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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

NANCY ZELDIN, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

CHOSEN FOODS LLC,

Defendant.

Case No. **'26CV5565 CAB B JW**

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

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1 Plaintiff Nancy Zeldin (“Plaintiff”), individually, and on behalf of all others
2 similarly situated, by and through undersigned counsel, brings this class action
3 against Defendant Chosen Foods LLC (“Defendant” or “Chosen”) and complains and
4 alleges upon personal knowledge as to herself and upon information and belief as to
5 all other matters.

6 **NATURE OF THE ACTION**

7 1. This is a class action brought on behalf of consumers who purchased
8 from Defendant products labeled and advertised as “made with 100% pure avocado
9 oil,” including Defendant’s Classic Mayo, Vegan Mayo, Chipotle Mayo, Classic
10 Ranch Dressing & Dip, Steakhouse Caesar Dressing & Marinade, Lemon Salad
11 Dressing & Marinade, Zesty Italian Dressing & Marinade, Greek Artichoke Dressing
12 & Marinade, and Homestyle Balsamic Dressing & Marinade (the “Products”). These
13 Products list avocado oil as the only oil ingredient. Researchers at the University of
14 California at Davis, however, have determined that the Products contain non-avocado
15 oils.

16 2. This action arises from Defendant’s systemic practices of marketing,
17 advertising, and labeling the Products using false, misleading, and deceptive
18 representations, while omitting their true ingredients. Specifically, Defendant falsely
19 and misleadingly labels the Products as “made with 100% pure avocado oil”—a
20 claim Defendant reiterates on the ingredients list, where no oil other than avocado oil
21 is listed.

22 3. Defendant’s marking is false and deceptive because the Products in fact
23 contain undisclosed seed oils.

24 4. Defendant makes the misleading claims and omissions on the Products’
25 label and ingredients list to induce consumers to pay a higher price for the Products
26 than they otherwise would, due to the unique benefits of avocado oil as compared to
27 seed oils, including:
28

- 1 • Not highly processed, unlike seed oils;¹
- 2 • Blood pressure benefits;²
- 3 • Vitamins including vitamin E for skin, eye, and brain health, and
- 4 antioxidants to improve cholesterol;³
- 5 • A milder taste than other oils;⁴ and
- 6 • A high smoke point (around 480°F to 520°F) as compared to, *e.g.*,
- 7 canola oil (around 400-475°F) or grapeseed oil (390-420°F),⁵ making
- 8 avocado oil easier to cook with and less burn-prone than seed oils.

9 5. Plaintiff and Class members are purchasers of the Products who were
 10 induced to pay a price premium as a result of Defendant's false and misleading
 11 statements: (1) the Products claim to be "made with 100% pure avocado oil," which
 12 is false because of the inclusion of non-avocado oils in the Products; and (2) the
 13 Products inaccurately list avocado oil as the only oil on the list of ingredients despite
 14 the presence of other oils.

15 6. Plaintiff and Class members purchased the Products at the price offered
 16 only because they believed the Products were "made with 100% pure avocado oil,"
 17 *as advertised.*

18 7. Defendant's uniform misrepresentations and omissions constitute false
 19 and deceptive advertising, forming a pattern of unlawful and unfair business practices
 20 that harm the public and violate consumer protection laws.

21 8. Indeed, had they known the truth, Plaintiff and Class members *would*
 22 *not have purchased* the Products or would have *paid less*.

23 ¹ *Yes, Avocado Oil Is Good for You*, CLEVELAND CLINIC (Dec. 19, 2024), *available*
 24 *at* <https://health.clevelandclinic.org/is-avocado-oil-good-for-you>.

25 ² *Id.*

26 ³ *Id.*

27 ⁴ *Id.*

28 ⁵ Annie Edwards, *Smoke Point of Oils*, VOMFASS (Oct. 4, 2025), *available at*
[https://vomfassusa.com/blogs/gourmet-foods/smoke-point-of-](https://vomfassusa.com/blogs/gourmet-foods/smoke-point-of-oils?srltid=AfmBOooGxfTlu-Z3OZhZFoaMn25L_mNn_PwSvMaBMx8PtAlF8vuE3ocv)
[oils?srltid=AfmBOooGxfTlu-](https://vomfassusa.com/blogs/gourmet-foods/smoke-point-of-oils?srltid=AfmBOooGxfTlu-Z3OZhZFoaMn25L_mNn_PwSvMaBMx8PtAlF8vuE3ocv)
[Z3OZhZFoaMn25L_mNn_PwSvMaBMx8PtAlF8vuE3ocv.](https://vomfassusa.com/blogs/gourmet-foods/smoke-point-of-oils?srltid=AfmBOooGxfTlu-Z3OZhZFoaMn25L_mNn_PwSvMaBMx8PtAlF8vuE3ocv)

9. Accordingly, Plaintiff brings this action on behalf of herself and similarly situated consumers seeking redress for Defendant's violations of applicable state consumer protection laws and for the economic injury caused by Defendant's deceptive conduct. Plaintiff seeks monetary and injunctive relief against Defendant for violating the California Consumer Legal Remedies Act ("CLRA"), Cal. Civ. Code §§ 1750, *et seq.*; the California Unfair Competition Law ("UCL"), Cal. Bus. & Prof. Code §§ 17200, *et seq.*; California's False Advertising Law ("FAL"), Cal. Bus. & Prof. Code §§ 17500, *et seq.*; Arizona consumer fraud statutes; and the common-law prohibitions on unjust enrichment and fraud.

PARTIES

10. Plaintiff Nancy Zeldin is a citizen of Arizona and resides in Tucson, Arizona. Plaintiff last purchased the Chosen Foods Avocado Oil Mayo from Costco in Tucson, Arizona in May, 2026 for approximately \$9.00 plus tax.

11. Defendant Chosen Foods LLC is a Delaware Limited Liability Company that maintains its principal place of business located at 350 Camino de la Reina, Suite 400, San Diego, CA 92108. Defendant Chosen manufactures, markets, distributes, advertises, and sells the Products in the United States, including in California and in this District, through brick-and-mortar stores and throughout numerous retailers online.

JURISDICTION AND VENUE

12. This Court has jurisdiction over the subject-matter of this proposed class action pursuant to 28 U.S.C. § 1332(d), which, under the provisions of the Class Action Fairness Act ("CAFA"), provides for the original jurisdiction of the federal courts in any class action in which at least 100 members are in the proposed plaintiff class, any member of the plaintiff class is a citizen of a State different from any defendant, and the matter in controversy exceeds the sum of \$5,000,000.00, exclusive of interest and costs. Plaintiff alleges that the total claims of individual members of

the proposed Class (as defined herein) are in excess of \$5,000,000.00 in the aggregate, exclusive of interest and costs.

13. Venue in this Court is proper pursuant to 28 U.S.C. § 1391 because a substantial part of the events giving rise to the claims asserted herein occurred in this District and Defendant are subject to personal jurisdiction to the federal court in this District. Moreover, Defendant inhabit and/or may be found in this judicial district and the interstate trade and commerce described herein is and has been carried out in part within this judicial district. Defendant is also headquartered in this District.

FACTUAL ALLEGATIONS

I. DEFENDANT’S FALSE AND MISLEADING STATEMENTS

14. Chosen describes itself as “America’s #1 Avocado Oil” on the Chosen “About Us” webpage, where it prominently features a bottle of “100% Pure AVOCADO OIL” nestled among several avocados, whole and sliced.⁶

