wake up and have more energy then ever before. I can't believe it."



### Michael J. Fox

"The advances Eastwood has made in the CBD industry are remarkable. I wouldn't believe it if I hadn't had the chance to try it out for myself. After using **Sera Relief CBD Gummies** for two weeks I was already feeling like a new me."



Mariane from Chicago, US ordered:  
**Sera Relief CBD Gummies Bottle - 8 seconds ago**

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## Garth Brooks

"It's hard to believe, but all my chronic pain has vanished! After a few weeks of using **Sera Relief CBD Gummies** I was able to stop taking all over the counter and prescription medications."

## Try It For Yourself!

While **Sera Relief CBD Gummies** is selling out around the world, Eastwood didn't want our readers to miss out on experiencing the benefits of **Sera Relief CBD Gummies** for themselves.

As such, Eastwood is offering our lucky readers the chance to try **Sera Relief CBD Gummies**! There's no need to rush out to the shops or wait in line. You can order your special bottle of the supplement right now from the comfort of your own home.

If you want to finally be free from aches and pains while fostering a much happier mood, make sure you use **Sera Relief CBD Gummies** every day. This product is designed to give you incredible results.

Because of the high demand of **Sera Relief CBD Gummies**, Eastwood can only offer a limited amount of special bottles so you'll need to act quickly to take advantage of this amazing offer.



**UPDATE: ONLY 6 SPECIAL BOTTLES STILL AVAILABLE.** Promotion expected to end: **Wednesday, May 6, 2020**

**CLAIM YOUR SPECIAL BOTTLE!**

## COMMENTS



### Tarah Smith

I keep see this everywhere - has anyone tried it yet? Looking for Results? Let me know!

Reply · 13 · Like · 12 minutes ago



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# EXHIBIT 2





FASHION HEALTH CULTURE BEAUTY

HEALTH

# Big Pharma In Outrage Over Clint Eastwood's CBD: Euphoric CBD Gummies - He Fires Back With This!



By Alice Palmer, Monday, July 6, 2020



(ET) - In an emotional 1-on-1 interview, one of America's most respected icons revealed that he wouldn't be where he is without CBD.

We all know and love Clint Eastwood as the charismatic actor and director who has never been shy about advocating for marijuana use. He has always been focused on making movies, going on tour, and promoting America. However, he shocked everyone when he announced his new CBD line, **Euphoric CBD Gummies**, would be the next step in his career.

In recent developments, Eastwood revealed that he would be stepping away from the spotlight to put more time into his wellness business, now that it has grown so fast:

*"This was a really, really difficult decision for me. When I started this whole thing back in 2015, it really was just a part time passion project and a way for me to give back. Now here we are almost 5 years later and **Euphoric CBD Gummies** has steadily grown into a full-fledged business that's helped thousands of people become pain free and much happier. My line gives me a chance to do something bigger than movies and I knew I would regret it for the rest of my life if I let that opportunity pass me by."*

Eastwood went on to say that he never really expected things to get this big and that several studios and sponsors were furious that he was splitting up his time. In fact, relations with some studios grew so tense that **they ended up giving him an ultimatum** - acting or his wellness line.

He knew he would receive scrutiny from fans and sponsors for quitting, but he felt it was

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**BREAKING NEWS**

British pop singer Ellie Goulding says she really needed the time to recharge and reset. ...[\[READ MORE\]](#)

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## READERS RESULTS



"The **Euphoric CBD Gummies** is absolute best CBD product I've ever tried. Thought my days of feeling young were long gone. I can't thank you enough for this!"

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**Euphoric CBD Gummies has been found to have a positive impact on key body functions including - neurological, physical, and psychological.**

This includes but not limited to:

- Reduces Chronic Pain
- Supports Joint Health
- Reduces Anxiety
- Reduces Headaches
- Reduces Blood Sugar

live a normal life thanks to this:

**Clifton Carter, Austin, TX**

### Euphoric CBD Gummies



Try Euphoric CBD Gummies now



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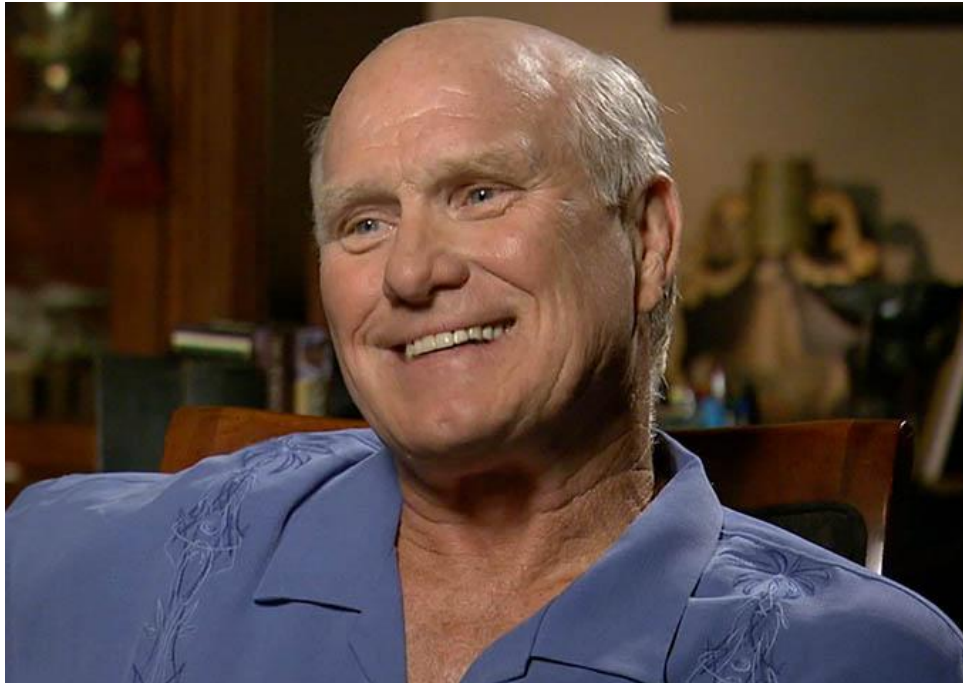
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# EXHIBIT 3



