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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

IN RE CONAGRA FOODS, INC.	Case No. CV 11-05379-CJC (AGR _x)
	MDL No. 2291
	<u>CLASS ACTION</u>

**MEMORANDUM IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT
AND CERTIFICATION OF SETTLEMENT CLASS**

Dated: July 23, 2019

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FOR FINAL APPROVAL OF PROPOSED
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CERTIFICATION OF SETTLEMENT CLASS

CV 11-05379-CJC (AGR_x)

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1 **I. INTRODUCTION**

2 Plaintiffs and Defendant Conagra (“the Parties”) seek final approval of the arm’s-length
3 settlement (“Settlement”) that they reached after almost eight years of hard-fought litigation.¹ Not
4 only did Conagra remove the “100% Natural” representation from its Wesson brand cooking oils
5 (“Wesson Oils”) during the course of this litigation,² but this litigation also achieved Plaintiffs’ goal
6 of injunctive relief preventing Conagra’s advertising the Wesson Oils as “natural,” should Conagra
7 reacquire the Wesson brand, and the Settlement also provides monetary and injunctive relief to
8 purchasers of the Wesson Oils in 11 State Classes (collectively, the “Settlement Class”) who submit
9 valid claim forms.³

10 The Parties, with the substantial assistance of Magistrate Judge Douglas F. McCormick as
11 mediator, agreed that the value of the injunctive relief was \$27,000,000. The Settlement also provides
12 the following monetary benefits: (a) \$0.15 for each unit of Wesson Oils purchased by members of
13 the 11 Classes who submit a Valid Claim form, up to 30 units per Household—a per-unit amount that
14 *materially exceeds* the amount that Class members could obtain, on a per-unit basis, had Plaintiffs
15 prevailed at trial; (b) an additional fund of \$575,000 to be allocated to members of the New York and
16 Oregon state classes who submit Valid Claim forms, as compensation for the statutory damages
17 available under those states’ statutory consumer protection regimes, which Plaintiffs contend apply;
18 and (c) an additional fund of \$10,000 to compensate those in all Classes who submit valid proof of
19 purchase receipts for more than 30 purchases. The combined result ensures that Class members obtain

20 _____
21 ¹ Despite their best efforts, as of the time of this filing, the parties were unable to complete their
22 discussion concerning a small number of minor linguistic issues in the final approval and fee
23 motions. That discussion continues. Should the parties resolve their aforementioned minor
24 differences, Class Counsel will advise the Court of that fact.

² An achievement that Plaintiffs credit to this litigation, but with which Conagra disagrees (*see*
25 footnote 12, below).

³ A detailed description of the Settlement is set forth in the Memorandum in Support of Unopposed
26 Motion for Order Directing Notice to Class Members (“Preliminary Approval Memorandum” (Doc.
27 651)).

1 recovery now, rather than wait years for trial, and provides additional injunctive relief. Conagra will
2 pay valid claims, attorneys' fees and expenses (separate from and in addition to the benefits provided
3 to Class members), separate payment of administrative costs, and service awards to the Class
4 Representative Plaintiffs. No monies will revert to Conagra.

5 When reviewing a proposed class action settlement, courts in this Circuit recognize that "[a]
6 presumption of correctness is said to attach to a class settlement reached in arm's-length negotiations
7 between experienced capable counsel after meaningful discovery." *In re Heritage Bond Litig.*, 2005
8 WL 1594403, at *9 (C.D. Cal. June 10, 2005) (internal quotation and citations omitted); *see also In*
9 *re Syncor ERISA Litig.*, 516 F.3d 1095, 1101 (9th Cir. 2008) ("there is a strong judicial policy that
10 favors settlements, particularly where complex class action litigation is concerned"). As
11 demonstrated below, the proposed Settlement is "fair, reasonable and adequate" under Fed. R. Civ.
12 P. 23(e)(2) and thus merits final approval. Moreover, the absence of any objections confirms that the
13 Settlement satisfies Rule 23(e)(2). For those reasons, as well as for those set forth below, the Court
14 should grant final approval to the Settlement and final certification of the Settlement Class.

15 **II. BACKGROUND**

16 **A. Procedural History**

17 Plaintiffs in this action, residents of 11 different states, allege that Conagra's "natural" claim
18 on Wesson Oils was false and misleading because the products contain GMOs. Plaintiffs further
19 allege that Wesson Oils commanded a premium price due to the presence of the "100% Natural"
20 claim on the label and that, consequently, every Class member was induced to pay more for Wesson
21 Oils because of that false and deceptive claim. Accordingly, Plaintiffs brought this Action on behalf
22 of themselves and other similarly situated consumers seeking to end Conagra's use of the "natural"
23 claim and obtain monetary compensation for the Classes, *i.e.*, the price premium they allegedly paid
24 for Wesson Oils because of the presence of the "100% Natural" claim. Conagra denies Plaintiffs'
25 allegations and believes that it has a variety of meritorious defenses.

26 The Kelston/Levitt Declaration (Doc. 652), submitted with the Preliminary Approval
27

Memorandum, provides a detailed description of the history of the litigation, including, among other things, the nature of the claims asserted, creation of the MDL, early proceedings and discovery, discovery class certification proceedings, appeals, and ancillary litigation. In January 2018, the Parties conducted a day-long mediation session with the Honorable Edward A. Infante (Ret.), under the auspices of JAMS in San Francisco, but they were unable to forge a settlement. From June through mid-October 2018, the Parties mediated under the auspices of Magistrate Judge Douglas F. McCormick (C.D. Cal.)—this Court’s appointed settlement mediator for this litigation—including an in-person settlement conference as well as through extensive telephonic and email communications. With Magistrate Judge McCormick’s continued involvement, the parties negotiated monetary compensation to the Classes, the provision of the injunctive relief to Class members and its valuation, the amount of attorneys’ fees Class Counsel would seek from the Court without Conagra’s objection, and the selection of a Settlement Administrator. On November 13, 2018, the parties accepted a “mediator’s proposal,” recommending that aggregate attorneys’ fees and expenses for Plaintiffs be set at an amount not to exceed \$6,850,000. The Plaintiffs moved for preliminary approval of the Settlement on March 12, 2019, and the Court issued its order granting preliminary approval on April 4, 2019 (Doc. 654).

B. Key Settlement Terms

The Settlement requires Conagra to pay monetary benefits, including a per-unit amount that is *more* than Class members could have obtained, on a per-unit basis, had Plaintiffs prevailed at trial⁴ and also certain injunctive relief that the Parties agree is valued at \$27,000,000.⁵

⁴ Plaintiffs’ expert estimates that this monetary compensation is **36% higher** than the approximately 10.2 cents per unit that class members could obtain at trial. Doc. 652 at ¶¶ 18-19.

⁵ Plaintiffs’ expert estimates the aggregate value of the labeling and marketing changes to be approximately \$30,600,000 if just one additional year passes without the “natural” claims being restored to Wesson Oils’ labels. Conagra contends its decision to institute label and marketing changes in July 2017 did not relate in any way to this litigation and therefore does not confirm or agree with Plaintiffs’ valuation over and above the \$27,000,000 agreed value of Injunctive Relief.

1 During the pendency of this litigation, Conagra removed the “natural” claim from the labels
2 of Wesson Oil Products and stopped marketing, advertising, and selling Wesson Oil Products as
3 “natural.” The Parties have agreed that, as part of the Final Approval Order, the Court will issue an
4 injunction ordering that, should Conagra reacquire the Wesson Oil brand:

- 5 • Conagra will not advertise, market or sell Wesson Oil Products labeled as “natural”
6 unless the FDA issues guidance or a regulation, or federal legislation is enacted,
7 permitting use of a “natural” claim on a product containing processed oil derived from
8 genetically engineered seed stock.
- 9 • Conagra will not advertise, market, or sell Wesson Oil Products as “non-GMO” unless
10 the claim is certified by an independent third-party certification organization.
- 11 • The Settlement does not preclude Conagra from making other changes to the
12 advertising and marketing of Wesson Oil Products, provided that those changes do not
13 conflict with the provisions of the Settlement.

14 S.A., §§8.2.1 through 8.2.4. Conagra consummated a sale of the Wesson brand to Richardson
15 International, a Canadian company, on February 25, 2019. As a result of that sale, the Parties have
16 revised the terms of the injunctive relief to clarify that it will apply to Conagra in the event it
17 reacquires the Wesson brand.⁶ Class members will release Conagra and related entities⁷ from all
18 claims that have been or could have been brought in connection with Conagra’s distribution, labeling,
19 packaging, marketing, advertising, and/or sale of the Wesson Oil Products during the applicable Class
20 Periods subject to the express exceptions listed in the Reservation of Claims and Rights (Settlement
21 Agreement Section 7.2), specifically excluded from the release is any claim for bodily injury allegedly
22 suffered in connection with the Wesson Oil Products.

23
24 ⁶ As discussed in the Declaration of Larry Kopald, attached hereto as Exhibit A, and as more fully
25 explained below, pursuant to industry custom and related facts, Class Counsel asserts that it is
26 virtually certain that Richardson will not restore the allegedly false “100% Natural” claim to the
27 Wesson Oil packaging, thus confirming the ongoing material value of the label change and
concomitant injunctive relief provided by this Settlement to Plaintiffs and the other Settlement Class
members.

⁷ For purposes of clarity, “related entities” does not include Richardson.

1 The Settlement represents an excellent recovery for the Settlement Class, as confirmed by the
2 fact that to date *only one* Settlement Class member requested to opt-out of the Settlement Class, and
3 *no* Settlement Class member has objected to the Settlement. *See* Declaration of Jennifer M. Keough
4 Regarding Settlement Administration and Notice Plan, attached hereto as Exhibit B (“Keough Decl.”)
5 at ¶¶ 18-21.

6 **III. THE NOTICE PLAN AND RESPONSE THERETO**

7 **A. Implementation of the Notice Plan**

8 After the Court issued its order granting preliminary approval on April 4, 2019 (Doc. 654)
9 and its order directing notice to Class members (Doc. 655), the Parties supervised the provision of
10 notice to potential Settlement Class members by JND Legal Administration (“JND”), pursuant to the
11 Court-approved Notice Plan. The Notice Plan provided for: (1) a settlement website,
12 www.wessonoilsettlement.com, with links to the Claim Form, the Long-Form Notice, relevant
13 pleadings and documents, and frequently-asked questions; (2) a heavy digital effort geographically
14 focused on the Class States that includes the leading digital network (Google Display Network) and
15 the top social platform (Facebook); (3) newspaper notice placements in the *Los Angeles Daily News*;
16 (4) an internet search effort on a top search engine site (Google); (5) a press release distributed to
17 media outlets nationwide; (6) national media through publication in the widely-read consumer
18 magazine, *People*; and (7) a toll-free telephone helpline (833-291-1651) through which Settlement
19 Class members were able to obtain additional information about the Settlement and request printed
20 copies of the Long Form Notice and Claim Form. *See* Declaration of Jennifer M. Keough Regarding
21 Proposed Notice Program (Doc. 652-1) at ¶¶ 12-25, and Preliminary Approval Memorandum (Doc.
22 651) at 6-7.

23 The Parties commenced implementation of the Notice Plan on April 12, 2019. On March 21,
24 2019, in compliance with the Class Action Fairness Act, 28 U.S.C. §1715 (“CAFA”), notice of the
25 Settlement and related materials were sent to the Attorneys General of all U.S. states and territories,
26
27

1 as well as to the Attorney General of the United States. *See* Keough Decl. at ¶¶ 4-5.⁸

2 JND established the Settlement Website on April 12, 2019. In addition to the features outlined
3 above (allowing for the submission of online claims), the Settlement Website also contains a “Contact
4 Us” page, through which Class members can send an email with any additional questions to a
5 dedicated email address. As of July 19, 2019, the Settlement website has tracked 117,216 unique
6 visitors who registered 553,793 page views. *Id.* at ¶ 16.

7 JND also established the toll-free hotline devoted to this case to further apprise Class members
8 of the rights and options in the Settlement. This hotline is accessible twenty-four hours a day, seven
9 days a week. *Id.* at ¶ 13. As of July 19, 2019, the toll-free hotline had received 199 calls totaling
10 approximately 476.52 minutes. *Id.* at ¶ 14.

11 From April 14, 2019 through July 6, 2019, JND caused the Court-approved digital notice
12 campaign to run in order to reach unknown Class members. *Id.* at ¶ 9. This campaign included banner
13 display ads in both English and Spanish that linked to the Settlement website, and promoted posts
14 appeared on Facebook and Google Display. *Id.* The digital campaign delivered 205,946,126
15 impressions, exceeding the campaign goal by more than 11,225,126 impressions. *Id.* JND also
16 caused paid digital ads to appear on the Google search engine results pages when keywords related
17 to the Settlement were searched. *Id.* at ¶ 10. Over 27,000 impressions were delivered from April 14,
18 2019 through July 6, 2019. *Id.* Additionally, news of the Settlement went “viral” on websites/blogs
19 related to class actions (*e.g.* Top Class Actions) and finances (*e.g.* Common Sense with Money,
20 Hustler Money Blog, The Penny Hoarder, Addicted to Savings), which resulted in at least 30 mentions
21 to date with a potential reach of over 16.7 million. *Id.* at ¶ 12. As a result of that coverage, the
22 Settlement received increased claim filing traffic. *Id.*

23 JND also caused notice of the Settlement to be disseminated through print media. JND caused
24 a copy of the Publication Notice to be published four times in the *Los Angeles Daily News* on April
25

26 ⁸ While, to date, none of the CAFA-noticed entities have filed papers attempting to challenge this
27 strong settlement, should any of them ultimately elect to do so, the parties herein will respond as
appropriate.

1 17, 2019, April 24, 2019, May 1, 2019, and May 8, 2019 and also published in the May 20, 2019
2 issue of *People* magazine that became available to readers on May 10, 2019. *Id.* at ¶ 8. The national
3 edition of *People* magazine has a circulation of 3,425,166 and a readership of over 38 million. *Id.*
4 To further boost awareness of the Settlement, gain online visibility, and gain media pickup, on April
5 16, 2019, JND caused a national press release to be issued, in English and Spanish, to approximately
6 11,000 English and 150 Spanish media outlets. *Id.* at ¶ 11. The press release allowed for additional
7 notice exposure through 244 pickups with an estimated potential audience of over 59.8 million. *Id.*

8 There was no direct notice because Conagra did not have personal information about unnamed
9 Settlement Class members; accordingly, the best notice practicable was achievable via the methods
10 described above. *Id.* at ¶ 7.

11 **B. Response to the Notice Plan**

12 The Notice Plan delivered an approximate 72% measurable reach with an average frequency
13 of 2.5 views-per-person reached. *Id.* at ¶ 17. This 72% reach *exceeds* the 70% reach that the Notice
14 Plan was originally projected to target, resulting in additional Notice of the Settlement being provided
15 to Class members. *Id.* The 70.83% reach does not include additional coverage received from the
16 paid press release, the earned media coverage, the Settlement Website, or the toll-free hotline. *Id.*

17 As of July 19, 2019, JND has received 70,745 claims for 1,937,091 units; only one request for
18 exclusion from the Class; and no objections from any Class members.⁹ *Id.* at ¶¶ 18-22. The deadline
19 to submit a Claim Form is August 22, 2019, and the deadline to postmark exclusion requests or file
20 an objection to the Settlement Agreement is August 6, 2019. *Id.* Of the Claim Forms received, 70,554
21 were submitted through the Settlement website and 191 were submitted by mail. *Id.* at ¶ 22.

22 **C. CAFA Response**

23 As a result of the CAFA notice, representatives from the state Attorneys General offices in
24 Indiana, Texas, and Arizona contacted Class Counsel regarding the Settlement. On July 15, 2019,

26 ⁹ These claims numbers are prior to de-duplication and other verification/fraud checks to be
27 undertaken by JND.

1 Class Counsel, counsel for Conagra, and representatives from each of those three states' Attorneys
2 General's offices participated in a teleconference, during which counsel for the Parties explained and
3 answered questions about the Settlement. As discussed above, to date, none of the CAFA-noticed
4 entities have filed papers attempting to challenge this strong settlement.

5 **IV. ARGUMENT**

6 In deciding whether to grant final approval to a proposed class action settlement, courts first
7 determine whether to certify the settlement class definitively for purposes of settlement under Fed. R.
8 Civ. P. 23(a) and 23 (b), and then whether to approve the settlement under Fed. R. Civ. P. 23(c).

9 **A. Certification of the Settlement Class is Appropriate**

10 The Court previously certified 11 state-wide litigation classes (California, Colorado, Florida,
11 Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota, and Texas) to pursue certain
12 claims, finding that Plaintiffs satisfied the numerosity, commonality, typicality, and adequacy
13 requirements of Rule 23(a), as well as the predominance and superiority requirements of Rule
14 23(b)(3). Doc. 545. The Ninth Circuit affirmed. *See Briseño v. ConAgra Foods, Inc.*, 844 F.3d 1121
15 (9th Cir. 2017); *Briseño v. ConAgra Foods, Inc.*, 674 F. App'x 654 (9th Cir. 2017). And on October
16 10, 2017, the Supreme Court of the United States denied Conagra's petition for writ of *certiorari*. As
17 part of its April 4, 2019 Order Directing Notice to Class Members (Doc. 655 at 4-5), the Court
18 acknowledged the 11 certified Classes and directed notice of the Settlement to the class members.

19 As discussed in the Court's class certification rulings in this litigation, the requirements of
20 fairness and adequacy have been met with respect to certification of the Settlement Class, because the
21 legal and remedial theories raised by the Plaintiffs are shared with the Settlement Class members,
22 Class Counsel satisfies the adequacy requirement, and no conflicts exist between Plaintiffs and
23 Settlement Class members. *See* Preliminary Approval Memorandum. (Doc. 651) at 17-22. Moreover,
24 the Ninth Circuit previously said in this litigation that "the benefits of the class mechanism are best
25 realized in cases like this, where the likely recovery is too small to incentivize individual lawsuits,
26 and the realistic alternative to class litigation will be no adjudication at all." *Briseño*, 674 F. App'x

1 at 657. The 11 Classes should remain certified for settlement purposes. *Chambers v. Whirlpool*
2 *Corp.*, 214 F. Supp. 3d 877, 887 (C.D. Cal. 2016) (confirming certification of Rule
3 23(b)(3) class previously approved in an order granting preliminary approval “[b]ecause
4 circumstances have not changed[.]”).

5 **B. Notice to the Classes was Adequate**

6 In determining whether to grant final approval of a proposed settlement, the Court must find
7 that adequate notice was issued to all prospective class members, in accordance with due process
8 concerns and Rule 23. Notice to class members must “generally describe[] the terms of the settlement
9 in sufficient detail to alert those with adverse viewpoints to investigate and to come forward and be
10 heard.” *Churchill Vill., L.L.C. v. Gen. Elec.*, 361 F.3d 566, 575 (9th Cir. 2004) (quoting *Mendoza v.*
11 *Tucson Sch. Dist. No. 1*, 623 F.2d 1338, 1352 (9th Cir. 1980)); accord *Shaffer v. Cont'l Cas. Co.*, 362
12 F. App’x 627, 631 (9th Cir. 2010). Rule 23(c)(2) requires “the best notice that is practicable under
13 the circumstances” and that it inform class members of (i) the nature of the action; (ii) the definition
14 of the class certified; (iii) the class claims, issues or defenses; (iv) the fact that a class member may
15 enter an appearance through an attorney if the class member desires; (v) the fact that the court will
16 exclude from the class any class member who requests exclusion; (vi) the time and manner for
17 requesting exclusion; and (vii) the binding effect of a class judgment under Rule 23(c)(3). *See* Fed.
18 R. Civ. P. 23(c)(2). The Court has already determined that the form of the Notice was proper and
19 approved the Long Form Class Notice, the Publication Notice and the Notice Plan. *See* Order
20 Directing Notice to Class Members (Doc. 655) at 8-9.

21 In determining whether a notice plan, as implemented, is fair, adequate, and appropriate, it is
22 not necessary that every Settlement Class member receive actual notice to meet due process
23 considerations, as long as the notice is “reasonably certain to inform the absent members of the
24 plaintiff class.” *Destefano v. Zynga, Inc.*, No. 12-CV-04007-JSC, 2016 WL 537946, at *6 (N.D. Cal.
25 Feb. 11, 2016) (quoting *Silber v. Mabon*, 18 F.3d 1449, 1454 (9th Cir. 1994)). “The manner of notice
26 need not be perfect.” *Id.* at *7; *In re Online DVD-Rental Antitrust Litig.*, 779 F.3d 934, 947 (9th Cir.

2015) (“The notice in this case was not perfect, but the court did not abuse its discretion in approving the notice plan and ultimately approving the settlement.”).

The Parties implemented the Notice Plan in accordance with the Court-approved terms. As set forth in Section III, above, the Notice Plan was robust and comprehensive. Notice of the Settlement was disseminated via, among other efforts, the leading digital network (Google Display Network), the top social platform (Facebook), print media (*People* magazine), and a nationwide press release. See Keough Decl. at ¶¶ 7-11. There is a case-specific Settlement website, www.wessonoilsettlement.com, which includes links to relevant documents and pleadings, the Claim Form, the Long-Form Class Notice, and frequently-asked questions (including information on how to opt-out, object and appear at the fairness hearing), and a toll-free number that provided information about the Settlement. *Id.* at ¶¶ 13-15. The Notice Plan yielded greater reach than that which was projected in the Notice Plan submitted to the Court with the Preliminary Approval motion. *Id.* at ¶ 17. The success of the Notice Plan is highlighted by the 70,745 claims submitted to date, totaling 1,937,091 units.¹⁰

As Rule 23(c)(2) requires, the Class Notice informed Class members of the claims alleged in the action, the definition of the certified Settlement Class, the Settlement terms, the scope of the release, and their rights as members of the Settlement Class to opt out of or otherwise object to the Settlement, including Plaintiffs’ request for attorney’s fees, expenses, and service awards, and their right to request exclusion from the Class. The Notice Plan fairly apprised Class members of the Settlement and their options in accordance with Rule 23(c)(2) and due process. Therefore, the Court should find that Notice was given to Settlement Class members by the best means “practicable under the circumstances.” Fed. R. Civ. P. 23(c)(2).

C. The Settlement is Fair, Reasonable, and Adequate and Merits Final Approval

The factors used in this Circuit to review proposed class action settlements are: (1) the strength

¹⁰ Of those, New York Class members have made 8,852 claims for 250,621 units, and Oregon Class members have made 1,620 claims for 43,978 units, which is pertinent to the separate \$575,000 fund that the Settlement provides to compensate those Class members for their statutory damages.

1 of the plaintiff's case; (2) the risk, expense, complexity, and likely duration of further litigation; (3)
2 the risk of maintaining class action status throughout the trial; (4) the amount offered in settlement;
3 (5) the extent of discovery completed and the stage of the proceedings; (6) the experience and views
4 of counsel; (7) the presence of a government participant; (8) the reaction of the class members to the
5 proposed settlement; and (9) whether the settlement is a product of collusion among the parties. *In*
6 *re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935, 946 (9th Cir. 2011) (quoting *Churchill Vill.*,
7 361 F.3d at 575). Each of the factors weighs in favor of final approval of the settlement.

8 **1. The Strength of Plaintiffs' Case**

9 Plaintiffs believe the merits of their case are strong. Despite Conagra's denials, Plaintiffs
10 assert there is abundant evidence that the "100% Natural" claim, which appeared on every bottle of
11 Wesson Oil sold during the class period, was material to consumers, that consumers interpreted the
12 claim to mean that the products did not contain GMOs, and that every Class member paid a premium
13 price for Wesson Oils due to the presence of the "100% Natural" claim on the label. Plaintiffs'
14 evidence is found in two general categories of documents: (i) objective third-party surveys that, as
15 Judge Morrow found, "tend to show that . . . consumers find the '100% Natural' claim material to
16 their purchasing decisions," and which support Plaintiffs' contention that a "natural" claim is
17 understood by consumers to mean that the product does not contain GMOs; and (ii) internal Conagra
18 documents obtained by Plaintiffs in discovery demonstrating that consumers exposed to a "100%
19 Natural" or "Natural" claim on Conagra product labels generally consider the representation a
20 significant factor in their purchasing decisions.¹¹

21 Plaintiffs' primary objective in this litigation was achieved when—after this litigation
22 began—Conagra decided to remove the "100% Natural" claim from Wesson labels, and stopped its
23 decades-long practice of marketing Wesson Oils as "natural." Plaintiffs contend that Conagra's
24 decision was due, at least in part, to this litigation, and is further evidence of the merits of Plaintiffs'
25 claims. Conagra denies this litigation contributed in any way to its decision to drop the 'Natural'

26
27 ¹¹ See *In re Conagra Foods, Inc.*, 90 F. Supp. 3d 919, 1018 (C.D. Cal. 2015) ("*Conagra IP*").

1 claim from Wesson Oils. Due to the timing of Conagra's decision and the parties' agreement to enter
2 mediation immediately after Conagra had exhausted its appeals of Judge Morrow's class certification
3 ruling, Plaintiffs have not had an opportunity to conduct discovery regarding Conagra's decision to
4 implement the label and marketing change, or to seek a ruling that this litigation was a "catalyst" in
5 that decision. Nonetheless, the injunctive relief agreed to as part of this settlement assures that, should
6 Conagra reacquire the Wesson Oil brand (which it divested in February 2019), Conagra will not label
7 or market Wesson Oils as "natural," unless legislation or regulation authorizing use of a "natural"
8 claim on a product containing processed oil from genetically engineered seed stock is implemented.

9 Regardless of the parties' evaluations of the strength of Plaintiffs' case, this Settlement
10 includes monetary relief for Class members that is approximately **36% higher** than they could have
11 obtained at trial. Doc. 652 at ¶¶ 18-19.

12 The Court previously found:

13 Litigation had reached a stage where the parties had a clear view of the strengths
14 and weaknesses of their positions to reach a fair and reasonable settlement. In
15 particular, Plaintiffs would have difficulty proving that all class members
16 purchased Wesson Oils during the relevant time period and that they paid a
premium because Wesson Oils were labeled and advertised as '100% Natural.'
Given these risks, the amount and terms of the settlement are reasonable.

17 Order Granting Preliminary Approval of Class Action Settlement (Doc. 654) at 5. Based on the
18 foregoing considerations, "it is plainly reasonable for the parties at this stage to agree that the actual
19 recovery realized and risks avoided here outweigh the opportunity to pursue potentially more
20 favorable results through full adjudication." *Dennis v. Kellogg Co.*, 09-CV-1786-L (WMc), 2013
21 WL 6055326, at *3 (S.D. Cal. Nov. 14, 2013).