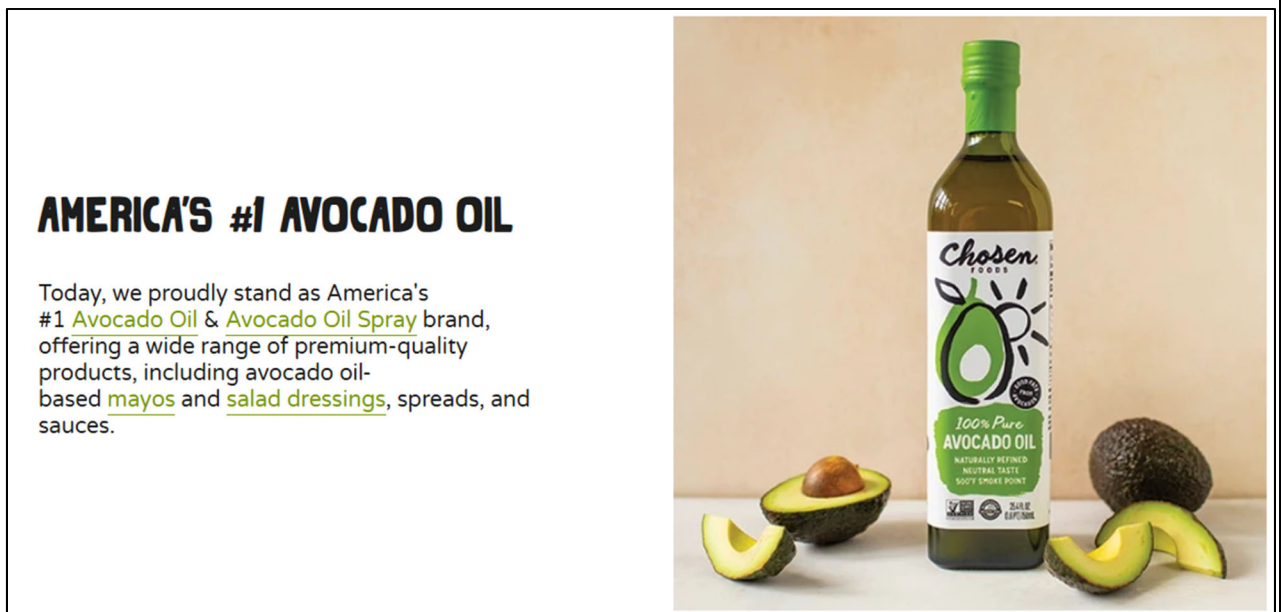
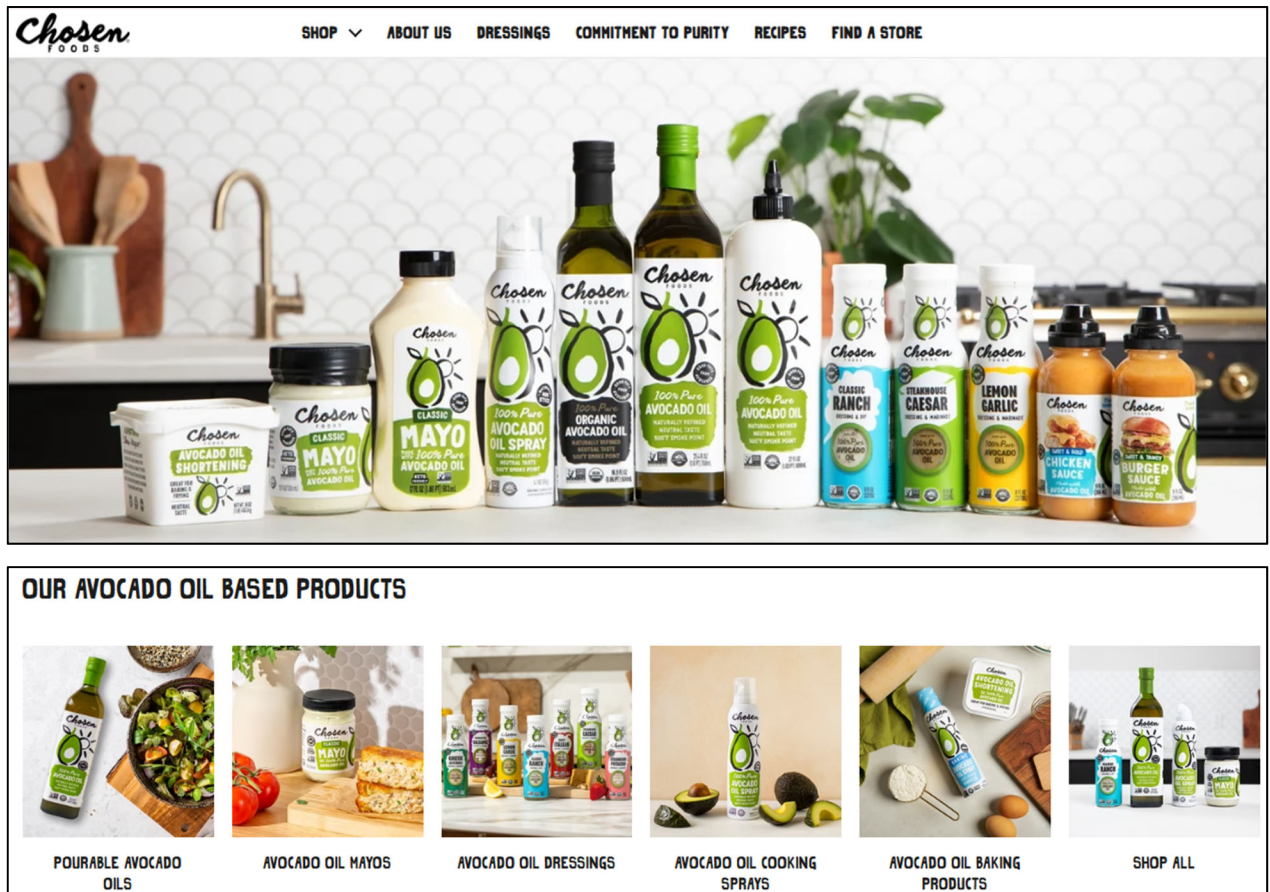


Image available at: <https://chosenfoods.com/pages/about-us>

15. Indeed, Chosen centers the avocado at every opportunity, from its

⁶ *Welcome to Chosen Foods, CHOSEN FOODS, available at: <https://chosenfoods.com/pages/about-us> (“About Chosen”).*

Product bottles, all of which feature a stylized avocado bright and green in the center of the bottle above text advertising that the Product is made with “100% Pure AVOCADO OIL”; to its website, where visitors are greeted with a banner displaying all of the avocado-branded bottles on display above a list of “Our Avocado Oil Based Products,” including “Pourable Avocado Oils,” “Avocado Oil Mayos,” “Avocado Oil Dressings,” “Avocado Oil Cooking Sprays,” and “Avocado Oil Baking Products.”⁷



Images from: <https://chosenfoods.com/>

16. On the front labels of the Products themselves, Chosen states that its, e.g., Classic Mayo is made with “100% Pure AVOCADO OIL[.]” In a round black seal, Chosen states: “Good Fats From Avocados,” evoking a prominent benefit of avocado oil.

⁷ Home, CHOSEN FOODS, available at: <https://chosenfoods.com/>.

17. On the “Ingredients” portion of the reverse label of the Products, “Avocado Oil” is the first listed ingredient, and *only* listed oil ingredient.



Images from: <https://www.walmart.com/ip/Chosen-Foods-100-Pure-Avocado-Oil-Based-Classic-Mayonnaise-Jar-12-fl-oz>

18. On its “About Us” page, Chosen provides its avocado-centric company mission alongside an image of an unripe avocado dangling from a branch: “At Chosen Foods, we believe that everything in life should be thoughtfully chosen. That’s why we’re dedicated to ensuring the purity and quality of our avocado oil, only using the best ingredients, and crafting products that taste as good as they make you feel. / So go ahead, taste and feel the difference with Chosen Foods! Join us in celebrating the power of the avocado and take your meals to the next level with our delicious and nutritious products.”⁸

⁸ About Chosen.



PURITY & QUALITY

At Chosen Foods, we believe that everything in life should be thoughtfully chosen. That's why we're dedicated to ensuring the **purity and quality** of our avocado oil, only using the best ingredients, and crafting products that taste as good as they make you feel.

So go ahead, taste and feel the difference with Chosen Foods! Join us in celebrating the power of the avocado and take your meals to the next level with our delicious and nutritious products.

Image available at: <https://chosenfoods.com/pages/about-us>

19. Chosen then states the benefits of avocado oil: “Chosen Foods Avocado Oil is 100% pure, naturally refined, and crafted for everyday cooking. With 10 grams of monounsaturated fat per serving, it’s a versatile staple for any kitchen. Its neutral flavor and 500°F smoke point make it ideal for everything from high-heat cooking to drizzling over salads. Plus, it’s gluten-free, plant-based, and made without soy or canola oils—just simple, quality ingredients.”⁹

20. These and similar misrepresentations and omissions are repeated throughout the packaging and advertising for the Products, as described below. In each case, Chosen’s representations as to the quality, characteristics, and ingredients of the Products is false and misleading because, far from containing *only* “100% pure avocado oil,” the Products in fact contain seed oils.

21. On retailer websites, Chosen’s Products include the “100% pure avocado oil” claim in the very name of the Product. For example, Walmart.com lists

⁹ *Id.*

1 Chosen's Classic Mayo as "Chosen Foods 100% Pure Avocado Oil Classic Mayo 12
2 oz Jar[.]"¹⁰

3 22. Promotional images provided by Chosen to major retailers such as
4 Walmart feature images of avocados and state that, *e.g.*, Chosen's Classic Mayo
5 Product contains "Simple Ingredients," is "Powered by 100% Pure Avocado Oil,"
6 and contains "Good Fats[.]"



23
24 *Image from:* <https://www.walmart.com/ip/Chosen-Foods-100-Pure-Avocado-Oil-Based-Classic-Mayonnaise-Jar-12-fl-oz>

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28 ¹⁰ <https://www.walmart.com/ip/Chosen-Foods-100-Pure-Avocado-Oil-Based-Classic-Mayonnaise-Jar-12-fl-oz>.

23. In the “Key Item Features” portion of retailer websites, Chosen’s Classic Mayo is advertised as “Made with 100% pure avocado oil / Contains good fats from avocados / Prepared with simple, wholesome ingredients[.]”

