

1 M. RAY HARTMAN III (CA SBN 211205)
RHartman@mofo.com
2 MORRISON & FOERSTER LLP
12531 High Bluff Drive, Suite 200
3 San Diego, California 92130-3588
Telephone: 858.720.5100
4 Facsimile: 858.720.5125

5 Attorneys for Defendant
AMAZON.COM SALES, INC.
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10

11 JUANITA HOPSON, an individual;
12 STEVENSON HOPSON, an individual,

13 Plaintiffs,

14 v.

15 PREVAGEN, INC., a Wisconsin
corporation; AMAZON.COM SALES,
16 INC., a Delaware corporation; GNC
HOLDINGS LLC, a limited liability
17 company and DOES 1-100, inclusive,

18 Defendants.
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Case No. 5:26-cv-3594

**DEFENDANT AMAZON.COM
SALES, INC.'S NOTICE OF
REMOVAL**

[Removed from the Superior Court of
the State of California for the County
of Riverside, Case No.
CVRI2507148]

20 **TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

21 **PLEASE TAKE NOTICE** that defendant Amazon.com Sales, Inc. removes
22 this civil action from the Superior Court of the State of California, County of
23 Riverside, to the United States District Court for the Central District of California
24 under 28 U.S.C. §§ 1332, 1441, and 1446. Diversity jurisdiction exists because there
25 is diversity among the relevant parties and the amount in controversy exceeds the
26 statutory minimum requirement.
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I. INTRODUCTION

1 1. This case is a product liability action brought by Plaintiffs Juanita
2 Hopson and Stevenson Hopson (“Plaintiffs” or “Hopson”). As set forth below, the
3 Court has diversity of citizenship subject matter jurisdiction over this case because
4 complete diversity exists and the amount in controversy exceeds the statutory
5 minimum requirement.

6 2. Plaintiffs’ Complaint alleges that Plaintiffs are California residents who
7 were injured by a Prevagen supplement purchased on Amazon.com. The Complaint
8 alleges causes of action for negligence, strict product liability, failure to
9 warn/negligent recall, and claims under the California Consumer Legal Remedies
10 Act (“CLRA”).

11 3. Plaintiffs filed their Complaint on December 18, 2025, in the Superior
12 Court of the State of California, County of Riverside, Case No. CVRI2507148.
13 Plaintiffs served Amazon with their Complaint on January 22, 2026. Plaintiffs
14 subsequently served Amazon with a First Amended Complaint on February 12, 2026.
15 True and correct copies of the Complaint, Amended Complaint, and all other
16 documents served upon Amazon are attached hereto as Exhibit A.

II. THIS CASE IS REMOVABLE UNDER DIVERSITY JURISDICTION

17 4. This action is removable under 28 U.S.C. § 1441 because this Court
18 would have had original jurisdiction under 28 U.S.C. § 1332(a)-(c) had Plaintiffs
19 filed this action initially in federal court. Plaintiffs are not citizens of the same state
20 as any of the defendants, and the amount in controversy exceeds \$75,000, exclusive
21 of interest and costs.

A. The parties are completely diverse.

22 5. Plaintiffs reside in Riverside County, California, and are citizens of
23 California for diversity purposes. *See* Plaintiffs’ First Amended Complaint (“FAC”) at ¶ 11.
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1 6. Plaintiffs name Amazon.com Sales, Inc. as a defendant. Amazon.com
2 Sales, Inc. is not a citizen of California. For the purposes of diversity, a corporation
3 is a citizen of its state of incorporation and the state where it has its principal place
4 of business. 28 U.S.C. § 1332(c)(1). Defendant Amazon.com Sales, Inc. is
5 incorporated under the laws of the state of Delaware with its principal place of
6 business in Washington. Accordingly, Amazon.com Sales, Inc. is a citizen of
7 Delaware and Washington.

8 7. Plaintiffs' FAC alleges that defendant Prevagen is a Wisconsin
9 corporation. *See, e.g.*, FAC at ¶ 15. Prevagen's principal place of business is likewise
10 in Wisconsin. Accordingly, Prevagen is a citizen of Wisconsin. A true and correct
11 copy of Wisconsin Department of Financial Institutions corporate records for
12 Prevagen, Inc. is attached hereto as Exhibit C.