22 **2. The Risk, Expense, Complexity, and Duration of Further Litigation**

23 While Plaintiffs believe their case is a strong one, the complexity and risk of further litigation
24 are substantial, and it is unclear whether there would be any recovery at all for the Class members in
25 the 11 certified state classes. Should litigation continue, more expense and complexity would result,
26 because fact discovery would need to be reopened for Plaintiffs to obtain relevant discovery regarding
27

1 Conagra's label and marketing change in 2017, for Conagra to update past document productions, and
2 for the parties to resolve issues surrounding Conagra's productions of documents just preceding the
3 close of fact discovery in 2015. Had Plaintiffs proceeded to trial, Conagra would have mounted a
4 vigorous defense to Plaintiffs' claims that the challenged claims were misleading, likely would have
5 moved to decertify the state-wide classes, and would have continued to challenge Plaintiffs' price
6 premium damages methodology.

7 Additional risks of continuing this litigation include further motion practice and a possible
8 adverse outcome at trial. Indeed, the Court previously found, "[t]he Settlement Agreement also
9 presents a fair compromise in light of the risks and expense of continued litigation," including the
10 risk of possible motions to decertify, possible *Daubert* motions, motions for summary judgment, and
11 potentially trial. Order Granting Preliminary Approval of Class Action Settlement (Doc. 654) at 4-5.
12 The substantial relief obtained through this Settlement, balanced against the length, expense, and
13 uncertainty of further litigation, weighs in favor of approval. *See Nat'l Rural Telecomms. Coop. v.*
14 *DIRECTV, Inc.*, 221 F.R.D. 523, 526 (C.D. Cal. 2004) ("unless the settlement is clearly inadequate,
15 its acceptance and approval are preferable to lengthy and expensive litigation with uncertain results.")
16 (quoting 3 Newberg on Class Actions § 11:50 (4th ed. 2012)).

17 3. The Risk of Maintaining Class Action Status Through Trial

18 Although the Court has previously certified 11 separate state law classes, the Ninth Circuit
19 Court of Appeals affirmed that decision, and the United States Supreme Court declined to review the
20 Ninth Circuit's affirmance, Plaintiffs anticipate that Conagra would likely seek to decertify the
21 Classes based on changes in both the factual and legal landscapes. Indeed, Conagra believes that its
22 legal position in this litigation would be strengthened, because although the National Bioengineered
23 Food Disclosure Law requires affirmative labeling of GMO foods, the FDA standard issued under
24 that law excludes highly refined oils.

1 **4. The Amount Offered in Settlement**

2 **a. The Value of Injunctive Relief**

3 Approximately six years after commencement of this litigation, Conagra removed the “100%
4 Natural” claim from all Wesson labels, and stopped advertising and marketing Wesson Oils as
5 “natural”; the changes were completed by July 2017. The injunctive relief agreed to in this Settlement
6 guarantees that, should Conagra reacquire the Wesson Oil brand it divested on February 25, 2019, it
7 will not revert to labeling, advertising, or marketing Wesson Oils as “natural” unless the FDA issues
8 guidance or a regulation, or federal legislation is enacted, permitting use of a “natural” claim on a
9 product containing processed oil derived from genetically engineered seed stock. There is no reason
10 to believe that guidance, regulation, or legislation permitting the use of a “natural” claim on Wesson
11 Oils is imminent.¹²

12 Plaintiffs’ damages expert Colin Weir has calculated that Wesson purchasers in the 11 class
13 states paid approximately \$11,540,000 more *per year* for the products due to the presence of the
14 “100% Natural” claim on the labels. *See* Declaration of Colin B. Weir (Doc. 652-4) at ¶ 24. Thus,
15 according to Plaintiffs’ expert’s calculations, the value of the labeling change from July 1, 2017 to
16 February 25, 2019, when Conagra sold the Wesson brand, is approximately \$19,080,000. According
17 to the Weir estimate, if just one additional year passes without “natural” claims being restored to
18 Wesson Oils labels, the benefits to class members will reach \$30,620,520.¹³ This Court has already
19 _____

20 ¹² In another case involving a claim that a product containing GMOs was deceptively marketed as
21 “natural,” a court recently observed that although the FDA has stated that it “plans to publicly
22 communicate next steps regarding Agency policies related to ‘natural.’” in 2019, “this hardly suggests
23 that rulemaking is imminent,” because “such agency action typically takes between two and five years
24 to complete.” *In re Kind LLC “Healthy & All Natural” Litig.*, No. 1:16-cv-00959-WHP, 2019 WL
542834, at *2 (S.D.N.Y. Feb. 11, 2019). Conagra denies that this litigation contributed to its decision
to drop the “natural” claim from Wesson Oil in 2017 and further disagrees with Mr. Weir’s calculation
of the value of this label change.

25 ¹³ This calculation diverges from the Parties’ mediated agreement that the value of the forward-
26 looking injunctive relief was \$27,000,000. And, to be clear, in light of the fact that almost half a year
has elapsed since Richardson’s acquisition of the Wesson Oil brand and no reversion to the allegedly
false “100% Natural” representation has found its way back onto the Wesson Oil product packaging,
it appears that Mr. Weir’s minimum one year valuation of the label change will be readily met.

1 adopted this point, recognizing that “[t]he conservative estimate of the total value of the labeling and
2 marketing changes is \$30,600,000.” Order Granting Preliminary Approval of Class Action
3 Settlement (Doc. 654) at 6, n.3.

4 Notably, in the absence of Conagra reacquiring the Wesson Oil brand, Plaintiffs contend it is
5 highly unlikely that Richardson International will resume labeling Wesson products as “natural.”
6 Plaintiffs’ marketing expert, Larry Kopald (President of Kopald/Stranger), has 25 years of first-hand,
7 front-line knowledge and experience in the field of consumer goods marketing a marketing
8 consultancy. In his declaration, attached hereto as Exhibit A (“Kopald Decl.”), he opines that (1)
9 barring significant reformulation of the Wesson Oils, Richardson will not consider reverting to the
10 use of a “100% Natural” claim on the products; and (2) the history of this litigation and the terms of
11 the settlement, including the injunction prohibiting Conagra’s use of a “100% Natural” claim on
12 Wesson Oils in the event it reacquires the brand, and the negative impact it would create on the brand
13 trust for the Wesson brand, are all factors that would strongly discourage Richardson (or any other
14 company) from resuming the use of the “100% Natural” claim on Wesson Oils. Kopald Decl. at
15 Section V. Moreover, Richardson is unlikely to resume labeling Wesson products as “natural”
16 without affirmative legislative or regulatory authorization in the United States. Therefore, the
17 Settlement provides injunctive relief valued at tens of millions of dollars, guarantees that Conagra
18 will not revert to the challenged “natural” claims absent regulatory or legislative permission, and
19 makes it unlikely that Richardson will revert to using the challenged “natural” claims, thereby, in
20 Plaintiffs’ view, preserving and perpetuating the value of the label change and the remainder of the
21 Settlement’s injunctive relief well into the future.¹⁴

22 **b. Monetary Compensation to Class Members**

23 The Settlement provides that Class members can obtain compensation of \$0.15 for each unit
24 of Wesson Oils they purchased during the relevant Class Period, up to a maximum of 30 units per
25

26 ¹⁴ The Court also previously recognized that “it is highly unlikely that Richardson International will
27 resume labeling the products as ‘natural’ without affirmative legislative or regulatory authorization.”
Id.

1 Household, with no proofs of purchase required. There is no limit on the number of units for which
2 Class members can be compensated if they submit documentary proofs of purchase.

3 While \$0.15 per unit is a modest amount when considered in isolation, *it is 36% more than*
4 *the best-case result at trial*, which would have yielded maximum damages of approximately 10.2
5 cents per unit. Declaration of Colin B. Weir (Doc. 652-4) at ¶ 35. This figure takes into account
6 Judge Morrow’s ruling that the appropriate measure of damages in the case was not the price premium
7 paid by Class members due to the presence of the “100% Natural” claim, as Plaintiffs’ claimed, but
8 only the portion of that premium attributable to consumers’ belief that “100% Natural” meant that the
9 products were GMO-free. Mr. Weir’s conjoint survey indicated that approximately 27% of the value
10 of the “natural” claim on Wesson Oils was due to its non-GMO meaning. *Id.* at ¶ 34.

11 In addition to the per-unit compensation available to all Class members, the Settlement
12 includes a \$575,000 fund to be allocated solely among New York and Oregon Class members, which
13 is intended to compensate them for the statutory damages provided for in the consumer protection
14 laws of those states and sought by Plaintiffs. After extended arm’s-length negotiations mediated by
15 Magistrate Judge McCormick, the parties agreed that a fund of \$575,000 is fair, reasonable, and
16 adequate to compensate New York and Oregon Class members for the statutory damages to which
17 Plaintiffs contend consumers in those states could be entitled if they were to prevail at trial. When
18 granting preliminary approval, the Court said that the classes’ monetary recovery “is a fair result” in
19 light of the significant hurdles to recovery if litigation were to continue and that the recovery is within
20 the range of reasonableness when compared to settlements in similar cases. Order Granting
21 Preliminary Approval of Class Action Settlement (Doc. 654) at 5-6. There is no reason for the Court
22 to change its previous conclusion.

23 **5. The Extent of Discovery Completed and the Stage of Proceedings**

24 This factor favors final approval, because the discovery obtained and stage of proceedings
25 allowed counsel on both sides to make well-informed judgments about the merits of the case and the
26 risks of proceeding to trial. Indeed, the Court already found as much. *See id.* at 4-5 (“The parties,
27

1 after substantial discovery, substantive briefing, and the assistance of two mediators, were able to
2 realistically value Defendants' liability and assess the risks of moving forward . . .").

3 **6. The Experience and View of Counsel**

4 Counsel for both sides have extensive experience in class action litigation and are thoroughly
5 familiar with the factual and legal issues involved. "Great weight is accorded to the recommendation
6 of counsel, who are most closely acquainted with the facts of the underlying litigation." *See Gribble*
7 *v. Cool Trans Inc.*, No. CV 06-04863 GAF SHX, 2008 WL 5281665, at *9 (C.D. Cal. Dec. 15, 2008)
8 (*Nat'l Rural Telecommc'ns Coop. v. DIRECTV, Inc.*, 221 F.R.D. 523, 528 (C.D. Cal. 2004)); *see also*
9 *Wertz v. U.S. Bancorp*, No. 13-cv-3130-BAS(AGS), 2017 WL 1807633, at *6 (S.D. Cal. May 5,
10 2017) ("Generally, the recommendations of plaintiffs' counsel should be given a presumption of
11 reasonableness.") (internal quotation omitted). Class Counsel have evaluated the inherent risks and
12 expenses associated with continuing this litigation and believe that the provision of the injunctive and
13 monetary relief outlined above adequately compensates Class members for the harm they allegedly
14 suffered.

15 **7. The Presence of a Government Participant**

16 The United States Attorney General and Attorneys General of each of the states were notified
17 pursuant to the Class Action Fairness Act, 28 U.S.C. § 1715, and given an opportunity to raise any
18 objections or concerns they may have. As discussed above in Section III(C), Class Counsel and
19 counsel for Conagra have participated in a teleconference with representatives from the state
20 Attorneys General offices in Indiana, Texas, and Arizona in order to describe and answer questions
21 about the Settlement. Again, and as also discussed above, to date, none of the CAFA-noticed entities
22 have filed papers attempting to challenge this strong settlement. Should any of them ultimately elect
23 to do so, however, the parties herein will respond appropriately.

24 **8. The Reaction of the Class Members to the Proposed Settlement**

25 As discussed above in Section III(A)-(B), Class members' response to the Settlement has been
26 overwhelmingly positive. As of July 19, 2019, JND has received 70,745 claims submitted to date
27

(totaling 1,937,091 units), only one request for exclusion, and no objections from any Class members. This factor weighs in favor of final approval. “[T]he absence of a large number of objections to a proposed class action settlement raises a strong presumption that the terms of a proposed class settlement action are favorable to the class members.” *Nat’l Rural Telecommc’ns*, 221 F.R.D. at 529.

9. Lack of Collusion Among the Parties

Where a settlement is the product of arm’s-length negotiations conducted by capable and experienced counsel, the court begins its analysis with a presumption that the settlement is fair and reasonable. *See* 4 William B. Rubenstein, Alba Conte & Herbert Newberg, *Newberg on Class Actions* § 13.45 (5th ed. 2014); *see also G. F. v. Contra Costa Cty.*, 2015 WL 4606078, at *13 (N.D. Cal. July 30, 2015) (“[T]he assistance of an experienced mediator in the settlement process confirms that the settlement is non-collusive).

The Settlement here is the product of extensive arm’s-length and adversarial settlement discussions, including two separate mediations. The Parties did not commence discussion of attorneys’ fees until agreement on all substantive portions of the class resolution had been reached. Agreement on the payment of attorneys’ fees was resolved only by both parties accepting a “mediator’s proposal” offered by Magistrate Judge McCormick. The Court already found that “[t]here is no evidence of collusion during the parties’ settlement negotiations.” Order Granting Preliminary Approval of Class Action Settlement (Doc. 654) at 4.

D. The Rule 23(e)(2) Considerations Favor Final Approval

Under the recently-amended Rule 23(e)(2), a court considering whether to grant approval of a class settlement must also consider whether: (1) the class representatives and class counsel have adequately represented the class; (2) the proposal was negotiated at arm’s length; (3) the relief provided for the class is adequate; and (4) the proposal treats class members equitably relative to each other. These factors overlap substantially with the *Churchill* factors discussed above, and likewise support granting final approval of the Settlement.

1 **1. The Class Representatives and Class Counsel Have Adequately**
2 **Represented the Class**

3 Class counsel vigorously prosecuted this case for more than eight years, successfully
4 obtaining certification of 11 state-wide classes, and successfully negotiating a settlement that provides
5 both monetary and injunctive relief, including *more* monetary relief than could have been obtained at
6 trial. The Class Representatives each committed substantial time to this case, and each reviewed and
7 approved of the proposed Settlement upon finding it was fair, reasonable, and adequate for the
8 Classes. The extensive efforts of Class Counsel and Class Representatives, the Court’s recognition
9 of their adequacy in granting class certification, together with the value of the Settlement achieved,
10 evidence that they have and continue to adequately represent the interests of the Settlement Class.

11 **2. The Settlement was Negotiated at Arm’s Length**

12 The Settlement was reached after extensive mediation efforts before two neutrals. The Court
13 already found that “[t]here is no evidence of collusion during the parties’ settlement negotiations.”
14 Order Granting Preliminary Approval of Class Action Settlement (Doc. 654) at 4.

15 **3. The Relief Provided for the Class, Including the Mediated Agreement for**
16 **Attorneys’ Fees, is Adequate**

17 Rule 23(e)(2)(C) directs the Court to consider whether the relief provided for the class is
18 adequate, taking into account:

- 19 (i) the costs, risks, and delay of trial and appeal;
20 (ii) the effectiveness of any proposed method of distributing relief to the class, including
21 the method of processing class-member claims;
22 (iii) the terms of any proposed award of attorneys’ fees, including timing of payment; and
23 (iv) any agreement required to be identified under Rule 23(e)(3).

24 *See* Section IV(C)(2)-(4), above, for the costs, risks, and delay of trial and appeal. *See* Section III(A)-
25 (B), above, for discussion of the effectiveness of the proposed notice and claims process. Apart from
the Settlement Agreement, there are no agreements requiring disclosure under Rule 23(e)(3).

26 The mediated agreement provides that Conagra will pay attorneys’ fees and costs—separate
27

1 from and in addition to the benefits provided to Class members—awarded by the Court in a total
2 amount not to exceed \$6,850,000—which, as explained in Plaintiffs’ contemporaneously filed Motion
3 for Award of Attorneys’ Fees, Expenses, and Representative Plaintiffs’ Service Awards, is actually
4 approximately 50% of the fees that Plaintiffs’ counsel incurred in litigating this action to its
5 conclusion. Conagra’s agreement not to contest a request for an award of fees and expenses up to the
6 maximum amount was agreed to by the Parties after extensive negotiation and with the assistance of
7 Magistrate Judge McCormick as mediator and only after the Parties had reached agreement on all
8 substantive terms pertaining to class-wide relief. The Court already found reasonable the request for
9 attorneys’ fees and incentive awards. Order Granting Preliminary Approval of Class Action
10 Settlement (Doc. 654) at 6-7. Nonetheless, for the Court’s consideration and approval, Plaintiffs are
11 filing concurrently herewith their Motion for Award of Attorneys’ Fees, Expenses, and
12 Representative Plaintiffs’ Service Awards.

13 **4. The Proposal Treats Class Members Equitably**

14 The Settlement does not grant preferential treatment to any segment of the Class. All Class
15 members may claim monetary benefits on a per-unit basis, and all Class members stand to benefit
16 from the injunctive relief. The Settlement provides compensation to New York and Oregon Class
17 members due to the statutory damage provisions in their state consumer protection statutes that
18 Plaintiffs contend they may recover, in an amount agreed after extensive arm’s length negotiations
19 and with the assistance of Magistrate Judge McCormick as mediator. The service awards requested
20 for the Class Representatives are commonly awarded in class actions, are well-justified under the
21 circumstances here, and are appropriate in amount given precedent and the Class Representatives’
22 commitment and effort throughout the course of this litigation.

23 **V. CONCLUSION**

24 For the foregoing reasons, the Parties respectfully request that the Court grant this Motion and
25 enter the Proposed Order (Doc. 652-1 at 97-111).

Respectfully submitted,

Dated: July 23, 2019

/s/ David E. Azar

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Class Counsel

CERTIFICATE OF SERVICE

The undersigned certifies that, on July 23, 2019, he caused this document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of filing to registered counsel of record for each party.

Dated: July 23, 2019

/s/ David E. Azar

David E. Azar (SBN 218319)

EXHIBIT A

I, Larry Kopald, declare as follows:

I. BACKGROUND AND RELEVANT EXPERIENCE

1. I hold a graduate degree from Northwestern University in the area of marketing, advertising, and communications. Currently, I am President of Kopald/Stranger, a marketing consultancy with clients such as Walmart, Nike, Patagonia, and others. I am also a Senior Fellow at USC's Marshall School of Business, and served on the White House Panel For Corporate Innovation during the Obama administration.
2. Over the past 25 years I have been employed by global advertising agencies such as Ogilvy & Mather, Leo Burnett, DDB, and Foote, Cone and Belding. I also co-created THINK, an early adopter of technology in marketing, that grew to 700 employees before being sold in 2004 for \$241 million.
3. I have overseen the advertising for McDonalds, General Foods, Kraft, Procter & Gamble, Coca-Cola, Pepsi, Kimberly-Clark, Honda, and Mazda, among others.
4. I have been integrally involved in the launch of eight companies/brands that have achieved billion-dollar sales levels, such as Huggies Diapers, Chicken McNuggets, Acura automobiles, and others.
5. I have had successes profiled in the Harvard Business Review and dozens of other business-related publications, and have won more than 400 major awards for marketing and advertising.
6. I have previously given expert testimony in the areas of marketing and advertising claims for fast food and CPG companies.

II. ENGAGEMENT

I have been engaged by Plaintiffs' counsel in this action to provide my expert opinion regarding the value and meaning of on-package claims and the

likelihood that Richardson International (“Richardson”), the current owner of Wesson Oils, would resume use of a “100% Natural” or “Natural” claim in the marketing and sale of Wesson Oils.

I have been educated regarding the history of Wesson Oil—a *brand whose advertising I oversaw in the 1990s*—and its (now-removed) claim to be “100% Natural.” It is my understanding that ConAgra, the owner of the Wesson Oil brand from 1990 until it sold the brand to Richardson in February 2019, used the “100% Natural” claim on each bottle of Wesson Oil that it sold at all times relevant to this litigation, until it removed the “100% Natural” claim from its Wesson Oil products on or about July 1, 2017.

I have spent twenty-five years creating, identifying, and developing both product and legal support for marketing claims, and have spent extensive time evaluating the valuable “real estate” a company has with on-package messaging. My strong assessment is that for legal, marketing, and space limitations, these types of decisions are not taken lightly, and often demand significant multi-departmental involvement.

III. MATERIALS REVIEWED

1. Plaintiffs’ Memorandum of Points and Authorities in Support of Amended Motion for Class Certification (Unredacted version of Doc. 371);
2. Defendant’s Memorandum of Points and Authorities in Opposition to Plaintiffs’ Amended Motion for Class Certification (Unredacted version of Doc. 383);
3. Plaintiffs’ Reply Memorandum of Points and Authorities in Support of Amended Motion for Class Certification (Unredacted version of Doc. 393);
4. Order Granting in Part and Denying in Part Plaintiffs’ Amended Motion for Class Certification (Doc. 545);

5. Plaintiffs' Memorandum in Support of Unopposed Motion for Order Directing Notice to Class Members (Doc. 651); and
6. Joint Declaration of Henry J. Kelston and Adam J. Levitt in Support of Unopposed Motion for Order Directing Notice to the Classes (Doc. 652).

IV. REMOVAL OF THE "100% NATURAL" CLAIM

1. On or about July 1, 2017, Conagra removed the "natural" claim from the labels of its Wesson Oil products and stopped marketing, advertising, and selling Wesson Oils as "natural."
2. Conagra contends that this litigation did not contribute, in any way, to its decision to drop the "natural" claim from Wesson Oil.
3. I have been informed that Conagra claims that its decision to remove the "natural" claim from Wesson Oils was related to the anticipated effective date of a Vermont state law that would have prohibited the use of "natural" claims on GMO (or "bioengineered") products.
4. Conagra's claims in this regard are extremely implausible.
5. First, on July 29, 2016, US President Obama signed into law the National Bioengineered Food Disclosure Law, which overturned Vermont's GMO label law and established a national standard for GMO labeling. The law bars any state laws or regulations on GMO labeling. Thus, by mid-2016, the Vermont GMO-labeling law was effectively dead.
6. Moreover, the federal law does NOT prohibit the use of "natural" claims on GMO products. Therefore, Conagra would not have removed the "natural" claim from Wesson Oils in response to the federal law.
7. However, in May 2017, Conagra struck a deal to sell the Wesson brand to J. M. Smucker Co. for approximately \$285 million.
<https://www.reuters.com/article/us-conagrabrands-wesson-smucker-idUSKBN18Q1I2>

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8. Considering the timeline—specifically the (ultimately aborted) sale to Smucker in May 2017 and Conagra’s removal of the “natural” claim from its Wesson Oil products in July 2017—it is highly unlikely that those two events were unrelated. Indeed, it is highly likely that before it would agree to purchase the Wesson brand, Smucker required Conagra to “clean up” the potential liability from this litigation, which would have included removing the “natural” claim from Wesson labels to prevent the potential liability from continuing to accrue.

V. SUMMARY OF OPINIONS

1. Based on all of the facts and circumstances—including those set forth above—and, further, based on my 25 years of knowledge and experience in the field of consumer goods marketing, it is my opinion that, barring a significant reformulation of the product itself, Richardson will not consider reverting to the use of a “100% Natural” claim on Wesson Oil products.
2. The history of this litigation and the terms of the settlement, including the injunction prohibiting Conagra’s use of a “100% Natural” claim on Wesson Oils in the event it reacquires the brand, and the negative impact it would create on the brand trust for the Wesson brand, are all factors that would strongly discourage Richardson (or any other company) from resuming the use of the “100% Natural” claim on Wesson Oils.

VI. SUPPORT FOR OPINIONS

1. For decades, Conagra marketed the Wesson brand as “Natural,” and since 2005 as “100% Natural,” despite the fact that the product used genetically-modified, unnatural organisms. This misleading, on-package, marketing claim was instrumental in building and maintaining brand trust for Wesson, as confirmed by Conagra’s own marketing documents, as well as by third-party surveys submitted by Plaintiffs and cited by the Court in its decision granting class certification.
2. Conagra’s decision to remove the “100% Natural” claim from Wesson Oils carried with it a significant risk of diminishment of brand trust.. While the brand may have weathered this violation of trust, it is highly likely that a

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second betrayal of trust could do serious damage to Wesson's brand and sales.

3. Another reason that Richardson is highly unlikely to put the "100% Natural" claim back on its package is that, in the past few years, consumers have become more concerned than ever about GMOs, in part due to the health threats resulting from the increased use of glyphosate on GMO crops. In fact, glyphosate is increasingly being banned around the world due to it being a probable carcinogen and Monsanto (now owned by Bayer) has lost a string of lawsuits in the United States claiming that its glyphosate product, Roundup, caused cancer, and has literally thousands of additional lawsuits filed against it. . Perhaps most importantly, *almost 90 percent of Americans support on-package labeling of GMOs in food.* As a result, the risk to brand trust of using a "100% natural" claim on a GMO product has increased significantly.
4. Conagra was not alone in being forced to remove a "100% Natural" claim from a food using GMO ingredients. This further reduces the likelihood that Richardson would restore the 100% Natural claim after almost identical marketing claims have been rejected elsewhere by consumers and the courts, again confirming that the public does not believe a GMO product to be "natural." Indeed, other examples of this include Frito-Lay, which, in 2017, settled a class action lawsuit by agreeing to an injunction barring the use of an "All Natural" claim on certain Tostitos, Sun Chips and Frito's Bean Dip products. Additionally, PepsiCo settled a class-action suit in 2013 that claimed that Naked Juice contains genetically-altered soy even though it advertised that it was made of "All Natural Fruit." Likewise, in 2013, Barbara's Bakery agreed to a \$4 million settlement in a class-action lawsuit regarding its "all natural" claims on GMO cereals and snacks, and agreed to remove GMOs from its product line.
5. As more and more products voluntarily claim to be non-GMO on their packaging, Richardson is more likely, in my opinion, to convert its product to non-GMO ingredients than to resume the use of the "100% Natural" claim on the current Wesson product.

