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22 UNITED STATES DISTRICT COURT  
23 SOUTHERN DISTRICT OF CALIFORNIA

24 Bridget Mikha, an individual; Brianne  
25 Butcher, an individual on behalf of  
26 themselves and all others similarly  
27 situated,

28 Plaintiff,

vs.

SOOFER CO, INC., d/b/a/ SADAF  
FOODS,

Defendant.

CASE NO. '26CV1951 AGS BJW  
**CLASS ACTION COMPLAINT**  
JURY TRIAL DEMANDED

1 Plaintiff BRIDGET MIKHA and Plaintiff BRIANNE BUTCHER ("Plaintiffs"),  
2 by and through their attorneys, bring this class action on behalf of themselves and the  
3 Classes, as defined below, against Defendant SOOFER CO., INC., d/b/a SADAF  
4 FOODS ("Defendant"). The following allegations are based upon information and  
5 belief, including the investigation of Plaintiffs' counsel and laboratory testing  
6 conducted as of January, 2026 and are as follows:

7 **INTRODUCTION**

8 1. This class action addresses a profound breach of consumer trust by Defendant,  
9 which has misled thousands, if not millions, through its product labeled  
10 "**MEDITERRANEAN OLIVE OIL BLEND**" (the "Misabeled Product").  
11 Laboratory testing reveals a troubling reality – the Misabeled Product contains no  
12 detectable olive oil and consists entirely of soybean oil, despite the  
13 "**MEDITERRANEAN OLIVE OIL BLEND**" branding, prominent depiction of a  
14 cluster of olives, and small-font label on the bottle listing "soya oil, canola oil, extra  
15 virgin olive oil" as the ingredients. This uniform mislabeling scheme was developed,  
16 approved, and disseminated from Defendant's headquarters in California and has  
17 deceived consumers nationwide through both online and retail sales channels. This  
18 misconduct violates California law in three critical ways: (1) the failure to label the  
19 product as "mixed vegetable oil" as required; (2) the omission of definitive blend  
20 proportions; and (3) the complete absence of olive oil. These violations demand  
21 accountability for a company that has prioritized profit over people.

22 2. In addition to violating California Health & Safety Code § 112895(b),  
23 Defendant's conduct constitutes false advertising, unfair competition, and deceptive  
24 business practices in violation of California Business & Professions Code § 17200 and  
25 § 17500, common-law fraud and deceit, breach of the implied warranty of  
26 merchantability, and unjust enrichment. These interrelated violations form a single,  
27 uniform course of deceptive conduct affecting consumers nationwide.

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1 3. Consumers, drawn to olive oil for its recognized health and culinary value – a  
2 preference supported by the guidance of doctors and nutrition experts – were deceived  
3 into purchasing a product they believed was a genuine olive oil blend. Laboratory  
4 testing confirms it is entirely soybean oil, a stark departure from their expectations.  
5 This serious misrepresentation has caused significant financial harm to Plaintiffs and  
6 other nationwide purchasers who paid a premium for a product that was neither what  
7 it claimed to be nor fit for its advertised use. Many consumers would not have  
8 purchased or consumed it at all had they known the truth. Comparable cases like *Koller*  
9 *v. Deoleo USA, Inc.* (N.D. Cal 2018), which reportedly resulted in a \$7 million  
10 settlement, and *Kumar v. SALOV North America Corp.* (N.D. Cal 2017), which  
11 reportedly obtained approximately \$5 million in relief, involved products that allegedly  
12 misstated the olives’ country of origin; Defendant’s complete substitution of soybean  
13 oil for olive oil is a far more egregious deception, warranting substantial redress.

14 4. Defendant’s actions reflect a troubling disregard for consumer protection and  
15 public health, exploiting trust in olive oil’s reputation to boost profits. The triple  
16 violation of California Health and Safety Code Section 112895(b) – failing to use the  
17 required “mixed vegetable oil” label, withholding blend proportions, and delivering a  
18 product with no olive oil – underscores a dangerous pattern of product deceit that must  
19 be stopped.

20 5. Plaintiffs bring this action individually and on behalf of all others similarly  
21 situated to hold Defendant accountable for its unlawful, unfair, and fraudulent labeling,  
22 advertising, and sale of the “**MEDITERRANEAN OLIVE OIL BLEND,**” and to  
23 obtain restitution, damages, and injunctive relief necessary to prevent ongoing  
24 deception.

25 6. Defendant continues to label, market, and sell this product, using the same  
26 misrepresentations, thereby threatening continued harm to consumers absent judicial  
27 intervention. Plaintiffs therefore bring this action on behalf of themselves and a class  
28 of similarly situated consumers nationwide and in California for: (1) Violation of

1 California Health & Safety Code § 112895(b); (2) Violation of California Business &  
2 Professions Code §§ 17500 et seq.; (3) Violation of California Business &  
3 Professions Code §§ 17200 et seq.; (4) Fraud and Deceit under California common  
4 law; (5) Breach of the Implied Warranty of Merchantability, California Commercial  
5 Code § 2314; and, (6) Unjust Enrichment / Restitution under the common law of  
6 California and the United States.

7 **PARTIES**

8 7. Plaintiff Bridget Mikha is over the age of 18 years old, and at all times relevant  
9 herein was a resident of San Diego, in the State of California.

10 8. Plaintiff Brianne Butcher is over the age of 18 years old, and at all times relevant  
11 herein was a resident of Yuma, in the State of Arizona.