24. Chosen’s social media feeds are replete with images and logos of avocados, including one video (called an Instagram “Reel”) of Chosen staff dressed as avocados with the caption “National Avocado Day got us acting up [avocado emoji] [dancing man emoji][.]”

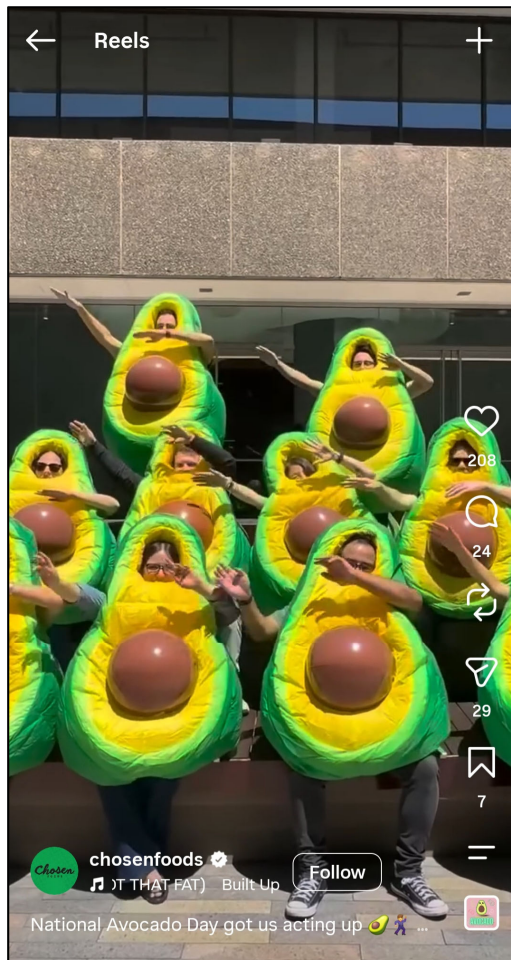


Image from: <https://www.instagram.com/reel/DMynz3oSe6G/?stkn=MzRIODBiNWFIZA==>

25. In sum, the 100% Pure Avocado Oil claim is not just the single most prominent claim on the Products and advertisements for the Products but is the core identity of Chosen Foods as a company.

A. The Products Contain Uniform Misrepresentations and Omissions.

26. Defendant’s website advertising for its Avocado Mayo, including Defendant’s Classic Mayo, Vegan Mayo, and Chipotle Mayo, contain numerous misrepresentations and omissions. Defendant claims “Our Avocado Oil- Based Mayos are made with 100% Pure Avocado Oil” and “Made with simple ingredients and good fats from avocados. . . .”



Image from: <https://chosenfoods.com/collections/healthy-mayo>

27. Defendant touts its Classic Avocado Oil Mayo as “Made with 100% pure avocado oil, cage-free eggs, organic vinegar, organic mustard, and spices,” and “Unsweetened, gluten-free, healthy, Certified Non-GMO, and free of soy, canola, and other oils,” and lists the ingredients of “Avocado Oil, Filtered Water, Egg Yolks, Organic Whole Eggs, Organic Distilled White Vinegar, Organic Mustard (Distilled Organic Vinegar, Water, Organic Mustard Seed, Salt, Organic Spices), Salt, Organic Rosemary Extract.”¹¹

¹¹ <https://chosenfoods.com/products/classic-avocado-oil-mayo-32oz-bpa-free-pet>

CLASSIC AVOCADO OIL MAYO 32 FL OZ

Dip into our clean take on a classic spread. Made with 100% pure avocado oil, cage-free eggs, organic vinegar, organic mustard, and spices, it's rich and slightly tangy—perfect for everyday use.

Our original Classic Avocado Oil Mayo recipe, otherwise known as your new go-to spread.

For sandwiches, salads, dips, and marinades: Spread on burgers, wraps and tortillas, roast fresh vegetables, or mix with a dash of vinegar to create a homemade salad dressing.

Unsweetened, gluten-free, healthy, Certified Non-GMO, and free of soy, canola, and other oils.

Try our avocado-based oils, sprays, mayos, dressings and marinades to elevate the everyday!

Ingredients:

Avocado Oil, Filtered Water, Egg Yolks, Organic Whole Eggs, Organic Distilled White Vinegar, Organic Mustard (Distilled Organic Vinegar, Water, Organic Mustard Seed, Salt, Organic Spices), Salt, Organic Rosemary Extract.

Image from: <https://chosenfoods.com/products/classic-avocado-oil-mayo-32oz-bpa-free-pet>

28. Nowhere on its website does Defendant disclose that its Classic Mayo is not made with 100% pure avocado oil and, indeed, contains seed oils.

29. Defendant touts its Vegan Avocado Oil Mayo as “Plant Based, with all the taste. Our totally vegan take on this classic spread is made with 100% Pure Avocado Oil” and “Certified Non-GMO, kosher, and free of soy, canola, and other oils,” and lists the ingredients of “AVOCADO OIL, FILTERED WATER, DISTILLED WHITE VINEGAR, SUGAR, CHICKPEA PROTEIN BLEND (CHICKPEA PROTEIN, TAMARIND SEED GUM), SALT, MUSTARD* (DISTILLED VINEGAR*, WATER, MUSTARD SEED*, SALT, SPICES*),

1 XANTHAN GUM, ROSEMARY EXTRACT* (FOR FRESHNESS), MUSTARD
2 OIL.”¹²

3 4 **VEGAN AVOCADO OIL MAYO 24 FL OZ**

5 Plant Based, with all the taste. Our totally vegan take on this classic spread is made
6 with 100% Pure Avocado Oil and is 1000% delicious.

7 **Made with 100% Pure Avocado Oil** – Packed with good fats from avocados and
8 crafted from plants for clean, wholesome flavor.

9 **Endless Uses, Unbeatable Flavor** – This creamy vegan mayo does it all—spread it on
10 sandwiches, wraps, and burgers, dip it with fries or veggies, and even use it to make
11 your own marinades, bound salads, or homemade salad dressings.

12 Certified Non-GMO, kosher, and free of soy, canola, and other oils.

13 **Ingredients:** AVOCADO OIL, FILTERED WATER, DISTILLED WHITE VINEGAR,
14 SUGAR, CHICKPEA PROTEIN BLEND (CHICKPEA PROTEIN, TAMARIND SEED
15 GUM), SALT, MUSTARD* (DISTILLED VINEGAR*, WATER, MUSTARD SEED*, SALT,
16 SPICES*), XANTHAN GUM, ROSEMARY EXTRACT* (FOR FRESHNESS), MUSTARD
17 OIL.

18 *Image from:* <https://chosenfoods.com/products/copy-of-vegan-avocado-oil-mayo-24oz-glass-jar>

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28 30. Nowhere on its website does Defendant disclose that its Vegan Mayo is
not made with 100% pure avocado oil and, indeed, contains seed oils.

¹² <https://chosenfoods.com/products/copy-of-vegan-avocado-oil-mayo-24oz-glass-jar>

31. Defendant touts its Chipotle Mayo as “Made with 100% Pure Avocado Oil, Certified Non-GMO, gluten-free, kosher, keto friendly, and free of soy and canola oils,” and lists the ingredients of “Avocado Oil, Filtered Water, Egg Yolks, Distilled White Vinegar*, Whole Eggs*, Chipotle*, Salt, Smoked Paprika*, Garlic*, Cumin*, Rosemary Extract* (for freshness).”¹³

CHIPOTLE AVOCADO OIL MAYO 11.25 FL OZ

Our Chipotle Mayo, now in a convenient squeeze! With smoky chipotle flavor and rich, creamy goodness, it adds just the right zing to any dish. Perfect for spreading, dipping, or drizzling—just squeeze, and you’re ready to go!

Made with 100% Pure Avocado Oil, Certified Non-GMO, gluten-free, kosher, keto friendly, and free of soy and canola oils.

Spread it on sandwiches, wraps, and burgers, dip it with fries or veggies, and even use it to make your own marinades, bound salads, or homemade salad dressings.

**INGREDIENTS: AVOCADO OIL,
FILTERED WATER, EGG YOLKS,
DISTILLED WHITE VINEGAR*,
WHOLE EGGS*, CHIPOTLE*, SALT,
SMOKED PAPRIKA*, GARLIC*,
CUMIN*, ROSEMARY EXTRACT*
(FOR FRESHNESS).**

Images from: <https://chosenfoods.com/products/chipotle-avocado-oil-mayo-squeeze-11-25oz>

32. Nowhere on its website does Defendant disclose that its Chipotle Mayo is not made with 100% pure avocado oil and, indeed, contains seed oils.

