UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SARLESA MARTIN on behalf of herself and all others similarly situated, Plaintiff, v. CONAGRA BRANDS, INC. Defendant.	CASE NO. 26-13482 **CLASS ACTION COMPLAINT** **JURY TRIAL DEMANDED**

Plaintiff Sarlesa Martin ("Plaintiff"), individually and on behalf of all others similarly situated, based on personal knowledge as to her own experiences and on investigation of counsel as to all other matters, alleges the following against Defendant Conagra Brands, Inc. ("Conagra"):

NATURE OF THE ACTION

1. Plaintiff brings this class action on behalf of herself and all other similarly situated consumers who purchased Duncan Hines Keto Friendly baking mixes marketed as containing zero grams of added sugar (the "Products").

2. Defendant markets and advertises the Products as "0g Added Sugar Per Serving" (the "Representations"). Defendant repeats these claims throughout the Products' packaging and marketing. The Products, however, do not contain 0g of

added sugar because they contain 4-5 grams of sugar in the form of allulose depending on the type of mix. Allulose is a monosaccharide, qualifying it as a sugar under the applicable federal labeling standards.

3. Defendant's own labeling admits the Products contain allulose. For example, the ingredients list on each of the Products identifies allulose, even though the front of each package represents that the Products contain "0g Added Sugar Per Serving" and the Nutrition Facts panel declares 0 grams of added sugars. The front-of-package representations are nutrient-content claims under 21 C.F.R. § 101.13(b) and (b)(1).

4. Conagra offers Duncan Hines Keto Friendly products labeled "0g Added Sugar Per Serving" in varieties including Classic Yellow Cake Mix, Chewy Fudge Brownie Mix and Blueberry Muffin Mix. All variations contain approximately 4-5 grams of allulose per serving.

5. The Products' labels repeatedly represents that the Products contain "0g Added Sugar Per Serving." This statement is a nutrient-content claim under 21 C.F.R. § 101.13(b) and, where phrased as a variant of "no sugar added"/"without sugar added," must comply with 21 C.F.R. § 101.60(c). Defendant nevertheless adds allulose. Defendant's Representations are both false and misleading. Accordingly, Plaintiff brings a claim against Defendant for unjust enrichment.

JURISDICTION AND VENUE

6. This Court has subject-matter jurisdiction over this action pursuant to the Class Action Fairness Act, 28 U.S.C. § 1332(d)(2)(A), because the proposed Classes include more than 100 members, the aggregate claims of the proposed Classes exceed $5,000,000, exclusive of interest and costs, and at least one member of the proposed Classes is a citizen of a state different from Defendant; Plaintiff is a citizen of the State of Kentucky, and Defendant is a citizen of the States of Delaware and Illinois.

7. The Court has personal jurisdiction over Defendant because Defendant maintains its principal place of business in Illinois and is therefore at home in this state. Defendant's contacts include, without limitation, sales of the Products directly to consumers located in this District; advertising and marketing directed into this District; and operation of an e-commerce website and third-party retail listings through which consumers in this District have purchased the Products.

8. Venue is proper in this Court under 28 U.S.C. § 1391 because the Defendant does business in this Judicial District is headquartered in this district, and a substantial part of the events that gave rise to Plaintiff's claims occurred within this District.

PARTIES

9. Plaintiff Sarlesa Martin is a citizen of Kentucky residing in Lexington, Kentucky. Plaintiff regularly purchased Duncan Hines Keto Friendly Classic Yellow Cake Mix, Duncan Hines Keto Friendly Chewy Fudge Brownie Mix and Duncan Hines Keto Friendly Blueberry Muffin Mix for personal use from Kroger and Walmart locations in Lexington, Kentucky throughout 2025. Plaintiff saw and relied on Defendant's prominent representations that the Products contained "0g of Added Sugar Per Serving." Based on that representation, Plaintiff reasonably believed the Products contained no added sugar. The representation was part of the basis of Plaintiff's bargain, and Plaintiff would not have purchased the Products on the same terms, or at all, had she known it was untrue. Plaintiff paid a price premium because of the false representation and did not receive the benefit of the bargain because the Products in fact contain allulose.

10. Plaintiff remains interested in purchasing Duncan Hines Keto Friendly products that truly contain no added sugar but cannot know whether the Products' composition may change over time. Plaintiff is an average consumer without specialized knowledge of food chemistry, and neither Plaintiff nor reasonable consumers have the specialized knowledge needed to determine independently whether allulose is a sugar.