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THE THINKING BEHIND THE FUTURE

6. Brand trust, brand value, and good will are all impacted by brand claims. Indeed, what separates one product from a competing product is often little more than the brand itself. Consumers often have no way to differentiate among products without brand claims, which is why an on-package claim is so important. In addition, there is a hierarchy of the importance of these claims.
7. At the top of this hierarchy for a food product is safety (which, in the food industry, refers to health). It is well-known that consumers interpret “100% Natural” as an important health-related claim, which was also confirmed by evidence in this case. This fact further heightened the risk to brand trust of Conagra’s decision to remove the “100% Natural” claim from Wesson Oils.
8. A violation of customers’ trust is survivable if the brand already has secure loyalty. A second violation of that group’s trust, however, could be commercially lethal. In fact, also according to the Center for Food Integrity research, a single item of negative information is capable of neutralizing five similar pieces of positive information. To this point, when I was producing advertising for McDonalds, that company repeatedly stated that for every consumer that took the time to complain about a product issue they assumed there were 1,000 more with similar issues that didn’t write, but were at risk of being lost as customers.
9. Additionally, while we do not know if the litigation reduced the price Richardson paid for the Wesson brand (as it was, interestingly, not disclosed), my experience—having been on both sides of buying and selling companies—would lead me to believe it impacted the negotiations. It is my opinion, looking at the progression of the settlement, the initial sale to Smucker, the mention of the litigation in Conagra’s Annual Report, and the quick sale to Richardson, that Conagra was looking to sell, and Richardson was looking to buy, an unencumbered brand. While this may make sound business sense, it also leads me to conclude that Richardson’s undoing the removal of the item that caused the litigation is implausible, highly unlikely, and would be contrary to all accepted business and strategic brand planning norms.

VII. CONCLUSION

It is my professional opinion that Richardson will not restore the “100% Natural” claim to the Wesson Oil products, which this settlement caused to be removed, for all of the reasons above.

To further my conclusion, according to a Business Insider article regarding about 18 instances of companies found to have used misleading claims, *not one* has restored the claim once it was removed.

<https://www.businessinsider.com/false-advertising-scandals-2017-2 - hyundai-over-sold-its-cars-horsepower-12>

Indeed, the risks are simply too high for a brand or corporation to do this, and additionally more so in the food industry. It is highly likely that doing so would result in similar litigation and much greater media coverage, due to it being seen as a repeat violation of the trust of its customers during a time of increasing importance on food safety.

Fool me once, shame on me. Fool me twice, and lose market share.

VIII. VERIFICATION

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief, and that this declaration was executed at 10:15 AM, this 23 day of July, 2019.



LARRY KOPALD

EXHIBIT B

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

IN RE CONAGRA FOODS, INC.

Case No. CV 11-05379-CJC (AGRx)
MDL No. 2291

**DECLARATION OF JENNIFER M.
KEOUGH REGARDING
SETTLEMENT ADMINISTRATION
AND NOTICE PLAN**

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am the Chief Executive Officer of JND Legal Administration LLC (“JND”). JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

2. JND is serving as the Settlement Administrator in the above-captioned litigation (“Action”) for the purposes of administering the Settlement Agreement and Release, Docket No. 652-1, (the “Settlement Agreement”) preliminarily approved by the Court in its Order Granting Preliminary Approval of Class Action Settlement, Docket No. 654, (the “Order”) dated April 4, 2019. This Declaration supplements my previous Declaration regarding the Proposed Notice Program, Docket No. 652-1, that also detailed my experience including my background handling Settlements throughout the 9th Circuit. The following statements are based on my personal knowledge and information

1 provided to me by other JND employees working under my supervision, and if called
2 on to do so, I could and would testify competently thereto.

3 3. The purpose of this Declaration is to provide the Court with a summary of the
4 Settlement Administration and Notice Plan outlined in my previous Declaration.

5 **CAFA NOTICE**

6 4. On March 21, 2019, and in compliance with the Class Action Fairness Act
7 (“CAFA”), 28 U.S.C. § 1715, JND compiled a CD-ROM containing the following
8 documents with an accompanying cover letter and attachment of recipients:

- 9 a. Class Action Complaint, filed June 28, 2011;
- 10 b. Consolidated Amended Class Action Complaint, filed
11 January 12, 2012;
- 12 c. Second Consolidated Amended Class Action Complaint, filed
13 December 19, 2012;
- 14 d. Notice of Motion and Unopposed Motion for Order Directing
15 Notice to Class Members, filed March 12, 2019, and attaching:
- 16 i. Exhibit A: Order Directing Notice to Class Members;
- 17 e. Memorandum in Support of Unopposed Motion for Order
18 Directing Notice to Class Members, filed March 12, 2019; and
- 19 f. Joint Declaration of Henry J. Kelston and Adam J. Levitt in
20 Support of Unopposed Motion for Order Directing Notice to the
21 Classes, filed March 12, 2019, and attaching:

Exhibit 1: Settlement Agreement and Release, and attaching:

Exhibit A: Order Directing Notice to Class Members;

Exhibit A-1: Publication Notice;

Exhibit A-2: Posted Notice;

Exhibit A-3: Claim Form Instructions and Claim Form;

Exhibit A-4: Declaration of Jennifer M. Keough Regarding
Proposed Notice Program; and

Exhibit B: [Proposed] Final Order Approving Class
Action Settlement;

Exhibit 2: Milberg Tadler Phillips Grossman LLP's Firm Practice
and Achievements;

Exhibit 3: DiCello Levitt Gutzler LLC's Experience and
Representative Cases; and

Exhibit 4: Declaration of Colin B. Weir.

5. A true and correct copy of the CAFA Notice and list of recipients is
attached hereto as **Exhibit A**.

NOTICE PLAN OVERVIEW

6. The objective of the Notice Program was to provide Settlement notice to
the following Settlement Classes, which are limited by the applicable statute of
limitations periods established by the laws of the eleven states ("Class States"):

- a. California Class: all natural persons who resided in the State of California and purchased Wesson Oil Products in California, for personal, non-commercial use, between June 28, 2007 and July 1, 2017.
- b. Colorado Class: all natural persons who resided in the State of Colorado and purchased Wesson Oil Products in Colorado, for personal, non-commercial use, between January 12, 2009 and July 1, 2017.
- c. Florida Class: all natural persons who resided in the State of Florida and purchased Wesson Oil Products in Florida, for personal, non-commercial use, between January 12, 2008 and July 1, 2017.
- d. Illinois Class: all natural persons who resided in the State of Illinois and purchased Wesson Oil Products in Illinois, for personal, non-commercial use, between January 12, 2007 and July 1, 2017.
- e. Indiana Class: all natural persons who resided in the State of Indiana and purchased Wesson Oil Products in Indiana, for personal, non-commercial use, between January 12, 2006 and July 1, 2017.
- f. Nebraska Class: all natural persons who resided in the State of Nebraska and purchased Wesson Oil Products in Nebraska, for

1 personal, non-commercial use, between January 12, 2008 and
2 July 1, 2017.

3 g. New York Class: all natural persons who resided in the State of
4 New York and purchased Wesson Oil Products in New York, for
5 personal, non-commercial use, between January 12, 2008 and
6 July 1, 2017.

7 h. Ohio Class: all natural persons who resided in the State of Ohio
8 and purchased Wesson Oil Products in Ohio, for personal, non-
9 commercial use, between January 12, 2010 and July 1, 2017.

10 i. Oregon Class: all natural persons who resided in the State of
11 Oregon and purchased Wesson Oil Products in Oregon, for
12 personal, non-commercial use, between January 12, 2006 and
13 July 1, 2017.

14 j. South Dakota Class: all natural persons who resided in the State of
15 South Dakota and purchased Wesson Oil Products in South Dakota,
16 for personal, non-commercial use, between January 12, 2006 and
17 July 1, 2017.

18 k. Texas Class: all natural persons who resided in the State of Texas
19 and purchased Wesson Oil Products in Texas, for personal, non-
20 commercial use, between January 12, 2010 and July 1, 2017.

1 7. There was no direct notice here because Conagra did not have personal
2 information about unnamed Settlement Class Members. Accordingly, JND designed a
3 Notice Program to effectively reach unknown Class Members in the Class States
4 through a consumer media campaign. JND's Notice Program consisted of a print effort
5 in the national edition of a leading consumer magazine (*People*); a heavy digital effort
6 geographically focused on the Class States that included the leading digital network
7 (Google Display Network) and the top social platform (Facebook); newspaper notice
8 placements in the *Los Angeles Daily News* to fulfill California's Consumers Legal
9 Remedies Act (CLRA) notice requirements; an internet search effort on a top search
10 engine site (Google); a press release that was distributed to media outlets nationwide;
11 and the establishment of a settlement website and toll-free phone number from which
12 Class Members were able to receive additional information about the Settlement.

13 **PRINT AND CLRA NOTICE**

14 8. As directed by the Settlement Agreement and Order, JND caused the
15 Publication Notice to be published four times in the *Los Angeles Daily News* on April
16 17, 2019, April 24, 2019, May 1, 2019, and May 8, 2019 and in the May 20, 2019 issue
17 of *People* magazine which became available to readers on May 10, 2019. The national
18 edition of *People* magazine has a circulation of 3,425,166 and a readership of over 38
19 million, reaching 15.5% of adults eighteen years of age and older nationwide. In addition,
20 *People* magazine reaches 17.6% of Wesson Oil Consumers in the Class States. A true
21 and correct copy of the Publication Notice is attached hereto as **Exhibit B**.

DIGITAL NOTICE

9. As directed by the Settlement Agreement and Order, JND caused a Digital Notice campaign, to run from April 14, 2019 through July 6, 2019 to reach unknown Class Members¹ in the Class States inform them regarding the Settlement. This campaign included banner display ads in both English and Spanish that linked to the Settlement Website. These promoted posts appeared on Facebook and Google Display, targeting adults in the Class States. The campaign concluded on July 6, 2019. The overall digital campaign delivered 205,946,126 impressions, exceeding the campaign goal by more than 11,225,126 impressions. Digital screenshots of the banner ads are attached hereto as **Exhibit C**.

INTERNET SEARCH

10. As directed by the Settlement Agreement and Order, JND also caused paid digital ads to appear on the Google search engine results pages when keywords related to the proposed Settlement were searched. Purchased keywords/phrases included “canola oil settlement”, “vegetable oil lawsuit”, “Wesson cooking oil”, “Wesson oil class action”, “Wesson oil settlement claim”, “Wesson Oil settlement form”, “claim Wesson oil”, “Wesson oil product suit”, “Conagra class action”. Over 27,000 impressions were delivered to adults in the Class States from April 14, 2019 through

¹ Capitalized terms used but not defined herein shall have the respective meanings given to them in the Settlement Agreement.

1 July 6, 2019. Digital screenshots of the Google search ads, as they appeared, are
2 attached as **Exhibit D**.

3 **PRESS RELEASE**

4 11. As directed by the Settlement Agreement and Order, on April 16, 2019,
5 JND caused a press release to be distributed in English and Spanish to approximately
6 11,000 English and 150 Spanish media outlets nationwide. The press release provided
7 information about the Settlement and allowed for additional notice exposure. The press
8 release had 244 pickups with an estimated potential audience of over 59.8 million. A
9 true and correct copy of the press release is attached hereto as **Exhibit E**. Attached as
10 **Exhibit F** is a Press Release visibility report.

11 **ADDITIONAL EARNED MEDIA**

12 12. In addition to the coverage received from the paid press release, news of
13 the Settlement also went “viral” on class action (e.g., Top Class Actions) and financial
14 sites/blogs (e.g., Common Sense with Money, Hustler Money Blog, The Penny
15 Hoarder, Addicted to Savings). As a result of this coverage, the Settlement received
16 increased claim filing traffic. There were at least 30 mentions to date with a potential
17 reach of over 16.7 million. Attached as **Exhibit G** is a visibility report for this
18 additional earned media coverage. Also attached as **Exhibit H** are some samples of
19 that earned media coverage.
20
21

TOLL-FREE NUMBER

13. On April 12, 2019, JND established a case-specific toll-free number (1-833-291-1651), that individuals may call to obtain additional information regarding the proposed Settlement. The toll-free number is available twenty-four hours a day, seven days a week in both English and Spanish. JND will continue to maintain the toll-free telephone number throughout the Settlement Administration process.

14. As of July 19, 2019, the toll-free number has received 199 calls for approximately 476.52 minutes.

SETTLEMENT WEBSITE

15. On April 12, 2019, JND established a Settlement Website, www.WessonOilSettlement.com, to provide additional information to Class Members including answers to frequently asked questions, important rights and options with deadlines, and allowed Class Members to electronically submit a Claim Form, download the Claim Form and Claim Form Instructions, and download the Posted Settlement Notice in English and Spanish. Settlement Website viewers can also download a copy the Settlement Agreement, the operative complaint in the Action as well as other relevant pleadings. The Settlement Website is optimized for display on mobile devices. Keywords and natural language search terms are included in the site's metadata to maximize search engine rankings. JND will continue to maintain the Settlement Website throughout the Settlement Administration process.

1 16. As of July 19, 2019, the Settlement Website has tracked 117,216 unique
2 users who registered 553,793 page views.

3 **NOTICE PLAN REACH**

4 17. The Notice Plan has delivered an approximate 72% measurable reach with
5 an average frequency of 2.5 views-per-person reached. This 72% reach *exceeds* the
6 70% reach that the Notice Plan was originally projected to achieve, resulting in
7 additional notice of the Settlement being provided to Class Members. The 72% reach
8 does not include the additional coverage received from the paid press release, the earned
9 media coverage, the toll-free telephone number, or the Settlement Website. The best
10 notice practicable was achieved via the methods described above.

11 **REQUESTS FOR EXCLUSION**

12 18. Per the terms of the Settlement Agreement and Order, any Class Member
13 who wishes to exclude themselves from the proposed Settlement (“opt-out”) must mail
14 a letter to JND stating that they desire to opt out of the Settlement, postmarked on or
15 before August 6, 2019.

16 19. As of the date of this Declaration, JND has received one opt-out
17 request. A true and correct copy of the potentially valid exclusion is attached hereto
18 as **Exhibit I**.

19 **OBJECTIONS**

20 20. Per the terms of the Settlement Agreement and Order, Settlement
21 objections must be made in writing, by filing a written objection with the Clerk of the

1 Court with a copy delivered to Class Counsel and Counsel for Conagra no later than
2 August 6, 2019.

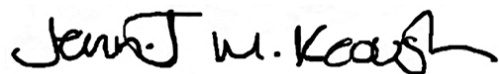
3 21. As of July 19, 2019, JND has not received any objections to the
4 proposed Settlement.

5 **CLAIMS**

6 22. Per the terms of the Settlement Agreement and Order, the deadline for
7 Class Members to submit a Claim Form is August 22, 2019. As of July 19, 2019, JND
8 has received 70,745 claims for 1,937,091 units. Of the Claim Forms received, 70,554
9 were submitted through the Settlement Website and 191 were submitted by mail. Of
10 those 70,745 claims, 148 have claimed more than 30 units for a total of 147,836 units.
11 New York Class Members have made 8,852 claims for 250,621 units and Oregon Class
12 Members have made 1,620 claims for 43,978 units. JND is processing and evaluating
13 Claim Forms received and will continue to do so over the next couple months.

14 I declare under the penalty of perjury pursuant to the laws of the United States of
15 America that the foregoing is true and correct.

16 Executed on July 23, 2019.

17 

18 JENNIFER M. KEOUGH

EXHIBIT A



March 21, 2019

UNITED STATES ATTORNEY GENERAL
AND THE APPROPRIATE OFFICIALS
IDENTIFIED IN ATTACHMENT A

RE: CAFA NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Dear Sir or Madam:

This Notice is being provided to you in accordance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, in connection with, and on behalf of, the Defendant (listed below) in the below-referenced class action (“the Action”). Plaintiffs’ Notice of Motion and Unopposed Motion for Order Directing Notice to Class Members was filed with the United States District Court for the Central District of California on March 12, 2019 and the hearing on the Motion is scheduled for April 15, 2019.

<u>Case Name:</u>	<i>In re Conagra Foods, Inc.</i>
<u>Case Number:</u>	2:11-cv-05379-CJC-AGR
<u>Jurisdiction:</u>	United States District Court, Central District of California
<u>Date Proposed Settlement filed with Court:</u>	March 12, 2019

Pursuant to 28 U.S.C. § 1715 (b), the enclosed CD contains the following documents filed in the Action:

- 01 - Complaint.pdf**
Class Action Complaint, filed June 28, 2011
- 02 - Consolidated Amended Class Action Complaint.pdf**
Consolidated Amended Class Action Complaint, filed January 12, 2012
- 03 – Second Consolidated Amended Class Action Complaint.pdf**
Second Consolidated Amended Class Action Complaint, filed December 19, 2012

04 – Motion for Order Directing Notice to Class Members.pdf

Notice of Motion and Unopposed Motion for Order Directing Notice to Class Members, filed March 12, 2019, and attaching:

Exhibit A: Order Directing Notice to Class Members.

05 – Memorandum in Support of Motion.pdf

Memorandum in Support of Unopposed Motion for Order Directing Notice to Class Members, filed March 12, 2019.

06 - Joint Declaration in Support of Motion.pdf

Joint Declaration of Henry J. Kelston and Adam J. Levitt in Support of Unopposed Motion for Order Directing Notice to the Classes, filed March 12, 2019, and attaching:

Exhibit 1: Settlement Agreement and Release;

Exhibit A: Order Directing Notice to Class Members;

Exhibit A-1: Publication Notice;

Exhibit A-2: Posted Notice;

Exhibit A-3: Claim Form Instructions and Claim Form;

Exhibit A-4: Declaration of Jennifer M. Keough Regarding Proposed Notice Program;

Exhibit B: [Proposed] Final Order Approving Class Action Settlement;

Exhibit 2: Milberg Tadle Phillips Grossman LLP's Firm Practice and Achievements;

Exhibit 3: DiCello Levitt Gutzler LLC's Experience and Representative Cases; and

Exhibit 4: Declaration of Colin B. Weir.

It is not feasible to provide a breakdown of the Settlement Class in accordance with 28 U.S.C. § 1715 (b)(7)(A) and (B). However, the scope of the class definition is limited to all natural persons who reside in California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota, and Texas and the entirety of the Settlement Classes are located in those eleven U.S. states. Accordingly, we estimate the number of Class Members in each state to be roughly proportionate to the populations of the states.

If you have any questions regarding the details of the Action and Settlement, please contact Defense Counsels' representative at:

Counsel for Conagra Brands, Inc.

Angela M Spivey
Alston and Bird LLP
One Atlantic Center
1201 West Peachtree Street, Suite 4900
Atlanta, GA 30309-3424
Phone: (404) 881-7857
E-mail: angela.spivey@alston.com

March 21, 2019

#19094

JND LEGAL ADMINISTRATION

Page 3

For questions regarding this notice, please contact JND at:

JND Class Action Administration
1100 2nd Ave, Suite 300
Seattle, WA 98101
Phone: (800) 207-7160

Regards,

/s/

JND Legal Administration

cc: Henry J. Kelston, Esq.
Angela M. Spivey, Esq.

CAFA Coordinator
Office of the Attorney General
Consumer Law Section
455 Golden Gate Ave., Ste 11000
San Francisco, CA 94102-7004

Phil Weiser
Office of the Attorney General
Ralph L. Carr Judicial Building
1300 Broadway, 10th Fl
Denver, CO 80203

Ashley Moody
Office of the Attorney General
State of Florida
The Capitol PL-01
Tallahassee, FL 32399-1050

Kwame Raoul
Office of the Attorney General
James R. Thompson Center
100 W. Randolph St
Chicago, IL 60601

Curtis T. Hill, Jr.
Indiana Attorney General's Office
Indiana Government Center South
302 W Washington St 5th Fl
Indianapolis, IN 46204

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Lincoln, NE 68509

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Dave Yost
Attorney General's Office
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Ellen F. Rosenblum
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Salem, OR 97301-4096

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Ste 1
Pierre, SD 57501-8501

Ken Paxton
Office of the Attorney General
300 W. 15th St
Austin, TX 78701

William P. Barr
Office of the U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Ave NW
Washington, DC 20530-0001

Delaware Division of Corporations
John G. Townsend Bldg.
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One Pennsylvania Plaza, Suite 1920
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Angela M. Spivey
Alston and Bird LLP
One Atlantic Center
1201 West Peachtree Street, Suite 4900
Atlanta, GA 30309-3424

EXHIBIT B

#19098

If you resided in California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota, or Texas and purchased Wesson Oil products in that state for your own personal, non-commercial use, you may be eligible to receive a payment from a class action settlement.

Para ver la notificación en español, visite www.wessonoilsettlement.com.

A Settlement has been proposed in a class action lawsuit (*In re ConAgra Foods, Inc.*, United States District Court for the Central District of California, Case No. 2:11-cv-05379-CJC-AGR, MDL No. 2291). The Court authorized this notice and will decide whether to approve the Settlement.

WHO IS AFFECTED?

You are a Class Member only if you resided in any of these eleven States and purchased Wesson brand cooking oils, including Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil, and Wesson Best Blend, in that state for your own personal, non-commercial use during these time periods:

<u>State:</u>	<u>Class Period:</u>
California	June 28, 2007 through July 1, 2017
Colorado	January 12, 2009 through July 1, 2017
Florida	January 12, 2008 through July 1, 2017
Illinois	January 12, 2007 through July 1, 2017
Indiana	January 12, 2006 through July 1, 2017
Nebraska	January 12, 2008 through July 1, 2017
New York	January 12, 2008 through July 1, 2017
Ohio	January 12, 2010 through July 1, 2017
Oregon	January 12, 2006 through July 1, 2017
South Dakota	January 12, 2006 through July 1, 2017
Texas	January 12, 2010 through July 1, 2017

WHAT'S THIS ABOUT?

The lawsuit alleges that Conagra violated certain laws in the marketing, advertising and sale of Wesson Oil Products made from Genetically Modified Ingredients (GMOs) as "Natural." Conagra denies any and all wrongdoing of any kind whatsoever and has asserted various defenses that it believes are meritorious.

WHAT CAN YOU GET FROM THE SETTLEMENT?

All Class Members who submit a valid claim receive \$0.15 for each unit of Wesson Oil Product purchased during the relevant Class Period. Class Members may submit a claim for up to 30 units without proof of purchase. Class Members may submit a claim for more than 30 units only with proof of purchase. There is also a \$575,000 fund to be allocated to New York and Oregon Class Members who submit valid claims as compensation for statutory damages provided for in the laws of those states. Conagra also agreed to certain injunctive relief.

HOW DO YOU GET A PAYMENT?

Go to www.wessonoilsettlement.com and file or download a Claim Form. All Claim Forms must be either submitted online or postmarked and mailed by **August 22, 2019**. Only one Claim Form can be submitted per Household (defined as all persons residing at the same physical address)

WHAT ARE YOUR OPTIONS?

If you are a Class Member and you do nothing or file a claim to receive monetary benefits you will be bound by the Court's judgments. If you want to opt out of the Settlement you must mail a request for exclusion postmarked by August 6, 2019. Any Class Member who does not opt out of the Settlement may object to the Settlement by filing a written objection by August 6, 2019. For specific details on how to opt out or object, please read the Posted Notice at www.wessonoilsettlement.com.

The Court will hold a hearing at the U.S. Courthouse, 350 W. 1st Street, Courtroom 7C, Los Angeles, CA 90012 on October 7, 2019 at 1:30 p.m., Pacific, to consider whether to approve the Settlement and applications for attorneys' fees and expenses up to \$6,850,000 and for service awards up to (a) \$3,000 each for the six Class Representatives who were deposed and (b) \$1,000 each for the seven who were not deposed. If you wish, you or your attorney may ask to appear and speak at the hearing at your own expense, but you do not have to.

This notice is only a summary. For additional information, please visit the Settlement website at www.wessonoilsettlement.com; call toll-free 1-833-291-1651; or write: Wesson Oil Settlement, c/o JND Legal Administration, P.O. Box 91249, Seattle, WA 98111-9349.

EXHIBIT C


JND – Wesson Oil Settlement Digital Media Visuals

1


DISPLAY BANNER

Popular Recipes


Most Made Today




Slow-Cooker Corned Beef and Cabbage
★★★★★ 1K



Polish Noodles (Cottage Cheese)
★★★★★ 175




World's Best Lasagna
★★★★★ 12K




Fluffy Pancakes
★★★★★ 11K

RECIPE OF THE DAY



Creamy Lemon Chicken Thighs
★★★★★ 3
Try this easy and elegant recipe for tender dark-meat chicken thighs and drumsticks baked in...
By Destiny Elizabeth Glynn



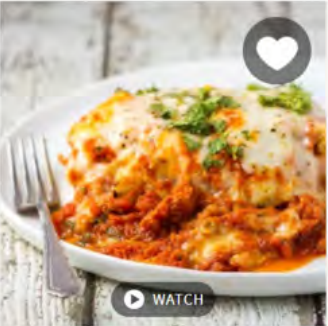
Our Newest Recipes
Find all the newest recipes published on Allrecipes.com. Make it, review it, and post a photo to help other home cooks!
By Allrecipes

LEGAL NOTICE

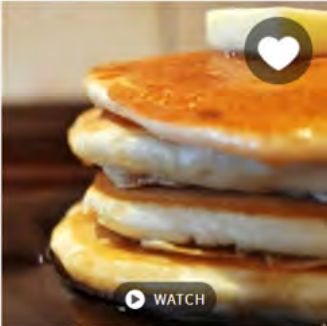
If you purchased certain Wesson Oil products, you may qualify for a payment from a class action settlement.

[LEARN MORE](#)

JND




WATCH

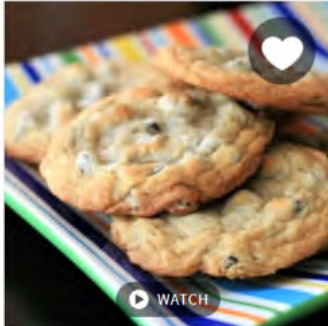


WATCH

PAID CONTENT



ADD WHISKERS WITH PEN
DIY Bunny Bags for Easter Treats
Cute, easy and filled with candy. What more could you want from an Easter craft?



WATCH

DP

News ▾ Sports ▾ Business ▾ Entertainment ▾ Lifestyle ▾ Opinion ▾ Politics ▾ Classifieds ▾

[SUBSCRIBE NOW](#)

Search



Breaking News Notre Dame cathedral on fire in Paris April 15, 2019 at 12:12 pm



COLORADO NEWS



LEGAL NOTICE

If you purchased certain Wesson Oil products, you may qualify for a payment from a class action settlement.

[LEARN MORE](#)

JND

JND – Wesson Oil Settlement Digital Media Visuals

2

DISPLAY BANNER

The screenshot shows the NBC Sports website interface. At the top, there's a navigation bar with 'NBC Sports' logo and 'xfinity' branding. Below it, a dark bar contains team names: WARRIORS, 49ERS, RAIDERS (highlighted), GIANTS, ATHLETICS, KINGS, SHARKS, TOM HABERSTROH, and MORE. A secondary bar lists categories: IN-GAME LIVE, VIDEO, SCOTT BAIR, INSIDER PODCAST, SCHEDULE, STANDINGS, STATS, TICKETS, and logos for SNY, GOLF, and ROTOWORLD.

A prominent banner at the top of the main content area reads: "If you purchased certain Wesson® Oil products, you may qualify for a payment from a class action settlement." with a "LEARN MORE" button and the JND logo.