12 9. Defendant Soofer Co., Inc., d/b/a Sadaf Foods (“Defendant”) is a corporation  
13 organized under the laws of the State of California, with its principal place of business  
14 in Los Angeles, California. Defendant manufactures, distributes, and sells food  
15 products, including the Mislabeled Product, both directly through its website  
16 (www.sadaf.com) and through third-party distributors, wholesalers, and retailers  
17 throughout the United States.

18 **JURISDICTION AND VENUE**

19 10. This Court has subject matter jurisdiction under the Class Action Fairness Act  
20 (“CAFA”), 28 U.S.C. § 1332(d), because this is a class action in which the aggregate  
21 amount in controversy exceeds \$5,000,000, exclusive of interest and costs, the  
22 proposed Classes consist of more than 100 members, and minimal diversity exists.  
23 Plaintiffs Bridgette Mikha is a citizen of the State of California and Plaintiff Brianne  
24 Butcher is a citizen of the State of Arizona, while Defendant Soofer Co., Inc. is a citizen  
25 of the State of California. Accordingly, at least one member of the proposed Classes is  
26 a citizen of a state different from Defendant, satisfying the minimal diversity  
27 requirement of CAFA.

28 11. This Court has supplemental jurisdiction over Plaintiffs’ state law claims

1 pursuant to 28 U.S.C. § 1367(a), because those claims are so related to the federal  
2 claims in this action that they form part of the same case or controversy under Article  
3 III of the United States Constitution.

4 12. This Court has personal jurisdiction over Defendant because it is registered to  
5 do business in California, conducts and continues to conduct substantial business  
6 within the state, employs numerous individuals in California, and has intentionally  
7 availed itself of the privileges and benefits of California law by operating its business  
8 and selling its products in this state.

9 13. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because (i)  
10 Plaintiff Bridgette Mikha resides within this judicial district; (ii) a substantial part of  
11 the events or omissions giving rise to the claims occurred within this judicial district;  
12 and (iii) Defendant conducts business in this district and derives substantial revenue  
13 from its activities here.

14 **FACTUAL ALLEGATIONS**

15 14. Defendant manufactures, distributes, and sells the Mislabeled Product labeled  
16 “**MEDITERRANEAN OLIVE OIL BLEND**,” which is marketed as a cooking oil  
17 suitable for various culinary uses, including frying, baking, and salad dressings.

18 15. The Mislabeled Product’s label prominently displays “**MEDITERRANEAN**  
19 **OLIVE OIL BLEND**” and features an image of olives, suggesting a genuine olive oil  
20 product. However, a small-font ingredient list – “soya oil, canola oil, olive oil” – masks  
21 the truth, as laboratory testing conducted as of January, 2026 confirms the product  
22 contains no detectable olive oil, consisting entirely of soybean oil.

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16. California Health and Safety Code Section 112895(b) requires that blends of olive oil with other oils be labeled as “mixed vegetable oil” and include prominent disclosure of contents and proportions. The Mislabeled Product violates this law in three serious ways: (1) it fails to label the product as “mixed vegetable oil”; (2) it omits any disclosure of blend proportions; and (3) it contains no “extra virgin olive oil,” and consists entirely of soybean oil, a clear departure from the label’s implication.

17. This misrepresentation preys on consumers who value olive oil for its recognized worth – a preference supported by the counsel of doctors and health providers – leading them to choose it over alternatives like soybean oil for reasons they hold important. Defendant’s failure to disclose the true composition undermines this trust.

1 18. Consumers, including Plaintiff, relied on the labeling, believing they were  
2 purchasing a true olive oil blend, only to receive a product consisting entirely of  
3 soybean oil, as confirmed by laboratory testing conducted as of January 2026. Amazon  
4 reviews reflect growing frustration among buyers misled into thinking the product  
5 consisted primarily of olive oil, their discontent a mere shadow of the outrage they  
6 would feel if they knew no olive oil was present.



kathy

8 ★☆☆☆☆ **Not just olive oil**

Reviewed in the United States on October 11, 2024

Verified Purchase

9 I did not realize this was a mixture of Olive Oil and Canola Oil. It says Olive Oil blend, but it is very difficult to see the place on the label where it says what the "blend" is ... It is  
10 not unusual to blend Pure Olive Oil with Extra Virgin to get a safer cooking product ..... I do not use Canola Oil, and now I have wasted the money for 2 bottles of this because I  
11 thought it was a blend of different types of olive oil. It is a food item, so I cannot return it. They need to make it more obvious what is actually in this.

8 people found this helpful

11 Helpful | Report



Hikestick

13 ★☆☆☆☆ **Not quality olive oil**

Reviewed in the United States on March 9, 2025

Verified Purchase

14 Look elsewhere. This is a BLEND with (maybe) a small amount of olive oil. Doubtful health benefits. Not very economical for a non-premium cooking oil. I also really dislike  
15 deceptive packaging practices.

15 Helpful | Report



Amit

17 ★☆☆☆☆ **It is not olive oil**

Reviewed in the United States on April 12, 2024

Verified Purchase

18 I was terribly disappointed when I received it and found out that it is not olive oil, but a blend of different oils. Furthermore, it is not an item that can be returned. It does not  
19 taste like olive oil, either. I bought it thinking that it was pure olive oil. VERY Disappointed

6 people found this helpful

19 Helpful | Report



Patricia R.