13 8. Defendant GNC Holdings LLC is a Delaware limited liability company.
14 For the purposes of diversity jurisdiction, a limited liability company is a citizen of
15 all states where each of its members is a citizen. *Americold Realty Tr. v. ConAgra*
16 *Foods, Inc.*, 577 U.S. 378, 382 (2016). GNC Holdings, LLC's sole member is ZT
17 Biopharmaceutical LLC, a Delaware limited liability company. ZT
18 Biopharmaceutical LLC's sole member is Jacks Enterprise Management (Suzhou)
19 Co. Ltd., an entity formed in the People's Republic of China. Because ZT
20 Biopharmaceutical LLC's sole member is a citizen of a foreign state, ZT
21 Biopharmaceutical LLC is likewise a citizen of a foreign state, and GNC Holdings,
22 LLC is in turn a citizen of a foreign state for diversity purposes. A true and correct
23 copy of GNC Holdings, LLC's Responses to Amazon's First Set of Special
24 Interrogatories, served on June 22, 2026, is attached hereto as Exhibit D. Because
25 none of GNC's members are citizens of California, GNC is not a citizen of California
26 for diversity purposes.

27 9. The defendants identified as Does 1 through 100 in the FAC are
28 fictitious parties against whom no cause of action can be validly alleged. To the best

1 of Amazon's information and belief, no fictitiously designated defendant has been
2 served with process, and these fictitious parties may be ignored for purposes of
3 determining removal. *See* 28 U.S.C. § 1441(b)(1).

4 10. Because Plaintiffs are California citizens, Amazon is a citizen of
5 Delaware and Washington, Prevagen is a citizen of Wisconsin, and GNC is a citizen
6 of a foreign state, complete diversity of citizenship exists and removal is proper.

7 **B. The Amount in Controversy is Satisfied**

8 11. Plaintiffs do not assert a specific value for their claims on the face of the
9 Complaint or Amended Complaint. *See* Complaint ("Compl"); FAC. Their form
10 cover sheet indicates, though, that the damages they seek are unlimited. *See* Ex. A.
11 The Court should conclude based on Plaintiffs' Complaint and representations that
12 Plaintiffs' claims involve an amount in controversy in excess of \$75,000, exclusive
13 of interest and costs.

14 12. When a plaintiff's complaint does not demand a specific dollar amount,
15 the case is removable if the court determines "by a preponderance of evidence that
16 the amount in controversy satisfie[s] the jurisdictional requirement." *Singer v. State*
17 *Farm Mut. Auto. Ins. Co.*, 116 F.3d 373, 376 (9th Cir. 1997). In so doing, the court
18 should use "judicial experience and common sense." *Dourian v. Stryker Corp.*, 2012
19 WL 12893752, at *1 (C.D. Cal. 2012) (citation omitted).

20 13. "The amount in controversy includes all recoverable damages sought by
21 a plaintiff, including compensatory damages, punitive damages, statutory penalties,
22 and attorney's fees when authorized by statute." *Martin v. Container Store, Inc.*, 601
23 F.Supp.3d 614, 616 (C.D. Cal. 2022).

24 14. Additionally, future attorney's fees—not just attorney's fees as of the
25 date of removal—are included when calculating a reasonable estimate of a plaintiff's
26 attorney's fees. *See Fritsch v. Swift Trans. Co. of Ariz., LLC*, 899 F.3d 785, 794 (9th
27 Cir. 2018).

1 15. Here, Plaintiffs filed an unlimited civil case seeking relief for personal
2 injuries under four theories of liability: negligence, strict product liability, failure to
3 warn/negligent recall, and claims under the CLRA. *See generally* Compl.; FAC.
4 Plaintiffs allege that they suffered injuries, including “transient cerebral ischemia and
5 partial seizures” leading to “permanent neurological injury,” as well as symptoms of
6 “confusion, brain fog, excruciating headaches, irritation, memory loss, dizziness,
7 cognitive dysregulation, [and] neurological abnormalities.” FAC ¶¶ 6–9. The FAC
8 further alleges that Plaintiff Stevenson Hopson required “multiple emergency
9 hospitalizations” as a result of his injuries. *Id.* ¶ 7. Plaintiffs seek economic damages,
10 including past medical expenses, non-economic damages, and costs of suit. *Id.* at pg.
11 15, ¶¶ 1–6.

12 16. Considering the severity of Plaintiffs’ alleged injuries and the nature and
13 extent of the damages requested, it is apparent that the amount in controversy exceeds
14 \$75,000, and therefore meets the amount in controversy requirement. Thus, Amazon
15 has satisfied its burden to establish that the amount in controversy exceeds \$75,000.

16 17. By the statements contained in this Notice of Removal, Amazon does
17 not concede that Plaintiffs are entitled to any damages.