Below the banner is a "WATCH NOW" section with a "VIEW FULL SCHEDULE" link. To the right, a "TV SCHEDULE" box says "TONIGHT ON Sports".

The main content area features a "RAIDERS" header with social media links. The central image shows a Raiders player (Quinnen Williams) with the text "Quinnen Williams is ready to shine on the NFL stage". Below this image is the headline: "2019 NFL mock draft: How Mel Kiper would use Raiders' first four picks".

On the right side, there are several smaller articles and ads, including one for "Business Microfiber Oxfords" with a "60% OFF" discount, and several NFL draft-related news snippets.

At the bottom left, there's a "WATCH NOW" section listing upcoming events: "NBC Sports California Kings Press Conference", "NBC Sports Bay Area Clippers vs. Warriors Game 2 (NBCS BAY)", "NBC Sports Bay Area Giants vs. Nationals, April 16 (NBCS BAY)", and "NBC Sports California Astros vs. Athletics, April 16 (NBCS CA)".

The screenshot shows a USA Today article by Dawn Gilbertson. The headline is "Between North America and Cape Town, South Africa". The article is dated "5, 2019 9:57 AM".

The article features a large photo of the interior of a Boeing 787-10 Dreamliner, showing rows of seats and overhead storage bins. A smaller photo shows the exterior of the aircraft on the tarmac.

Below the photos is a blue button that says "View | 61 Photos".

The main text of the article reads: "United shows off first Boeing 787-10 Dreamliner at Washington Dulles".

Below this, the article states: "United Airlines plans to begin nonstop flights between Newark, New Jersey, and Cape Town, South Africa, in December."

At the bottom of the article, there is a small banner for the Wesson Oil settlement, identical to the one in the first screenshot.

JND – Wesson Oil Settlement Digital Media Visuals

3

DISPLAY BANNER – SPANISH



EL DIARIO

[Ingresar](#) [SUSCRIBETE](#)

Notre-Dame Sarampión NYC Nueva York Donald Trump Venezuela ICE El Chapo El Mundo en 2 minutos

Contáctanos: Sin Recargo: +1 800-933-1212
Teléfono: +1 212-683-3800

 William Schwitzer
& Associates, PC

Fotos: Incendio masivo en la Catedral de Notre Dame en París

La iglesia construida en el siglo 13 es una de las estructuras arquitectónicas más emblemáticas de la capital francesa



LEGAL NOTICE
Si ha comprado ciertos productos de Wesson Oil, es posible que reúna los requisitos para recibir un pago por un acuerdo de demanda colectiva.

[MÁS INFORMACIÓN](#)

JND

CLASIFICADOS
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LEGAL NOTICE
Si ha comprado ciertos productos de Wesson Oil, es posible que reúna los requisitos para recibir un pago por un acuerdo de demanda colectiva.

[MÁS INFORMACIÓN](#)

JND

Este es el método educativo que tuvieron los creadores de Amazon, Google y hasta Beyoncé (VIDEO)

[f](#) [t](#) [e](#) [+](#) [G](#) [GUARDAR](#)

Foto: Getty Images



Your video will resume in 48 seconds



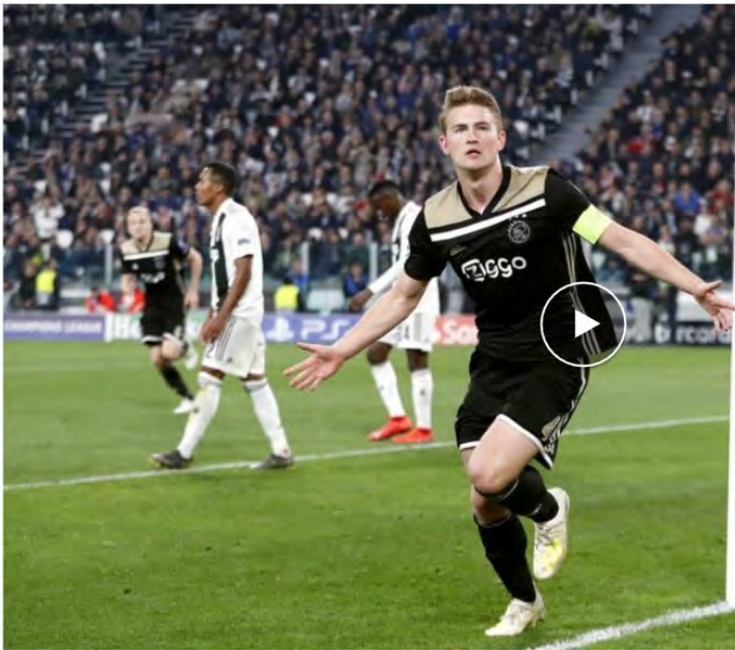
JND – Wesson Oil Settlement Digital Media Visuals

4

DISPLAY BANNER – SPANISH

SECCIONES

UNIVISION




JUVENTUS

JUVENTUS

1 (2)


FINAL

2 (3)



AJAX

LEGAL NOTICE



Si ha comprado ciertos productos de Wesson Oil,
es posible que reúna los requisitos para recibir
un pago por un acuerdo de demanda colectiva.

MÁS INFORMACIÓN

JND

JND – Wesson Oil Settlement Digital Media Visuals

5

SOCIAL MEDIA

Facebook interface showing a sponsored post from JND Legal Administration. The post features a video of oil being poured into a frying pan and text stating: "If you purchased Wesson Oil Products, you may qualify for a payment from a class action settlement." The URL www.wessonoilsettlement.com is visible. The post is titled "Purchasers of Wesson Oil Products". The right sidebar shows sponsored ads for SHEIN and Crate and Barrel.

Facebook interface showing a post from Elizabeth Mullen celebrating her mother's 60th birthday. The post includes a photo of a birthday cake and text: "Happy 60th Birthday to our amazing mom! We are so happy we were able to surprise her and celebrate this birthday milestone with her! It's truly incredible everything she has done and continues to do for all of us! Thank you for always being so strong and caring! #elevengrandchildren #momisalmost60 #strongestpersoniknow". The right sidebar shows a sponsored post from Wesson Oil Purchasers, which is a smaller version of the JND Legal Administration post.

JND – Wesson Oil Settlement Digital Media Visuals

6

SOCIAL MEDIA



JND – Wesson Oil Settlement Digital Media Visuals

7

SOCIAL MEDIA – SPANISH

Facebook interface showing a sponsored post from JND Legal Administration. The post text in Spanish reads: "Si ha comprado productos de Wesson® Oil, es posible que reúna los requisitos para recibir un pago por un acuerdo de demanda colectiva. See Translation". The image shows oil being poured into a frying pan. The URL www.wessonoilsettlement.com is visible at the bottom of the post. The right sidebar shows a promotion for FIGS (20% OFF) and a \$500 Toward Closing Costs offer from Dime.com.

Facebook interface showing a sponsored post from Delish. The post text reads: "Chicken Parm Burgers are what your life has been missing. Full recipe: http://dlsh.it/xvM4Dyc". The image shows a chicken parm burger. The URL www.wessonoilsettlement.com is visible at the bottom of the post. The right sidebar shows a sponsored ad for Wesson Oil with the text: "Compradores de Wesson® Oil™ www.wessonoilsettlement.com Los compradores de productos de Wesson® Oil™ pueden reunir los requisitos para recibir un...".

JND – Wesson Oil Settlement Digital Media Visuals

8

SOCIAL MEDIA – SPANISH



A screenshot of a Facebook post from the page "JND Legal Administration". The post is a sponsored advertisement for the Wesson Oil Settlement. The text of the post is in Spanish: "Los compradores de productos de Wesson® Oil™ pueden reunir los requisitos para recibir un pago por un acuerdo de demanda colectiva." Below the text is a link that says "See Translation". The main image in the post shows a hand pouring yellow cooking oil from a clear plastic bottle into a black frying pan. At the bottom of the post, there is a white bar containing the website "WWW.WESSONOILSETTLEMENT.COM", the text "Compradores de Wesson® Oil™", and a button that says "Learn More". The Facebook interface shows the post has 66 likes and 12 comments. The status bar at the top of the phone screen shows the time as 5:40.

5:40

66 12 Comments

Like Comment

JND JND Legal Administration
Sponsored (demo) ·

Los compradores de productos de Wesson® Oil™ pueden reunir los requisitos para recibir un pago por un acuerdo de demanda colectiva.
[See Translation](#)

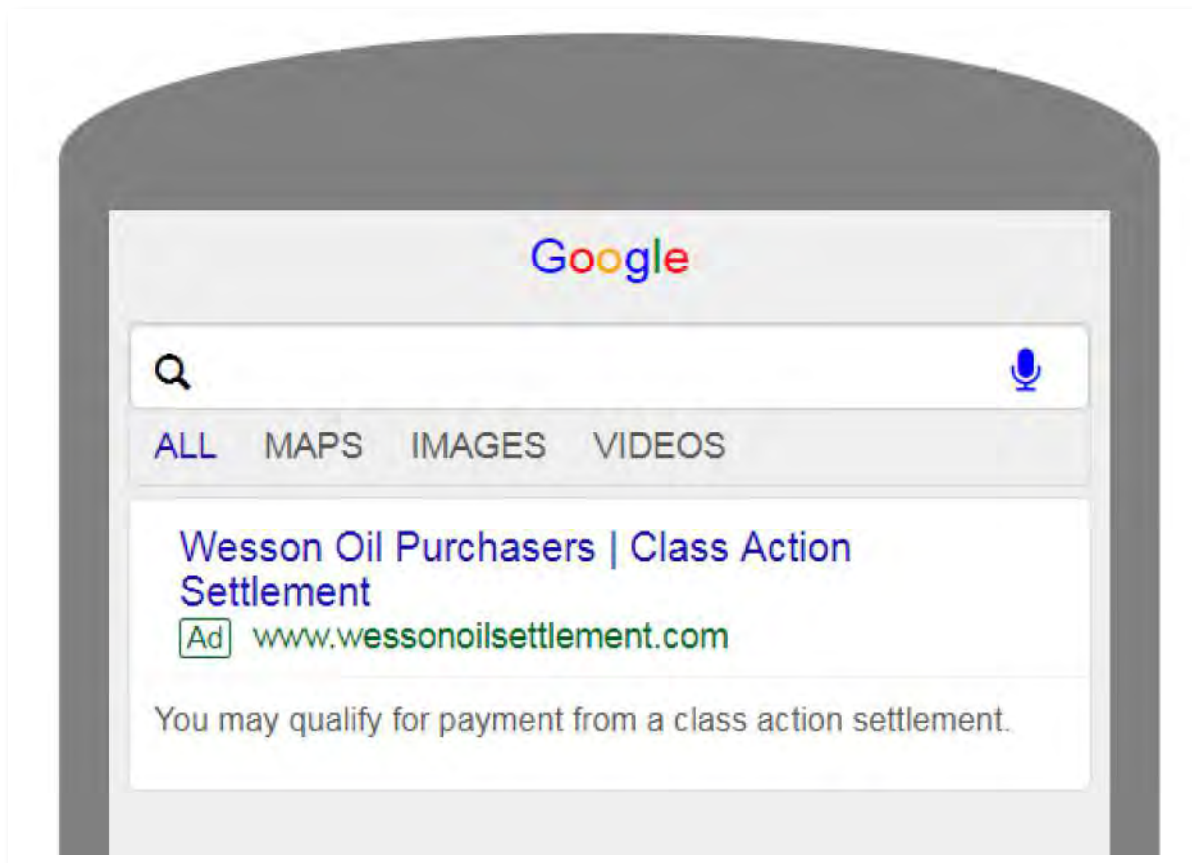
WWW.WESSONOILSETTLEMENT.COM
Compradores de Wesson® Oil™ [Learn More](#)

EXHIBIT D

JND – Wesson Oil Settlement Paid Digital Ads

1

GOOGLE SEARCH



BING SEARCH

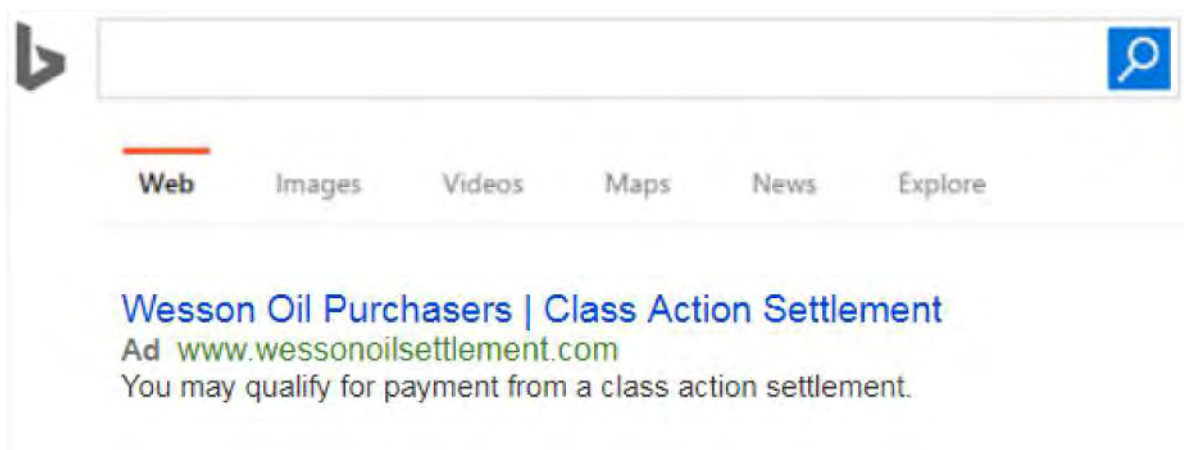


EXHIBIT E

If you resided in California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota, or Texas and purchased Wesson Oil products in that state for your own personal, non-commercial use, you may be eligible to receive a payment from a class action settlement.

Seattle, WA, April 16, 2019/JND Class Action Administration

A Settlement has been proposed in a class action lawsuit (*In re ConAgra Foods, Inc.*, United States District Court for the Central District of California, Case No. 2:11-cv-05379-CJC-AGR, MDL No. 2291). The Court authorized this notice and will decide whether to approve the Settlement.

WHO IS AFFECTED?

You are a Class Member only if you resided in any of these eleven States and purchased Wesson brand cooking oils, including Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil, and Wesson Best Blend, in that state for your own personal, non-commercial use during these time periods:

<u>State:</u>	<u>Class Period:</u>
California	June 28, 2007 through July 1, 2017
Colorado	January 12, 2009 through July 1, 2017
Florida	January 12, 2008 through July 1, 2017
Illinois	January 12, 2007 through July 1, 2017
Indiana	January 12, 2006 through July 1, 2017
Nebraska	January 12, 2008 through July 1, 2017
New York	January 12, 2008 through July 1, 2017
Ohio	January 12, 2010 through July 1, 2017
Oregon	January 12, 2006 through July 1, 2017
South Dakota	January 12, 2006 through July 1, 2017
Texas	January 12, 2010 through July 1, 2017

WHAT'S THIS ABOUT?

The lawsuit alleges that Conagra violated certain laws in the marketing, advertising and sale of Wesson Oil Products made from Genetically Modified Ingredients (GMOs) as "Natural." Conagra denies any and all wrongdoing of any kind whatsoever and has asserted various defenses that it believes are meritorious.

WHAT CAN YOU GET FROM THE SETTLEMENT?

All Class Members who submit a valid claim receive \$0.15 for each unit of Wesson Oil Product purchased during the relevant Class Period. Class Members may submit a claim for up to 30 units without proof of purchase. Class Members may submit a claim for more than 30 units only with proof of purchase. There is also a \$575,000 fund to be allocated to New York and Oregon Class Members who submit valid claims as compensation for statutory damages provided for in the laws of those states. Conagra also agreed to certain injunctive relief.

HOW DO YOU GET A PAYMENT?

Go to www.wessonoilsettlement.com and file or download a Claim Form. All Claim Forms must be either submitted online or postmarked and mailed by **August 22, 2019**. Only one Claim Form can be submitted per Household (defined as all persons residing at the same physical address).

WHAT ARE YOUR OPTIONS?

If you are a Class Member and you do nothing or file a claim to receive monetary benefits you will be bound by the Court's judgments. If you want to opt out of the Settlement you must mail a request for exclusion postmarked by August 6, 2019. Any Class Member who does not opt out of the Settlement may object to the Settlement by filing a written objection by August 6, 2019. For specific details on how to opt out or object, please read the Posted Notice at www.wessonoilsettlement.com.

The Court will hold a hearing at the U.S. Courthouse, 350 W. 1st Street, Courtroom 7C, Los Angeles, CA 90012 on October 7, 2019 at 1:30 p.m., Pacific, to consider whether to approve the Settlement and applications for attorneys' fees and expenses up to \$6,850,000 and for service awards up to (a) \$3,000 each for the six Class Representatives who were deposed and (b) \$1,000 each for the seven who were not deposed. If you wish, you or your attorney may ask to appear and speak at the hearing at your own expense, but you do not have to.

For additional information, please visit the Settlement website at www.wessonoilsettlement.com; call toll-free 1-833-291-1651; or write: Wesson Oil Settlement, c/o JND Legal Administration, P.O. Box 91249, Seattle, WA 98111-9349.

EXHIBIT F

composite

If you resided in California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota, or Texas and purchased Wesson Oil products in that state for your own personal, non-commercial use, you may be eligible to receive a payment from a class action settlement

English PR Newswire ID: 2432539-1 Clear Time Apr 16, 2019 9:17 AM ET

View Release ▼

Report shows data for: All 2 releases

Pickup

Where did my releases get picked up?

244	59,892,239
total pickup	total potential audience

Traffic

What traffic did my releases generate?

630	2,865
release views	release web crawler hits

Audience

Who are the audiences viewing my releases?

174	39	1,491	963
media views	organization views	targeted influencers	Associated Press outlets

Engagement

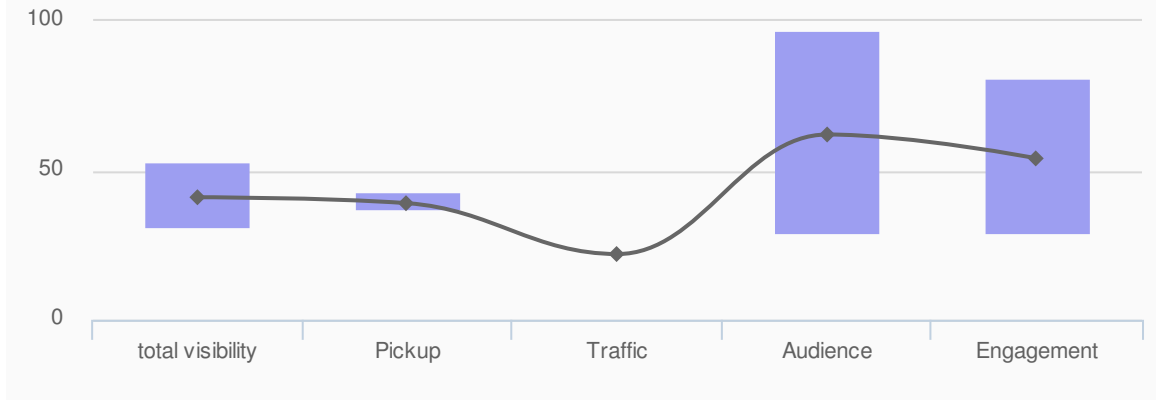
How are people engaging with my releases?

53
total engagement actions

4	49
shares	click-throughs

Industry Benchmarks

On a scale of 1 - 100, each bar shows the highest and lowest benchmark scores for your releases.



composite

Pickup

Overview

TOTAL PICKUP

244

TOTAL POTENTIAL AUDIENCE

59M

Exact Match

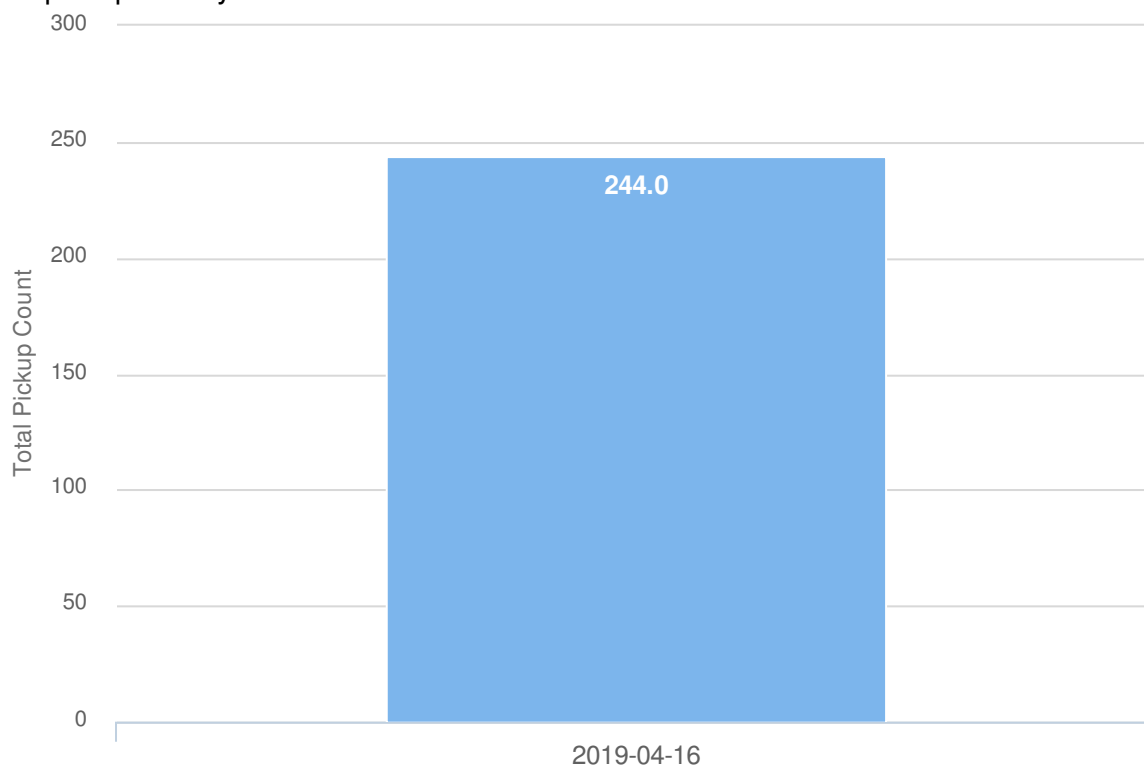
244 postings

Exact Match

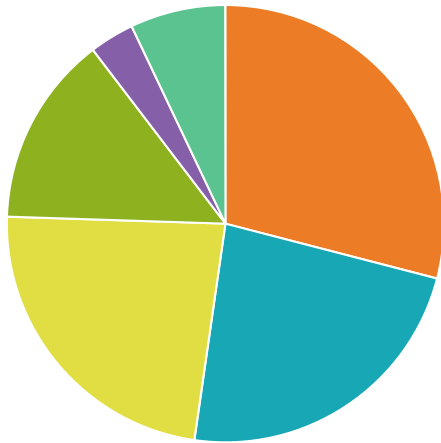
59M visitors

Total Pickup Over Time

Total pickup since your content was distributed

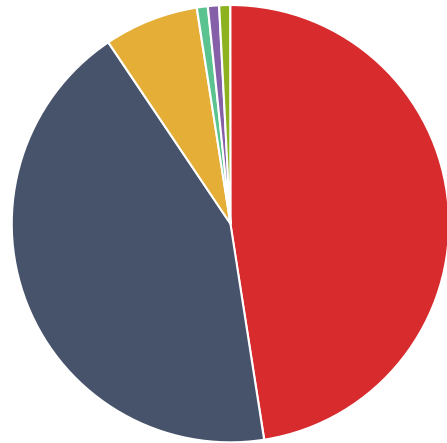


Total Pickup by Source Type



- Broadcast Media (70/29.0%)
- News & Information Service (56/23.2%)
- Newspaper (56/23.2%)
- Online News Sites & Other Influencers (34/14.1%)
- Financial News Service (8/3.3%)
- Other (17/7.1%)



Total Pickup by Industry

































- Multicultural & Demographic (116/47.5%)
- Media & Information (105/43.0%)
- Financial (17/7.0%)
- Retail & Consumer (2/0.8%)
- Tech (2/0.8%)
- Other (2/0.8%)

Exact Match Pickup































Exact matches are full text postings of your content which we have found in the online and social media that we monitor. Understand how it is calculated. Your release has generated **244** exact matches with a total potential audience of **59,892,239**.