20 ★☆☆☆☆ **It has canola oil in it, which I don't like**

Reviewed in the United States on January 6, 2025

Verified Purchase

21 it had canola oil, which I feel is unhealthy. I used it for cooking and eating.

One person found this helpful

22 Helpful | Report



Nissim

24 ★☆☆☆☆ **it's very bad**

Reviewed in the United States on December 29, 2024

Verified Purchase

25 Does not test good It's very bad quality not recommended

26 Helpful | Report

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 Amazon Customer  
★☆☆☆☆ **Won't order this again shiping way out of line**  
Reviewed in the United States on December 11, 2024  
**Verified Purchase**  
disapointed didnt realise it was mostly vegoil  
 |

 Princess  
★☆☆☆☆ **Disappointed**  
Reviewed in the United States on November 7, 2024  
**Verified Purchase**  
Not pure virgin olive oil.  
 |

 Birthday dress  
★☆☆☆☆ **Misleading it's mixed olive oil**  
Reviewed in the United States on July 27, 2024  
**Verified Purchase**  
It is not pure virgin olive oil it's mixed with other ultra processed oils  
2 people found this helpful  
 |

19.The Mislabeled Product is marketed as “olive oil for cooking and baking,” fostering a false impression of its composition.

20.Defendant ’s Amazon store description claims the product is “made from high-quality olives”.

21.Plaintiffs purchased the Mislabeled Product, trusting the labeling, and would not have purchased it or used it if they had known its true composition.

22.Plaintiffs have suffered financial harm, having paid for a product they believed was a true olive oil blend, only to discover it is entirely soybean oil.

23.Defendant ’s misleading labeling reflects a pattern of conduct that prioritizes profit over consumer trust, with decisions made in California, its principal place of business.

24.Defendants’ actions deceive the public, as reasonable consumers expect a product labeled “**MEDITERRANEAN OLIVE OIL BLEND**” with a graphic of olives (and the absence of other plant graphics, e.g., soybeans) to contain olive oil, not solely soybean oil.

25.These practices, undertaken for Defendant ’s financial benefit, create an unfair advantage over competitors and cause significant harm to the public.

1        **A. Scientific Testing Demonstrates that Defendant’s Product Does Not**  
2        **Contain Olive Oil**

3        26. To verify the accuracy of Defendant’s labeling and representations, Plaintiffs  
4 submitted the Mislabeled Product for independent laboratory testing. The analysis  
5 was conducted by Process NMR Associates, LLC (“PNA”), located in Poughkeepsie,  
6 New York, an analytical chemistry laboratory specializing in nuclear magnetic  
7 resonance (NMR) spectroscopy for compositional and structural analysis of industrial  
8 and food products.

9        27. Process NMR Associates was founded in 1997 by John Edwards, Ph.D., a  
10 physical chemist with more than 25 years of experience in industrial NMR  
11 spectroscopy and one of the leading experts in the field. Dr. Edwards personally  
12 conducted the analysis of the Mislabeled Product. His laboratory provides analytical  
13 NMR testing services to hundreds of corporate clients across the oil, nutraceutical,  
14 pharmaceutical, and food industries and is recognized for its expertise in detecting  
15 adulteration of edible oils.

16        28. The Mislabeled Product was analyzed using <sup>1</sup>H NMR (proton nuclear magnetic  
17 resonance) spectroscopy, a scientifically validated method for determining the  
18 chemical composition of organic materials. The test was performed using a Varian  
19 Mercury 300 MHz NMR spectrometer in deuterated chloroform (CDCl<sub>3</sub>), a neutral  
20 solvent that enables clear hydrogen signal detection. This analysis produces a unique  
21 molecular “fingerprint” that allows scientists to identify the type and proportion of  
22 oils present in a product.

23        29. The resulting <sup>1</sup>H NMR spectrum revealed a complete spectral overlap with  
24 pure soybean oil and lacked any resonance peaks characteristic of olive oil.

25        30. These findings demonstrate that the product marketed as a “Mediterranean  
26 Olive Oil Blend” was devoid of olive oil, consisting instead of soybean oil. The  
27 laboratory’s analysis provides objective, chemical proof that Defendant’s labeling  
28

1 and ingredient representations including the claim that the product contains “extra  
2 virgin olive oil,” are false and misleading to reasonable consumers.

3 31.The testing conducted by Process NMR Associates followed established,  
4 industry-standard scientific protocols and conforms to quantitative NMR (qNMR)  
5 methods recognized by international standards organizations for authenticity testing.  
6 <sup>1</sup>H NMR spectroscopy is a validated and widely accepted analytical method for  
7 verifying the composition of edible oils and detecting adulteration. The results here  
8 provide reliable, reproducible, and scientifically sound evidence that Defendant’s  
9 product was deceptively mislabeled.

10 **B. Plaintiffs’ Experience**

11 32.Plaintiff Bridget Mikha is a resident of San Diego, California.

12 33.On a date to be determined through discovery, Plaintiff Mikha purchased a 2L  
13 bottle of the Mislabeled Product from “Valley Foods” grocery store located at 1275 E  
14 Main St, El Cajon, CA 92021 for approximately \$11.99, drawn by the label’s  
15 suggestion of a “**MEDITERRANEAN OLIVE OIL BLEND**” and its marketing for  
16 culinary use.