clint eastwood cbd


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Jul 25, 2018 - Clint Eastwood has been a longtime investor in free radical pathology, not many people probably knew until Tuesday when he sued the maker ...

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### Clint Eastwood | Real Time Pain Relief

Pale Rider, Unforgiven, Fistful of Dollars, The Good, the Bad, and the Ugly; you probably can't think of a bad Western movie when it comes to Clint Eastwood.



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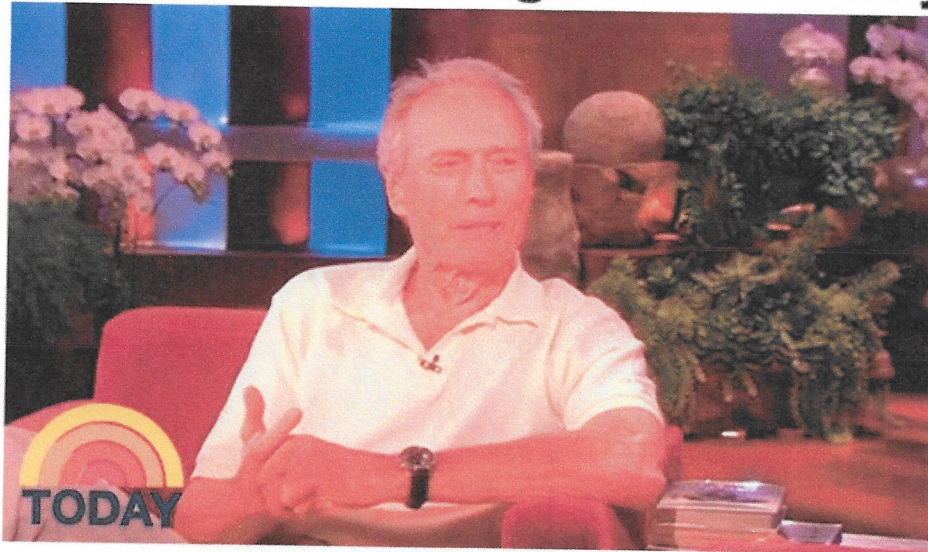
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**Sent:** Tuesday, July 7, 2020 7:33 AM

**Subject:** Clint Eastwood Exposes Shocking Secret Today

## **Breaking News: Clint Eastwood Exposes Shocking Secret Today**



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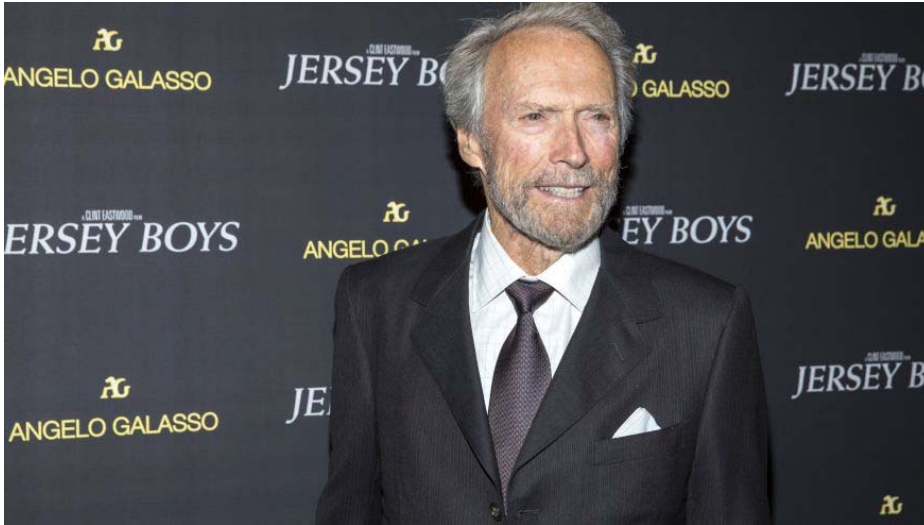
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HEALTH

# Big Pharma In Outrage Over Clint Eastwood's CBD: **Euphoric CBD** - He Fires Back With This!



By Alice Palmer, Thursday, May 14, 2020



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## YOU MAY ALSO LIKE

"I Needed the Time Off"



**BREAKING NEWS**

British pop singer Elle Goulding says she really needed the time to recharge and reset...[\[READ MORE\]](#)

10 MINUTES AGO

## READERS RESULTS



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**Lacey Johnson, New York, NY**



"I've been trying to get rid of my joint pain for decades. I can finally live a normal life thanks to this!"