Logo	Outlet Name	# of Releases	Location	Source Type	Industry	Potential Audience
	MarketWatch Online  View Release	1	United States	Financial News Service	Financial	16,341,607 visitors/month
	TheStreet.com Online  View Release	1	United States	Trade Publications	Financial	9,377,816 visitors/month
	PR Newswire Online  View Release	1	United States	PR Newswire	Media & Information	9,372,666 visitors/month
	PR Newswire Online  View Release	1	United States	PR Newswire	Media & Information	9,372,666 visitors/month
	WFMZ-TV IND-69 [Allentown, PA] Online  View Release	1	United States	Broadcast Media	Media & Information	2,098,364 visitors/month





























#19118

	WFMZ-TV IND-69 [Allentown, PA] Online  View Release	1	United States	Broadcast Media	Media & Information	2,098,364 visitors/month
	KOTV-TV CBS-6 [Tulsa, OK] Online  View Release	1	United States	Broadcast Media	Media & Information	2,056,942 visitors/month
	Spoke Online  View Release	1	United States	News & Information Service	Business Services	1,894,937 visitors/month
	Yahoo! Finance Online  View Release	1	Global	Online News Sites & Other Influencers	Media & Information	1,834,222 visitors/month
	Daily Herald [Chicago, IL] Online  View Release	1	United States	Newspaper	Media & Information	1,555,913 visitors/month
	Buffalo News [Buffalo, NY] Online  View Release	1	United States	Newspaper	Media & Information	1,537,817 visitors/month
	ADVFN Germany Online  View Release	1	Germany	Financial News Service	Financial	1,136,694 visitors/month
	WBBH-TV NBC-2 [Fort Myers, FL] Online  View Release	1	United States	Broadcast Media	Media & Information	870,274 visitors/month
	KWTU-TV CBS-9 [Oklahoma City, OK] Online  View Release	1	United States	Broadcast Media	Media & Information	854,368 visitors/month
	KAKE-TV ABC [Wichita, KS] Online  View Release	1	United States	Broadcast Media	Media & Information	848,576 visitors/month
	Play 96.5 FM Online  View Release	1	Puerto Rico	Broadcast Media	Multicultural & Demographic	465,498 visitors/month
	La Mega 106.9 FM Online  View Release	1	Puerto Rico	Broadcast Media	Multicultural & Demographic	465,498 visitors/month
	La Ley 107.9 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	465,498 visitors/month
	Minyanville Online  View Release	1	United States	Online News Sites & Other Influencers	Financial	455,400 visitors/month
	WBOC-TV CBS-16 [Salisbury, MD] Online  View Release	1	United States	Broadcast Media	Media & Information	433,550 visitors/month































#19119





























	One News Page Global Edition Online  View Release	1	Global	Online News Sites & Other Influencers	Media & Information	433,131 visitors/month
	WRCB-TV NBC-3 [Chattanooga, TN] Online  View Release	1	United States	Broadcast Media	Media & Information	430,946 visitors/month
	WVIR-TV NBC-29 [Charlottesville, VA] Online  View Release	1	United States	Broadcast Media	Media & Information	316,720 visitors/month
	KITV-TV ABC [Honolulu, HI] Online  View Release	1	United States	Broadcast Media	Media & Information	315,842 visitors/month
	NewsBlaze Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	189,533 visitors/month
	WZVN-TV ABC-7 [Fort Myers, FL] Online  View Release	1	United States	Broadcast Media	Media & Information	183,723 visitors/month
	myMotherLode.com [Sonora, CA] Online  View Release	1	United States	Newspaper	Media & Information	181,414 visitors/month
	KTVN-TV CBS-2 [Reno, NV] Online  View Release	1	United States	Broadcast Media	Media & Information	157,502 visitors/month
	WFMJ-TV NBC-21 [Youngstown, OH] Online  View Release	1	United States	Broadcast Media	Media & Information	157,337 visitors/month
	WRAL-TV CBS-5 [Raleigh, NC] Online  View Release	1	United States	Broadcast Media	Media & Information	156,085 visitors/month
	Townhall Finance Online  View Release	1	United States	Financial News Service	Media & Information	156,085 visitors/month
	Tamar Securities Online  View Release	1	United States	Online News Sites & Other Influencers	Financial	156,085 visitors/month
	Star Tribune [Minneapolis, MN] Online  View Release	1	United States	Newspaper	Media & Information	156,085 visitors/month
	FinancialContent - PR Newswire Online  View Release	1	United States	Financial News Service	Media & Information	156,085 visitors/month
	IBTimes Online  View Release	1	United States	Newspaper	Media & Information	156,085 visitors/month

#19120































	Rockford Register Star [Rockford, IL] Online  View Release	1	United States	Newspaper	Media & Information	156,085 visitors/month
	Great American Financial Resources Online  View Release	1	United States	News & Information Service	Financial	156,085 visitors/month
	Franklin Credit Management Online  View Release	1	United States	Online News Sites & Other Influencers	Financial	156,085 visitors/month
	Value Investing News Online  View Release	1	United States	Financial News Service	Financial	156,085 visitors/month
	Dow Theory Letters Online  View Release	1	United States	Banking & Financial Institutions	Financial	156,085 visitors/month
	Daily Penny Alerts Online  View Release	1	United States	Online News Sites & Other Influencers	Financial	156,085 visitors/month
	KVOR 740-AM [Colorado Springs, CO] Online  View Release	1	United States	Broadcast Media	Media & Information	156,085 visitors/month
	KARN 102.9-FM [Little Rock, AR] Online  View Release	1	United States	Broadcast Media	Media & Information	156,085 visitors/month
	Benefit Plans Administrative Services Online  View Release	1	United States	Online News Sites & Other Influencers	Financial	156,085 visitors/month
	Boston Herald [Boston, MA] Online  View Release	1	United States	Newspaper	Media & Information	156,085 visitors/month
	Ascensus Online  View Release	1	United States	Online News Sites & Other Influencers	Financial	156,085 visitors/month
	1st Discount Brokerage Online  View Release	1	United States	Financial News Service	Financial	156,085 visitors/month
	WSIL-TV ABC-3 [Carterville, IL] Online  View Release	1	United States	Broadcast Media	Media & Information	151,713 visitors/month
	WLNE-TV ABC-6 [Providence, RI] Online  View Release	1	United States	Broadcast Media	Media & Information	151,699 visitors/month

#19121




















	KLKN-TV ABC-8 [Lincoln, NE] Online  View Release	1	United States	Broadcast Media	Media & Information	150,562 visitors/month
	KEYC-TV CBS-12 / FOX-12 [Mankato, MN] Online  View Release	1	United States	Broadcast Media	Media & Information	150,149 visitors/month
	WICU-TV NBC-12 / WSEE-TV CBS-35 [Erie, PA] Online  View Release	1	United States	Broadcast Media	Media & Information	146,051 visitors/month
	Portada-Online.com Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	138,068 visitors/month
	The Chronicle Journal [Thunder Bay, ON] Online  View Release	1	Canada	Newspaper	Media & Information	132,751 visitors/month
	Siempre Mujer Online  View Release	1	United States	Magazine	Multicultural & Demographic	129,154 visitors/month
	Ticker Technologies Online  View Release	1	United States	Financial News Service	Financial	95,258 visitors/month
	RFD-TV [Nashville, TN] Online  View Release	1	United States	Broadcast Media	Media & Information	75,301 visitors/month
	AmericaTeVe Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	65,374 visitors/month
	WENY-TV [Horseheads, NY] Online  View Release	1	United States	Broadcast Media	Media & Information	58,862 visitors/month
	KUAM-TV NBC-8 / CBS-11 [Hagatna, Guam] Online  View Release	1	United States	Broadcast Media	Media & Information	56,423 visitors/month
	My Silly Little Gang Online  View Release	1	United States	Blog-Parental Influencers	Retail & Consumer	52,674 visitors/month
	The Costa Rica News - TCRN Online  View Release	1	Costa Rica	Online News Sites & Other Influencers	Media & Information	49,033 visitors/month
	The News Online  View Release	1	Mexico	Online News Sites & Other Influencers	Media & Information	46,414 visitors/month
	WICZ-TV FOX-40 [Binghamton, NY] Online  View Release	1	United States	Broadcast Media	Media & Information	45,701 visitors/month

	Hola Amigos Online  View Release	1	United States	Newspaper	Multicultural & Demographic	43,525 visitors/month
	KASA-TV Telemundo-2 [Albuquerque, NM] Online  View Release	1	United States	Broadcast Media	Media & Information	39,087 visitors/month
	Ser Padres Online  View Release	1	United States	Magazine	Multicultural & Demographic	38,058 visitors/month
	Daily Times Leader [West Point, MS] Online  View Release	1	United States	Newspaper	Media & Information	36,386 visitors/month
	ChicaNOL Online  View Release	1	United States	Blog	Multicultural & Demographic	34,322 visitors/month
	The Pilot News [Plymouth, IN] Online  View Release	1	United States	Newspaper	Media & Information	34,197 visitors/month
	Starkville Daily News [Starkville, MS] Online  View Release	1	United States	Newspaper	Media & Information	32,336 visitors/month
	Suncoast News Network [Sarasota, FL] Online  View Release	1	United States	Broadcast Media	Media & Information	26,660 visitors/month
	The Saline Courier [Benton, AR] Online  View Release	1	United States	Newspaper	Media & Information	15,041 visitors/month
	Decatur Daily Democrat [Decatur, IN] Online  View Release	1	United States	Newspaper	Media & Information	13,983 visitors/month
	The Observer News Enterprise [Newton, NC] Online  View Release	1	United States	Newspaper	Media & Information	13,763 visitors/month
	Access News Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	13,491 visitors/month
	The Punxsutawney Spirit [Punxsutawney, PA] Online  View Release	1	United States	Newspaper	Media & Information	13,490 visitors/month
	Mammoth Times [Mammoth Lakes, CA] Online  View Release	1	United States	Newspaper	Media & Information	13,060 visitors/month

#19123

	Mega TV Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	12,801 visitors/month
	Inyo Register [Bishop, CA] Online  View Release	1	United States	Newspaper	Media & Information	12,530 visitors/month
	KFAQ-AM 1170 [Tulsa, OK] Online  View Release	1	United States	Broadcast Media	Media & Information	12,484 visitors/month
	Malvern Daily Record [Malvern, AR] Online  View Release	1	United States	Newspaper	Media & Information	12,331 visitors/month
	Borger News Herald [Borger, TX] Online  View Release	1	United States	Newspaper	Media & Information	12,090 visitors/month
	Ridgway Record [Ridgway, PA] Online  View Release	1	United States	Newspaper	Media & Information	11,964 visitors/month
	ProfitQuotes Online  View Release	1	United States	Financial News Service	Financial	10,356 visitors/month
	Missouri Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	10,351 visitors/month
	Delaware Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	10,351 visitors/month
	Alaska Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	10,159 visitors/month
	100.7-FM The Score [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	10,156 visitors/month
	Valor Agregado - Gestão e Tecnologia - Mundo Corporativo Online  View Release	1	Brazil	Blog	Tech	10,036 visitors/month
	Prensa Mexicana Online  View Release	1	United States	Newspaper	Multicultural & Demographic	9,816 visitors/month
	KTTU-FM 97.3 Double T [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	9,802 visitors/month
	Centro Tampa Online  View Release	1	United States	Newspaper	Multicultural & Demographic	9,796 visitors/month

#19124

	Ismael Cala Online  View Release	1	United States	Blog	Multicultural & Demographic	9,693 visitors/month
	Our Good Life Online  View Release	1	United States	Blog-Parental Influencers	Retail & Consumer	9,510 visitors/month
	D'Latinos Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	9,439 visitors/month
	Univision Minnesota Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	9,439 visitors/month
	Univision Kansas City Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	9,439 visitors/month
	Seattle 24x7 Online  View Release	1	United States	Trade Publications	Tech	9,096 visitors/month
	The Evening Leader [St. Marys, OH] Online  View Release	1	United States	Newspaper	Media & Information	9,060 visitors/month
	El Colombiano Online  View Release	1	United States	Newspaper	Multicultural & Demographic	8,860 visitors/month
	Luis Jimenez Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	8,831 visitors/month
	Hola Arkansas! Online  View Release	1	United States	Newspaper	Multicultural & Demographic	8,786 visitors/month
	Georgia Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	8,563 visitors/month
	Poteau Daily News [Poteau, OK] Online  View Release	1	United States	Newspaper	Media & Information	8,430 visitors/month
	Ahora News (New Jersey) Online  View Release	1	United States	Newspaper	Multicultural & Demographic	8,281 visitors/month
	Latino Newspaper (SC) Online  View Release	1	United States	Newspaper	Multicultural & Demographic	8,196 visitors/month
	Cuba Journal Online  View Release	1	Cuba	Online News Sites & Other Influencers	Multicultural & Demographic	8,152 visitors/month

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Ask.com Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	8,120 visitors/month
Colorado Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	7,960 visitors/month
Arkansas Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	7,902 visitors/month
KQCW-TV CW-12/19 [Tulsa, OK] Online  View Release	1	United States	Broadcast Media	Media & Information	7,815 visitors/month
South Carolina Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	7,740 visitors/month
California Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	7,688 visitors/month
Arizona Hispano News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	7,607 visitors/month
Alabama Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	7,570 visitors/month
El Hispano Denver Online  View Release	1	United States	Newspaper	Multicultural & Demographic	7,543 visitors/month
Connecticut Hispano News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	7,530 visitors/month
EstilosBlog Online  View Release	1	United States	Blog	Multicultural & Demographic	7,521 visitors/month
El Chicago Hispano [Chicago, IL] Online  View Release	1	United States	Newspaper	Multicultural & Demographic	7,367 visitors/month
Diaspora Dominicana Online  View Release	1	Dominican Republic	News & Information Service	Media & Information	7,144 visitors/month
El Reportero Las Vegas Online  View Release	1	United States	Newspaper	Multicultural & Demographic	7,046 visitors/month
El Lider USA Online  View Release	1	United States	Newspaper	Multicultural & Demographic	7,031 visitors/month

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Telemundo Lubbock [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	6,981 visitors/month
La Familia de Broward Online  View Release	1	United States	Magazine	Multicultural & Demographic	6,934 visitors/month
Univision Canada Online  View Release	1	Canada	Broadcast Media	Multicultural & Demographic	6,867 visitors/month
Identidad Latina (CT) Online  View Release	1	United States	Newspaper	Multicultural & Demographic	6,658 visitors/month
KXTQ-FM 106.5 Magic [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	6,565 visitors/month
Latin Business Today Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	6,493 visitors/month
SuperLatina TV Online  View Release	1	United States	Blog	Multicultural & Demographic	6,408 visitors/month
KJTV-TV FOX-34 [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	6,310 visitors/month
La Prensa Hispana Online  View Release	1	United States	Newspaper	Multicultural & Demographic	6,239 visitors/month
Illinois Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	6,188 visitors/month
WBOC-TV FOX-21 [Salisbury, MD] Online  View Release	1	United States	Broadcast Media	Media & Information	6,182 visitors/month
Hoy en Delaware Online  View Release	1	United States	Newspaper	Multicultural & Demographic	6,045 visitors/month
KLCW-TV Lubbock CW [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	5,892 visitors/month
Michigan Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	5,372 visitors/month
Sweetwater Reporter [Sweetwater, TX] Online  View Release	1	United States	Newspaper	Media & Information	5,097 visitors/month















#19127

La Red Hispana Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	4,804 visitors/month
Hispanic Communications Network Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	4,702 visitors/month
KVOO-FM 98.5 [Tulsa, OK] Online  View Release	1	United States	Broadcast Media	Media & Information	4,388 visitors/month
Warren and Hunterdon Counties CityRoom [Warren County, NJ] Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	3,768 visitors/month
Seattle CityRoom [Seattle, WA] Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	3,768 visitors/month
El Paso CityRoom [El Paso, TX] Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	3,768 visitors/month
La Voz Hispanic News Online  View Release	1	United States	Newspaper	Multicultural & Demographic	3,669 visitors/month
Valley City Times-Record [Valley City, ND] Online  View Release	1	United States	Newspaper	Media & Information	3,320 visitors/month
Ooorale USA Online  View Release	1	United States	Newspaper	Multicultural & Demographic	3,212 visitors/month
The Morning News [Blackfoot, ID] Online  View Release	1	United States	Newspaper	Media & Information	2,703 visitors/month
WCB-TV CW-21 (Youngstown, OH) Online  View Release	1	United States	Broadcast Media	Media & Information	2,652 visitors/month
KLZK-FM 107.7 YES FM [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	2,476 visitors/month
The Antlers American [Antlers, OK] Online  View Release	1	United States	Newspaper	Media & Information	2,353 visitors/month
Fat Pitch Financials Online  View Release	1	United States	Online News Sites & Other Influencers	Financial	2,251 visitors/month
The Kane Republican [Kane, PA] Online  View Release	1	United States	Newspaper	Media & Information	2,177 visitors/month
















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KMYL-TV MyLubbock-TV [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	1,781 visitors/month
Oldies 97.7 FM [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	1,716 visitors/month
KLBB-FM 93.7 The Eagle [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	1,680 visitors/month
Minster Community Post [Minster, OH] Online  View Release	1	United States	Newspaper	Media & Information	1,592 visitors/month
La Doctora Isabel Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	1,131 visitors/month
Wapakoneta Daily News [Wapakoneta, OH] Online  View Release	1	United States	Newspaper	Media & Information	1,097 visitors/month
Manhattanweek Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	931 visitors/month
The Deer Park Tribune [Deer Park, WA] Online  View Release	1	United States	Newspaper	Media & Information	895 visitors/month
La Nación Hispana Online  View Release	1	United States	Newspaper	Multicultural & Demographic	792 visitors/month
Revista MUJERES Internacional Online  View Release	1	United States	Magazine	Multicultural & Demographic	777 visitors/month
Rhode Island Hispano News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	636 visitors/month
The Post and Mail [Columbia City, IN] Online  View Release	1	United States	Newspaper	Media & Information	626 visitors/month
Massachusetts Hispano News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	592 visitors/month
Wisconsin Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	521 visitors/month
Wyoming Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	488 visitors/month

#19129

Washington Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	488 visitors/month
Utah Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	488 visitors/month
Tennessee Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	488 visitors/month
North Carolina Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	488 visitors/month
New Mexico Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	488 visitors/month
Kentucky Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	488 visitors/month
Idaho Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	488 visitors/month
Mississippi Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	431 visitors/month
Hawaii Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	426 visitors/month
New York Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	415 visitors/month
Oklahoma Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	412 visitors/month
La Mega 97.9 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	405 visitors/month
North Dakota Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	402 visitors/month
Florida Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	402 visitors/month

#19130

Louisiana Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	392 visitors/month
La Raza 97.9 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	386 visitors/month
Virginia Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	385 visitors/month
Pennsylvania Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	385 visitors/month
Montana Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	383 visitors/month
Kansas Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	383 visitors/month
Ohio Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	379 visitors/month
Maine Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	379 visitors/month
Maryland Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	378 visitors/month
Nebraska Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	376 visitors/month
New Jersey Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	372 visitors/month
Texas Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	369 visitors/month
South Dakota Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	368 visitors/month
Oregon Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	368 visitors/month
Indiana Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	368 visitors/month






#19131

Minnesota Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	366 visitors/month
Vermont Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	364 visitors/month
Iowa Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	364 visitors/month
West Virginia Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	360 visitors/month
Nevada Latino News Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	353 visitors/month
Amor 93.1 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	328 visitors/month
El Zol 106.7 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	324 visitors/month
Zeta 92.3 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	303 visitors/month
La Nueva 94 FM Online  View Release	1	Puerto Rico	Broadcast Media	Multicultural & Demographic	281 visitors/month
Mega 96.3 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	265 visitors/month
Oklahoman [Oklahoma City, OK] Online  View Release	1	United States	Newspaper	Media & Information	227 visitors/month
La Raza 93.3 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	219 visitors/month
La Zeta 93.7 FM Online  View Release	1	Puerto Rico	Broadcast Media	Multicultural & Demographic	200 visitors/month
Pittsburgh Post-Gazette [Pittsburgh, PA] Online  View Release	1	United States	Newspaper	Media & Information	193 visitors/month
Ritmo 95.7 FM Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	112 visitors/month

#19132

Mercadotecnia y Medios Online  View Release	1	United States	News & Information Service	Multicultural & Demographic	105 visitors/month
Marketplace Online  View Release	1	United States	Broadcast Media	Media & Information	69 visitors/month
Hispanic PR Wire Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	43 visitors/month
Hispanic PR Wire Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	43 visitors/month
Conexión Hispana Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	
Invertir USA Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	
Fuente Latina Online  View Release	1	United States	Blog	Multicultural & Demographic	
1stCounsel Online  View Release	1	United States	Online News Sites & Other Influencers	Policy & Public Interest	
 One News Page Unites States Edition Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	
Musica Roots Musica Roots Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	
96.9-FM The Bull [Lubbock, TX] Online  View Release	1	United States	Broadcast Media	Media & Information	
KHTT-FM 106.9 [Tulsa, OK] Online  View Release	1	United States	Broadcast Media	Media & Information	
KJUN-TV / KFOL-TV HTV10 [Houma, LA] Online  View Release	1	United States	Broadcast Media	Media & Information	
DatelineCarolina Online  View Release	1	United States	Online News Sites & Other Influencers	Media & Information	
Bocalista Online  View Release	1	Puerto Rico	Online News Sites & Other Influencers	Multicultural & Demographic	

#19133

KXBL-FM 99.5 [Tulsa, OK] Online  View Release	1	United States	Broadcast Media	Media & Information	
KBEZ-FM 92.9 [Tulsa, OK] Online  View Release	1	United States	Broadcast Media	Media & Information	
Vida Nueva Online  View Release	1	United States	Newspaper	Multicultural & Demographic	
IBTN9 US Online  View Release	1	Global	Online News Sites & Other Influencers	Media & Information	
Somos Revista Online  View Release	1	United States	Magazine	Multicultural & Demographic	
SEGUROS, SALUD, PENSIONES & SEGURIDAD Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	
Winslow, Evans & Crocker Online  View Release	1	United States	Online News Sites & Other Influencers	Financial	
WZSP-FM 105.3 La Zeta [Nocatee, FL] Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	
WZZS-FM 106.9 La Número Uno / WTMJ-AM 1280 La Número Uno Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	
KRPR News Online  View Release	1	United States	Broadcast Media	Multicultural & Demographic	
AZCentral.com [Phoenix, AZ] Online  View Release	1	United States	Newspaper	Media & Information	
El Latino Digital Online  View Release	1	United States	Newspaper	Media & Information	
CONSTRUNEGOCIOS IN-MOBILIARIOS Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	
The Daily Press [St. Marys, PA] Online  View Release	1	United States	Newspaper	Media & Information	
Big Spring Herald [Big Spring, TX] Online  View Release	1	United States	Newspaper	Media & Information	

#19134

BancosFinanzaz Online  View Release	1	United States	Online News Sites & Other Influencers	Multicultural & Demographic	
Alma Emprendedora Online  View Release	1	United States	Newspaper	Multicultural & Demographic	

composite

Traffic

Overview

Total Release Views & Web Crawler Hits **3.5K**

RELEASE VIEWS	630	MULTIMEDIA	0	WEB CRAWLER HITS	2.9K
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Media Views 174 views

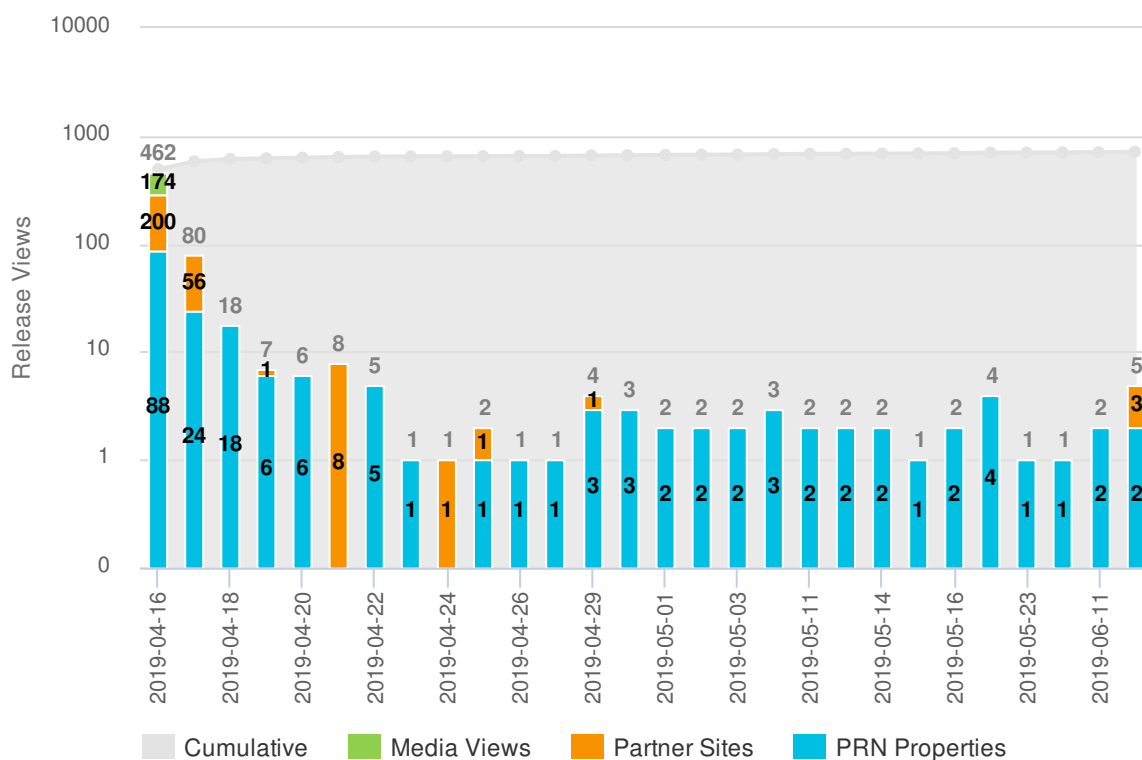
Public Views 456 views

Partner Sites 271 views

PR Newswire Channels 185 views

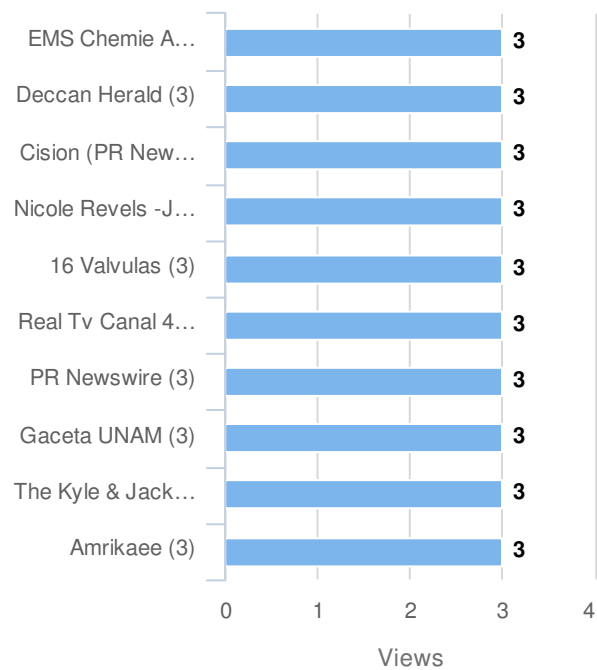
Release Views

Release Views Over Time



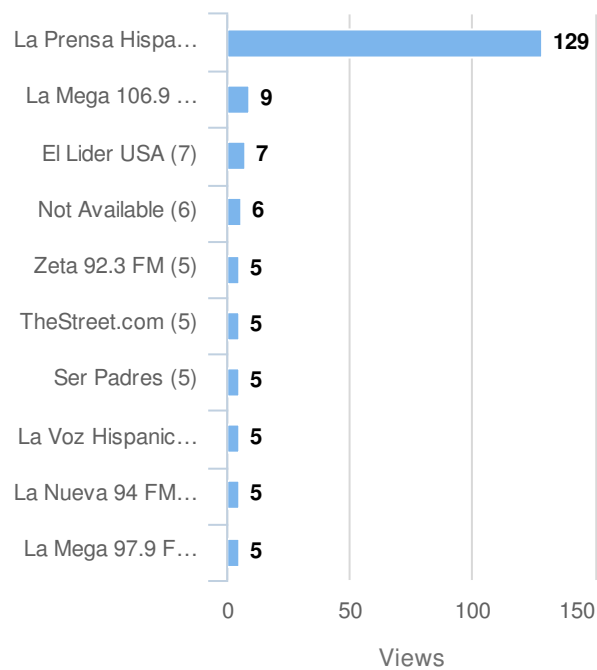
Media Views on PR Newswire for Journalists

Top 10 Outlets



Views on Partner Sites

Top 10 Sites

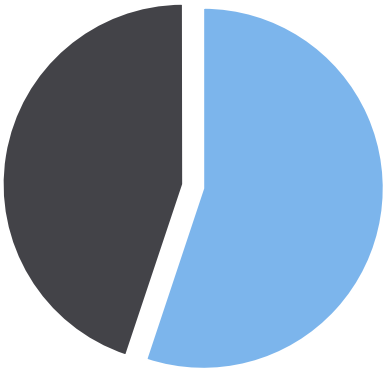


Traffic to PR Newswire Properties

Type of Views

Views

Type	Views
Total Views on PR Newswire Properties	185



Desktop Views

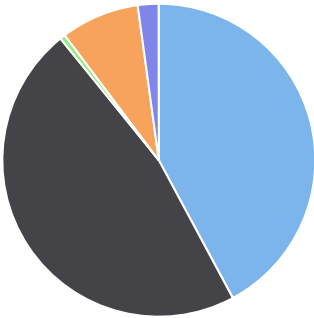
Mobile/Tablet Views

Type	Views
Desktop Views	102
Mobile/Tablet Views	83
Total Views on PR Newswire Properties	185

External Traffic Sources

Understand how viewers found your release.