11. Defendant Conagra Brands, Inc. is a Delaware corporation with its principal place of business in Chicago, Illinois. At all times during the class period, Defendant

formulated, labeled, marketed, distributed, and/or sold the Products throughout Illinois and the United States, including in this District.

FACTUAL ALLEGATIONS

A. Consumers Seek Out and Pay Premium Prices for Products That Contain No Added Sugar

12. Consumer demand for products without added sugar is well documented and food producers have been capitalizing on that trend.[1]

13. That demand accords with public-health guidance from federal agencies (e.g., the Dietary Guidelines for Americans), the World Health Organization, and the American Heart Association, each of which recommends limiting added sugar intake.[2]

14. Food and beverage manufacturers are aware of this demand and of the premium consumers will pay to satisfy it. Products labeled "no added sugar," "zero sugar," or "sugar free" command higher prices than comparable products that do not bear those claims, and manufacturers reserve the principal display panel for the claims they believe will most motivate a purchase.

[1] *Int'l Food Info. Council*, 2025 IFIC Food & Health Survey: A Focus on Sugars & Sweeteners 5, 9 (Dec. 2025) (reporting that in 2025, 75% of surveyed Americans were trying to limit or avoid sugar in their diet), https://ific.org/wp-content/uploads/2025-IFIC-Food-Health-Survey-Sugars-Sweeteners.pdf.

[2] U.S. Dep't of Health & Hum. Servs. & U.S. Dep't of Agric., *Dietary Guidelines for Americans*, 2025–2030 (Jan. 2026), https://cdn.realfood.gov/DGA.pdf; World Health Organization, *Guideline: Sugars Intake for Adults and Children* (2015), https://www.who.int/publications/i/item/9789241549028; American Heart Association, *Added Sugars*, heart.org/en/healthy-living/healthy-eating/eat-smart/sugar/added-sugars.

15. Defendant has capitalized on that demand. It sells the Products containing allulose, an added monosaccharide sugar, while representing them as containing "0g Added Sugar," thereby obtaining an unfair competitive advantage over competitors that accurately label comparable products.

B. Defendant's "0g Added Sugar" Representations

16. Defendant prominently represents on the Products that they contain "0g Added Sugar Per Serving."[3] Below is an illustrative sampling of the Products and the Representations:

[3] Defendant changed the front label of the Products and online marketing at some point in 2026.

Duncan Hines Keto Friendly Classic Yellow Cake Mix









Duncan Hines Keto Friendly Chewy Fudge Brownie Mix

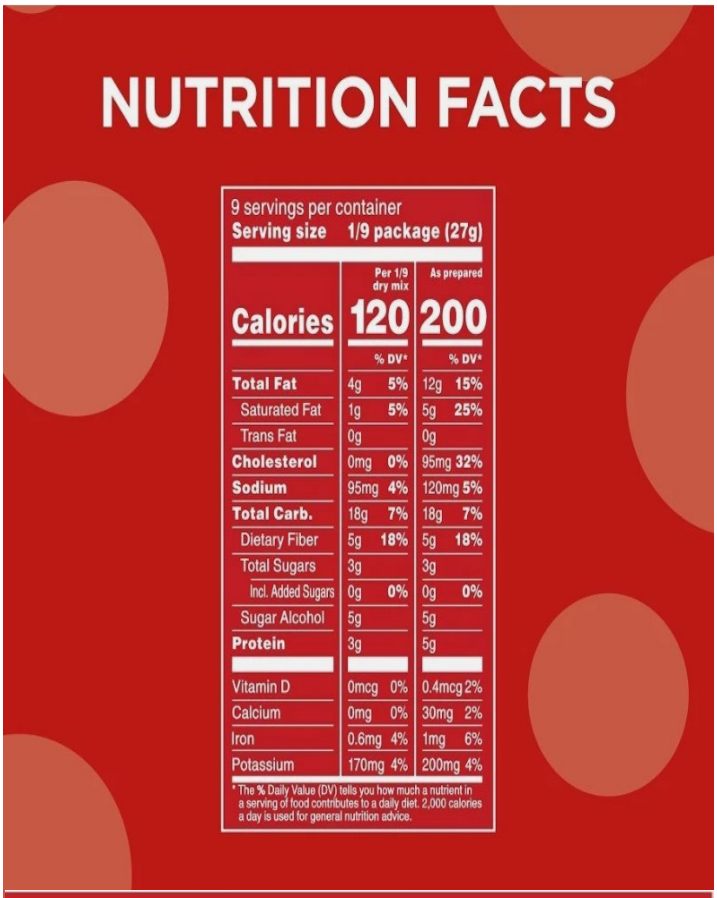






Duncan Hines Keto Friendly Blueberry Muffin Mix









17. The Representations communicate to reasonable consumers that the Products contain no added sugar. That is the plain and ordinary meaning of "0g Added Sugar Per Serving" and constitutes an absolute promise that the Products contains no added sugar.