**Clifton Carter, Austin, TX**

### **Euphoric CBD**

229 people are reading this report right now **x**



**UPDATE: ONLY 6 SPECIAL BOTTLES STILL AVAILABLE.** Promotion expected to end: **Thursday, May 14, 2020**

**CLAIM YOUR SPECIAL BOTTLE!**

## COMMENTS



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Thanks for the info, just started mine.

[Reply](#) . [13](#) . [Like](#) . **12 minutes ago**



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# EXHIBIT 6



5/12/2020

Big Pharma In Outrage Over Clint Eastwood's CBD

## NEWS

Home Video Politics U.S. Opinion Entertainment Tech Science Health Travel Lifestyle World Sports On Air

## HEALTH

# Big Pharma In Outrage Over Clint Eastwood's CBD: Euphoric CBD Pain Cream - He Fires Back With This!



By Alice Palmer, Tuesday, May 12, 2020



## YOU MAY ALSO LIKE

Our Hearts Go Out To Aaron Rodgers



BREAKING NEWS

Fans in mourning as tragedy comes to the Green Bay Packers... [\[READ MORE\]](#)

## READERS RESULTS



"The Euphoric CBD Pain Cream is the absolute best CBD product I've ever tried. Thought my days of feeling young were long gone. I can't thank you enough for this!"

Lacey Johnson, New York, NY

In an emotional 1-on-1 interview, one of America's most respected icons revealed that he wouldn't be where he is without CBD.

We all know and love Clint Eastwood as the charismatic actor and director who has never been shy about advocating for marijuana use. He has always been focused on making movies, going on tour, and promoting America. However, he shocked everyone when he announced his new CBD line, Euphoric CBD Pain Cream, would be the next step in his career.

In recent developments, Eastwood revealed that he would be stepping away from the spotlight to put more time into his wellness business, now that it has grown so fast:

"This was a really, really difficult decision for me. When I started this whole thing back in 2015, it really was just a part time passion project and a way for me to give back. Nowhere we are almost 5 years later and Euphoric CBD Pain Cream has steadily grown into a full-fledged business that's helped thousands of people become pain free and much happier. My line gives me a chance to take the rest of my life if I let that

Mary from NewYork, US ordered:

Euphoric CBD Pain Cream Bottle - 14 seconds ago

Ea  
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ng up his time. In fact,

relations with some studios grew so tense that ~~they ended up giving him an ultimatum~~ -

ushealthynews.com/v7ugnbp-KD/?tx=1&click=15&cep=8lxR3aRs4BJya\_8GPVyl\_ty0aFShddNreYJAdHggGblBq3eO9pCne9YqWyWAQvbjVHAirEL9U8DS5KS... 1/6



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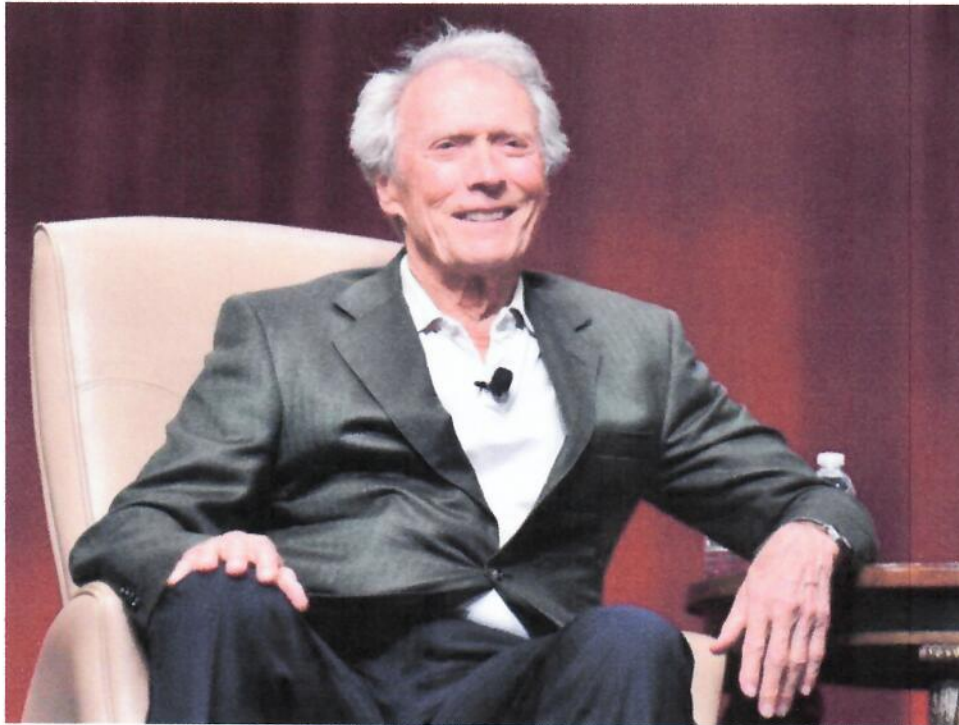


5/12/2020

Big Pharma In Outrage Over Clint Eastwood's CBD

...and some people grew so close that they started applying their own...  
 acting or his wellness line.

He knew he would receive scrutiny from fans and sponsors for quitting, but he felt it was time to work on something that would positively change the lives of millions of people.



Eastwood appears on TV Show to announce his biggest project yet

The product Eastwood is referring to is his breakthrough CBD wellness line **Euphoric CBD Pain Cream**. The star has spent the past four years developing a line of highly effective and highly potent wellness products that he claims are the solution for those who don't want to resort to using opiates.