Source	Source Type	Instances
Direct	Direct	78
Google	Search Engine	87
Facebook	Social Media	1
prnewswire.com	PR Newswire Properties	15
owler.com	Other Sites	3
app.cision.com	Other Sites	1
Total		185



Direct

Search Engine

Social Media

PR Newswire Properties

Other Sites

composite

Audience

Overview

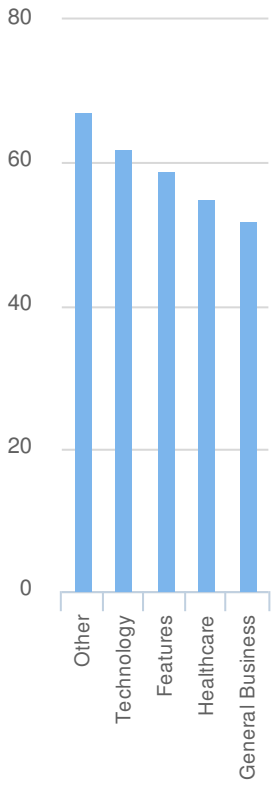
VIEWS FROM IDENTIFIED AUDIENCES 213		AP & INFLUENCER LIST RECIPIENTS 2.5K	
Media Views	174	Wire Distribution / AP Outlets	963
Organization Views	39	Targeted Influencers	1.5K

Audience Summary

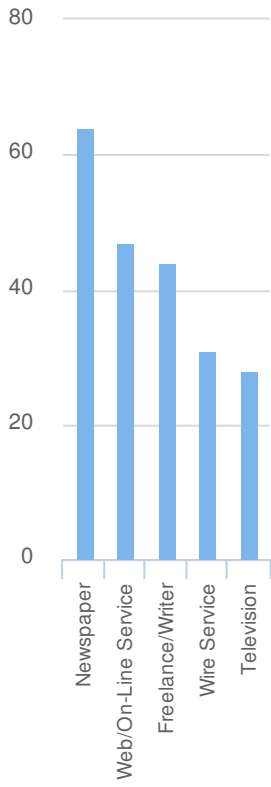
Media Demographics

A break down of the industries covered, the media types and the locations of the journalists & bloggers accessing your releases on PR Newswire for Journalists.

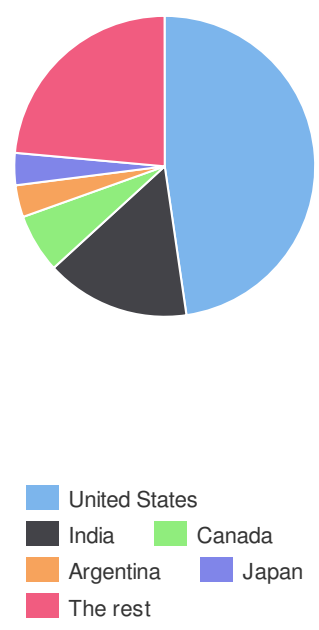
Top Industries



Top Media Types



Top Countries



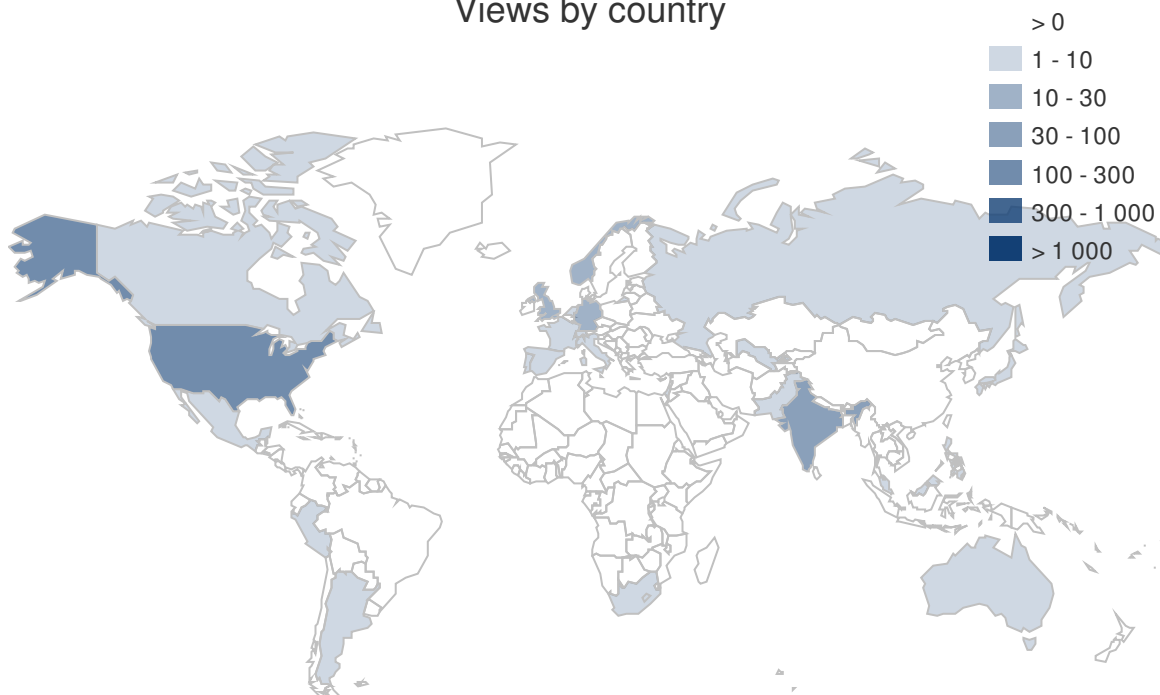
Geo-segmentation

See where views of your release originated. #19139

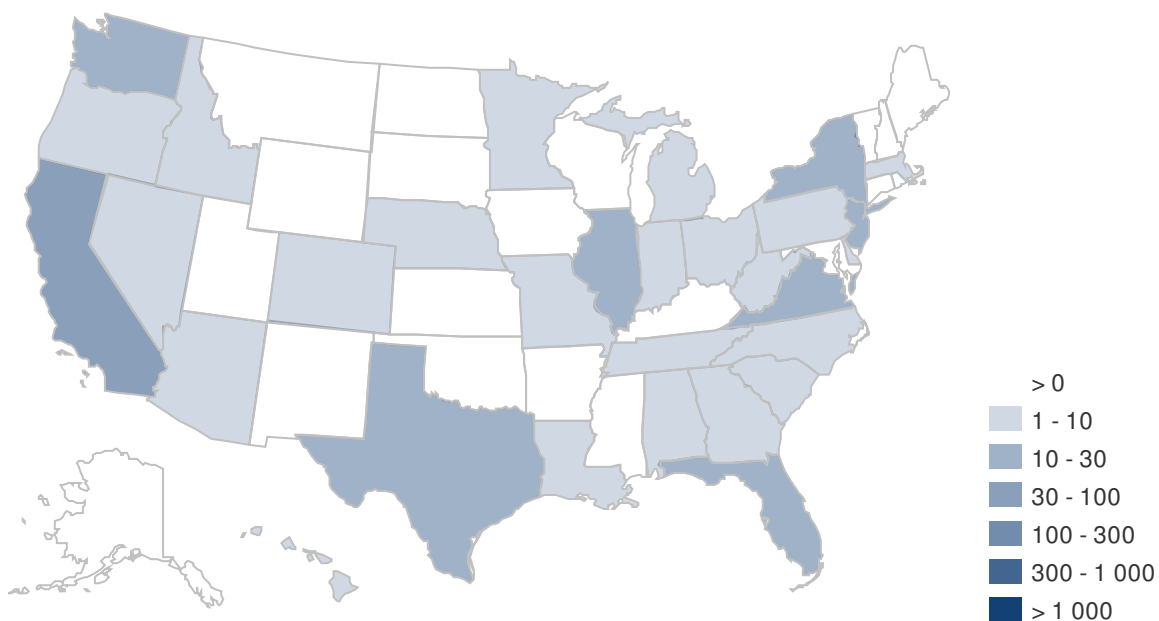
Select a region:

World View

Views by country



Views by state

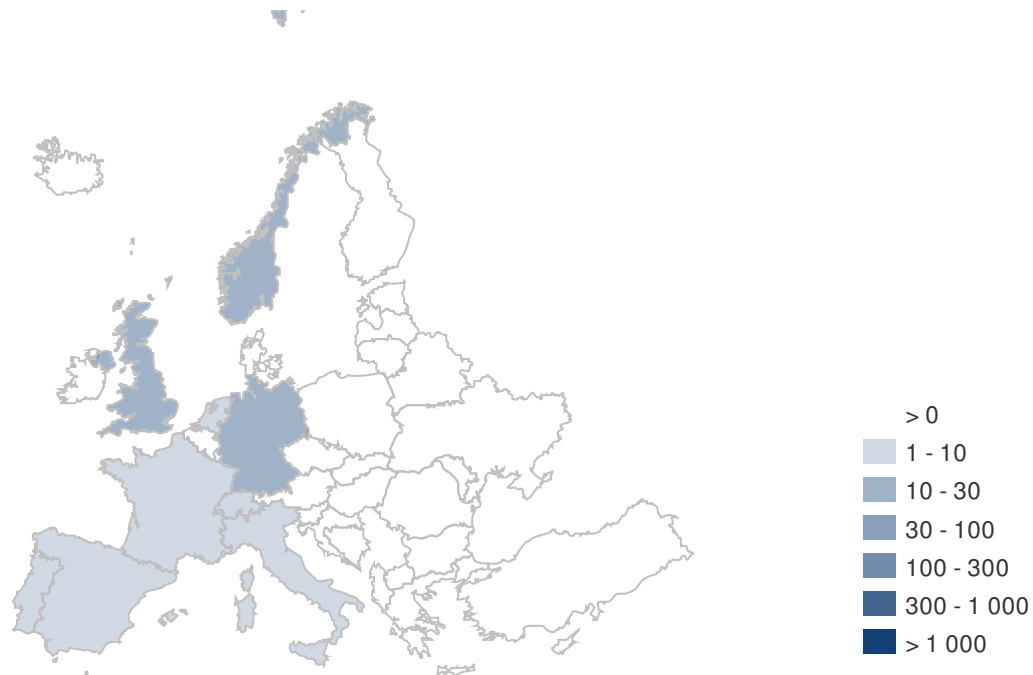


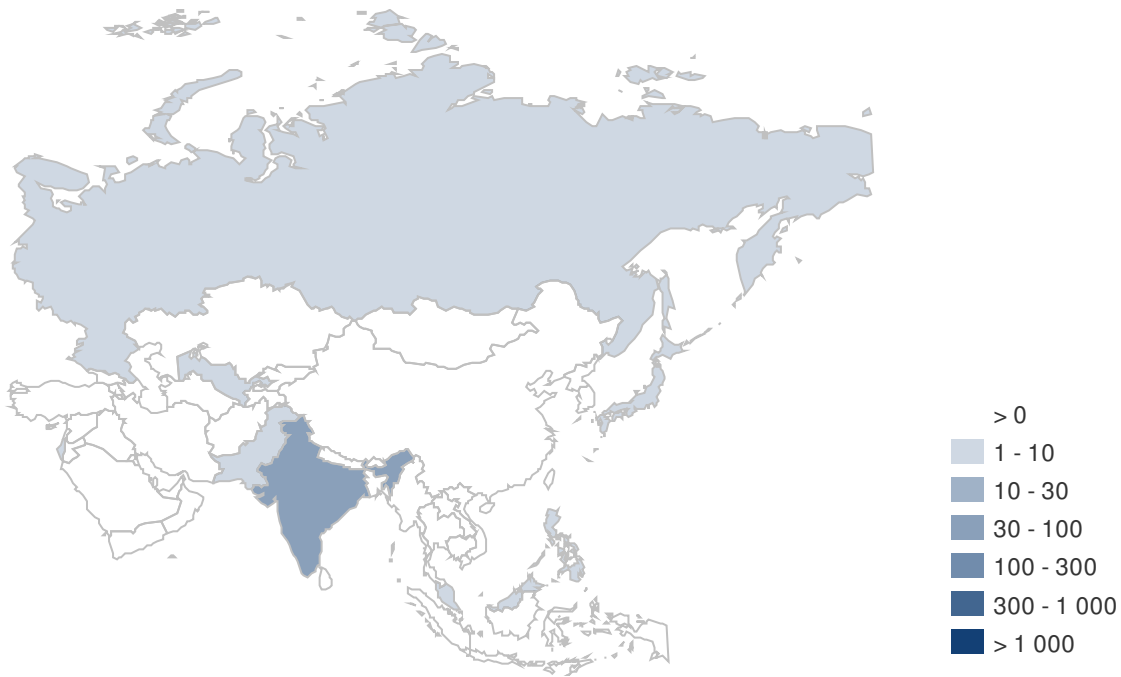
#19140

Views by province

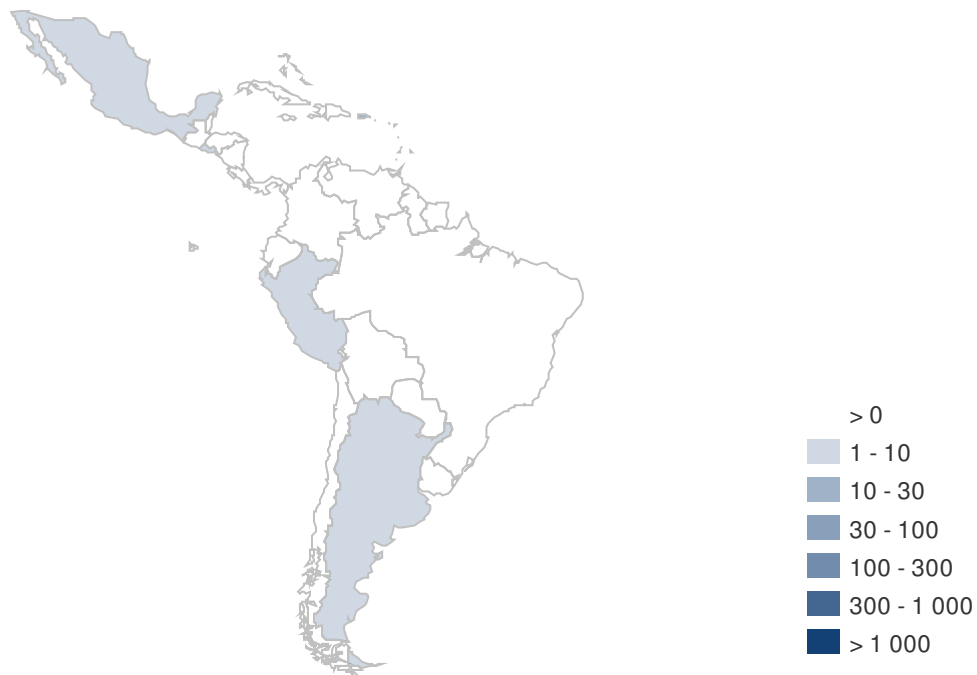


Views by country





Views by country



Audience Details

Media Views

See the details of each media outlet from PR Newswire for Journalists that viewed your release.

Outlet	Industry	Source Type	Country	Views <div>▼</div>
EMS Chemie AG	Auto, Consumer Products, General Business, Technology	Other	Switzerland	3
Total				174

Deccan Herald	Features, Financial Services, General Business, Technology	Newspaper	India	3
Cision (PR Newswire)	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United States	3
Nicole Revels - Journalist	Public Issues	Freelance/Writer	United States	3
16 Valvulas	Auto, Healthcare	Web/On-Line Service	Argentina	3
Real Tv Canal 41	Broadcast, Entertainment, Environment, Features, Media, Public Issues, Sports	Newspaper, Television	Peru	3
PR Newswire	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	Canada	3
Gaceta UNAM	Environment, Features, Healthcare, Media, Public Issues, Sports, Travel	Newspaper, Web/On-Line Service	Mexico	3
The Kyle & Jackie O Show	Broadcast, Consumer Products, Entertainment, Features, Media, Other, Public Issues, Technology	Radio	Australia	3
Amrikaee	Broadcast, Consumer Products, Energy, Entertainment, Features, General Business, Media, Other, Public Issues	Blogger, Freelance/Writer, Newspaper, Web/On-Line Service	United States	3
The Capital Sports Report	Auto, Sports	Newspaper	United States	3
prnewswire	Auto	Other	United States	3
Daily News	Other	Other	South Africa	3
krca Estrella tv channel 62	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Television	United States	3
Word Geek Media	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Freelance/Writer	United States	3
Argus Media Group	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Web/On-Line Service	United States	3
Chingari	General Business	Newspaper	India	3
First News Live	Features	Freelance/Writer	India	3
Total				174

Polish N Glitter	Consumer Products, Healthcare	Blogger	India	3
Way2Online	Transportation	Freelance/Writer	India	3
Healtheventz	Broadcast, Environment, Healthcare	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	India	3
The Page	General Business	Newspaper	India	3
Okinawa Marine	Broadcast, Environment, Features, Financial Services, Media, Public Issues, Technology, Transportation, Travel	Freelance/Writer, Newspaper, Web/On-Line Service, Wire Service	Japan	3
Mega Autos	Auto	Consumer Periodicals, Web/On-Line Service	Argentina	3
PR	Technology	Other	Malaysia	3
heart & soul	Entertainment, Healthcare, Travel	Consumer Periodicals, Radio, Web/On-Line Service	United States	3
PR Newswire	Other	Wire Service	United States	3
Economic Review	Auto, Energy, Features, Financial Services, Media, Public Issues, Sports	Freelance/Writer, Newspaper, Trade Periodicals	Pakistan	3
Arutz 7	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Newspaper, Radio, Web/On-Line Service	Israel	3
The Associated Press	Other	Wire Service	United States	3
New York 1 News	Other	Television	United States	3
Delion	Environment, Financial Services, General Business, Other, Technology	Blogger, Newspaper	Canada	3
Troc Radio	Broadcast, Consumer Products, Energy, Entertainment, Environment, General Business, Healthcare, Heavy Industry, Media, Public Issues, Technology, Transportation, Travel	Radio	Canada	3
IDG Japan	Technology	Consumer Periodicals, Web/On-Line Service, Wire Service	Japan	3
Bay News 9	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Television	United States	3
Telecos	Consumer Products, Energy, Environment, Healthcare, Technology	Other	Spain	3
Freelancer	Entertainment, Features, Healthcare	Freelance/Writer, Newspaper	United States	3
Total				174

News Aktuell	Other	Wire Service	Switzerland	3
Randall-Reilly Publishing Co.	Transportation	Trade Periodicals	United States	3
Houston Chronicle	Features	Newspaper	United States	3
Thomson Corp	Technology	Wire Service	India	3
Zee News	Auto, Broadcast, Consumer Products, Financial Services	Television	India	3
425 magazine	Consumer Products, Entertainment, Features, General Business	Freelance/Writer	United States	2
Global Legal Post	Other	Blogger	United Kingdom	2
Daily Tech Update	Technology	Blogger, Freelance/Writer, Newspaper	Hong Kong	2
El Vocero	Entertainment, Financial Services, General Business, Public Issues, Travel	Newspaper	Puerto Rico	2
KCPQ (Q13)	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Television	United States	2
The Washington Post	Consumer Products, Environment, Financial Services, General Business, Public Issues	Newspaper	United States	2
BioMetAuth.com	Technology	Freelance/Writer	United States	2
CelebMix	Entertainment	Freelance/Writer	United Kingdom	2
Sing Tao Daily Toronto Edition	Other	Newspaper	Canada	2
http://gay_blog.blogspot.com/	Other, Travel	Web/On-Line Service	United States	2
Freelancer	Other	Trade Periodicals	United States	2
Feather River Bulletin	Other	Newspaper	United States	2
Walla Walla Union Bulletin	Features, Healthcare, Technology	Newspaper	United States	2
Formula 4 Media / Sports Insight Extra	Broadcast, Consumer Products, Entertainment, Healthcare, Media, Sports	Blogger, Consumer Periodicals, Freelance/Writer, Other, Web/On-Line Service, Wire Service	United States	2
WSAZ	Financial Services	Television	United States	2
Total				174

SNL Energy	Energy	Trade Periodicals	United States	2
Kingsport Times-New	Other	Newspaper	United States	2
Reuters	Other	Wire Service	United States	2
LexisNexis	Other	Trade Periodicals, Web/On-Line Service	United States	2
China Business News	Financial Services	Newspaper	United States	2
KPLU-FM	Healthcare	Radio	United States	2
Coelum	Other	Consumer Periodicals, Web/On-Line Service	Italy	2
NewsRx	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Web/On-Line Service	United States	2
Pase de Prensa	Technology	Freelance/Writer	Spain	1
TrueCar	Auto	Web/On-Line Service	United States	1
Total				174

Organization Views

See which organizations have viewed your releases

Organization	Headquarters	Country	Location	Parent Organization	Industry	Views ▼
ALICLOUD-US	400 S El Camino Real, Suite 400	US	UNITED STATES			6
JPMorgan Chase & Co.	120 Broadway	US	UNITED STATES	Chase	Financial Services	4
Boise State University	1910 University Drive OIT	US	UNITED STATES	Boise State University	Education	3
Volo.com SRL		IT	ITALY			2
Robbins Geller Rudman & Dowd LLP	655 West Broadway		UNITED STATES			2
ConAgra Frozen Foods	7300 World Communications Dr	US	UNITED STATES	ConAgra Foods Inc.	Manufacturing	2
Model and Talent Agency LLC	5556 Centinela Avenue	US	UNITED STATES	Model and Talent Agency LLC		2
DUANE MORRIS LLP	30 S 17TH ST	US	UNITED STATES	Duane Morris LLP	Law Firms & Legal Services	2
Neptune Holding US Corp			UNITED STATES			2
Software Technology Parks of India		IN	INDIA			2
Conexio	1077 Celestial Street Building 1	US	UNITED STATES	Conexio , LLC	Business Services	1
West Corporation	11808 Miracle Hills Dr.	US	UNITED STATES	West Corporation	Software & Internet	1
Total						39

TELASTIC	4210 Coronado Avenue	US	UNITED STATES			1
Williams-Sonoma	3250 Van Ness Ave	US	UNITED STATES	Williams-Sonoma Inc		1
ANALYTICS INC	18750 LAKE DR E	US	UNITED STATES			1
Health Partners of Philadelphia	901 Market St Suite 500	US	UNITED STATES	Health Partners Inc	Insurance	1
LEAR WERTS LLP	2003 W BROADWAY	US	UNITED STATES	Lear Werts LLP	Law Firms & Legal Services	1
IVYTech Community College of Indiana	9301 East 59th Street	US	UNITED STATES	Ivy Tech Community College	Education	1
TRANSX	25 CAPILANO WAY	CA	CANADA	TransX Group of Companies	Transportation & Storage	1
Facebook, Inc.	1601 Willow Rd.	US	UNITED STATES	Facebook	Software & Internet	1
Symantec Corporation	43940 Digital Loudoun Plaza		UNITED STATES	Symantec Corporation	Software & Internet	1
Opoint AS	Akersgata 28 A Sentrum	NO	SWEDEN	Opoint AS		1
Total						39

Targeted Audience

The lists below represent categories of targeted audiences you selected for your release.

Cision Influencer Lists

Business & Finance (English) (210 organizations, 293 recipients)

Organization	Number of recipients
Freelancer	20
El Observador	7
Dos Mundos	5
Fusion	5
KABC-TV Ch. 7 ABC	5
The Associated Press	4
Caribbean Business	3
Delaware Hispano	3
Hispanic Lifestyle	3
Hispanic Network Magazine	3

Business & Finance (Spanish) (656 organizations, 1,198 recipients)

Organization	Number of recipients
KMEX-DT Ch. 34 Univisión	21
CNN en Español	19
WJAN LD Ch. 41 América TeVe	17

Organization	Number of recipients
Agencia EFE	16
KVEA Ch. 52 Telemundo	16
Telemundo Network	16
El Nuevo Día	12
WXTV-DT Ch. 41 Univisión	12
El Imparcial	11
El Nuevo Herald	11

Associated Press Outlets

Every PR Newswire U.S. wire newswire includes targeted distribution to the Associated Press, an essential global news network that delivers content to an extensive set of media platforms and formats. The list below represents the outlets you reach via this partnership.