17 34.Plaintiff values olive oil for its recognized worth, a choice informed by the  
18 guidance of doctors and health providers and prefers it over soybean oil for reasons she  
19 holds significant, willing to pay a premium for authenticity.

20 35.Upon using the Mislabeled Product in a salad, Plaintiff noticed that the taste was  
21 unusual and not characteristic of olive oil, which she expected based on the product’s  
22 labeling and marketing.

23 36.Plaintiff Brianne Butcher is a resident of Yuma, Arizona.

24 37.On dates to be determined through discovery, Plaintiff Butcher purchased,  
25 among other items, a 2L bottle of the Mislabeled Product from “Valley Foods” grocery  
26 store located at 1275 E Main St, El Cajon, CA 92021 for approximately \$11.99, drawn  
27 by the label’s suggestion of a “**MEDITERRANEAN OLIVE OIL BLEND**” and its  
28 marketing for culinary use.

1 38. Plaintiff Butcher regularly used the Mislabeled Product in cooking and  
2 reasonably believed it to be an olive oil product based on its labeling and  
3 presentation. She later learned that the product was not olive oil as represented, but  
4 instead consisted entirely of soybean oil.

5 39. Plaintiffs, through their counsel, submitted the Mislabeled Product for  
6 independent laboratory testing at Process NMR Associates, LLC (“PNA”), located in  
7 Poughkeepsie, New York.

8 40. The test revealed that the “MEDITERRANEAN OLIVE OIL BLEND” they  
9 had purchased was a complete spectral overlap with pure soybean oil and lacked any  
10 resonance peaks characteristic of olive oil.

11 41. Plaintiffs felt deeply misled by the Mislabeled Product’s labeling, which used  
12 “**MEDITERRANEAN OLIVE OIL BLEND**” and imagery featuring a cluster of  
13 olives displayed prominently on the product’s face to suggest a genuine product  
14 comprised of olive oil.

15 42. Had Plaintiffs known the true composition of the Mislabeled Product, they  
16 would not have purchased it or consumed it.

17 43. Plaintiffs’ experience is typical of the class members, who were similarly  
18 deceived by Defendant’s labeling practices and relied on the misleading label to their  
19 detriment.

20 **CLASS DEFINITIONS AND ALLEGATIONS**

21 44. Plaintiffs bring this action individually and on behalf of all others similarly  
22 situated pursuant to Rules 23(b)(2) and 23(b)(3) of the Federal Rules of Civil  
23 Procedure. Plaintiffs seek certification of the following Classes:

24 **Nationwide Class:** All persons in the United States who, within the four  
25 (4) years preceding the filing of this Complaint (or within the applicable  
26 shorter limitations period for any claim asserted herein), purchased the  
27 product labeled “Sadaf Mediterranean Olive Oil Blend” for personal,  
28 household, or consumer use, and not for resale.

1           **California Subclass:** All persons who, within the four (4) years preceding  
2 the filing of this Complaint (or within the applicable shorter limitations  
3 period for any claim asserted herein), purchased the product labeled  
4 “Sadaf Mediterranean Olive Oil Blend” for personal, household, or  
consumer use, and not for resale.

5           45. Excluded from the Class are Defendant, its officers and directors, families and  
6 legal representatives, heirs, successors, or assigns and any entity in which Defendant  
7 has a controlling interest, and any Judge assigned to this case and their immediate  
8 families.

9           46. Plaintiffs reserve the right to amend or otherwise alter the class definition  
10 presented to the Court at the appropriate time, or to propose or eliminate sub-classes,  
11 in response to facts learned through discovery, legal arguments advanced by  
12 Defendants, or otherwise.

13           47. This action is properly maintainable as a class action pursuant to Federal Rule  
14 of Civil Procedure 23 for the reasons set forth below.

15           48. **Numerosity:** Members of the Classes are so numerous that joinder of all  
16 Members is impracticable. Although the exact number of Class Members is unknown  
17 to Plaintiffs at this time, Plaintiffs are informed and believe that the number is in the  
18 thousands, if not millions, based on the widespread availability of the Mislabeled  
19 Product in retail outlets throughout California and the United States, including through  
20 Defendant’s website and online platforms such as Amazon. Verified reviews on  
21 Amazon show consumers frustrated by the lack of a pure olive oil blend, their dismay  
22 a faint echo of the anger they would feel if aware of the complete absence of olive oil.

23           49. **Common Questions Predominate:** There are questions of law and fact  
24 common to the classes that predominate over any individual issues including but not  
25 limited to:

26           a. Whether Defendant’s labeling of the Mislabeled Product as  
27 “**MEDITERRANEAN OLIVE OIL BLEND**” violates California  
28