**His product Euphoric CBD Pain Cream sold out within ten minutes when first launched** and it seems the world can't get enough of the benefits and results.

Eastwood even admitted that big pharma companies are furious with him after noticing a large decline in sales since **Euphoric CBD Pain Cream** was launched on the market.

*"Users of Euphoric CBD Pain Cream are experiencing results that before now were only possible through prescription medication. It's obviously a much cheaper, and safer alternative and because of that pharmaceutical companies are finding it harder to keep patients using their prescriptions."*

Having a crowd of angry pharmaceutical companies is a unique and effective endorsement for **Euphoric CBD Pain Cream**, but Eastwood has still been proactive in getting **Euphoric CBD Pain Cream** into the hands of those who need it.

**Euphoric CBD Pain Cream has been found to have a positive impact on key body functions including - neurological, physical, and psychological.**

Th



Mary from New York, US ordered:

**Euphoric CBD Pain Cream Bottle - 14 seconds ago**

- Supports Joint Health

ushealthynews.com/v7ugbnp-KD/?bt=1&click=15&cep=8ixR3aRs4BJya\_8GPVyl\_ty0aFShddNreYJAdHggGblBq3eO9pCne9YqWYWAQbjVHAiREL9U8DS5KS... 2/6

"I've been trying to get rid of my joint pain for decades. I can finally live a normal life thanks to this!"

**Clifton Carter, Austin, TX**

### Euphoric CBD Pain Cream



Try Euphoric CBD Pain Cream



"For the first time in forever I am finally happy when I look in the mirror every morning. I haven't felt this good in decades!"

**Lucas Gordon, Philadelphia, PA**



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# EXHIBIT 7



FASHION

HEALTH

CULTURE

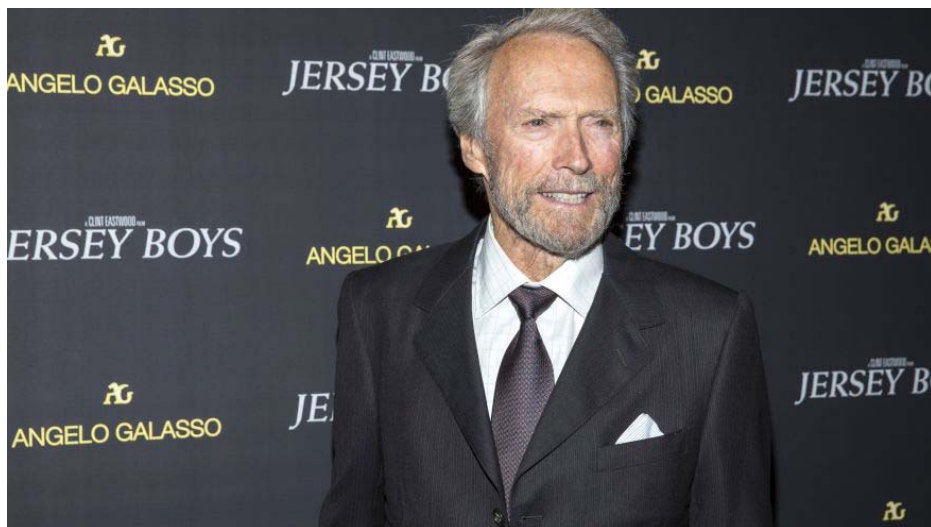
BEAUTY

## HEALTH

# Big Pharma In Outrage Over Clint Eastwood's CBD Based Wellness Product Line! He Fires Back With This!



By Alice Palmer, Monday, April 13, 2020



(ET) - In an emotional 1-on-1 interview, one of America's most respected icons revealed that he wouldn't be where he is without CBD.

We all know and love Clint Eastwood as the charismatic actor and director who has never been shy about advocating for marijuana use. He has always been focused on making movies, going on tour, and promoting America. However, he shocked everyone when he announced his new CBD line, **VETERANS VITALITY CBD Oil**, would be the next step in his career.

In recent developments, Eastwood revealed that he would be stepping away from the spotlight to put more time into his wellness business, now that it has grown so fast:

*"This was a really, really difficult decision for me. When I started this whole thing back in 2015, it really was just a part time passion project and a way for me to give back. Now here we are almost 5 years later and **VETERANS VITALITY CBD Oil** has steadily grown into a full-fledged business that's helped thousands of people become pain free and much happier. My line gives me a chance to do something bigger than movies and I knew I would regret it for the rest of my life if I let that opportunity pass me by."*

Eastwood went on to say that he never really expected things to get this big and that several studios and sponsors were furious that he was splitting up his time. In fact, relations with some studios grew so tense that **they ended up giving him an ultimatum** - acting or his wellness line.

He knew he would receive scrutiny from fans and sponsors for quitting, but he felt it was time to work on something that would positively change the lives of millions of people.



## READERS RESULTS



"The **VETERANS VITALITY CBD Oil** is the absolute best CBD product I've ever tried. Thought my days of feeling young were long gone. I can't thank you enough for this!"

Lacey Johnson, New York, NY



"I've been trying to get rid of my joint pain for decades. I can finally live a normal life thanks to this!"

Clifton Carter, Austin, TX

### VETERANS VITALITY CBD Oil



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**UPDATE :ONLY 6 SPECIAL DEALS STILL AVAILABLE.** Promotion expected to end: **Monday, April 13, 2020**

**CLAIM YOUR SPECIAL DEAL!**

## COMMENTS



**Tarah Smith**

I keep seeing this everywhere - has anyone tried it yet? Looking for Results? Let me know!