Outlet Name	City	State	Country	Newsline	Type	Audience
C-SPAN	Washington	DC	US	US1	Television	86,200,000 Subscribers
Scribd, Inc.	San Francisco	CA	US	US1	Aggregator	43,531,670 Visitors per Month
FoxNews.com	New York	NY	US	US1	Online	32,516,438 Visitors per Month
CBS News Radio	New York	NY	US	US1	Radio	30,000,000 Broadcast Audience
New York Times Digital	New York	NY	US	US1	Newspaper	29,886,442 Visitors per Month
Apple Inc.	Cupertino	CA	US	US1	Organization/Company	29,709,459 Visitors per month
CNBC.com	Englewood Cliffs	NJ	US	US1	Online	26,089,260 Visitors per Month
CBSnews.com	New York	NY	US	US1	Online	26,080,671 Visitors per Month
abcnews.com	New York	NY	US	US1	Online	24,167,779 Visitors per Month
U.S. News & World Report	Washington	DC	US	US1	Magazine	23,945,529 Visitors per Month

composite

Engagement

53
 Total Engagement Actions

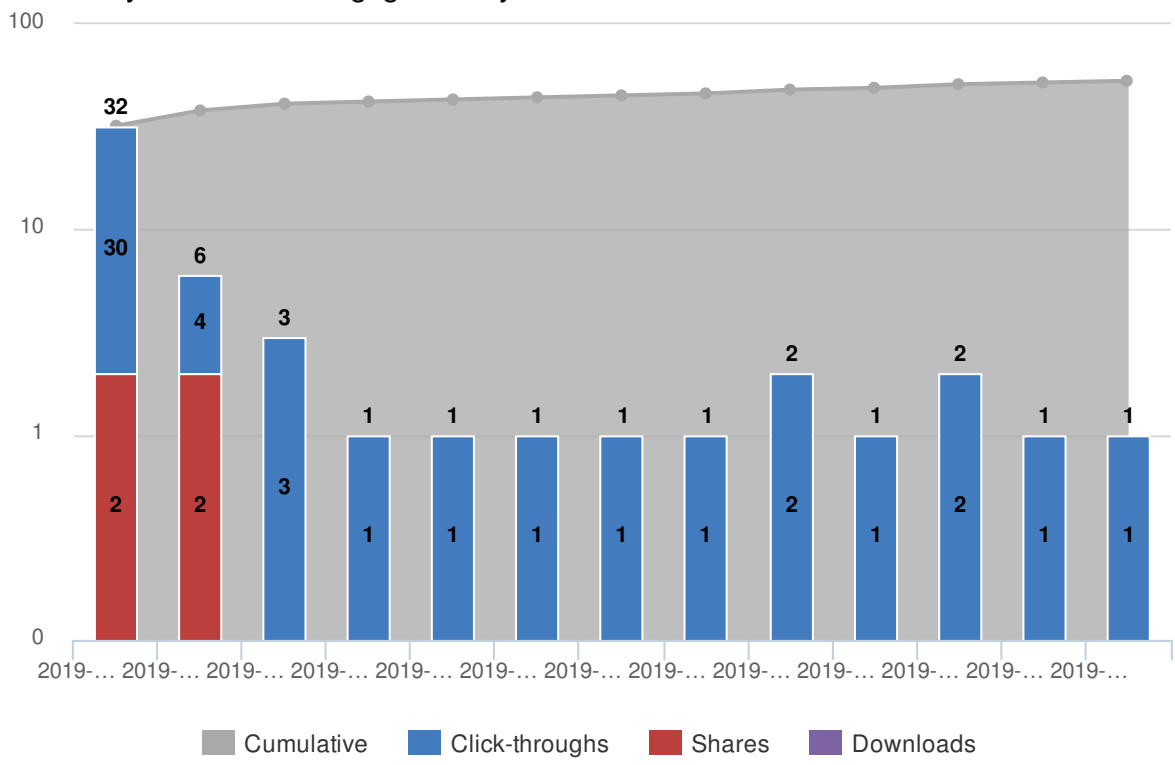
49
 Click-throughs

4
 Shares

Overview

Engagement Timeline

See when your audience engaged with your release.



Engagement Details

A break down of click-throughs, shares and other engagement actions.

Click-throughs

The number of times your releases sent visitors to the pages you linked to.

URL	Click-throughs
http://www.wessonoilsettlement.com/	33
http://www.wessonoilsettlement.com	16
Total	49

Shares

A break down of the types of sharing your releases generated.

Type of share	Shares
tweet	2
Print	2
Total Shares	4

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EXHIBIT G

Wesson Oil Settlement

Additional Earned Media Coverage

Apr 14, 2019 - Jul 19, 2019

Conagra Wesson Oil - AGR

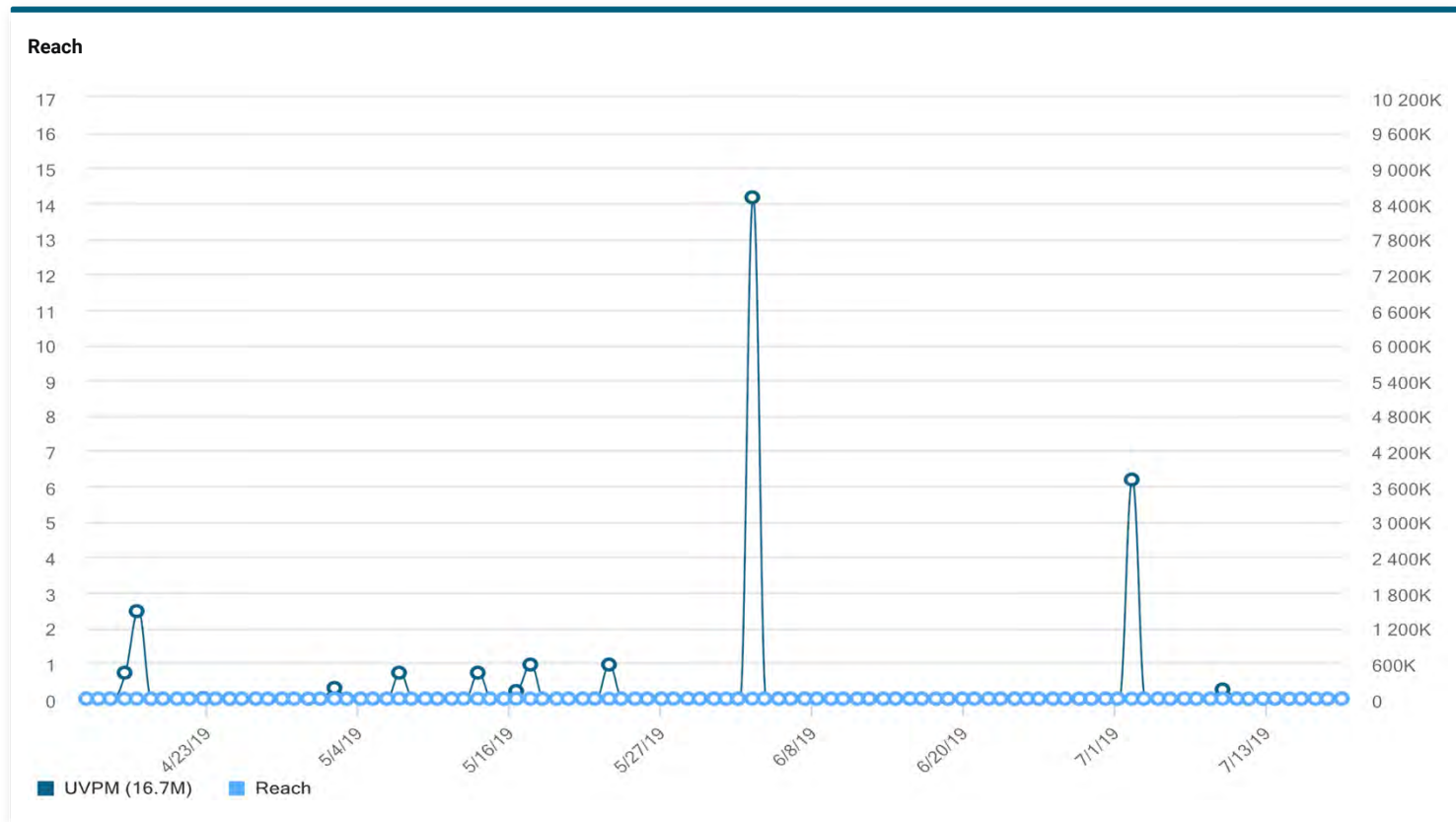
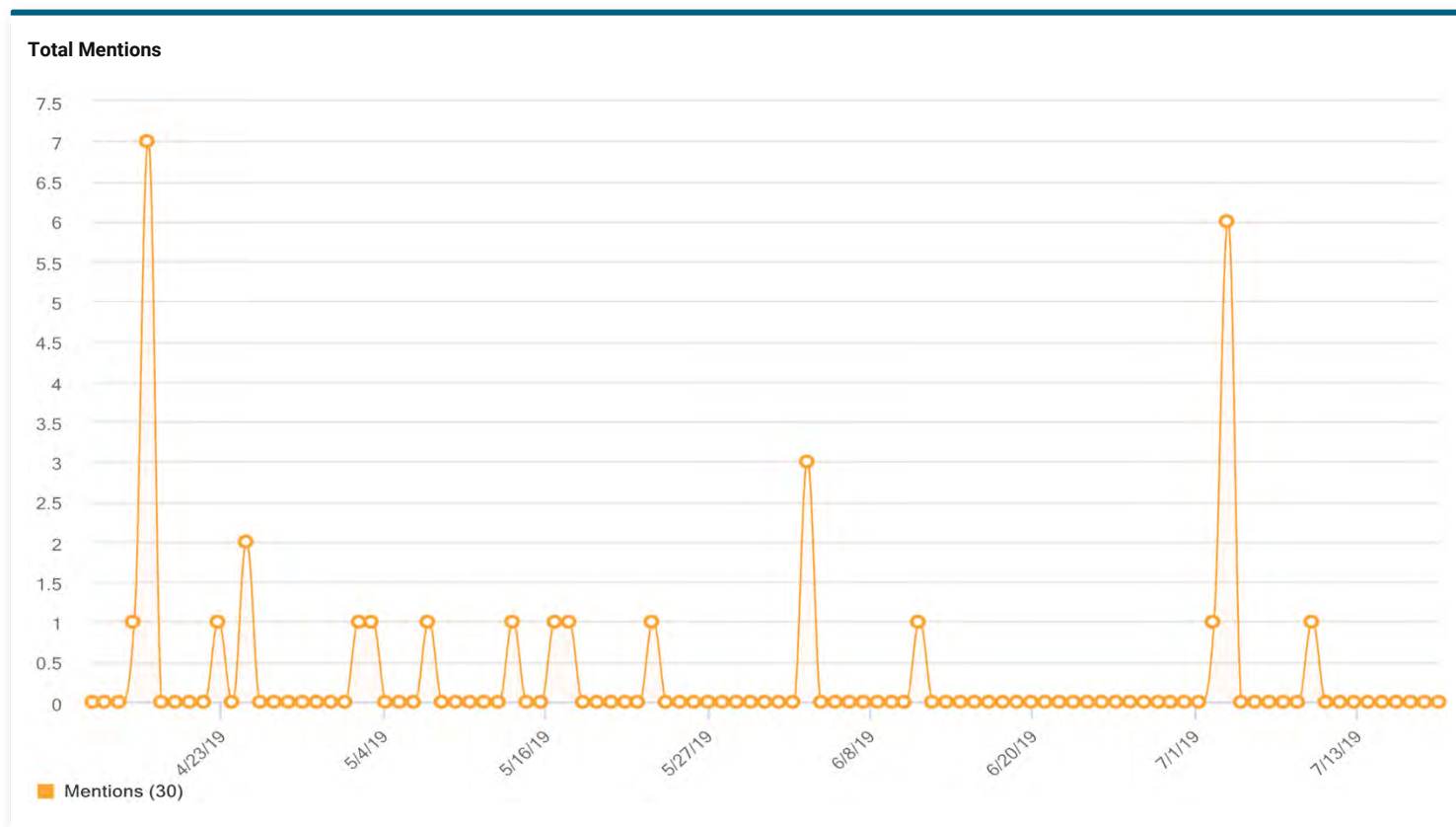
Summary

Total Mentions: 30

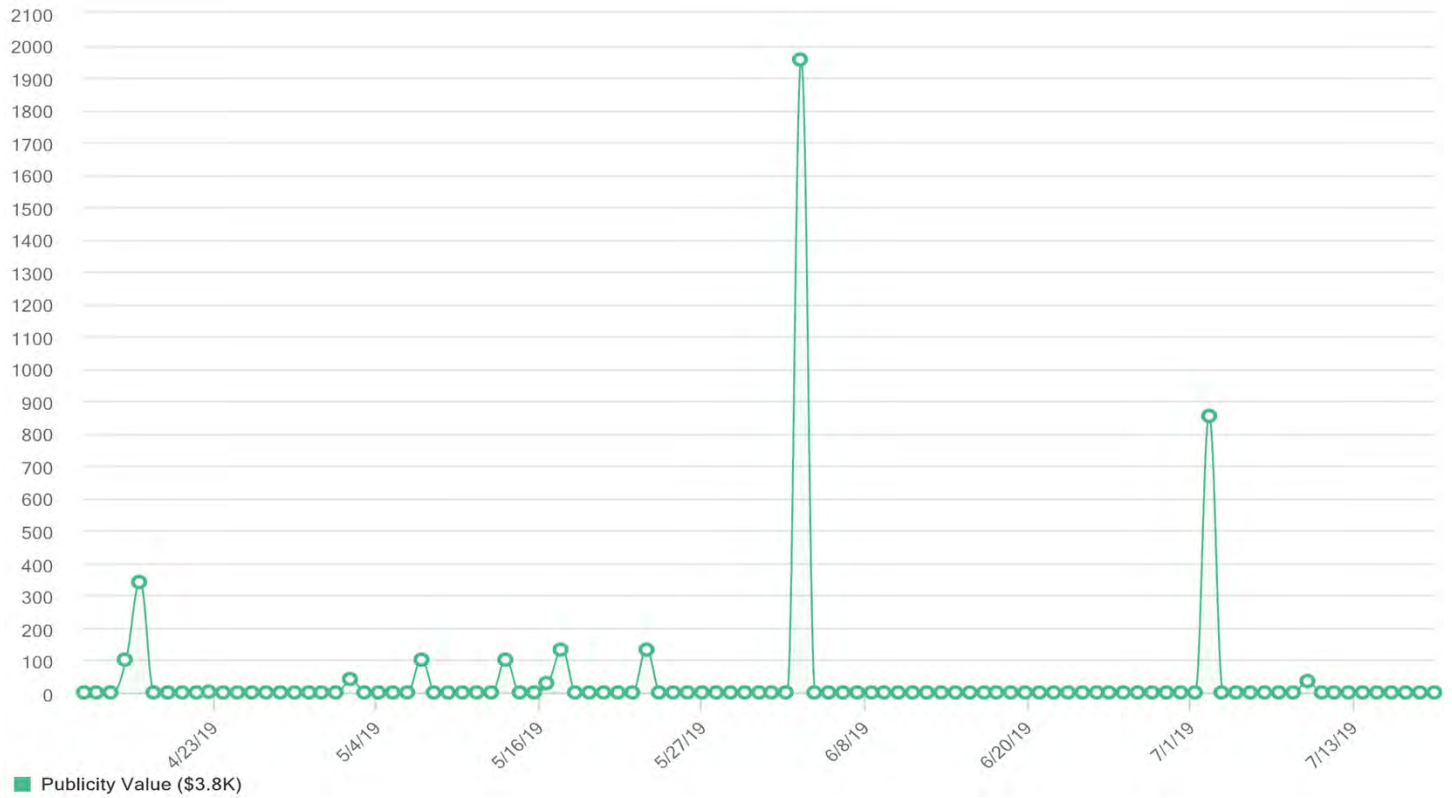
Total Reach: 16.7M

Total Publicity Value: \$3.8K

Mentions

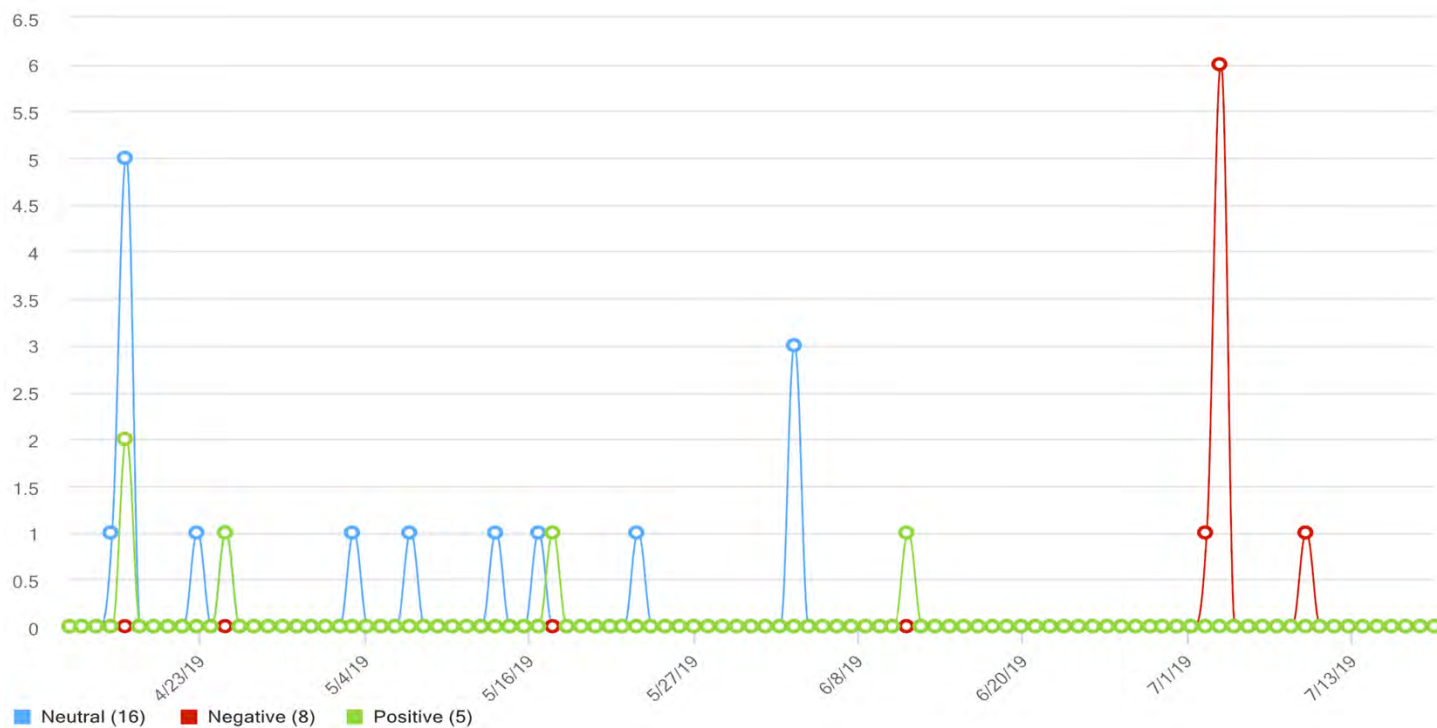


Value of Coverage

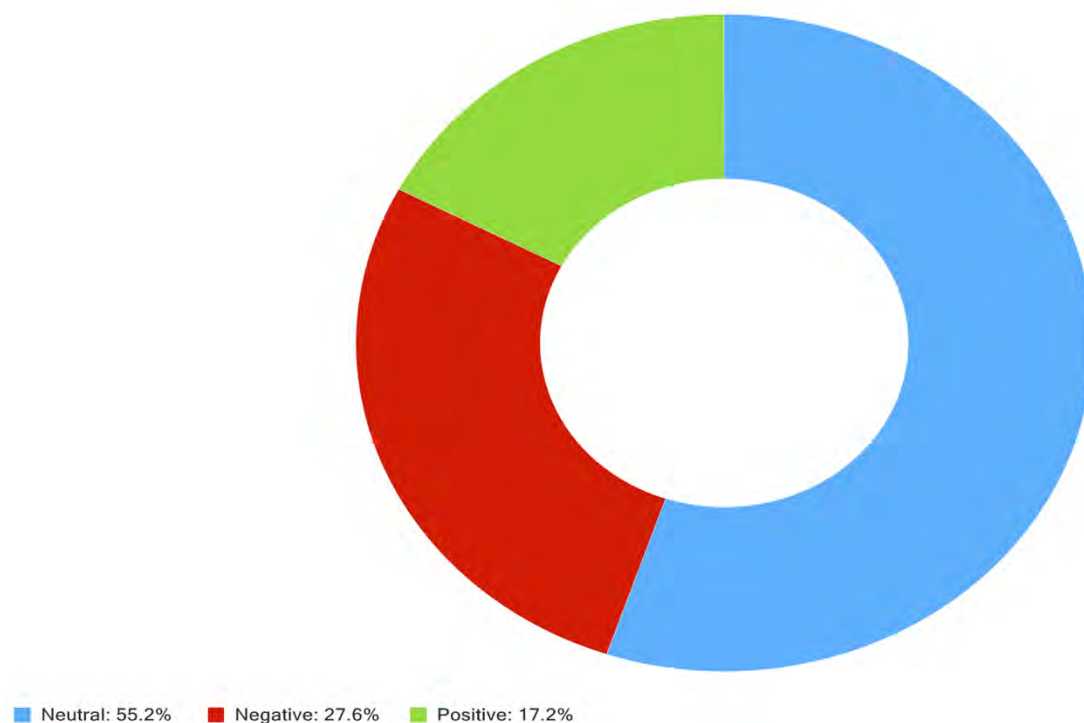


Sentiment

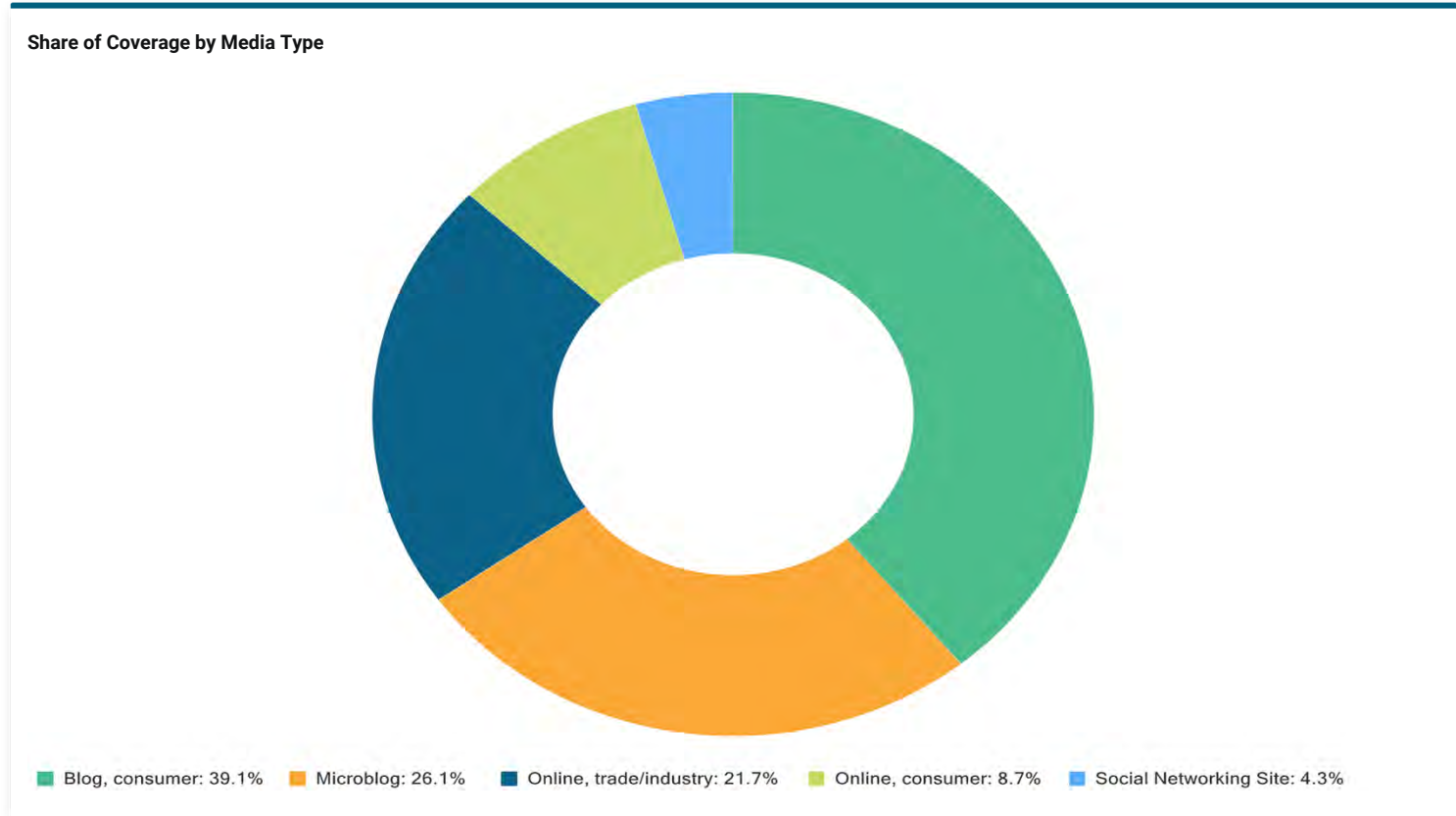
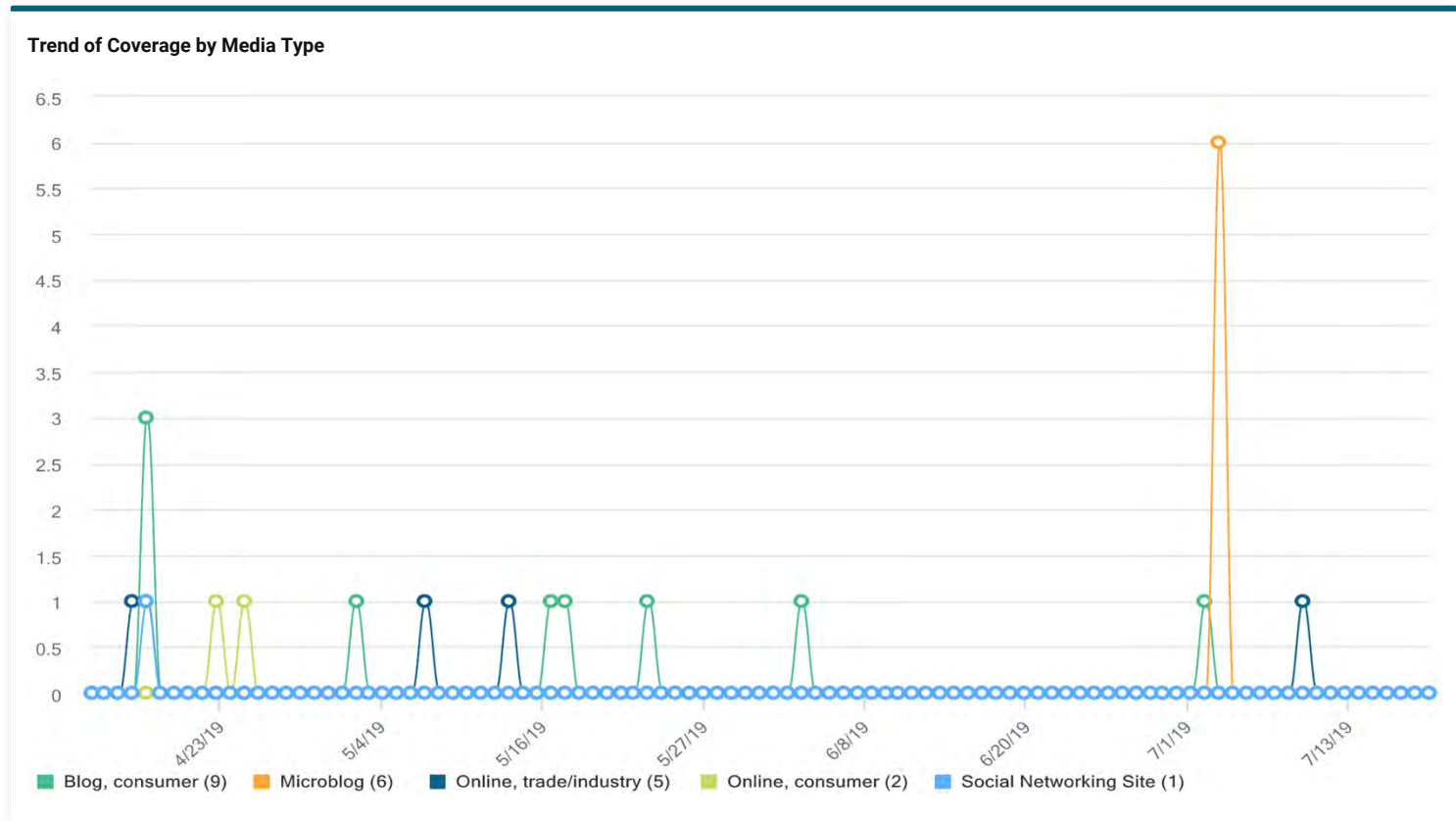
Sentiment Over Time