18 **III. CONSENT**

19 18. All properly joined and served defendants consent to the removal of this
20 action as required by 28 U.S.C. § 1446(b)(2)(A). *Proctor v. Vishay Intertechnology,*
21 *Inc.*, 584 F.3d 1208, 1225 (9th Cir. 2009) (“[T]he filing of a notice of removal can
22 be effective without individual consent documents on behalf of each defendant. One
23 defendant’s timely removal notice containing an averment of the other defendants’
24 consent and signed by an attorney of record is sufficient.”).

25 **IV. THE FILING IS TIMELY**

26 19. “The notice of removal of a civil action or proceeding shall be filed
27 within 30 days after the receipt by the defendant, through service or otherwise, of a
28 copy of the initial pleading setting forth the claim for relief upon which such action

1 or proceeding is based, or within 30 days after the service of summons upon the
2 defendant if such initial pleading has then been filed in court and is not required to
3 be served on the defendant, whichever period is shorter.” 28 U.S.C. § 1446(b)(1).

4 20. Plaintiffs filed their original Complaint on December 18, 2025, and
5 subsequently filed a First Amended Complaint on February 9, 2026, which was
6 served on Amazon on February 12, 2026. The face of neither the Complaint nor the
7 FAC affirmatively reveals information sufficient to trigger removal based on
8 diversity jurisdiction because neither pleading identifies the citizenship of defendant
9 GNC Holdings LLC. *See Harris v. Bankers Life & Cas. Co.*, 425 F.3d 689, 695 (9th
10 Cir. 2005) (“[T]he ground for removal must be revealed affirmatively in the initial
11 pleading in order for the first thirty-day clock under § 1446(b) to begin.”). Plaintiffs
12 alleged only that GNC is a “limited liability Company formed in California, with its
13 headquarters in Pennsylvania.” Compl. ¶ 17; FAC ¶ 17. But GNC is a limited liability
14 company, and limited liability companies are citizens of all states where each of their
15 members is a citizen. *Americold*, 577 U.S. at 382. Because Plaintiffs did not allege
16 the citizenship of GNC’s members, and in turn did not allege GNC’s state of
17 citizenship, the Complaint and FAC were “indeterminate” pleadings that did not start
18 the 30-day period for removal under 28 U.S.C. § 1446(b). *See Harris*, 425 F.3d at
19 695 (holding that “notice of removability under § 1446(b) is determined through
20 examination of the four corners of the applicable pleadings, not through subjective
21 knowledge or a duty to make further inquiry.”).

22 21. Where, as here, removability is not ascertainable from the face of the
23 complaint, a notice of removal must be filed within 30 days of a defendant's receipt
24 of an “amended pleading, motion, order or other paper from which it may first be
25 ascertained that the case is or has become removable.” 28 U.S.C. § 1446(b)(3). The
26 first time that Amazon could ascertain that this case is removable was when GNC
27 Holdings LLC served responses to Amazon’s First Set of Special Interrogatories on
28 June 22, 2026, confirming that GNC's sole member is ZT Biopharmaceutical LLC, a

1 Delaware limited liability company whose sole member is Jacks Enterprise
2 Management (Suzhou) Co. Ltd., an entity formed in the People's Republic of
3 China—and thus that none of GNC's members are citizens of California. *See* Ex. D.
4 GNC's interrogatory responses constitute an “other paper” establishing GNC's
5 citizenship for purposes of section 1446(b)(3). *See Najera v. Costco Wholesale*
6 *Corp.*, No. CV17-7585-MWF (MRWX), 2017 WL 6033666, at *3 (C.D. Cal. Dec.
7 6, 2017) (concluding that “discovery responses qualify as ‘other papers’ under §
8 1446(b)(3).”). Accordingly, this Notice of Removal is timely because Amazon filed
9 it within 30 days of its first receipt of GNC's interrogatory responses, and within one
10 year from the commencement of this action. *See* 28 U.S.C. § 1446(b)(3), (c)(1).

11 **V. VENUE OF REMOVED ACTION**

12 22. The Central District of California is the United States district court for
13 the district and division embracing the state court where this action was filed and is
14 pending. Venue is proper in this Court under 28 U.S.C. § 1441(a).

15 **VI. NOTICE TO THE STATE COURT**

16 23. A copy of this Notice of Removal is being served on all served parties
17 and filed with the Superior Court of the State of California, County of Riverside,
18 where this case was originally filed.

19 **VII. PLEADINGS IN THE STATE COURT ACTION**

20 24. All processes, pleadings, and orders in this action are attached as Exhibit
21 A. A true and correct copy of the Riverside County Superior Court Register of
22 Actions for this action is attached as Exhibit B.