Reply . 13 . Like . 12 minutes ago



**Maria Gonzales**

Im so serious... I've been using this product and the results are really amazing. Highly recommend!

Reply . 14 . Like . 16 minutes ago



**Jordan Smith**

I'll second that, crazy results to far. figured I had nothing to lose with an offer like this...glad I gave it a shot

Reply . 2 . Like . 1 hour ago



**Adisson Lewis**

I just claimed my deal which gave me free bottles. Thanks!

Reply . 13 . Like . 12 minutes ago



**Harrison Ferris**

I had a girl of mine (medical-practitioner) read through the studies, she was pretty shocked at how legit they were. I tried this, couldn't believe how fast I started seeing results

Reply . 13 . Like . 12 minutes ago



**Anthony Jack**

damn! I keep seeing reports about this product. they were initially sold-out when I first tried to get it. finally re-opened it back to the public!

Reply . 13 . Like . 12 minutes ago



**Kathrin Daryn**

I love the I'm going to give these products a chance to work their magic on me. I've tried everything out there and so far nothing has been good enough to help me.

Reply . 14 . Like . 16 minutes ago



**Cathryn Lane**

worked for me! I worked just like I thought it would. It was easy enough and I just want others to know when something works.

Reply . 2 . Like . 1 hour ago



**Christina Davis**

Thanks for the info, just started mine.

Reply . 13 . Like . 12 minutes ago



217 people are reading this report right now **x**





# EXHIBIT 8



HEALTH

# Big Pharma In Outrage Over Clint Eastwood's CBD: Patriot Supreme CBD - He Fires Back With This!



By Alice Palmer, Thursday, July 9, 2020



**In an emotional 1-on-1 interview, one of America's most respected icons revealed that he wouldn't be where he is without CBD.**

We all know and love Clint Eastwood as the charismatic actor and director who has never been shy about advocating for marijuana use. He has always been focused on making movies, going on tour, and promoting America. However, he shocked everyone when he announced his new CBD line, **Patriot Supreme CBD**, would be the next step in his career.

In recent developments, Eastwood revealed that he would be stepping away from the spotlight to put more time into his wellness business, now that it has grown so fast:

*"This was a really, really difficult decision for me. When I started this whole thing back in 2015, it really was just a part time passion project and a way for me to give back. Now here we are almost 5 years later and **Patriot Supreme CBD** has steadily grown into a full-fledged business that's helped thousands of people become pain free and much happier. My line gives me a chance to do something bigger than movies and I knew I would regret it for the rest of my life if I let that opportunity pass me by."*

Eastwood went on to say that he never really expected things to get this big and that several studios and sponsors were furious that he was splitting up his time. In fact, relations with some studios grew so tense that **they ended up giving him an ultimatum** - acting or his wellness line.

ushealthynews.com/v7ugnpb-IP/?txt=1&click=15&cep=kY276I7nfN3IXISuA4S2R2pzArcDCOD9HnhqVA5KCQkq-AKLJDFir\_rwP\_Ya4\_86TcdjiG2Zugtv... 1/6

## YOU MAY ALSO LIKE

### Bill Belichick Gets Booted From NFL



**BREAKING NEWS**

Fans livid after beloved coach gets canned after bitter dispute with NFL... [\[READ MORE\]](#)  
10 MINUTES AGO

## READERS RESULTS



"The **Patriot Supreme CBD** is the absolute best CBD product I've ever tried. Thought my days of feeling young were long gone. I can't thank you enough for this!"  
**Lacey Johnson, New York, NY**



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He knew he would receive scrutiny from fans and sponsors for quitting, but he felt it was time to work on something that would positively change the lives of millions of people.



Eastwood appears on *TV Show* to announce his biggest project yet

The product Eastwood is referring to is his breakthrough CBD wellness line **Patriot Supreme CBD**. The star has spent the past four years developing a line of highly effective and highly potent wellness products that he claims are the solution for those who don't want to resort to using opiates.

**His product Patriot Supreme CBD sold out within ten minutes when first launched** and it seems the world can't get enough of the benefits and results.

Eastwood even admitted that big pharma companies are furious with him after noticing a large decline in sales since **Patriot Supreme CBD** was launched on the market.

*"Users of Patriot Supreme CBD are experiencing results that before now were only possible through prescription medication. It's obviously a much cheaper, and safer alternative and because of that pharmaceutical companies are finding it harder to keep patients using their prescriptions."*

Having a crowd of angry pharmaceutical companies is a unique and effective endorsement for **Patriot Supreme CBD**, but Eastwood has still been proactive in getting **Patriot Supreme CBD** into the hands of those who need it.

**Patriot Supreme CBD has been found to have a positive impact on key body functions including - neurological, physical, and psychological.**

This includes but not limited to:

- Reduces Chronic Pain
- Supports Joint Health
- Reduces Anxiety

"I've been trying to get rid of my joint pain for decades. I can finally live a normal life thanks to this!"