- 1 Health and Safety Code Section 112895(b) by failing to label it as  
2 “blended vegetable oil” and omitting blend proportions;
- 3 b. Whether Defendant ’s labeling of the Mislabeled Product as  
4 “**MEDITERRANEAN OLIVE OIL BLEND**” violates California  
5 Health and Safety Code Section 112895(b) by misrepresenting a product  
6 that laboratory testing conducted as of January 2025 confirms contains no  
7 olive oil and consists entirely of soybean oil.
- 8 c. Whether Defendant’s failure to label the product as “mixed vegetable oil,”  
9 or to disclose blend proportions, violated California Health and Safety  
10 Code § 112895(b) and other labeling regulations;
- 11 d. Whether Defendant’s representations regarding the composition, source,  
12 and quality of the “Mediterranean Olive Oil Blend,” including claims that  
13 it is “made from high-quality olives,” were false, misleading, or likely to  
14 deceive reasonable consumers;
- 15 e. Whether Defendant knew or should have known that the “Mediterranean  
16 Olive Oil Blend” contained no olive oil prior to or during the period it was  
17 labeled, marketed, and sold to consumers;
- 18 f. Whether Defendants’ advertising, marketing, and sales practices were  
19 false, misleading, or deceptive;
- 20 g. Whether Defendants’ practices violate California Business and  
21 Professions Code Sections 17200, et seq., and 17500, et seq.;
- 22 h. Whether Defendants’ practices constitute fraud and deceit;
- 23 i. Whether Defendants breached the implied warranty of merchantability;
- 24 j. Whether Defendants were unjustly enriched by their practices;
- 25 k. Whether Plaintiff and class members suffered injury in fact and lost  
26 money or property as a result of Defendants’ practices;
- 27  
28

- 1 1. Whether Defendant has been unjustly enriched by the sale of the
- 2 Mislabeled Product and the appropriate measure of restitution,
- 3 disgorgement, and damages;
- 4 m. Whether Defendant’s misrepresentations and omissions caused
- 5 consumers to pay more for the product than it was worth and whether
- 6 Plaintiff and Class Members suffered ascertainable loss or injury in fact
- 7 as a result;
- 8 n. Whether Defendant’s deceptive labeling, advertising, and marketing
- 9 practices are ongoing and generally applicable to all Class Members;
- 10 o. Whether injunctive and declaratory relief are necessary to prevent
- 11 Defendant from continuing to mislabel, advertise, or sell the product as
- 12 “Mediterranean Olive Oil Blend”;
- 13 p. The appropriate corrective labeling, disclosure, or reformulation required
- 14 to bring the product into compliance with California Health and Safety
- 15 Code § 112895(b) and to prevent future consumer deception; and,
- 16 q. The appropriate measure of restitution, damages, and injunctive relief.

17 **50. Typicality:** Plaintiffs’ claims are typical of the claims of the class members they  
18 seek to represent, because Plaintiffs, like Class members purchased Defendant’s  
19 product believing it to be a true olive oil blend when it was not. Defendant’s unlawful,  
20 unfair, and/ or fraudulent actions concern the same business practices described herein  
21 irrespective of where they occurred or were experienced. Plaintiffs and the Class  
22 sustained similar injuries, including financial harm, arising out of Defendant’s conduct.  
23 Plaintiffs’ and Class members’ claims arise from the same practices and course of  
24 conduct and are based on the same legal theories.

25 **51. Adequacy:** Plaintiffs are adequate representatives of the Classes they seek to  
26 represent because they are committed to seeking justice for those affected and their  
27 interests do not conflict with the interests of the members of the Classes. Plaintiffs will  
28 fairly and adequately protect the interests of the Classes and have retained counsel

1 experienced and competent in prosecution of complex class actions, including complex  
2 questions that arise in consumer protection litigation.

3 52. **Superiority:** A class action is superior to other available methods for the fair  
4 and efficient adjudication of this controversy because:

- 5 a. Class-wide damages are essential to induce Defendant to comply with  
6 California and Federal Law.
- 7 b. Individual lawsuits would be impractical given the number of class  
8 members and the relatively small individual damages, while a class action  
9 ensures centralized accountability for Defendant 's actions and provides  
10 relief to those it has wronged.
- 11 c. Because of the relatively small size of Class Members' claims, it is likely  
12 that only a few Class Members could afford to seek legal redress for  
13 Defendant's misconduct
- 14 d. Class action treatment is manageable because it will permit a large  
15 number of similarly situated persons to prosecute their common claims  
16 in a single forum simultaneously, efficiently, and without the  
17 unnecessary duplication of effort and expense that numerous individual  
18 actions would endanger.

19 **FIRST CAUSE OF ACTION**  
20 **(Violation of California Health and Safety Code § 112895(b))**  
21 **(On Behalf of Themselves and the California Subclass)**

22 53. Plaintiffs reallege and incorporate by reference the allegations contained in the  
23 preceding paragraphs of this complaint as if fully set forth herein.

24 54. Beginning at an exact date unknown to Plaintiffs, but within four (4) years  
25 preceding the filing of this Class Action Complaint, Defendant made untrue, false,  
26 deceptive, and/or misleading statements in connection with the labeling and marketing  
27 of the Mislabeled Product.

28 55. Defendant made representations and statements (by omission and commission)  
that led reasonable customers to believe that they were purchasing a true olive oil blend.

1 Defendant deceptively failed to inform Plaintiffs, and those similarly situated, that the  
2 Mislabeled Product contained no olive oil, consisting entirely of soybean oil, and  
3 committed a triple violation of California Health and Safety Code Section 112895(b)  
4 by (1) failing to label it as “mixed vegetable oil,” (2) entirely omitting the nonexistent  
5 blend proportions, and (3) misrepresenting a product with no detectable olive oil.

6 56.Plaintiffs and those similarly situated relied to their detriment on Defendant’s  
7 false, misleading, and deceptive labeling and marketing practices. Had they been  
8 informed of the truth and not deceived, they would not have purchased or consumed  
9 the Mislabeled Product.

10 57.Defendant’s actions are likely to mislead the public, reflecting a serious lapse in  
11 responsibility.