18. The Representations are absolute, objective, and quantitative claims concerning whether and how much added sugar is in the Products. Those claims are demonstrably false: Defendant's own labels disclose that the Products contain allulose, a sugar, by listing it in the ingredients statement.

19. The Products' information panel(s) reinforce, rather than cure, the misleading impression created by the Representations: the Nutrition Facts panel declares 1-3 grams of Total Sugars and 0 grams of Added Sugars.

20. Allulose is a sugar. Chemically, allulose is a monosaccharide, the C-3 epimer of D-fructose, meaning allulose and fructose share the same molecular formula and connectivity but differ in the spatial orientation of a hydroxyl group at the third carbon.

21. Allulose is not merely a sugar as a matter of chemical classification, it is used as such. Because allulose is less sweet than table sugar (approximately 70% as sweet

as sucrose), it is used in gram-scale quantities as a bulk sweetener.[4] High-intensity sweeteners such as saccharin, aspartame, acesulfame potassium, neotame, sucralose, and advantame are approximately 200 to 20,000 times as sweet as sucrose and are therefore used in trace amounts.[5]

22. The FDA identifies allulose as a sugar. In its 2016 Nutrition Facts rulemaking, the FDA stated that allulose, "as a monosaccharide, must be included" in the Total Sugars declaration pending any future rulemaking that would otherwise exclude the substance. 81 Fed. Reg. 33,742, 33,795–96 (May 27, 2016). No such rulemaking has excluded allulose from the definition of Total Sugars. 21 C.F.R. § 101.9(c)(6)(ii). As the Seventh Circuit recently held, "there is no dispute that allulose is a monosaccharide…[and] because the definition includes every monosaccharide…allulose is a sugar under §101.9(c)(6)(ii)."[6]

23. In that appeal, the FDA, appearing as amicus curiae, took the position – which the Court ultimately adopted – that total sugars as defined in that regulation include all monosaccharides, including allulose.[7]

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[4] Mengting Tao, Wenli Zhang & Wanmeng Mu, D-Allulose: A New Generation of Potential Bulk Sweeteners in the Food Industry, 73 J. Agric. & Food Chem. 27,833, 27,833–35 (2025) (Viewpoint), https://doi.org/10.1021/acs.jafc.5c13620.

[5] U.S. Food & Drug Administration, Aspartame and Other Sweeteners in Food, https://www.fda.gov/food/food-additives-petitions/aspartame-and-other-sweeteners-food (last visited Oct. 1, 2026).

[6] *Franco v. Chobani, LLC*, 184 F.4th 599, 2026 U.S. App. LEXIS 22276 at *5 (7th Cir. 2026).

[7] *Id*.

C. The Products Violate FDA Nutrient-Content Regulations

24. Congress empowered the FDA to oversee and regulate food labeling through the Federal Food, Drug, and Cosmetic Act, as amended by the Nutrition Labeling and Education Act, 21 U.S.C. § 301 et seq. FDA's food-labeling regulations appear at 21 C.F.R. part 101.

25. Information within the Nutrition Facts panel is not itself a nutrient-content claim, but the same information placed outside that panel is subject to the nutrient-content-claim regulations. 21 C.F.R. § 101.13(c). The Representations are nutrient-content claims because they appear outside that panel and expressly or implicitly characterize the level of sugar in the Products. 21 C.F.R. § 101.13(b)(1)–(2), (c).

26. Unlike a "sugar free" or "zero sugar" claim, which may be made when a food contains less than 0.5 grams of sugars per serving, a "no added sugar" claim may not be made if any amount of sugar is added during processing. 21 C.F.R. § 101.60(c)(1)(i), (c)(2)(i). Because allulose is a sugar under § 101.9(c)(6)(ii), and because Defendant adds it to the Products as a sweetener, the Products cannot lawfully bear the Representations, regardless of the amount of allulose added.