**Clifton Carter, Austin, TX**

### **Patriot Supreme CBD**

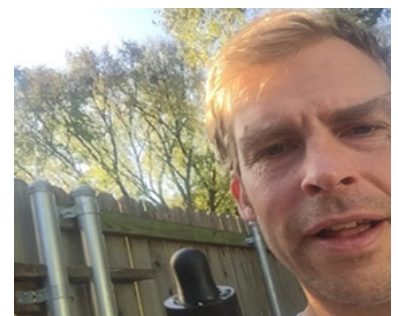


Try Patriot Supreme CBD now



"For the first time in forever I am finally happy when I look in the mirror every morning. I haven't felt this good in decades!"

**Lucas Gordon, Philadelphia, PA**



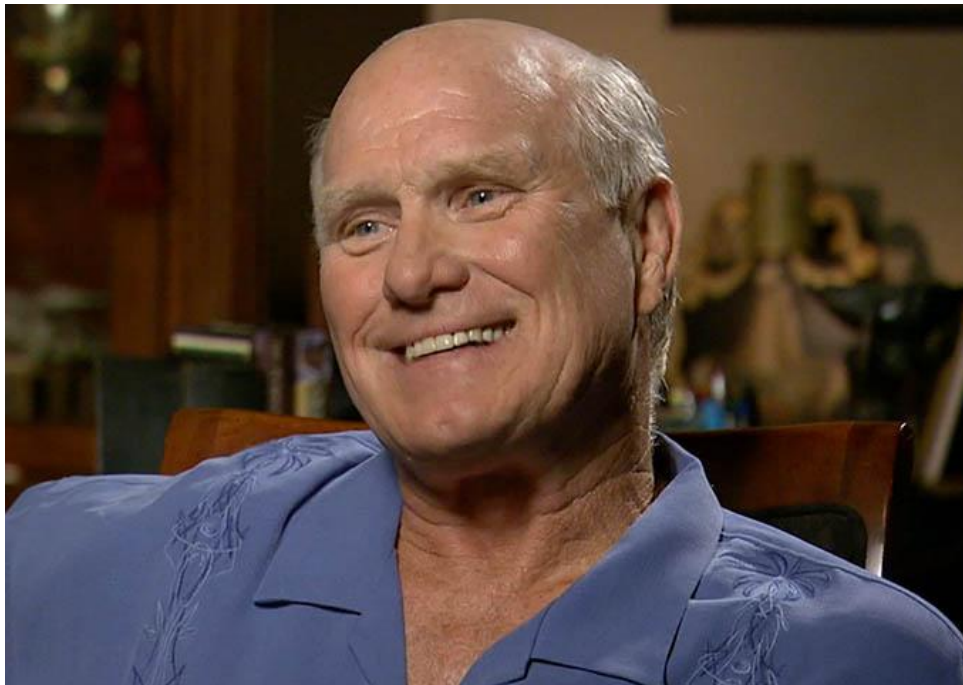
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- Reduces Headaches
- Reduces Blood Sugar
- Supports Cognitive Health
- Antioxidant Support

While making an appearance on 'TV Show' he gifted the cast and crew with **Patriot Supreme CBD** products and made sure every guest was given a sample of the life changing supplement. Since then, he has cultivated a huge celebrity clientele who are regularly reordering the products. See for yourself!

**Eastwood's new line has been a huge hit amongst fellow celebs who got to try the initial launch of **Patriot Supreme CBD**.**



**Terry Bradshaw**

"I started a new prescription my doctor suggested and had several negative side effects. Eastwood gave me a sample of **Patriot Supreme CBD** and the product is a miracle worker. It only took a few days for me to notice the difference."

"Thank God I didn't go through w that surgery... I got the same results, for less than a cup of coffee!"

**Jim McKale, Seattle, WA**



"I've only been using **Patriot Supreme CBD** for 2 weeks, and I love it!!!!!! I have seen a visible change in my appearance and physical health, best of all my husband complimented me after just 2 weeks!!!!"

**Carol Keeton, Denver, CO**



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### Sam Elliott

"The absolute CURE for aching feet on the red carpet. This miracle makes a long evening or day much more fun. Every night that I use **Patriot Supreme CBD** I wake up and have more energy then ever before. I can't believe it."



### Michael J. Fox

"The advances Eastwood has made in the CBD industry are remarkable. I wouldn't believe it if I hadn't had the chance to try it out for myself. After using **Patriot Supreme CBD** for two weeks I was already feeling like a new me."





## Garth Brooks

"It's hard to believe, but all my chronic pain has vanished! After a few weeks of using **Patriot Supreme CBD** I was able to stop taking all over the counter and prescription medications."

## Try It For Yourself!

While **Patriot Supreme CBD** is selling out around the world, Eastwood didn't want our readers to miss out on experiencing the benefits of **Patriot Supreme CBD** for themselves.

As such, Eastwood is offering our lucky readers the chance to try **Patriot Supreme CBD**! There's no need to rush out to the shops or wait in line. You can order your special bottle of the supplement right now from the comfort of your own home.

If you want to finally be free from aches and pains while fostering a much happier mood, make sure you use **Patriot Supreme CBD** every day. This product is designed to give you incredible results.

Because of the high demand of **Patriot Supreme CBD**, Eastwood can only offer a limited amount of special bottles so you'll need to act quickly to take advantage of this amazing offer.



**UPDATE: ONLY 6 SPECIAL BOTTLES STILL AVAILABLE.** Promotion expected to end: **Thursday, July 9, 2020**

**CLAIM YOUR SPECIAL BOTTLE!**

## COMMENTS



### Tarah Smith

I keep see this everywhere - has anyone tried it yet? Looking for Results? Let me know!