12 58.Defendant engaged in these deceptive labeling, marketing, and sales practices to  
13 increase its profits, making decisions in California, its principal place of business. This  
14 conduct violates California Health and Safety Code Section 112895(b).

15 59.These practices, undertaken for Defendant’s financial benefit, create an unfair  
16 advantage over competitors and cause harm to the public, a matter that requires  
17 resolution.

18 60.Plaintiffs seek, on behalf of those similarly situated, full restitution of monies to  
19 recover losses incurred due to Defendant’s actions, plus interest.

20 61.Plaintiffs seek an injunction to prevent Defendant from continuing these  
21 deceptive labeling, marketing, and sales practices, with the misconduct occurring  
22 within four (4) years preceding this filing.

23 62.Plaintiffs and those similarly situated seek a declaration that these practices  
24 violate the law and injunctive relief to stop Defendant’s ongoing deception. Without  
25 this, Defendant will continue to cause injury and loss, necessitating repeated legal  
26 action by affected consumers who deserve better protection under California Health  
27 and Safety Code Section 112895(b).

28

1 63.As a direct result, Plaintiff and the Class have suffered injury and lost money  
2 due to Defendant’s misleading labeling, in an amount to be proven at trial, exceeding  
3 the jurisdictional minimum.

4 **SECOND CAUSE OF ACTION**  
5 **(False Advertising in Violation of California Business & Professions Code §**  
6 **17500 et seq.)**

7 (On Behalf of Themselves and the California Subclass)

8 64.Plaintiffs reallege and incorporate by reference all preceding paragraphs as  
9 though fully set forth herein.

10 65.Beginning at an exact date unknown to Plaintiffs, but within four (4) years  
11 preceding the filing of this Class Action Complaint, Defendant made untrue, false,  
12 deceptive, and/or misleading statements in connection with the advertising and  
13 marketing of the Mislabeled Product.

14 66.Defendant made representations that led reasonable customers to believe they  
15 were purchasing a true olive oil blend. It failed to disclose that the Mislabeled Product  
16 contained no olive oil, consisting entirely of soybean oil, violating California Health  
17 and Safety Code Section 112895(b) by (1) not labeling it as “mixed vegetable oil,” (2)  
18 omitting nonexistent blend proportions, and (3) misrepresenting the absence of olive  
19 oil.

20 67.Plaintiffs and those similarly situated relied on Defendant’s deceptive  
21 advertising, and had they known the truth, they would not have purchased or consumed  
22 the Mislabeled Product.

23 68.Defendant’s actions are likely to mislead the public, indicating a serious breach  
24 of duty.

25 69.Defendant engaged in these deceptive advertising practices to boost its profits,  
26 with decisions made in California, violating California Business and Professions Code  
27 Section 17500, et seq.

28 70.These practices, driven by Defendant’s financial interests, create an unfair  
advantage and harm the public, necessitating action.

1 71.Plaintiffs seek full restitution on behalf of those similarly situated to recover  
2 losses from Defendant’s deception, plus interest.

3 72.Plaintiffs seek an injunction to stop Defendant’s ongoing deceptive advertising  
4 practices, with the misconduct occurring within four (4) years preceding this filing.

5 73.Plaintiffs and the Class seek a declaration that these practices violate the law and  
6 injunctive relief to prevent future deception by Defendant. Without this, ongoing harm  
7 will continue, requiring repeated legal recourse by affected consumers under California  
8 Business and Professions Code Section 17500, et seq.

9 74.As a result, Plaintiffs and the Class have suffered injury and lost money due to  
10 Defendant ’s misleading advertising, in an amount to be proven at trial, exceeding the  
11 jurisdictional minimum.

12 **PLAINTIFF’S THIRD CAUSE OF ACTION**  
13 **(Unfair Competition in Violation of California Business & Professions Code**  
14 **Section 17200 et seq.)**

14 (On Behalf of Themselves and the California Subclass)

15 75.Plaintiffs reallege and incorporate by reference all preceding paragraphs as  
16 though fully set forth herein.

17 76.Defendant ’s misleading labeling, advertising, marketing, and sales practices  
18 constitute unfair, unlawful, and fraudulent business practices under California Business  
19 and Professions Code Section 17200, et seq.

20 77.Defendant ’s actions in designing deceptive labeling and marketing, have injured  
21 Plaintiffs and class members by overcharging for a product believed to be a true olive  
22 oil blend, confirmed by laboratory testing as of January 2026 to contain no olive oil.

23 78.Plaintiffs seek full restitution on behalf of those similarly situated to recover  
24 losses from Defendant’s unfair practices, plus interest.

25 79.Plaintiffs seek an injunction to prevent Defendant from continuing these unfair,  
26 unlawful, and fraudulent business practices, with the misconduct occurring within four  
27 (4) years preceding this filing.

28

1 80.Plaintiffs and the Class seek a declaration that these practices violate the law and  
2 injunctive relief to stop Defendant’s ongoing deception. Without this, continued harm  
3 will persist, requiring repeated legal action by affected consumers under California  
4 Business and Professions Code Section 17200, et seq.

5 81.As a result, Plaintiffs and the Class have suffered injury and lost money due to  
6 Defendant’s unfair practices, in an amount to be proven at trial, exceeding the  
7 jurisdictional minimum.

8 **PLAINTIFF’S FOURTH CAUSE OF ACTION**  
9 **(Fraud and Deceit)**

(On Behalf of Themsevles and the Nationwide Class)

10 82.Plaintiffs reallege and incorporate by reference all preceding paragraphs as  
11 though fully set forth herein.