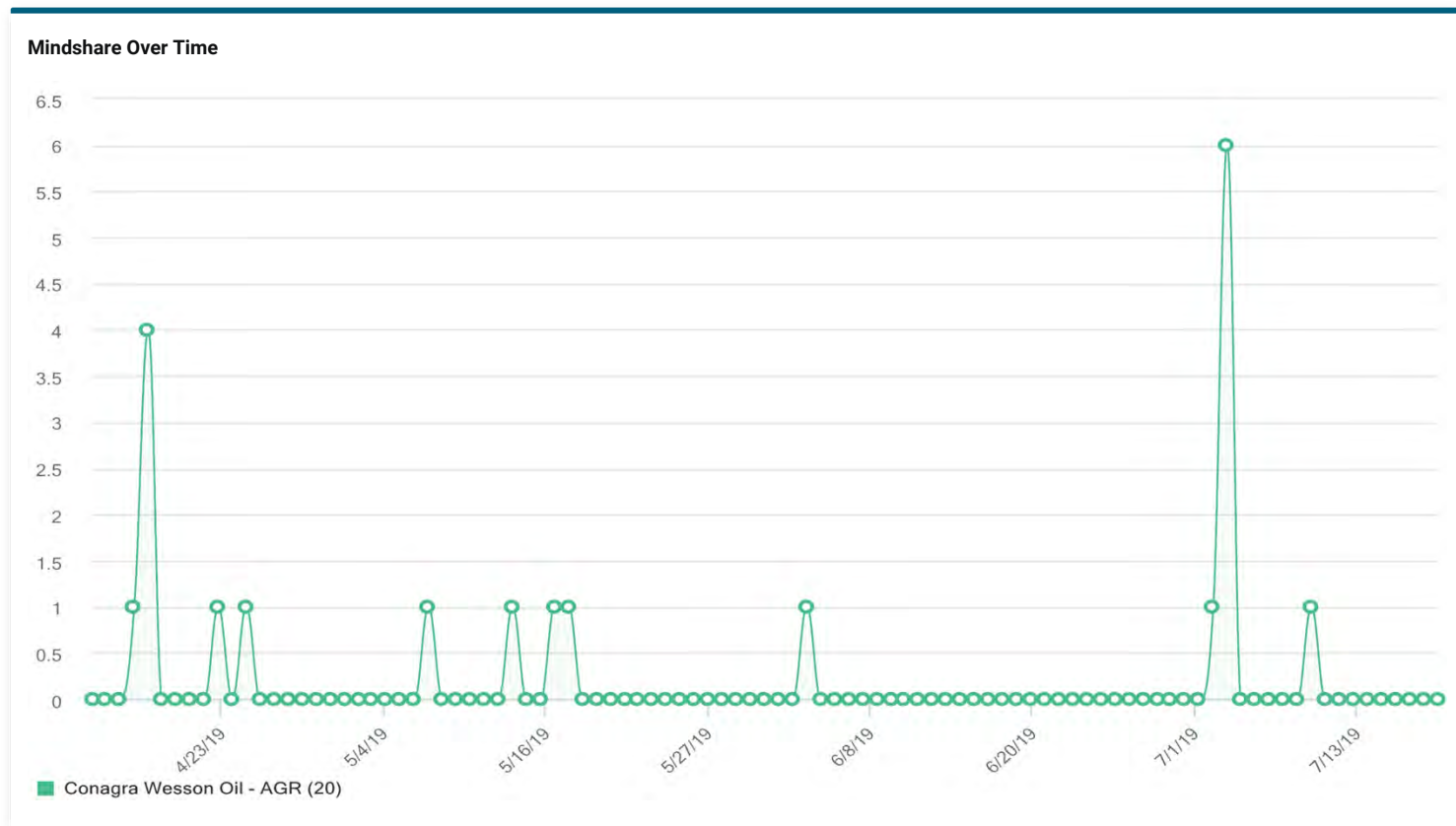
Share of Sentiment



Coverage by Media Type



Company Mindshare



Coverage Map

Mentions by Location



Prominent Terms and Top Outlets

Top Outlets

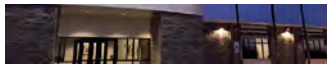
OUTLET	NUMBER OF CLIPS	REACH	PUBLICITY VALUE
Twitter	6	0	\$0.00
Top Class Actions	3	1,320,489	\$303.71
Common Sense with Money	2	1,059,812	\$243.76
Hustler Money Blog	2	1,155,600	\$265.79
Danny the Deal Guru	1	9,490	\$2.18
Miles to Memories	1	0	\$0.00
Pinching Your Pennies	1	172,417	\$39.66
For The Mommas	1	182,194	\$41.90
Addicted to Saving	1	130,207	\$29.95
The Penny Hoarder	1	8,500,523	\$1,955.12
Simplemost	1	3,715,259	\$854.51
Freebies 2deals	1	125,871	\$28.95
Facebook	1	0	\$0.00
How to Shop for Free with Kathy	1	155,745	\$35.82

EXHIBIT H

JND – Wesson Oil Settlement Earned Media Examples

1

HUSTLEMONEY BLOG



may be entitled to a potential reward from the Pioneer Natural Resources ERISA Class Action Lawsuit! According to this lawsuit,... [Keep Reading»](#)

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California P.F. Chang's Restaurant Class Action Lawsuit (Up to \$1,000)

By [Tristan Ho](#) Last updated: May 20, 2019

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For individuals who who used a credit card at a California P.F. Chang's location between May 3, 2016 and Feb. 22, 2019, you may qualify for this lawsuit. You may be entitled to a potential reward from the California P.F. Chang's Restaurant Class Action Lawsuit! According to this lawsuit, the restaurant chain provided a form to... [Keep Reading»](#)

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Wesson 'Natural' Cooking Oil Class Action Lawsuit (Up to \$4.50)

By [Jason Ha](#) Last updated: May 17, 2019

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For individuals who purchased Wesson brand cooking oil including Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil, and Wesson Best Blend while in California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota, and Texas during certain time frames. You may be entitled to a potential reward from the Wesson 'Natural' Cooking... [Keep Reading»](#)

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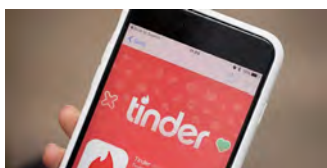
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Filed under: [Class Action Lawsuits](#)

California Tinder Age Bias Class Action Lawsuit (Varies)

By [Rijea Donayre](#) Last updated: May 17, 2019

— [Leave a Comment](#)



For individuals who are 29 or older that purchased a subscription to Tinder Plus or Tinder Gold between March 2, 2015 and March 1, 2019, then you are eligible for a potential award from the California Tinder Age Bias Class Action Lawsuit! According to the lawsuit, Tinder users 29 or older were charged more for... [Keep Reading»](#)

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UFB Direct High Yield Savings 2.45% APY



CIT Bank Saving Builder 2.40% APY



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Synchrony Bank Savings 2.25% APY



Barclays Online Savings 2.20% APY



American Expre High Yield Savir 2.10% APY



Huntington Business Premi Money Market 2.07% APY



BBVA Compass ClearChoice Mo Market 2.00% APY



E*Trade Broker \$2,500 Cash



Ally Invest \$3,500 Cash



You InvestSM by J.P. Morgan Up to \$625 Cash



TD Ameritrade \$600 Cash



Mr. Rebates \$7.50 Cash



Ebates \$10 Reward



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2

GREEK SPRINKLES

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Class-Action Settlements for June 2019

1 week ago 7 Min Read



"Pure" is a well-liked advertising buzzword, however it could possibly value corporations huge bucks in the event that they use the time period beneath false pretenses.



Admin



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Hertz Hotel Gift Offer.

Ad Earn \$50 off a hotel stay when you rent a midsize car or larger for 3+ days. Terms apply.

Hertz International

Book Now

This month's highlighted class-action settlements additionally have an effect on shoppers who skilled a shattered sunroof or have been gouged by a utility supplier that promised decrease charges.

Contents [hide]

- 1 Wesson 'Pure' Cooking Oil
- 2 Svetol Inexperienced Espresso Bean Extract Weight Loss
- 3 Gateway Power Variable Charges
- 4 Bluestem Manufacturers Mistaken Quantity Telephone Name
- 5 Martha Stewart Dwelling Subscriber Information
- 6 Hyundai Shattering Sunroof
- 7 Good!
- 8 Good!
- 9 Good!

JND – Wesson Oil Settlement Earned Media Examples

3

GREEK SPRINKLES

9.1 '+dataReturned.message+'

Wesson 'Pure' Cooking Oil

Wesson Oil producer Conagra Meals can pay shoppers 15 cents for each bottle of Wesson cooking oil bought as a part of a class-action lawsuit settlement over the corporate utilizing the phrases "100% pure" on merchandise that allegedly contained elements derived from genetically modified organisms (GMOs).

Shoppers who purchased Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil and Wesson Greatest Mix whereas in California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota and Texas throughout totally different time frames might obtain compensation.



Hertz Hotel Gift Offer.

Ad Earn \$50 off a hotel stay when you rent a midsize car or larger for 3+ days. Terms apply.

Hertz International

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Shoppers might obtain 15 cents per Wesson Oil bought, as much as 30 models with out proof of buy, for a complete of \$four.50. If receipts are included, the variety of models that may be claimed is limitless.

For an entire record of time frames designated to every state and to submit a declare by the Aug. 22, 2019 deadline, click on right here.

Svetol Inexperienced Espresso Bean Extract Weight Loss

In case you purchased Svetol Inexperienced Espresso Bean Extract or merchandise containing the extract believing it might assist you drop some pounds, you might acquire a portion of a \$1.3 million class-action settlement.

Among the many included merchandise is the Labrada Fats Loss Optimizer with Svetol Inexperienced Espresso Bean Extract.



Hertz Hotel Gift Offer.

Ad Earn \$50 off a hotel stay when you rent a midsize car or larger for 3+ days. Terms apply.

Hertz International

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The go well with alleged Naturex promised the merchandise would "bust your physique fats for good," however clients say the gadgets didn't assist them reduce weight.

Anybody who bought Svetol or any inexperienced espresso bean extract product containing Svetol between February 2, 2012 and Might 17, 2019, could also be eligible. Consumers can obtain \$30 per buy with their proof of buy. These with out receipts might submit as much as two claims for a complete of \$60.

Click on right here for extra info and to submit a declare by the Aug. 30, 2019 deadline.


Gateway Power Variable Charges

Gateway Power Providers has agreed to settle three separate class-action lawsuits for \$9.25 million over electrical energy and fuel fees.

JND – Wesson Oil Settlement Earned Media Examples

4





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Wesson 'Natural' Cooking Oil

Wesson Oil manufacturer Conagra Foods will pay consumers 15 cents for every bottle of Wesson cooking oil purchased as part of a class-action lawsuit settlement over the company using the words "100% natural" on products that allegedly contained ingredients derived from genetically modified organisms (GMOs).

Consumers who bought Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil and Wesson Best Blend while in California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota and Texas during different time frames could receive compensation.

Consumers may receive 15 cents per Wesson Oil purchased, up to 30 units without proof of purchase, for a total of \$4.50. If receipts are included, the number of units that can be claimed is unlimited.

For a complete list of time frames designated to each state and to submit a claim by the Aug. 22, 2019 deadline, [click here](#).




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TOP CLASS ACTIONS



Walmart Class Action Says Pharmacy Sends Unwanted Texts

TOP SETTLEMENTS


- Wesson 'Natural' Cooking Oil Class Action Settlement
- Fingerhut, Gettington Texts Class Action Settlement
- Nabi Tablet Class Action Settlement
- California Volaris Call Recording Class Action Settlement
- Whole Foods, Health-Ade Kombucha Class Action Settlement
- Sagent Lending Unwanted Phone Calls Class Action Settlement
- California Cedar Financial Call Recording Class Action Settlement

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TOP NEWS

TOP CLASS ACTION SETTLEMENTS

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Wesson 'Natural' Cooking Oil Class Action Settlement

Wesson 'Natural' Cooking Oil Class Action Settlement

Fingerhut, Gettington Texts Class Action Settlement

Nabi Tablet Class Action Settlement


California Volaris Call Recording Class Action Settlement

Whole Foods, Health-Ade Kombucha Class Action Settlement

Sagent Lending Unwanted Phone Calls Class Action Settlement


California Cedar Financial Call Recording Class Action Settlement

Providence Health 401(k) Class Action Settlement




Wesson 'Natural' Cooking Oil Class Action Settlement

A proposed Settlement has been reached in a class action lawsuit involving claims that the marketing, advertising and sale of Wesson brand cooking oils, including Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil,... [Read More](#)



Fingerhut, Gettington Texts Class Action Settlement

Fingerhut has agreed to pay \$5.25 million to resolve claims that it violated federal law by sending unsolicited text messages to consumers. The settlement includes all persons who were sent a text message from... [Read More](#)




Nabi Tablet Class Action Settlement

A \$3 million settlement will be distributed to consumers who bought a Nabi tablet with a defective charging system. This amount is set aside for the Class as part of a larger bankruptcy case... [Read More](#)


JND – Wesson Oil Settlement Earned Media Examples

6

TOP CLASS ACTIONS

Settlements Investigations Personal Injury News

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Wesson 'Natural' Cooking Oil Class Action Settlement

A proposed Settlement has been reached in a class action lawsuit involving claims that the marketing, advertising and sale of Wesson brand cooking oils, including Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil, and Wesson Best Blend ("Wesson Oil Products") made from Genetically Modified Ingredients ("GMOs") as... [Read More](#)

POTENTIAL SETTLEMENT: \$4.50


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FEATURED SETTLEMENTS




Wesson 'Natural' Cooking Oil Class Action Settlement

A proposed Settlement has been reached in a class action lawsuit involving claims that the marketing, advertising and sale of Wesson brand cooking oils, including Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil, and Wesson Best Blend ("Wesson Oil Products") made from Genetically Modified Ingredients ("GMOs") as... [Read More](#)

POTENTIAL SETTLEMENT \$4.50

[Submit Claim](#)




All Web Leads Telemarketing Calls Class Action Settlement

A \$6.5 million settlement has been reached to resolve claims that consumers received unsolicited phone calls from All Web Leads after searching for health insurance quotes online. The settlement will benefit individuals who received one or more non-emergency calls from All Web Leads Inc. or any party acting... [Read More](#)

POTENTIAL SETTLEMENT \$70

[Submit Claim](#)



Purex Natural Elements Laundry Detergent Class Action Settlement

A \$1.5 million class action settlement resolves claims that Purex Natural Elements laundry detergent contains synthetic ingredients despite its "natural" label. If you purchased Purex laundry detergent labeled as "Natural Elements" between May 19, 2013, and March 8, 2019, you could get cash from this class action settlement... [Read More](#)


POTENTIAL SETTLEMENT \$4 PER PRODUCT

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TOP CLASS ACTIONS



Settlements Investigations Personal Injury News ...

Wesson 'Natural' Cooking Oil Class Action Settlement

FOLLOW ARTICLE


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8

LEER EN ESPAÑOL

By Top Class Actions
June 7, 2019



A proposed Settlement has been reached in a class action lawsuit involving claims that the marketing, advertising and sale of Wesson brand cooking oils, including Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil, and Wesson Best Blend ("Wesson Oil Products") made from Genetically Modified Ingredients ("GMOs") as "100% Natural" was unlawful.

To make a claim in the Wesson cooking oil class action lawsuit, Class Members must file a claim online at www.wessonoilsettlement.com or by mail.

Class Members who submit a valid approved claim are entitled to receive 15¢ per unit of the Wesson Oil Product purchased during the relevant Class period without proof of purchase. Class Members who provide proof of purchase receipts for more than 30 units to the satisfaction of the Settlement Administrator may receive Settlement compensation of 15¢ for all units with receipts. There is also an additional fund of \$575,000 to be allocated to New York and Oregon state Class Members who submit valid claim forms, as compensation for the statutory damages provided for in the consumer protection laws of those states.

Class Members include purchasers of Wesson Oil Products, which includes Wesson Vegetable Oil, Wesson Canola Oil, Wesson Corn Oil, and Wesson Best Blend, for their own personal, non-commercial use including, while residing in California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota, and Texas.

In addition to monetary benefits, Conagra agreed to injunctive relief. The settling parties agree that the value of this injunctive relief to the Classes is \$27 million.

Class Members who wish to opt out or exclude themselves from the Wesson cooking oil class action settlement must do so by August 6, 2019.

Who's Eligible

Class Members include those who purchased Wesson cooking oil products for their own personal, non-commercial, use in that state during the following Class periods:

- California between June 28, 2007 through July 1, 2017;
- Colorado between January 12, 2009 through July 1, 2017;
- Florida between January 12, 2008 through July 1, 2017;
- Illinois between January 12, 2007 through July 1, 2017;
- Indiana between January 12, 2006 through July 1, 2017;
- Nebraska between January 12, 2008 through July 1, 2017;
- New York between January 12, 2008 through July 1, 2017;
- Ohio between January 12, 2010 through July 1, 2017;
- Oregon between January 12, 2006 through July 1, 2017;
- South Dakota between January 12, 2006 through July 1, 2017;
- Texas between January 12, 2010 through July 1, 2017.

TOP NEWS

- Walmart Class Action Says Pharmacy Sends Unwanted Texts
- Roundup Lawsuit Trials: Bayer Requests New Venues
- Bose Wants Headphone Wiretap Class Action Dismissed
- On Call Shifts: Retail & Restaurant Jobs in California & Oregon Lawsuit Investigation
- Hidden Fees Class Action Lawsuit Investigation
- Doctor's Choice Whistle Blower Lawsuit Alleges Medicare Billing Fraud
- Are MLB Baseball Parks Printing Private Information on Receipts?
- NAD Tells Capillus to End Some Hair Cap Claims

SPONSORED SETTLEMENTS

- Wesson 'Natural' Cooking Oil Class Action Settlement
- California New Balance Shoes Class Action Settlement

TOP INVESTIGATIONS

- On Call Shifts: Retail & Restaurant Jobs in California & Oregon Lawsuit Investigation
- Hidden Fees Class Action Lawsuit Investigation
- LabCorp Data Breach Class Action

JND – Wesson Oil Settlement Earned Media Examples

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TOP CLASS ACTIONS

Potential Award	Class Members will receive 15¢ for each Wesson Oil purchased up to 30 units without proof of purchase, and unlimited units if they can provide proof of purchase with their claim. There is also an additional fund of \$575,000 to be allocated to New York and Oregon state Class Members who submit valid claim forms, as compensation for the statutory damages provided for in the consumer protection laws of those states.
Proof of Purchase	None required to claim up to 30 units of Wesson Oil Products. Class Members wanting to claim more than 30 units will need to submit proof of purchase.
Claim Form	CLICK HERE TO FILE A CLAIM » NOTE: If you do not qualify for this settlement do NOT file a claim. Remember: you are submitting your claim <i>under penalty of perjury</i> . You are also harming other eligible Class Members by submitting a fraudulent claim. If you're unsure if you qualify, please read the FAQ section of the Settlement Administrator's website to ensure you meet all standards (Top Class Actions is not a Settlement Administrator). If you don't qualify for this settlement, check out our database of other open class action settlements you may be eligible for.
Claim Form Deadline	08/22/2019
Case Name	<i>In re: ConAgra Foods Inc.</i> , Case No. 2:11-cv-05379, in the U.S. District Court for the Central District of California
Final Hearing	10/7/2019
Settlement Website	www.WessonOilSettlement.com
Claims Administrator	Wesson Oil Settlement c/o JND Legal Administration PO Box 91249 Seattle, WA 98111-9349 1-833-291-1651 info@WessonOilSettlement.com
Class Counsel	DiCello Levitt Gutzler LLC and Milberg Tadler Phillips Grossman LLP
Defense Counsel	Alston & Bird


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Total Loss Car Accident & Motorcycle Accident Claim Lawsuit Investigation
















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TOP CLASS ACTIONS

Related Posts

	Wesson 'Natural' Cooking Oil Class Action Settlement		Utz, Bachman 'All Natural' Snacks Class Action Settlement
	DNA Tests Allegedly Revealed Mislabeling of GNC Products		Pret A Manger Class Action Challenges Natural Food Claims
	Kind Bar 'All Natural' Class Action Can Move Forward, NY Judge Says		Ricola Class Action Lawsuit Says Throat Drops Aren't All Natural
	Judge Dismisses Kraft 'Natural' Sour Cream Class Action Lawsuit		\$2.4M Settlement Reached In Johnson & Johnson Baby Wash Suit
	California Baby Natural Bug Repellent Is Complete Sham, Class Action Says		Wahl No Rinse Waterless Shampoo Allegedly Not 'Natural'
	Natural Mojo Marinade Class Action Says Products Are Not 'All Natural'		Champion Petfoods Class Action Claims Dog Food Is Toxic
	Dirty Salt & Vinegar Potato Chips Aren't 'All Natural,' Class Action Says		

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The Penny Hoarder

June 11 at 9:05 AM ·

Wesson settled over its 'natural' cooking oil claims. Martha Stewart magazines pay up for selling subscriber information. Hyundai offers compensation over its shattering sunroofs. Find out about these and more class-action settlements you could cash in on.

[https://www.thepennyhoarder.com/.../class-action-settlement.../...](https://www.thepennyhoarder.com/.../class-action-settlement.../)



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Class-Action Settlements: 'Natural' Mislabeling and Shattering Sunroofs

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10 Class-Action Lawsuits That Could Owe You Money

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4. Wesson Oil

A lawsuit claims ConAgra Foods, Inc. was not truthful in branding a variety of Wesson Oil products as “100% Natural” when they were actually made with genetically modified organisms (GMOs). The parties in this lawsuit settled to avoid further litigation.

The settlement covers multiple states, including California, Colorado, Florida, Illinois, Indiana, Nebraska, New York, Ohio, Oregon, South Dakota and Texas. Residents of those states who bought Wesson Oil products with this label from 2007 through 2017 should [check the list](#) to see if they are eligible for money in this settlement. The amount that could go to each customer is not listed on the settlement website.



Getty Images

EXHIBIT I

JUN 03 2019

W.A. Johnson, J.D., LL.M

[REDACTED]
Lithonia, GA 30058

May 22, 2019
Via Certified Mail

7018 0360 0001 2996 8929

Office of the Clerk
United States District Court for the Central
District of California
350 W. 1st Street, Suite 4311
Los Angeles, CA 90012

Wesson Oil Settlement
Exclusions
c/o JND Legal Administration
P.O. Box 91250
Seattle, WA 98111-9350

RE: Opting Out of In re: ConAgra Foods, Inc, Case No. 2:11-cv-05379-CJC-AGR, MDL No. 2291.

Dear Counsels and Class Administrator,

I attest that I Willis Johnson reside at [REDACTED] Lithonia, GA 30058. My email address [REDACTED] My phone number is [REDACTED] "I hereby request that I be excluded from the proposed Settlement Class In re ConAgra Foods, Inc, Case No. 2:11-cv-05379-CJC-AGR, MDL No. 2291.

I am writing to request that I Willis Johnson be exclude from the cash settlement class in the case of In re ConAgra Foods, Inc, Case No. 2:11-cv-05379-CJC-AGR, MDL No. 2291.

I wish to be exclude this Settlement Class. I request to be excluded from the Claims Class In re ConAgra Foods, Inc, Case No. 2:11-cv-05379-CJC-AGR, MDL No. 2291. I have reviewed and understood the Class Notice and chooses to be excluded from the Settlement.

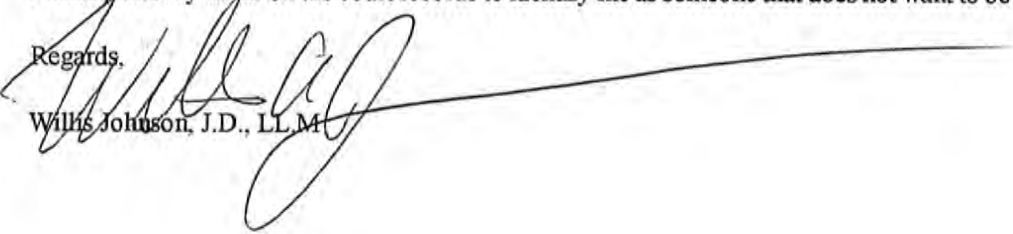
I do not wish to get any cash settlement award from this class action settlement in In re ConAgra Foods, Inc, Case No. 2:11-cv-05379-CJC-AGR, MDL No. 2291.

Furthermore, I do not wish to be legally bound by the governing court's final judgment and/or settlement in the class action final approval hearing. Moreover, I wish to file an independent lawsuit against the settling Defendant. It is my position that my rights were violated. I wish to reserve all of my rights under the law.

I do not wish to be represented by DiCello Levitt Gutzler LLC and Milberg Tadler Phillips Grossman LLP. I do not approve these counsels petitioning the court to receive attorney fees on my behalf.

Please place my name on the court records to identify me as someone that does not want to be bound by the Settlement.

Regards,


Willis Johnson, J.D., LL.M

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JUN 03 2019

Wesson Oil Settlement Exclusions
c/o JND Legal Administration
P.O. Box 91250
Seattle, WA 98111-9350
98111-9350 8929

Willis Johnson

Lithonia, GA 30058

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