Reply · 13 · Like · 12 minutes ago



### Maria Gonzales

Im so serious... I've been 1 months using this product and the results are really amazing. Highly recommend!

Reply · 14 · Like · 16 minutes ago



### Jordan Smith

I'll second that, crazy results to far. figured I had nothing to lose with an offer like this...glad I gave it a shot

Reply · 2 · Like · 1 hour ago



**Addison Lewis**

I just claimed my samples. Thanks!

[Reply](#) . [13](#) . [Like](#) . 12 minutes ago



**Harrison Ferris**

I had a girl of mine (medical-practitioner) read through the studies, she was pretty shocked at how legit they were. I tried this, couldn't believe how fast I started seeing results

[Reply](#) . [13](#) . [Like](#) . 12 minutes ago



**Anthony Jack**

damn! I keep seeing reports about this product. they were initially sold-out when I first tried to get it. finally re-opened it back to the public!

[Reply](#) . [13](#) . [Like](#) . 12 minutes ago



**Kathrin Daryn**

I love the I'm going to give these products a chance to work their magic on me. I've tried everything out there and so far nothing has been good enough to help me.

[Reply](#) . [14](#) . [Like](#) . 16 minutes ago



**Cathryn Lane**

worked for me! I worked just like I thought it would. It was easy enough and I just want others to know when something works.

[Reply](#) . [2](#) . [Like](#) . 1 hour ago



**Christina Davis**

Thanks for the info, just started mine.

[Reply](#) . [13](#) . [Like](#) . 12 minutes ago



# EXHIBIT 9



FASHION

HEALTH

CULTURE

BEAUTY

HEALTH

# Big Pharma In Outrage Over Clint Eastwood's CBD: Premium CBD - He Fires Back With This!



By Alice Palmer, Sunday, July 12, 2020



(ET) - In an emotional 1-on-1 interview, one of America's most respected icons revealed that he wouldn't be where he is without CBD.

We all know and love Clint Eastwood as the charismatic actor and director who has never been shy about advocating for marijuana use. He has always been focused on making movies, going on tour, and promoting America. However, he shocked everyone when he announced his new CBD line, Premium CBD, would be the next step in his career.

In recent developments, Eastwood revealed that he would be stepping away from the spotlight to put more time into his wellness business, now that it has grown so fast:

*"This was a really, really difficult decision for me. When I started this whole thing back in 2015, it really was just a part time passion project and a way for me to give back. Now here we are almost 5 years later and Premium CBD has steadily grown into a full-fledged business that's helped thousands of people become pain free and much happier. My line gives me a chance to do something bigger than music and I knew I would regret it for the rest of my life if I let that opportunity pass me by."*

Eastwood went on to say that he never really expected things to get this big and that several studios and sponsors were furious that he was splitting up his time. In fact, relations with some studios grew so tense that **they ended up giving him an ultimatum** - acting or his wellness line.

He knew he would receive scrutiny from fans and sponsors for quitting, but he felt it was

[https://consumersaving.org/Clint0528reduce/?cep=H\\_eV8O\\_7d1fqG3G9Nu5DI8Yb968CFDYgyaOKLdDXSzz8R-SSWRgjcGfJhAj3IcAvM-gZb8u\\_oodgz\\_YV84sIv...](https://consumersaving.org/Clint0528reduce/?cep=H_eV8O_7d1fqG3G9Nu5DI8Yb968CFDYgyaOKLdDXSzz8R-SSWRgjcGfJhAj3IcAvM-gZb8u_oodgz_YV84sIv...) 1/6

## READERS RESULTS



"The Premium CBD is the absolute best CBD product I've ever tried. Thought my days of feeling young were long gone. I can't thank you enough for this!"

Lacey Johnson, New York, NY



"I've been trying to get rid of my joint pain for decades. I can finally live a normal life thanks to this!"

Clifton Carter, Austin, TX

### Premium CBD



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time to work on something that would positively change the lives of millions of people.



Eastwood appears on *Fox* to announce his biggest project yet

The product Eastwood is referring to is his breakthrough CBD wellness line **Premium CBD**. The star has spent the past four years developing a line of highly effective and highly potent wellness products that he claims are the solution for those who don't want to resort to using opiates.

His product **Premium CBD** sold out within ten minutes when first launched and it seems the world can't get enough of the benefits and results.

Eastwood even admitted that big pharma companies are furious with him after noticing a large decline in sales since **Premium CBD** was launched on the market.

*"Users of **Premium CBD** are experiencing results that before now were only possible through prescription medication. It's obviously a much cheaper, and safer alternative and because of that pharmaceutical companies are finding it harder to keep patients using their prescriptions."*

Having a crowd of angry pharmaceutical companies is a unique and effective endorsement for **Premium CBD**, but Eastwood has still been proactive in getting **Premium CBD** into the hands of those who need it.

**Premium CBD** has been found to have a positive impact on key body functions including - neurological, physical, and psychological.

This includes but not limited to:

- Reduces Chronic Pain
- Supports Joint Health
- Reduces Anxiety
- Reduces Headaches
- Reduces Blood Sugar
- Supports Cognitive Health



Try Premium CBD now!



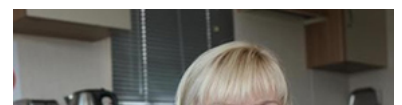
"For the first time in forever I am finally happy when I look in the mirror every morning. I haven't felt this good in decades!"