12 83.Defendant knowingly and intentionally misrepresented the Mislabeled Product  
13 by labeling it as “Mediterranean Olive Oil Blend,” when laboratory testing conducted  
14 as of January 2026 confirms it contains no olive oil and consists entirely of soybean  
15 oil, in violation of California Health and Safety Code § 112895(b).

16 84.Defendant made these misrepresentations on the front and back labels of the  
17 product packaging and on its website, www.sadaf.com, where it advertised the product  
18 as a “Mediterranean Olive Oil Blend” suitable for cooking, frying, and salad use.  
19 These statements were made to consumers, including Plaintiffs, at the point of sale  
20 and in online product listings throughout the applicable class period. Plaintiffs  
21 purchased the product in reliance on these representations within the four years  
22 preceding the filing of this Complaint.

23 85.Plaintiffs and Class members reasonably relied on Defendant’s  
24 misrepresentations and omissions, believing the product contained olive oil, and  
25 suffered economic injury as a result.

26 86.Defendant’s fraudulent conduct was willful, knowing, and intentional.  
27 Defendant was aware that the product contained no olive oil at the time it labeled and  
28 sold it as an “olive oil blend,” and nevertheless continued to market and distribute it

1 with the intent to deceive consumers and increase profits. Defendant's actions were  
2 undertaken with conscious disregard for consumer rights and safety, warranting  
3 punitive and exemplary damages.

4 87.As a result, Plaintiffs and the Class have suffered injury and lost money due to  
5 Defendant's fraud, in an amount to be proven at trial, exceeding the jurisdictional  
6 minimum.

7 88.As a direct and proximate result of Defendant's fraudulent misrepresentations  
8 and omissions, Plaintiffs and the Class paid more for the product than it was worth,  
9 were deprived of the benefit of their bargain, and suffered measurable economic  
10 damages.

11 89.Defendant continues to label, market, and sell the same or substantially similar  
12 product with the same false representations. Absent injunctive relief, Plaintiff and the  
13 Class will continue to face the risk of future deception and harm.

14 **PLAINTIFF'S FIFTH CAUSE OF ACTION**  
15 **Breach of Implied Warranty of Merchantability (California Commercial Code**  
16 **Section 2314)**

17 (On Behalf of Themselves and the Nationwide Class)

18 90.Plaintiffs reallege and incorporate by reference all preceding paragraphs as  
19 though fully set forth herein.

20 91.Defendant, as manufacturer, distributor, and retailer, impliedly warranted that  
21 the Mislabeled Product was merchantable and fit as a true olive oil blend for culinary  
22 use.

23 92.The Mislabeled Product was not merchantable, as laboratory testing conducted  
24 as of January 2026 confirms it contains no olive oil, consisting entirely of soybean oil,  
25 failing to meet consumer expectations and causing financial harm.

26 93.Plaintiffs and class members relied on the implied warranty of a true olive oil  
27 blend, but the product's soybean oil composition, confirmed by testing, renders it unfit,  
28 resulting in economic loss.

1 94.As a result of Defendant’s breach, Plaintiffs and the Class have suffered injury  
2 and lost money, in an amount to be proven at trial, exceeding the jurisdictional  
3 minimum.

4 **PLAINTIFF’S SIXTH CAUSE OF ACTION**  
5 **Unjust Enrichment**

(On Behalf of Themselves and the Nationwide Class)

6 95.Plaintiffs reallege and incorporate by reference all preceding paragraphs as  
7 though fully set forth herein.

8 96.Defendant has been unjustly enriched by selling the Mislabeled Product, which  
9 consumers overpaid for believing it was a true olive oil blend, when laboratory testing  
10 conducted as of January 2026 confirms it contains no olive oil.

11 97.Defendant has no right to retain these profits, and it would be unjust to allow it  
12 to benefit from this deception.

13 98.Plaintiffs and the Class are entitled to restitution of the amounts paid, less the  
14 fair market value if properly labeled as soybean oil, in an amount to be proven at trial,  
15 exceeding the jurisdictional minimum.

16 **PRAAYER FOR RELIEF**

17 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

- 18 1. For an order certifying this action as a class action pursuant to  
19 Federal Rules of Civil Procedure 23(b)(2) and 23(b)(3)
- 20 2. For an order appointing Plaintiffs as representatives of the Classes  
21 and appointing their counsel as class counsel;
- 22 3. For full restitution of all monies acquired by Defendants from  
23 Plaintiffs and class members through the sale of the Mislabeled  
24 Product, in an amount to be determined at trial;
- 25 4. For disgorgement of all profits obtained by Defendants from the  
26 sale of the Mislabeled Product, in an amount to be determined at  
27 trial;

- 1 5. For compensatory damages, including damages for breach of
- 2 implied warranty of merchantability, in an amount to be determined
- 3 at trial;
- 4 6. For punitive damages against Defendant for its willful, malicious,
- 5 and oppressive conduct, in an amount to be determined at trial;
- 6 7. For prejudgment interest on all monetary awards at the legal rate
- 7 pursuant to California Civil Code Section 3287(a);
- 8 8. For declaratory relief, declaring that Defendants’ labeling,
- 9 marketing, and sales practices violate California law;
- 10 9. For injunctive relief, including an order enjoining Defendants from
- 11 continuing to label, market, or sell the Mislabeled Product as
- 12 “**MEDITERRANEAN OLIVE OIL BLEND**” and requiring
- 13 Defendant to reformulate the product label to “blended vegetable
- 14 oil” with the contents and proportions prominently displayed, in
- 15 compliance with California Health and Safety Code Section
- 16 112895(b);
- 17 10. For reasonable attorneys’ fees according to proof, pursuant to
- 18 California Code of Civil Procedure Section 1021.5, California Civil
- 19 Code § 1780(e), and other applicable law;
- 20 11. For restitution and disgorgement pursuant to Business and
- 21 Professions Code §§ 17203 and 17535;
- 22 12. For costs of suit incurred; and
- 23 13. For such further relief as this Court may deem just and proper.