33. Defendant’s website advertising for its Avocado Oil Dressings, including Defendant’s Classic Ranch Dressing & Dip, Steakhouse Caesar Dressing

¹³ <https://chosenfoods.com/products/chipotle-avocado-oil-mayo-squeeze-11-25oz>

& Marinade, Lemon Salad Dressing & Marinade, Zesty Italian Dressing & Marinade, Greek Artichoke Dressing & Marinade, and Homestyle Balsamic Dressing & Marinade, contains numerous misrepresentations and omissions. Defendant represents, “Made with 100% Pure Avocado Oil and simple ingredients, these flavor-packed dressings are crafted without soy or canola oil and full of good fats from avocados.”¹⁴



CLASSIC RANCH SALAD DRESSING 8 FL OZ



CAESAR SALAD DRESSING 8 FL OZ



LEMON GARLIC SALAD DRESSING 8 FL OZ



ITALIAN SALAD DRESSING 8 FL OZ



GREEK ARTICHOKE SALAD DRESSING 8 FL OZ



BALSAMIC SALAD DRESSING 8 FL OZ

Image from: <https://chosenfoods.com/collections/dressings-marinades-made-with-avocado-oil>

34. Defendant touts its Classic Ranch Dressing & Dip as “Made with 100% Pure Avocado Oil – This clean ranch dressing is packed with good fats from avocados and crafted without soy or canola oil,” having “Simple Ingredients You Can Trust – Made with no natural flavors, artificial ingredients, or hidden additives. Just clean,

¹⁴ <https://chosenfoods.com/collections/dressings-marinades-made-with-avocado-oil>

1 wholesome flavor in every drop,” and “Certified Non-GMO, gluten-free, glyphosate-
2 residue free, and free of soy and canola oils.”¹⁵

3 4 **CLASSIC RANCH SALAD DRESSING 8 FL OZ**

5 A delicious combination of umami, bright herbs, and rich creaminess, this ranch
6 dressing delivers all the classic flavor you love with a clean, modern twist. Your inner
7 child—and your taste buds—will thank you!

8 **Made with 100% Pure Avocado Oil** – This clean ranch dressing is packed with good
9 fats from avocados and crafted without soy or canola oil.

10 **Endless Uses, Ultimate Flavor** – Perfect for dipping wings, veggies, or fries and
11 drizzling over loaded cobb salads and wraps.

12 **Simple Ingredients You Can Trust** – Made with no natural flavors, artificial
13 ingredients, or hidden additives. Just clean, wholesome flavor in every drop.

14 **Shake, Then Savor** – Our bottled dressings naturally separate because we keep it
15 real. Just shake well, and enjoy the fresh, balanced flavor in every drizzle.

16 Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy and
17 canola oils.

18 *Image from: <https://chosenfoods.com/products/classic-ranch-dressing-and-marinade>*

19 35. Nowhere on its website does Defendant disclose that its Classic Ranch
20 Dressing & Dip is not made with 100% pure avocado oil and, indeed, contains seed
21 oils.

22 36. Defendant touts its Steakhouse Caesar Dressing & Marinade as “Made
23 with 100% Pure Avocado Oil – This clean Caesar dressing is packed with good fats
24 from avocados and crafted without soy or canola oil,” having “Simple Ingredients
25 You Can Trust – Made with no natural flavors, artificial ingredients, or hidden
26
27

28 ¹⁵ <https://chosenfoods.com/products/classic-ranch-dressing-and-marinade>

additives. Just clean, wholesome flavor in every drop,” and “Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy and canola oils.”¹⁶

CAESAR SALAD DRESSING 8 FL OZ

Ultra-delicious and perfectly garlicky with a subtle parmesan flavor and a hint of anchovy, this Caesar dressing is the steakhouse classic you know and love—right at home.

Made with 100% Pure Avocado Oil – This clean caesar dressing is packed with good fats from avocados and crafted without soy or canola oil.

Endless Uses, Ultimate Flavor – Perfect for elevating Caesar salads loaded with crisp romaine, croutons, and shaved parmesan, or as a savory marinade for grilled chicken, shrimp, or steak.

Simple Ingredients You Can Trust – Made with no natural flavors, artificial ingredients, or hidden additives. Just clean, wholesome flavor in every drop.

Shake, Then Savor – Our bottled dressings naturally separate because we keep it real. Just shake well, and enjoy the fresh, balanced flavor in every drizzle.

Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy and canola oils.

Image from: <https://chosenfoods.com/products/caesar-dressing-and-marinade>

37. Nowhere on its website does Defendant disclose that its Steakhouse Caesar Dressing & Marinade is not made with 100% pure avocado oil and, indeed, contains seed oils.

38. Defendant touts its Lemon Salad Dressing & Marinade as “Made with 100% Pure Avocado Oil – This clean lemon garlic dressing is packed with good fats from avocados and crafted without soy or canola oil,” having “Simple Ingredients

¹⁶ <https://chosenfoods.com/products/caesar-dressing-and-marinade>

1 You Can Trust – Made with no natural flavors, artificial ingredients, or hidden
2 additives. Just clean, wholesome flavor in every drop,” and “Certified Non-GMO,
3 gluten-free, glyphosate-residue free, and free of soy and canola oils.”¹⁷

4 5 **LEMON GARLIC SALAD DRESSING 8 FL OZ**

6
7 The zesty bestie your taste buds never knew they needed, this tangy
8 dressing is sunshine in a bottle! Bright lemon mingles with robust garlic for
9 an unforgettable combo you’ll never want to stop drizzlin’.

10 **Made with 100% Pure Avocado Oil** – This clean lemon garlic dressing is
11 packed with good fats from avocados and crafted without soy or canola oil.

12 **Endless Uses, Ultimate Flavor** – Perfect as a tangy dressing for
13 Mediterranean salads and grain bowls, or as a bold marinade for chicken,
14 fish, and veggies.

15 **Simple Ingredients You Can Trust** – Made with no natural flavors, artificial
16 ingredients, or hidden additives. Just clean, wholesome flavor in every drop.

17
18 **Shake, Then Savor** – Our bottled dressings naturally separate because we
19 keep it real. Just shake well, and enjoy the fresh, balanced flavor in every
20 drizzle.

21 Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy
22 and canola oils.

23 *Image from:* <https://chosenfoods.com/products/chosen-foods-avocado-oil-dressing-marinade-lemon-garlic>

24 39. Nowhere on its website does Defendant disclose that its Lemon Salad
25 Dressing & Marinade is not made with 100% pure avocado oil and, indeed, contains
26 seed oils.

27
28 ¹⁷ <https://chosenfoods.com/products/chosen-foods-avocado-oil-dressing-marinade-lemon-garlic>

40. Defendant touts its Zesty Italian Dressing & Marinade as “Made with 100% Pure Avocado Oil – This clean Italian dressing is packed with good fats from avocados and crafted without soy or canola oil,” having “Simple Ingredients You Can Trust – Made with no natural flavors, artificial ingredients, or hidden additives. Just clean, wholesome flavor in every drop,” and “Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy and canola oils.”¹⁸

ITALIAN SALAD DRESSING 8 FL OZ

Balanced & Beautiful Italian Dressing

Made with a blend of premium red wine vinegar, herbs, and spices, you'll want to pour this perfectly balanced Italian dressing on the finest dishes.

Made with 100% Pure Avocado Oil – This clean italian dressing is packed with good fats from avocados and crafted without soy or canola oil.

Endless Uses, Ultimate Flavor – Perfect for drizzling over fresh greens, antipasti salads, or as a vibrant marinade for chicken, beef, or roasted vegetables.

Simple Ingredients You Can Trust – Made with no natural flavors, artificial ingredients, or hidden additives. Just clean, wholesome flavor in every drop.

Shake, Then Savor – Our bottled dressings naturally separate because we keep it real. Just shake well, and enjoy the fresh, balanced flavor in every drizzle.

Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy and canola oils.

Image from: <https://chosenfoods.com/products/red-wine-italian-dressing-marinade>

41. Nowhere on its website does Defendant disclose that its Zesty Italian Dressing & Marinade is not made with 100% pure avocado oil and, indeed, contains seed oils.

¹⁸ <https://chosenfoods.com/products/red-wine-italian-dressing-marinade>

42. Defendant touts its Greek Artichoke Dressing & Marinade as “Made with 100% Pure Avocado Oil – This clean Greek dressing is packed with good fats from avocados and crafted without soy or canola oil,” having “Simple Ingredients You Can Trust – Made with no natural flavors, artificial ingredients, or hidden additives. Just clean, wholesome flavor in every drop,” and “Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy and canola oils.”¹⁹

GREEK ARTICHOKE SALAD DRESSING 8 FL OZ

Sophisticated Greek Dressing

A light and balanced blend of savory artichokes, lively herbs, and a kick of Calabrian chili—this Greek Artichoke dressing brings the flavor your greens deserve, elevating your everyday salad to new heights.

Made with 100% Pure Avocado Oil – This clean greek dressing is packed with good fats from avocados and crafted without soy or canola oil.

Endless Uses, Ultimate Flavor – Perfect for drizzling over Greek salads with cucumbers, olives, and feta, or as a zesty greek marinade for grilled chicken, lamb, or roasted vegetables.

