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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

GORDON NOBORU YAMAGATA and  
STAMATIS F. PELARDIS, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

RECKITT BENCKISER LLC,

Defendant.

Case No. 3:17-cv-03529-VC

**DECLARATION OF SYED MOIZ ON  
BEHALF OF AMAZON.COM, INC.**

1 I, Syed Moiz, hereby declare as follows:

2 1. I am over the age of 18 years. I am a Program Manager at Amazon.com., Inc.  
3 (“Amazon”). Based on my position at Amazon, I am familiar with Amazon’s email systems and  
4 have experience with sending mass email messages to Amazon customers. I have personal  
5 knowledge of the facts contained herein, and, if called as a witness, I could and would competently  
6 testify to those facts.

7 2. On July 23, 2021, and in compliance with the June 24, 2021, Order Granting  
8 Preliminary Approval in the above-captioned action, I caused an email to be sent out on behalf of,  
9 and in the name of, Amazon to the email addresses associated with Amazon customers that  
10 Amazon’s records indicate purchased Schiff Move Free® Advanced, Move Free® Advanced Plus  
11 MSM, or Move Free® Advanced Plus MSM & Vitamin D, from Amazon’s website between from  
12 May 28, 2015 to February 21, 2021. This “Email Message” is described below.

13 3. The subject of the Email Message was “Notice Regarding Class Action Settlement.”  
14 The body of the Email Message was in the following form:

15 Greetings,

16 Amazon is emailing you because our records indicate that you may have purchased  
17 Schiff Move Free® Advanced, Move Free® Advanced Plus MSM, or Move Free®  
18 Advanced Plus MSM & Vitamin D from May 28, 2015 to June 24, 2021. If so, you  
19 may be entitled to receive a cash payment from a \$50 million class action  
20 settlement. In Yamagata v. Reckitt Benckiser, LLC, Case No. 3:17-cv-03529-VC  
21 (N.D. Cal.), a federal court in California preliminarily approved the settlement of a  
class action lawsuit involving claims that these Schiff Move Free® Advanced  
supplements were falsely advertised. The defendant in the lawsuit denies these  
claims.

22 Amazon is sending this email on behalf of the parties to the lawsuit, and as required  
23 by the Court. But because we are not involved in the lawsuit, we cannot assist you  
24 directly. To determine whether you are a member of the class, obtain a copy of the  
25 Settlement Agreement, view the full notice approved by the Court, and file a claim,  
26 please go to <https://www.MoveFreeAdvancedSettlement.com> or call the Settlement  
27 Administrator at 1 (855) 435-0524. You must submit a valid claim to receive a  
28 cash payment. The estimated cash award is \$22 per bottle purchased. No proof of  
purchase is required for claims of up to 3 bottles. The full notice also provides  
details on how to opt out or object to the settlement. Claims must be submitted by  
November 8, 2021 and opt outs must be submitted by October 14, 2021. Objections  
must be received by the Court by October 14, 2021. The Court will require only

1 substantial compliance with the requirements for submitting an objection. The  
2 Court will hold a hearing on October 28, 2021 at 2:00 p.m. to consider whether to  
3 approve this Settlement and requested Plaintiffs' attorneys' fees of 25% of the  
4 Settlement amount and reimbursement of costs, among other matters. You may  
5 appear the hearing, but you don't have to.

6 If you have any questions about the settlement, please visit  
7 <https://www.MoveFreeAdvancedSettlement.com> or Plaintiffs' attorneys Timothy  
8 G. Blood and Thomas J. O'Reardon II of Blood Hurst & O'Reardon, LLP.  
9 Telephone: 619-338-1100; Email: [info@bholaw.com](mailto:info@bholaw.com).

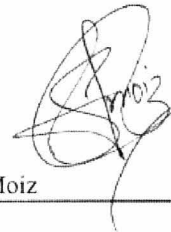
10 Sincerely,

11 Customer Service  
12 Amazon.com

13 4. The Email Message was sent to a total of 859,694 email addresses.

14 5. The Email Message was successfully delivered to a total of 859,480 email addresses  
15 as reported by Amazon's email server.

16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct, and this declaration was executed this 26<sup>th</sup> day of August, 2021, in  
18 Hyderabad, India.



19 By: Syed Moiz