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**JURY TRIAL DEMANDED**

Plaintiff hereby demands a trial by jury.

Dated: March 27, 2026

Respectfully submitted,

SWIGART LAW GROUP, APC

/s/ Joshua B. Swigart

Joshua B. Swigart

Katherine A. Tuohy

THE LAW OFFICES OF QUINTIN  
SHAMMAM

/s/ Quintin G. Shammam

Quintin G. Shammam

THE LAW OFFICE OF JOSEPH  
M. ATTIQ

/s/ Joseph M. Attiq

Joseph M. Attiq

Attorney for Plaintiffs

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court.

I. (a) PLAINTIFFS
Bridget Mikha, an individual; Brianne Butcher, an individual on behalf of themselves and all others similarly situated
(b) County of Residence of First Listed Plaintiff San Diego
(c) Attorneys (Firm Name, Address, and Telephone Number) Joshua Swigart, Swigart Law Group, APC

DEFENDANTS
SOOFER CO, INC., d/b/a/ SADAF FOODS
County of Residence of First Listed Defendant Los Angeles
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known) Unk
'26CV1951 AGS BJW

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
Citizen of This State X 1 1 Incorporated or Principal Place of Business In This State 4 X 4
Citizen of Another State X 2 2 Incorporated and Principal Place of Business In Another State 5 5
Citizen or Subject of a Foreign Country 3 3 Foreign Nation 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)
CONTRACT: 110 Insurance, 120 Marine, 130 Miller Act, 140 Negotiable Instrument, 150 Recovery of Overpayment & Enforcement of Judgment, 151 Medicare Act, 152 Recovery of Defaulted Student Loans (Excludes Veterans), 153 Recovery of Overpayment of Veteran's Benefits, 160 Stockholders' Suits, 190 Other Contract, 195 Contract Product Liability, 196 Franchise
TORTS: PERSONAL INJURY: 310 Airplane, 315 Airplane Product Liability, 320 Assault, Libel & Slander, 330 Federal Employers' Liability, 340 Marine, 345 Marine Product Liability, 350 Motor Vehicle, 355 Motor Vehicle Product Liability, 360 Other Personal Injury, 362 Personal Injury - Medical Malpractice; 365 Personal Injury - Product Liability, 367 Health Care/Pharmaceutical Personal Injury Product Liability, 368 Asbestos Personal Injury Product Liability; PRISONER PETITIONS: Habeas Corpus: 463 Alien Detainee, 510 Motions to Vacate Sentence, 530 General, 535 Death Penalty; Other: 540 Mandamus & Other, 550 Civil Rights, 555 Prison Condition, 560 Civil Detainee - Conditions of Confinement
FORFEITURE/PENALTY: 625 Drug Related Seizure of Property 21 USC 881, 690 Other
LABOR: 710 Fair Labor Standards Act, 720 Labor/Management Relations, 740 Railway Labor Act, 751 Family and Medical Leave Act, 790 Other Labor Litigation, 791 Employee Retirement Income Security Act
IMMIGRATION: 462 Naturalization Application, 465 Other Immigration Actions
BANKRUPTCY: 422 Appeal 28 USC 158, 423 Withdrawal 28 USC 157
PROPERTY RIGHTS: 820 Copyrights, 830 Patent, 835 Patent - Abbreviated New Drug Application, 840 Trademark
SOCIAL SECURITY: 861 HIA (1395ff), 862 Black Lung (923), 863 DIWC/DIWW (405(g)), 864 SSID Title XVI, 865 RSI (405(g))
FEDERAL TAX SUITS: 870 Taxes (U.S. Plaintiff or Defendant), 871 IRS—Third Party 26 USC 7609
OTHER STATUTES: 375 False Claims Act, 376 Qui Tam (31 USC 3729(a)), 400 State Reapportionment, 410 Antitrust, 430 Banks and Banking, 450 Commerce, 460 Deportation, 470 Racketeer Influenced and Corrupt Organizations, 480 Consumer Credit, 485 Telephone Consumer Protection Act, 490 Cable/Sat TV, 850 Securities/Commodities/Exchange, X 890 Other Statutory Actions, 891 Agricultural Acts, 893 Environmental Matters, 895 Freedom of Information Act, 896 Arbitration, 899 Administrative Procedure Act/Review or Appeal of Agency Decision, 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)
X 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. § 1332(d)
Brief description of cause: Product mislabeled as Olive-Oil

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 10,000,000
CHECK YES only if demanded in complaint: JURY DEMAND: X Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE DOCKET NUMBER

DATE 03/27/2026 SIGNATURE OF ATTORNEY OF RECORD /s/ Joshua B. Swigart

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.