**Lucas Gordon, Philadelphia, PA**



"Thank God I didn't go through w that surgery... I got the same results, for less than a cup of coffee!"

**Jim McKale, Seattle, WA**



234 people are reading this report right now X



- Antioxidant Support

While making an appearance on 'Fox' he gifted the cast and crew with **Premium CBD** products and made sure every guest was given a sample of the life changing supplement. Since then, he has cultivated a huge celebrity clientele who are regularly reordering the products. See for yourself!

**Eastwood's new line has been a huge hit amongst fellow celebs who got to try the initial launch of **Premium CBD**.**



"I've only been using **Premium CBD** for 2 weeks, and I love it!!!!!! I have seen a visible change in my appearance and physical health, best of all my husband complimented me after just 2 weeks!!!!!"

**Carol Keeton, Denver, CO**



### George Strait

"I started a new prescription my doctor suggested and had several negative side effects. Eastwood gave me a sample of **Premium CBD** and the product is a miracle worker. It only took a few days for me to notice the difference."



### Sam Elliott

"The absolute CURE for aching feet on the red carpet. This miracle makes a long



The absolute GO-TO for acting reel on the red carpet. This miracle makes a long evening or day much more fun. Every night that I use **Premium CBD** I wake up and have more energy then ever before. I can't believe it."



### Tom Hanks

"The advances Eastwood has made in the CBD industry are remarkable. I wouldn't believe it if I hadn't had the chance to try it out for myself. After using **Premium CBD** for two weeks I was already feeling like a new me."



### Garth Brooks

"It's hard to believe, but all my chronic pain has vanished! After a few weeks of using **Premium CBD** I was able to stop taking all over the counter and prescription medications."

## Try It For Yourself!

While **Premium CBD** is selling out around the world, Eastwood didn't want our readers to miss out on experiencing the benefits of **Premium CBD** for themselves.

As such, Eastwood is offering our lucky readers the chance to try **Premium CBD**! There's no need to rush out to the shops or wait in line. You can order your special bottle of the supplement right now from the comfort of your own home. The only thing you'll need to pay for is the discounted shipping rate, which is less than \$6!

If you want to finally be free from aches and pains while fostering a much happier mood, make sure you use **Premium CBD** every day. This product is designed to give you incredible results.

Because of the high demand of **Premium CBD**, Eastwood can only offer a limited amount of special bottles so you'll need to act quickly to take advantage of this amazing offer.



**UPDATE: ONLY 6 SPECIAL BOTTLES STILL AVAILABLE.** Promotion expected to end: **Sunday, July 12, 2020**

**CLAIM YOUR SPECIAL BOTTLE!**

## COMMENTS



**Tarah Smith**

I keep see this everywhere - has anyone tried it yet? Looking for Results? Let me know!

Reply . 13 . Like . 12 minutes ago



**Maria Gonzales**

Im so serious... I've been 1 months using this product and the results are really amazing. Highly recommend!

Reply . 14 . Like . 16 minutes ago



**Jordan Smith**

I'll second that, crazy results to far. figured I had nothing to lose with an offer like this...glad I gave it a shot

Reply . 2 . Like . 1 hour ago



**Adisson Lewis**

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Reply . 13 . Like . 12 minutes ago



**Harrison Ferris**

I had a girl of mine (medical-practitioner) read through the studies, she was pretty shocked at how legit they were. I tried this, couldn't believe how fast I started seeing results

Reply . 13 . Like . 12 minutes ago



**Anthony Jack**

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Reply . 13 . Like . 12 minutes ago

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**Kathrin Daryn**

I love the I'm going to give these products a chance to work their magic on me. I've tried everything out there and so far nothing has been good enough to help me.

Reply · 14 · Like · 16 minutes ago



**Cathryn Lane**

worked for me! I worked just like I thought it would. It was easy enough and I just want others to know when something works.

Reply · 2 · Like · 1 hour ago



**Christina Davis**

Thanks for the info, just started mine.

Reply · 13 · Like · 12 minutes ago



# EXHIBIT 10

**Int. Cl.: 41**

**Prior U.S. Cls.: 100, 101, and 107**

**Reg. No. 3,265,483**

**United States Patent and Trademark Office**

**Registered July 17, 2007**

**SERVICE MARK  
PRINCIPAL REGISTER**

**CLINT EASTWOOD**

EASTWOOD, CLINT (UNITED STATES INDIVIDUAL)  
2049 CENTURY PARK EAST SUITE 2500  
LOS ANGELES, CA 90067

DEO, AUDIO AND RADIO PROGRAMS; AND ENTERTAINMENT SERVICES, NAMELY, SONG WRITING AND COMPOSITION, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FOR: ENTERTAINMENT SERVICES, NAMELY, PERSONAL APPEARANCES AND LIVE PERFORMANCES AND LIVE RECORDED PERFORMANCES BY A MOVIE STAR AND ACTOR; ENTERTAINMENT SERVICES, NAMELY, RECORDED ARTISTIC, DRAMATIC AND VISUAL ARTS PERFORMANCES; ENTERTAINMENT SERVICES, NAMELY, DIRECTING, PRODUCING, DEVELOPING, SCRIPTWRITING AND EDITING ENTERTAINMENT AND EDUCATIONAL MOTION PICTURE FILMS, TELEVISION PROGRAMS, VI-

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GRETТА YAO, EXAMINING ATTORNEY