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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS**

WILLIAM HILL, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiff,

v.

VIRTUS NUTRITION LLC, a Delaware
limited liability company; NUTRIUS LLC, a
Delaware limited liability company; and DOES
1 through 100, inclusive;

Defendants.

Case No.: CV-23-000667

Assigned for All Purposes to:
Honorable Stacy P. Speiller
Department 22

CLASS ACTION

**PLAINTIFFS' SUPPLEMENTAL BRIEF
IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Supplemental Declaration of Proposed
Class Counsel (Douglas Han); Declarations
of Proposed Class Representatives (William
Hill, Klint Miller, and Martin Villanueva);
and [Proposed] Amended Order filed
concurrently herewith]

Hearing Date: April 26, 2024
Hearing Time: 8:30 a.m.
Hearing Place: Department 22

Complaint Filed: February 7, 2023
FAC Filed: April 24, 2023
SAC Filed: December 13, 2023
Trial Date: None Set

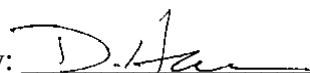
Plaintiffs William Hill, Klint Miller, and Martin Villanueva (“Plaintiffs”) provide this supplemental submission in response to the Court’s tentative ruling on Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement. On March 4, 2024, prior to the originally scheduled Preliminary Approval Hearing, the Court issued a tentative ruling ordering Plaintiffs and Defendants Virtus Nutrition LLC and Nutrius LLC (“Defendants”) to file additional information and continuing the Preliminary Approval Hearing to April 26, 2024 at 8:30 a.m.

The chart below lists each of the Court’s issues from the tentative ruling and the revisions/submissions made to address each issue.

Ruling	Revisions/Submissions
(1) Declarations from the class representatives providing information that the Court can use to determine whether the representatives’ claims are typical for the class and whether they have actively participated in this litigation such that a \$10,000 payment to each of the class representatives is warranted.	(Supplemental Declaration of Douglas Han in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 9; See Declaration of William Hill; See Declaration of Klint Miller; See Declaration of Martin Villanueva.)
(2) The Court also requires a supplemental brief from Plaintiffs’ counsel explaining why they think a 38% contingency fee is justified.	(Supp Han Decl., <i>supra</i> , at ¶ 5-8; Exhibits 3, 4.)

Dated: March 19, 2024

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiffs

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PROOF OF SERVICE
1013A(3) CCP

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 751 N. Fair Oaks Avenue, Suite 101, Pasadena, California 91103 and my electronic service address is manderson@justicelawcorp.com.

On March 19, 2024, I served the foregoing document described as

**PLAINTIFFS' SUPPLEMENTAL BRIEF IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

for the following case: **Hill, et al. v. Virtus Nutrition LLC et al.**
LWDA/Court Case No.: **LWDA Case No.: LWDA-CM-934421-23**
Court Case No.: CV-23-000667
Stanislaus County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[X] STATE

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 19, 2024, at Pasadena, California.



Mariah Anderson