Simple Ingredients You Can Trust – Made with no natural flavors, artificial ingredients, or hidden additives. Just clean, wholesome flavor in every drop.

Shake, Then Savor – Our bottled dressings naturally separate because we keep it real. Just shake well, and enjoy the fresh, balanced flavor in every drizzle.

Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy and canola oils.

Image from: <https://chosenfoods.com/products/greek-artichoke-dressing-marinade>

43. Nowhere on its website does Defendant disclose that its Greek Artichoke Dressing & Marinade is not made with 100% pure avocado oil and, indeed, contains seed oils.

¹⁹ <https://chosenfoods.com/products/greek-artichoke-dressing-marinade>

1 44. Defendant touts its Homestyle Balsamic Dressing & Marinade as “Made
2 with 100% Pure Avocado Oil – This clean balsamic dressing is packed with good
3 fats from avocados and crafted without soy or canola oil,” having “Simple
4 Ingredients You Can Trust – Made with no natural flavors, artificial ingredients, or
5 hidden additives. Just clean, wholesome flavor in every drop,” and “Certified Non-
6 GMO, gluten-free, glyphosate-residue free, and free of soy and canola oils.”²⁰

8 **BALSAMIC SALAD DRESSING 8 FL OZ**

9 Rich, smooth, and oh-so-sophisticated. Tangy balsamic vinegar dances with
10 Dijon mustard and shallots in this bottled homestyle balsamic dressing for a
11 flavor that’s pure magic.

12 **Made with 100% Pure Avocado Oil** – This clean balsamic dressing is packed
13 with good fats from avocados and crafted without soy or canola oil.

14 **Endless Uses, Ultimate Flavor** – This vinaigrette is perfect for drizzling over
15 spinach salads with goat cheese and berries or as a flavorful balsamic
16 marinade for roasted chicken.

17 **Simple Ingredients You Can Trust** – Made with no natural flavors, artificial
18 ingredients, or hidden additives. Just clean, wholesome flavor in every drop.

19 **Shake, Then Savor** – Our bottled dressings naturally separate because we
20 keep it real. Just shake well, and enjoy the fresh, balanced flavor in every
21 drizzle.

22 Certified Non-GMO, gluten-free, glyphosate-residue free, and free of soy
23 and canola oils.

24 *Image from: <https://chosenfoods.com/products/homestyle-balsamic-dressing-marinade>*

25 45. Nowhere on its website does Defendant disclose that its Homestyle
26 Balsamic Dressing & Marinade is not made with 100% pure avocado oil and, indeed,
27 contains seed oils.

28 ²⁰ <https://chosenfoods.com/products/homestyle-balsamic-dressing-marinade>

B. Defendant's Products Are Not Made with 100% Pure Avocado Oil and Are Contaminated with Non-Avocado Based Oils.

2026 University of California Davis Food Science Study.

46. In 2026, researchers at University of California Davis²¹ conducted a major food science study ("UC Davis study" or "Study") that analyzed 54 total products that were labeled as containing avocado oil and olive oil. The researchers selected three main product categories that have become increasingly prevalent in the U.S. market: salad dressings, mayonnaise, and potato chips/other snacks.

47. The 2026 Study is the latest in a series of UC Davis finding on the authenticity of avocado oil. A 2020 study found 82% of commercial bottled avocado oil were either rancid or mixed with other oils.²² A later study in 2023 found 70% of private label oils were rancid or adulterated.²³

48. As UC Davis researchers recognized in 2026, consumers are increasingly paying a premium for products made with avocado oil and deserve to have confidence that the ingredients they purchase from suppliers are authentic.²⁴

49. The 2026 Study included these categories because avocado oil and olive oil are frequently promoted as premium ingredients in each category, while also representing distinct food matrices and processing conditions. The researchers proffer that evaluating multiple product categories allowed assessment of oil

²¹ <https://www.sciencedirect.com/science/article/pii/S2772502226007274> (*Authenticity of avocado and olive oils used as ingredients in commercially processed foods*, Applied Food Research, 2026 UC Davis Study).

²² "Study Finds 82 Percent of Avocado Oil Rancid or Mixed With Other Oils" (*Food Scientist Says Standards Needed to Protect Consumers and Industry*), Diane Nelson, June 15, 2020; <https://www.ucdavis.edu/food/news/study-finds-82-percent-avocado-oil-rancid-or-mixed-other-oils>

²³ "Nearly 70% of Private Label Avocado Oil Rancid or Mixed With Other Oils" (*Researchers Identify Key Markers to Help Professional Retail Buyers Choose Authentic Products*), Tiffany Dobbyn, May 24, 2023; <https://www.ucdavis.edu/food/news/70%25-private-label-avocado-oil-rancid-or-mixed-other-oils> .

²⁴ *Id.* Footnote 23. <https://www.ucdavis.edu/food/news/study-finds-82-percent-avocado-oil-rancid-or-mixed-other-oils> .

1 authenticity across different commercial applications. Within each category,
2 products were selected based on consumer popularity and market availability. Only
3 products that stated a single oil (e.g., avocado or olive oil) in the ingredient statement
4 and did not list additional edible oils were included in the study. Three vegetable oil
5 mayonnaise products were also collected as compositional comparators; however
6 these products did not claim to contain avocado or olive oil as the sole oil source,
7 they were not included in authenticity classification analysis.²⁵

8 50. The Study researchers purchased samples in 2025 and 2026 from online
9 sources and retail stores in California and stored unopened in the laboratory until they
10 performed their analysis. Two separate lots of each product were collected and
11 analyzed, and each lot was analyzed in duplicate.²⁶

12 51. The Study concluded that all of the samples from the Chosen food
13 products – the Classic Mayo, the Vegan Mayo, the Lemon Garlic Dressing &
14 Marinade, and the Zesty Italian Dressing & Marinade were not “compositionally
15 consistent with authentic oil.”²⁷

16 **Findings of the 2026 UC Davis Study.**

17 52. The UC Davis Study revealed that 100% of the salad dressings labeled
18 as using avocado oil *failed purity tests*. Researchers found that every single dressing
19 tested showed severe dilution or a complete swap with cheap seed oils.

20 53. The UC Davis Study revealed that 71% of the mayonnaise labeled as
21 using avocado oil *failed purity tests*. Researchers found that nearly three-quarters of

22 ²⁵ *Id.*

23 ²⁶ *Id.*

24 ²⁷ To accompany the Study, the UC Davis website provided a “Media Kit” of
25 materials which included a document titled “**Studied products AFRES.pdf.**” At
26 the top of the first of three pages, U.C. Davis states: “Brand information in
27 **Authenticity of avocado and olive oils used as ingredients in commercially**
28 **processed foods**” (bold in original). The Chosen food samples are identified on line
item numbers 45 through 48 and 57 through 60. See
<https://ucdavis.app.box.com/s/6ogs4l0ogplunooktwryr5b1m6k2xr9u/file/2353660743779>

1 the testing group failed. When looking strictly at U.S.-manufactured mayonnaise, the
2 failure rate neared 100%.

3 54. The UC Davis Study revealed that 93% of potato chips and other snacks
4 labeled as using avocado oil *failed purity tests*. Researchers found that most products
5 were mixed or substituted with cheaper oils like soybean or canola oil. The UC Davis
6 Study found that 26 out of 28 chip products tested did not match the chemical
7 fingerprint of pure avocado oil; 26 or 28 equals a 93% failure rate. In conclusion, the
8 Study found 48 or the 54 avocado oil-labeled products were adulterated with cheaper
9 oils.²⁸

10 55. By contrast, when the UC Davis researchers applied the same purity
11 tests to 20 olive oil-labeled processed foods, only one failed.²⁹

12 56. UC Davis researchers tested for specific fatty acids (like cis-vaccenic
13 acid) and sterols to track exact oil profiles.

14 57. Processed foods tested with olive oil labels showed 90% to 100%
15 authenticity, indicating the issue is largely isolated to the emerging avocado oil
16 market.

17 58. While the full scientific paper contains raw lot numbers rather than a
18 singular consumer "blacklist," data and public reports tracking the UC Davis Study
19 explicitly name several popular health-food staples whose avocado oil-labeled snacks
20 failed authenticity criteria.³⁰

21
22
23
24
25 ²⁸ See also, "*That Avocado Oil Chip You're Eating May Not Be Made With Pure*
26 *Avocado Oil*" (*Study Finds 89% of Avocado Oil-labeled Processed Foods Tested*
27 *Contain Other Oils*); Amy Quinton, July 15, 2026,
28 <https://www.ucdavis.edu/food/news/avocado-oil-chip-youre-eating-may-not-be-made-pure-avocado-oil> .

²⁹ *Id.*

³⁰ *Id.*

1 **II. CHOSEN’S MISREPRESENTATIONS AND OMISSIONS ARE**
2 **MATERIAL TO CONSUMERS.**

3 59. Based on Plaintiff’s investigation, Chosen Foods distributes its products
4 across more than 24,000 retail stores in the United States and Canada, including
5 major retail chains such as Walmart, Costco, Kroger, Whole Foods Market, H-E-B,
6 Albertson’s/Safeway, Stop & Shop, and B&J’s Wholesale Club.