27. Because the Products bear false, misleading, and impermissible nutrient-content claims, they are misbranded under federal law. 21 U.S.C. § 343(a)(1), (r)(1)(A); 21 C.F.R. §§ 101.13, 101.60(c), 101.9(c)(6)(ii). Plaintiff does not seek to

enforce the FDCA directly, but seeks relief under the theory that Defendant has been unjustly enriched as a result of this unlawful conduct.

D. Reasonable Consumers Cannot Detect Defendant's Deception

28. Reasonable consumers have no reason to search the side or back panel when presented with a conspicuous front-panel representation that the Products contain "0g Added Sugar." Consumers are not expected to look beyond a misleading front-of-package representation to discover it is false.

29. Even a consumer who reviews the Nutrition Facts panel would encounter a declaration of 1 to 3 grams of Total Sugars depending on the product and 0 grams of Added Sugars.

30. Consumers are not required to conduct independent scientific testing or research into the chemical classification of listed ingredients to verify express label claims. Reasonable consumers do not possess specialized knowledge of carbohydrate chemistry. Defendant is responsible for ensuring its labeling and marketing claims are truthful and not misleading.

E. Defendant Knew the Representations Were False

31. Defendant knew, or should have known, that the Representations were false or misleading when it marketed, advertised, labeled, distributed, and sold the Products. Specifically, Defendant knew that: (a) the Products contain allulose; (b) allulose is a free monosaccharide and sugar; (c) its labels list allulose as an ingredient

on the ingredient statement; (d) its labels nevertheless represent that the Products contain 0g of added sugar; (e) reasonable consumers would rely on the Representations when purchasing; (f) consumers would not receive the represented benefit of the bargain; and (g) the Representations enabled Defendant to charge a premium for the Products.

F. Defendant's Representations Injured Plaintiff and the Class

32. As a direct and proximate result of Defendant's false, misleading, and deceptive representations and omissions, Defendant injured Plaintiff and Class Members, who: (a) paid money for products that were not as represented; (b) paid a price premium for the Products; (c) were deprived of the benefit of their bargains; and (d) purchased misbranded Products that could not lawfully have been sold as labeled.

CLASS ACTION ALLEGATIONS

33. Plaintiff brings this action on behalf of herself and all others similarly situated under Federal Rule of Civil Procedure 23(a), (b)(2), and/or (b)(3). The proposed class is defined as follows (the "Class"):

a. Nationwide Class: All persons in the United States who, during the maximum period of time permitted by law, purchased the Products for personal use.

34. Excluded from the Class are: (1) Defendant, its officers, and directors; (2) the judge and magistrate judge assigned to this action and their staff and immediate families; (3) Plaintiff's counsel and Defendant's counsel; and (4) persons who purchased the Products for resale.

35. Plaintiff reserves the right to amend the class definitions and to add classes or subclasses as appropriate based on investigation, discovery, and the specific theories of liability.

Numerosity

36. The exact number of Class Members is unknown to Plaintiff and can be determined only through discovery, but upon information and belief they number at least in the thousands, and joinder is impracticable. Class Members may be identified through Defendant and third-party retailers' distribution and sales records, and notified by mail, email, publication, and/or other appropriate means.

Existence and Predominance of Common Questions of Law and Fact

37. Common questions of law and fact exist as to all Class Members and predominate over questions affecting only individual members, including, but not limited to:

a. Whether allulose is a monosaccharide and sugar;

b. Whether the Products contain added allulose and fail the governing conditions for the Representations under 21 C.F.R. §§ 101.13 and 101.60(c);

c. Whether reasonable consumers would understand Defendant's Representations to be untrue or misleading;

d. Whether Defendant's Representations were material;

e. Whether the Products are misbranded under federal law;

f. Whether Defendant was unjustly enriched;

g. Whether Plaintiff and Class Members suffered damages and, if so, the amount of those damages;

h. Whether Plaintiff and Class Members are entitled to restitution, and/or disgorgement; and

i. Whether Plaintiff and Class Members are entitled to attorneys' fees and costs.

Typicality

38. Plaintiff's claims are typical of those of other Class Members because Plaintiff was exposed to Defendant's Representations, purchased a Product in reliance on them, and suffered the same type of economic loss.

Adequacy

39. Plaintiff will fairly and adequately represent and protect the Class' interests. Plaintiff has no interests adverse to the Class, is committed to vigorous prosecution, and has retained skilled and experienced counsel.

40. Plaintiff is not subject to any individual defenses that are unique or different from those applicable to other Class Members or the Class as a whole.