7 60. Chosen derives an estimated annual revenue of approximately \$51.7
8 million.³¹ In 2024, Chosen’s private equity owner Butterfly Equity is reported to have
9 explored a sale of Chosen “that could value the avocado-based food products
10 company at around \$600 million or more.”³²

11 61. Avocados, it seems, are big business, in part because of their health
12 benefits.

13 62. As the Cleveland Health Clinic has stated unambiguously: “Yes,
14 Avocado Oil Is Good for You.”³³

15 63. Registered dietitian Julia Zumpano explains: “Seed oils are made from
16 the seeds of plants, such as corn, sunflowers and peanuts, and are highly processed[.]
17 They have little nutritional value and high levels of omega-6 fatty acids — a type of
18 unsaturated fat. Having too many omega-6s in your diet can cause inflammation in
19 your body.”³⁴ But avocado oil is made from the creamy, green flesh of an avocado,
20 and therefore does not go through the extensive processing of seed oils.³⁵

21 64. Zumpano continues: “the American Heart Association recommends
22 replacing foods high in saturated fats with those containing monounsaturated fats

23 ³¹ https://rocketreach.co/chosen-foods-profile_b5e955ddf42e8268.

24 ³² Abigail Summerville, *Chosen Foods’ owner explores sale of avocado-based food*
25 *products maker, sources say*, REUTERS (Mar. 19, 2024), available at:
[https://www.reuters.com/markets/deals/chosen-foods-owner-explores-sale-](https://www.reuters.com/markets/deals/chosen-foods-owner-explores-sale-avocado-based-food-products-maker-sources-say-2024-03-19/)
[avocado-based-food-products-maker-sources-say-2024-03-19/](https://www.reuters.com/markets/deals/chosen-foods-owner-explores-sale-avocado-based-food-products-maker-sources-say-2024-03-19/).

26 ³³ *Yes, Avocado Oil Is Good for You*.

27 ³⁴ *Id.*

28 ³⁵ *Id.*

1 whenever possible[.] Around 70% of the total fat in avocado oil is monounsaturated,
2 so it hits the mark.”³⁶

3 65. Avocado oil also contains essential vitamin E and other beneficial
4 antioxidants for eyes, skin, and brain health, as well as lowering cholesterol.³⁷

5 66. “Nearly two out of three consumers say that ingredients have at least a
6 moderate influence on their food and beverage purchases”³⁸ and approximately half
7 of all United States consumers—and 79% of “health-focused shoppers”—are
8 “worried about health risks from artificial ingredients, chemicals, and/or
9 preservatives in foods.”³⁹

10 67. In addition, avocado oil has cooking and flavor benefits over seed oils.

11 68. Avocado oil has a smoke point—temperature at which it burns—higher
12 than seed oils at around 480°F to 520°F as compared to, *e.g.*, canola oil (around 400-
13 475°F) or grapeseed oil (390-420°F).⁴⁰ Avocado oil is therefore easier to cook with,
14 as it is less likely to burn.

15 69. Avocado oil has a milder taste than other oils, including many seed
16 oils.⁴¹

17 70. Defendant’s statements that its products are “made with 100% pure
18 avocado oil” claims strongly influence purchasing decisions, steering consumers to
19 choose and pay more for products that prominently make “made with 100% pure
20 avocado oil” label claims over those that do not.

21 ³⁶ *Id.*

22 ³⁷ *Id.*

23 ³⁸ Lauren Manning, *Consumers are paying more attention to ingredient lists, report*
24 *finds*, FOOD DIVE (Jun. 18, 2021), <https://www.fooddive.com/news/consumers-are-paying-more-attention-to-ingredient-lists-report-finds/601925/>.

25 ³⁹ Danielle Romano, *U.S. Shoppers Are Concerned About Artificial Ingredients in*
26 *Food*, CONVENIENCE STORE NEWS (Mar. 2, 2026), <https://csnews.com/us-shoppers-are-concerned-about-artificial-ingredients-food#:~:text=Consumers%20report%20that%20they%20are,79%25%20of%20health%2Dfocused%20shoppers.>

27 ⁴⁰ Edwards, *Smoke Point of Oils*.

28 ⁴¹ *See Yes, Avocado Oil Is Good for You.*

1 71. Chosen further, and extensively, emphasizes the health, cooking, and
2 flavor benefits of avocado oil over other oils on its packaging and website, as
3 described herein.

4 72. Defendant's "made with 100% pure avocado oil" claims are therefore
5 part of a deliberate marketing strategy designed to capitalize on this demand.
6 Defendant knows that consumers place a premium on products free of seed oils and
7 that such claims materially increase marketability and sales. But those statements are
8 false and misleading.

9 73. Consumers who sought to avoid seed oils reasonably relied on
10 Defendant's representations and did not receive the natural, wholesome product they
11 believed they were purchasing. Defendant, meanwhile, obtained an unfair
12 competitive advantage and extracted a price premium based on these deceptive and
13 material misrepresentations.

14 74. Defendant charges a price premium for the Products, and that premium
15 is tied directly to their "made with 100% pure avocado oil" marketing. By falsely
16 presenting the Products as free of seed oils, Defendant positioned them as superior to
17 any competing products that truthfully disclose the Products' artificial flavoring and
18 the reality of the hydration provided by the Products.

19 75. Defendant's conduct misleads reasonable consumers, distorts
20 competition, and, ultimately, results in economic harm. Consumers paid more than
21 they otherwise would have for a product that lacked advertised benefits. This
22 widespread deception erodes consumer trust in the truth of product labeling and
23 marketing.

24 76. Due to Defendant's large market share and significant sales of the
25 Products, there are likely tens of thousands of individual consumers who have
26 purchased, repeat purchase, and are continuing to purchase the Products based on
27 Defendant's misrepresentations.
28

1 77. Given that the Products contain seed oils and are not in fact “made with
2 100% pure avocado oil”, those consumers are being materially misled and induced
3 to pay a price premium by Defendant’s deceptive conduct.

4 78. As such, Plaintiff and Class members were harmed in the form of the
5 monies they paid for the Products which they would not have paid had they known
6 the truth.

7 **A. But For Defendant’s Misrepresentations, Plaintiff and Class**
8 **Members Would Not Have Paid the Price Premium for**
9 **the Products**

10 79. Defendant’s misrepresentations caused Plaintiff and members of the
11 proposed Classes to pay a price premium for the Products because they believed they
12 were purchasing a product that was made with *only* avocado oil, and was not made
13 with other oils, like seed oils.

14 80. Ordinary consumers would reasonably be misled by Defendant’s
15 claims. Consumers saw Defendant’s claim that their products used “100% Avocado
16 Oil,” along with the Products’ ingredients list that only lists avocado oil and no other
17 oils in the ingredients. Based, on Defendant’s label, and marketing surrounding their
18 use of only avocado oil, a reasonable consumer would reasonably believe that when
19 Defendant says, “100% Avocado Oil,” it means that avocado oil is the *only* oil.

20 81. Ordinary consumers are also not in the position to evaluate Defendant’s
21 claims. When consumers are look for food that does not use seed oils, they must rely
22 on Defendant’s, and other companies, claims that there are in fact no seed oils used
23 in their products. They must also rely on the ingredients list on the Product. If the
24 ingredients list only lists one type of oil – avocado oil – consumers do not have the
25 expert knowledge or resources to determine the ingredients otherwise.

26 82. Thus, consumers reasonably relied on Defendant’s claims made
27 continuously and conspicuously in their marketing and advertising of the Products.

28 83. Had Defendant truthfully represented the Products, specifically that the
Products were not “made with 100% pure avocado oil” as conveyed by Defendant’s

1 labeling and advertising, Plaintiff and members of the prospective Classes would not
2 have purchased the Products, or at least would have purchased them for a much lower
3 price.

4 84. Accordingly, Plaintiff and other members of the Classes incurred
5 economic damages equal to the entirety of the purchase price they paid for
6 the Products.

7 **PLAINTIFF'S EXPERIENCES**

8 **A. Plaintiff Nancy Zeldin**

9 85. In May 2026, Plaintiff Nancy Zeldin purchased Defendant's Products in
10 person at a Costco location in Tucson, Arizona for approximately \$9.00 plus tax.

11 86. Plaintiff cares about avoiding seed oils in her diet and consciously
12 purchases products made without seed oils, like avocado oil.

13 87. When Plaintiff read Defendant's label which read "100% Avocado Oil,"
14 she reasonably understood that to mean that the Products only contained avocado oil,
15 and did not contain seed oils.

16 88. Plaintiff also read the ingredients list on the back of the Product label,
17 which lists avocado oil as *the only oil* used in the Product. Plaintiff thus reasonably
18 believed that the Product only contained avocado oil, and did not contain seed oils.