Superiority

41. A class action is superior to other available methods for the fair and efficient adjudication of this controversy because the expense and burden of individual litigation make it economically infeasible for Class Members to seek redress individually, and class wide adjudication avoids the risk of inconsistent judgments while conserving judicial and party resources.

42. The prosecution of separate actions would also create a risk of inconsistent rulings that could be dispositive of the interests of Class Members who are not parties to those adjudications and/or that could substantially impair their ability to protect their interests.

Equitable Relief

43. Defendant has acted in a manner that is consistent across the entire Class, rendering Class-wide equitable relief appropriate.

CAUSES OF ACTION

Count One

Unjust Enrichment
(On Behalf of Plaintiff and the Nationwide Class)

44. Plaintiff incorporate by reference and re-alleges the allegations contained in all preceding paragraphs.

45. Defendant's false and misleading Representations caused Plaintiff and Class Members to pay a price premium for the Products, thereby conferring a direct and unjust benefit on Defendant at Plaintiff and Class Members' expense.

46. Defendant have been unjustly enriched by retaining revenues from Plaintiff and Class Members' purchases. That retention is unjust because Defendant misrepresented that the Products contained no added sugar, causing purchases that otherwise would not have occurred or would have occurred only at lower prices

47. Defendant knew of the benefit Plaintiff and the Class Members conferred on them.

48. Under the circumstances, it would be inequitable for Defendant to retain the benefit conferred upon it, and Defendant's retention of that benefit violates fundamental principles of justice, equity, and good conscience. Plaintiff and Class Members seek disgorgement and restitution of Defendant's wrongful profits, revenue, and benefits.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated, respectfully requests that the Court enter judgment against Defendant as follows:

a. For an order certifying the Class under Fed. R. Civ. P. 23, naming Plaintiff as representatives of the Class, and appointing Plaintiff's counsel as Class Counsel;

b. For an order declaring that Defendant's conduct has unjustly enriched Defendant at the expense of Plaintiff and the Class;

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

d. For damages, restitution, and/or disgorgement available under the asserted causes of action, in an amount to be proven at trial;

e. For pre- and post-judgment interest on all amounts awarded;

f. For an order awarding Plaintiff's and the Class' reasonable attorneys' fees, expenses, and costs of suit; and

h. For such other and further relief as the Court deems just and proper.

DEMAND FOR TRIAL BY JURY

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff demand a trial by jury of any and all issues in this action so triable as of right.

Dated: October 30, 2026

By: _/s/*James J. Rosemergy*

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Attorneys for Plaintiff and the Putative Class
**Pro hac vice forthcoming*

ILND 44 (Rev. 08/23)

CIVIL COVER SHEET

The ILND 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

SARLESA MARTIN, et al

(b) County of Residence of First Listed Plaintiff Fayette, KY
(Except in U.S. plaintiff cases)

(c) Attorneys *(firm name, address, and telephone number)*

Carey & Danis, LLC, 8235 Forsyth, Ste. 1100, St. Louis MO, 63105 314-725-7700

DEFENDANTS

Conagra Brands, Inc.

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)*

II. BASIS OF JURISDICTION *(Check **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 *(For Diversity Cases Only.)*

*(Check **one** box, only 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 *(Check **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 Loan (Excludes Veterans)
- ☐ 153 Recovery 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

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

PRISONER PETITIONS
- ☐ 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

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

PROPERTY RIGHTS
- ☐ 820 Copyright
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016 (DTSA)

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 (TCPA)
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Arts
- ☐ 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

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 463 Habeas Corpus – Alien Detainee (Prisoner Petition)
- ☐ 465 Other Immigration Actions

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAXES
- ☐ 870 Taxes (U.S. Plaintiff or Defendant
- ☐ 871 IRS—Third Party 26 USC 7609

V. ORIGIN *(Check **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

(Enter U.S. Civil Statute under which you are filing and write a brief statement of cause.)

28 USC 1332d

VII. PREVIOUS BANKRUPTCY MATTERS

(For nature of suit 422 and 423, enter the case number and judge for any associated bankruptcy matter previously adjudicated by a judge of this Court. Use a separate attachment if necessary.)

VIII. 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

IX. RELATED CASE(S) IF ANY *(See instructions):*

Judge Hon. Jeremy C. Daniel Case Number 1:26-cv-11420

X. Is this a previously dismissed or remanded case?

☐ Yes ■ No **If yes, Case #** **Name of Judge**

Date: 10/30/2026

Signature of Attorney of Record