19 89. Plaintiff relied on these representations in her decision to purchase the
20 Product. These claims, and her desire to purchase a product that only used avocado
21 oil – and did not contain seed oils – was a significant reason she purchased the
22 Product.

23 90. Plaintiff paid a premium price for the Product, as opposed to other
24 products at a less expensive price point, because she believed she was purchasing a
25 premium product that used only avocado oil, and did not contain seed oils.

26 91. Had Plaintiff known that the Products were not "made with 100% pure
27 avocado oil," Plaintiff would not have purchased the Products, would have purchase
28 another, less expensive product, or at least would have paid substantially less.

CLASS ALLEGATIONS

92. Plaintiff brings this Action individually and on behalf of all other persons similarly situated pursuant to Fed. R. Civ. P. 23, seeking certification of the proposed classes (collectively, the “Class”):

Nationwide Class: All persons within the United States who purchased any of the Products within the applicable statute of limitations period through the date of judgment or until the conduct alleged ceases (“Class Period”).

93. Additionally, Plaintiff brings this Action on behalf of the following subclass:

Arizona Subclass: All persons within the State of Arizona who purchased any of the Products during the Class Period.

94. Excluded from the proposed Class are Defendant and any such entities in which the Defendant have a controlling interest, the Defendant’s agents, employees and legal representatives, any judge or judicial officer to whom this matter is assigned and any member of such judge or judicial officers’ staff and immediately family, as well as all resellers of the Products.

95. **Numerosity.** The members of the Class are so numerous that joinder would be inefficient and impracticable. Based upon Defendant’s annual sales statistics, there are at least tens of thousands of Class members across the country.

96. **Commonality.** There are common questions of law and fact relevant to the Class, and these questions predominate over any questions affecting individual Class members. These common questions of law and fact include, without limitation:

- a. Whether Defendant violated state and common law statutes and doctrines;
- b. Whether Defendant engaged in the conduct as alleged;
- c. Whether Defendant breached express warranties;

1 d. Whether Defendant failed to warn of the risks that followed the
2 foreseeable use of its Products;

3 e. Whether Defendant were unjustly enriched;

4 f. Whether Plaintiff was harmed;

5 g. The measure of damages to Plaintiff and Class members; and,

6 h. Whether Plaintiff is entitled to declaratory and injunctive relief.

7 97. **Typicality.** Plaintiff's claims are typical of those of other Class
8 members because Plaintiff, like every other Class member, was harmed by way of
9 the conduct as alleged herein. Plaintiff, like all other Class members, was injured by
10 Defendant's uniform conduct. Plaintiff is advancing the same claims and legal
11 theories on behalf of herself and all other Class members, such that there are no
12 defenses unique to Plaintiff. The claims of Plaintiff and those of the other Class
13 members arise from the same operative facts and are based on the same legal theories.

14 98. **Adequacy of Representation.** Plaintiff will fairly and adequately
15 represent and protect the interests of the Class members in that she has no disabling
16 or disqualifying conflicts of interest that would be antagonistic to those of the other
17 members of the Class. The damages and infringement of rights that Plaintiff suffered
18 are typical of other Class members, and Plaintiff seeks no relief that is antagonistic
19 or adverse to the members of the Class. Plaintiff has retained counsel experienced in
20 consumer protection class action litigation, and Plaintiff intends to prosecute her
21 action vigorously.

22 99. **Superiority of Class Action.** A class action is superior to other
23 available methods for the fair and efficient adjudication of this controversy, as the
24 pursuit of numerous individual lawsuits would not be economically feasible for
25 individual Class members, and certification as a class action will preserve judicial
26 resources by allowing the Class common issues to be adjudicated in a single forum,
27 avoiding the need for duplicative hearings and discovery in individual actions that
28

1 are based on an identical set of facts. In addition, without a class action, it is likely
2 that many members of the Class will remain unaware of the claims they may possess.

3 100. The litigation of the claims brought herein is manageable. Defendant's
4 uniform conduct, the consistent provisions of the relevant laws and the ascertainable
5 identities of Class members demonstrate that there would be no significant
6 manageability problems with prosecuting this lawsuit as a class action.

7 101. Adequate notice can be given to Class members directly using
8 information maintained in the parties' records.

9 102. **Predominance.** The issues in this action are appropriate for certification
10 because such claims present only particular, common issues, the resolution of which
11 would advance the disposition of this matter and the parties' interests therein.

12 103. This proposed class action does not present any unique management
13 difficulties.

14 104. A class action is superior to other available methods for the fair and
15 efficient adjudication of this controversy.

16 105. The prerequisites to maintaining a class action for equitable relief are
17 met as Defendant has acted or refused to act on grounds generally applicable to the
18 Class, thereby making appropriate equitable relief with respect to the Class as a
19 whole.

20 106. The prosecution of separate actions by members of the Class would
21 create a risk of establishing inconsistent rulings and/or incompatible standards of
22 conduct for Defendant. For example, one court might enjoin Defendant from
23 performing the challenged acts, whereas another might not. Additionally, individual
24 actions could be dispositive of the interests of the even where certain class members
25 are not parties to such actions.

CLAIMS FOR RELIEF

COUNT I

**Violations of the California Unfair Competition Law
Cal. Business & Professions Code §§ 17200, *et seq.***

107. Plaintiff incorporates by reference and re-alleges each and every allegation set forth above as though fully set forth herein.

108. Plaintiff brings this claim individually and on behalf of the Nationwide Class.

109. Plaintiff and the proposed class members desired to purchase the Products based on Defendant's misleading "made with 100% pure avocado oil" claims.

110. The Unfair Competition Law, Business & Professions Code §§ 17200, *et seq.* ("UCL"), prohibits any "unlawful," "unfair," or "fraudulent" business act or practice and any false or misleading advertising.

111. **Unlawful Business Practices:** In the course of conducting business, Defendant committed "unlawful" business practices in violation of the UCL by, inter alia, making "made with 100% pure avocado oil" claims, which are false, misleading, and deceptive (which also constitutes advertising within the meaning of § 17200); violating the Consumers Legal Remedies Act, California Civil Code §§ 1750, *et seq.*

112. Plaintiff and the proposed class reserve the right to allege other violations of law, which constitute other unlawful business acts or practices. Such conduct is ongoing and continues to this date.

113. **Unfair Business Practices:** In the course of conducting business, Defendant committed "unfair" business acts and practices by, inter alia, making "made with 100% pure avocado oil" claims, which are false, misleading, and deceptive (which also constitutes advertising within the meaning of § 17200). There is no societal benefit from false advertising, only harm. While Plaintiff and the public at large were and continue to be harmed, Defendant have been unjustly enriched by

1 its false, misleading, and deceptive representation as it unfairly enticed Plaintiff and
2 the proposed class members to purchase the Products instead of similar, less
3 expensive beverages sold by other manufacturers. Because the utility of Defendant's
4 conduct (zero) is outweighed by the gravity of harm to Plaintiff, consumers, and the
5 competitive market, Defendant's conduct is "unfair."

6 114. There were reasonably available alternatives to further Defendant's
7 legitimate business interests, other than the conduct described herein. For example,
8 Defendant could have sold the Products without the "made with 100% pure avocado
9 oil" claims.

10 115. **Fraudulent Business Practices:** In the course of conducting business,
11 Defendant committed "fraudulent business act[s] or practices" and deceptive or
12 misleading advertising by, inter alia, making the "made with 100% pure avocado oil"
13 claims, which are false, misleading, and deceptive to reasonable consumers.

14 116. Defendant's actions, claims, and misleading statements, as more fully
15 set forth above, are misleading and/or likely to deceive the consuming public within
16 the meaning of Business & Professions Code §§ 17200, *et seq.*

17 117. Plaintiff relied on Defendant's "made with 100% pure avocado oil"
18 claims and was in fact injured as a result of those false, misleading, and deceptive
19 representation.

20 118. As alleged herein, Plaintiff and the proposed class members have
21 suffered injury in fact and lost money or property at the time of purchase as a result
22 of Defendant's conduct because they were exposed to and purchased Defendant's
23 Products in reliance on the "made with 100% pure avocado oil" claims.

24 119. Unless restrained and enjoined, Defendant will continue to engage in
25 the above-described conduct. Accordingly, injunctive relief is appropriate.

26 120. Plaintiff and the proposed class members seek declaratory relief and an
27 injunction prohibiting Defendant from continuing such practices, corrective
28 advertising, restitution of all money obtained from Plaintiff and the proposed class

1 members collected as a result of unfair competition, and all other relief this Court
2 deems appropriate, consistent with Business & Professions Code § 17203.

3 **COUNT II**
4 **Violations of the California False Advertising Law**
5 **Cal. Bus. & Prof. Code §§ 17500 & 17501 *et seq.***

6 121. Plaintiff incorporates by reference and re-alleges each and every
7 allegation set forth above as though fully set forth herein.

8 122. Plaintiff brings this cause of action individually and on behalf of the
9 Nationwide Class.

10 123. Defendant have violated Sections 17500 and 17501 of the Business and
11 Professions Code.

12 124. Defendant have violated, and continue to violate, Section 17500 of the
13 Business and Professions Code by disseminating untrue and misleading
14 advertisements to Plaintiff and class members.

15 125. Defendant engaged in a campaign of false and misleading advertising
16 and marketing with regard to the benefits of its Products to deceive consumers into
17 believing that the Products were more hydrating than water and were free of artificial
18 flavoring – when, in reality, this was untrue.

19 126. Because Plaintiff bought these Products numerous times, Plaintiff has
20 standing to pursue this claim because she has suffered an economic injury due to lost
21 money or property as a result of Defendant's acts or practices. When Plaintiff
22 purchased the Products, she relied on false, misleading and deceptive representations
23 which led her to believe that the Products were as advertised on their packaging.
24 Plaintiff spent money in the transaction that she otherwise would not have spent had
25 she known the truth about Defendant's Products.

26 127. Defendant's conduct was deceptive in a materially misleading way
27 because it violates consumers' reasonable expectations. Defendant knew consumers
28 would purchase its Products and/or pay more for them under the false – but
reasonable – belief that they were consistent with advertising and packaging.

128. Defendant knew that the “made with 100% pure avocado oil” claims on its Products, which are specifically marketed toward health-conscious purchasers, are material to consumers. As a result of its false advertising, Defendant sold tens-to-hundreds of thousands of units of the Products to unsuspecting consumers nationwide.

129. As a direct and proximate result of Defendant’s false, misleading and deceptive representations and/or omissions, Plaintiff and Class members were injured in that they: (1) overpaid for the Products that were not what Defendant represented, (2) were deprived of the benefit of the bargain because these Products were different than what was advertised and marketed, and (3) were deprived of the benefit of the bargain because the Products they purchased had less value than if Defendant had adequately disclosed the truth about them.

130. On behalf of herself and Class members, Plaintiff seeks to enjoin Defendant’s unlawful acts and practices.

131. On behalf of herself and Class members, Plaintiff also seeks to recover her actual damages or \$500.00 in statutory penalties, whichever is greater, three times her actual damages, and reasonable attorneys’ fees.

COUNT III
Violations of the California Consumer Legal Remedies Act
Cal. Civ. Code §§ 1750, *et seq.*

132. Plaintiff incorporates by reference and re-alleges each and every allegation set forth above as though fully set forth herein.

133. Plaintiff brings this cause of action individually and on behalf of the Nationwide Class.

134. Plaintiff brings this claim individually and on behalf of similarly situated consumers pursuant to the Consumers Legal Remedies Act, California Civil Code §§ 1750, *et seq.* (the “CLRA”).

135. Plaintiff is a consumer as defined by California Civil Code § 1761(d).

136. The Products are “goods” within the meaning of the CLRA.

1 137. Defendant violated and continue to violate the CLRA by “[r]epresenting
2 that [the Product has] . . . characteristics, . . . uses [and] benefits . . . which [it does]
3 not have” and “[r]epresenting that [the Product is] of a particular standard, quality,
4 or grade . . . if [it is] of another” in transactions with Plaintiff and the proposed class
5 members which were intended to result in, and did result in, the sale of the Products.
6 *See* California Civil Code § 1770(a)(5), (7).

7 138. Pursuant to California Civil Code § 1782(d), Plaintiff and the proposed
8 class members seek a Court Order declaring Defendant to be in violation of the
9 CLRA and enjoining the above-described wrongful acts and practices of Defendant.
10 Plaintiff intends to amend to add requests for damages to this Count.

11 139. Pursuant to § 1782 of the CLRA, Plaintiff has, concurrent with the filing
12 of this Complaint, notified Defendant in writing by certified mail of the particular
13 violations of § 1770 of the CLRA and demanded that Defendant rectify the problems
14 associated with the actions detailed above and give notice to all affected consumers
15 of Defendant’s intent to so act. Following the required 30-day notice period, Plaintiff
16 intend to amend to add requests for restitution and disgorgement to this Count.

17 **COUNT IV**
18 **Violations of the Arizona Consumer Fraud Act**
19 **A.R.S. §§ 44-1521, *et. seq.***
On Behalf of Plaintiff and the Arizona Subclass

20 140. Plaintiff incorporates by reference and re-alleges each and every
21 allegation set forth above as though fully set forth herein.

22 141. Plaintiff brings this cause of action individually and on behalf of the
23 Arizona Subclass as defined above.

24 142. Defendant is a “person” as defined by A.R.S. § 44-1521(6).

25 143. Defendant advertised, offered, or sold goods or services in Arizona and
26 engaged in trade or commerce directly or indirectly affecting the people of Arizona.

27 144. Defendant engaged in deceptive and unfair acts and practices,
28 misrepresentation, concealment, suppression, and omission of material facts

1 affecting the people of Arizona in connection with the sale and advertisement of
2 “merchandise” (as defined in the Arizona Consumer Fraud Act, A.R.S. § 44-1521(5))
3 in violations of A.R.S. § 44-1521(A).

4 145. Defendant’s representations and omissions were material because they
5 were likely to deceive reasonable consumers.

6 146. Defendant intended to mislead Plaintiff and Arizona Subclass members
7 and induce them to rely on its misrepresentations and omissions.

8 147. Defendant misrepresented to Plaintiff and Arizona Subclass members
9 that the Product were made with “100% pure Avocado Oil” and the ingredients of
10 the Products. Plaintiff and Arizona Subclass members acted reasonably in relying on
11 Defendant’s misrepresentations and omissions, the truth of which they could not have
12 discovered.

13 148. Defendant acted intentionally, knowingly, and maliciously to violate the
14 Arizona Consumer Fraud Act, and recklessly disregard Plaintiff and Arizona
15 Subclass members’ rights. Defendant’s knowledge that the Products were not in fact
16 made with “100% pure Avocado Oil” and that the Products were made with other
17 oils, like seed oils, put it on notice that the Products were not as advertised.

18 149. As a direct and proximate result of Defendant’s unfair and deceptive
19 acts and practices, Plaintiff and Arizona Subclass members have suffered and will
20 continue to suffer injury, ascertainable losses of money and property, and monetary
21 and non-monetary damages, including from not receiving the benefit of the bargain
22 in purchasing their Products.

23 150. Plaintiff and Arizona Subclass members seek all monetary and non-
24 monetary relief allowed by law, including compensatory damages; disgorgement;
25 punitive damages; and reasonable attorneys’ fees and costs.

26 **PRAYER FOR RELIEF**

27 Plaintiff, individually, and on behalf of all other members of the Classes,
28 respectfully requests that the Court enter judgment in their favor and against

Defendant as follows:

A. For an order certifying the Classes under Rule 23 of the Federal Rules of Civil Procedure and naming Plaintiff as representative of the Classes, and Plaintiff's attorneys as Class Counsel to represent the Class members;

B. For an order declaring that Defendant's conduct violates the statutes and laws referenced herein;

C. For an order finding in favor of Plaintiff and the Classes on all counts asserted herein;

D. For compensatory, statutory, and punitive damages in amounts to be determined by the Court and/or jury;

E. For injunctive relief enjoining the illegal acts detailed herein;

F. For prejudgment interest on all amounts awarded;

G. For an order of restitution and all other forms of equitable monetary relief;

H. For an order awarding Plaintiff and the Classes their reasonable attorneys' fees and expenses and costs of suit.

JURY TRIAL DEMANDED

Plaintiff demand a trial by jury on all claims so triable.

Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

DATED: September 28, 2026

By: /s/ Matthew B. George
Matthew B. George

Laurence D. King (SBN 206423)
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ajd@kaplanfox.com
spintar@kaplanfox.com
Attorneys for Plaintiff Nancy Zeldin, and the
Proposed Classes

CIVIL COVER SHEET
of 2

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. 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. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

NANCY ZELDIN, individually, and on behalf of all others
similarly situated

(b) County of Residence of First Listed Plaintiff Pima County, Arizona
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Matthew B. George (SBN 239322) / Kaplan Fox & Kilsheimer LLP
1999 Harrison Street, Suite 1501, Oakland, CA 94612
T: 415-772-4700

DEFENDANTS

CHOSEN FOODS LLC

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

'26CV5565 CAB BJW

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 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 | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☒ 4 |
| Citizen of Another State | ☒ 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)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 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	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 PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☒ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 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	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 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	☐ 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 (15 USC 1681 or 1692) ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 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
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education 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			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 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:

Violation of various state consumer protection laws for false & misleading representations of various consumer avocado oil-ingredient food products

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** 5,000,000 **CHECK YES only if demanded in complaint:**
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE See Notice of Related Cases DOCKET NUMBER _____

DATE

Sep 28, 2026

SIGNATURE OF ATTORNEY OF RECORD

/s/ Matthew B. George

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.
- 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 cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

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