23 **VIII. NON-WAIVER OF DEFENSES**

24 25. Amazon expressly reserves all of its defenses. By removing the action
25 to this Court, Amazon does not waive any rights or defenses available under federal
26 or state law. Nothing in this Notice of Removal should be taken as an admission that
27 Plaintiffs' allegations are sufficient to state a claim or have any substantive merit, or
28 that Plaintiffs can prove any amount of damages or entitlement to any form of relief.

1
2 Dated: June 29, 2026

MORRISON & FOERSTER LLP

3
4 By: /s/ M. Ray Hartman III

M. Ray Hartman III

5 *Attorneys for Defendant*
6 AMAZON.COM SALES, INC.
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EXHIBIT A

Electronically FILED by Superior Court of California, County of Riverside on 12/18/2025 10:42 AM
Case Number CVRI2507148 0000151543475 - Jason B. Galkin, Executive Officer/Clerk of the Court By Janelle Blackwell, Clerk

John C. Carpenter, Esq. (SBN 155610)
carpenter@cz.law
Alina S. Vulic, Esq. (SBN 337080)
avulic@cz.law
CARPENTER & ZUCKERMAN
8827 West Olympic Boulevard
Beverly Hills, CA 90211
Telephone: 310-273-1230
Facsimile: 310-858-1063
teamcarpenter@cz.law

Attorneys for Plaintiffs

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE**

JUANITA HOPSON, an individual;	)	Case No. CVRI 25071 48
STEVENSON HOPSON, an individual,	)	
	)	
Plaintiffs,	)	COMPLAINT FOR DAMAGES
vs.	)	
	)	1. NEGLIGENCE
PREVAGEN, INC., a Wisconsin	)	2. STRICT PRODUCT LIABILITY
corporation; AMAZON.COM SALES,	)	3. FAILURE TO WARN/NEGLIGENT
INC., a Delaware Corporation; GNC	)	RECALL
HOLDINGS, LLC, a limited liability	)	4. CONSUMER LEGAL REMDIES
Company and DOES 1-100, inclusive,	)	ACT
	)	
Defendants.	)	<u>DEMAND FOR JURY TRIAL</u>
	)	
	)	
	)	
	)	

COMES NOW plaintiffs STEVENSON HOPSON, an individual, and JUANITA HOPSON, an individual (hereinafter collectively referred to as "Plaintiffs") and alleges causes of action against defendants PREVAGEN, INC., AMAZON.COM SALES, INC., GNC HOLDINGS, LLC and DOES 1 through 100 (collectively referred to throughout portions of this Complaint as "Defendants") inclusive for damages and injunctive relief.

I. INTRODUCTION

1. Plaintiff STEVENSON HOPSON is an adult, and his true name is used throughout this Complaint.

2. Plaintiff JUANITA HOPSON is an adult, and her true name is used throughout this Complaint.

3. In or around, December 25, 2023, Plaintiffs placed an order from the Prevagen Official Store on Amazon and on GNC Online for Prevagen, a supplement touted to improve the cognitive function of its consumer. These orders were fulfilled and shipped to Plaintiffs within the confines of the State of California.

4. On December 28, 2023, the Prevagen supplement, which was manufactured and sold by the defendants was fulfilled and shipped and delivered to the Plaintiffs at their California home.

5. Upon the supplement's arrival, 87-year-old Stevenson Hopson, and his wife Juanita Hopson used the supplement as directed and for its advertised purpose of "cognitive support"

6. In or around May 6, 2024, after regularly consuming the Prevagen supplement in its directed course, Plaintiff Stevenson Hopson suddenly experienced a severe transient cerebral ischemic attack while with his wife.

7. This episode caused confusion, blurred vision, garbled speech, and temporary loss of ability to speak, lasting approximately ten minutes. He subsequently suffered additional episodes of transient cerebral ischemia and partial seizures on May 7, 9, and 10, 2024, resulting in recurrent loss of consciousness, expressive aphasia, left arm weakness, confusion, and multiple emergency hospitalizations at Kaiser Permanente Downey and Anaheim.

8. These events led to permanent neurological injury, including partial epilepsy, abnormal EEG findings showing left temporal lobe abnormalities, and the need for anti-seizure medication (levetiracetam), ongoing neurological monitoring, and driving restrictions with mandatory reporting to the Department of Motor Vehicles.

1 **III. FURTHER ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

2 *(Against All Defendants Including DOES 1-100)*

3 15. Plaintiffs are informed and believe, and thereon allege, that PREVAGEN, INC.,
4 a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC
5 HOLDINGS, LLC, a limited liability Company and DOES 1-100, inclusive, and each of them,
6 and their officers, directors and/or managing agents, knew of, intended for, ratified and
7 committed the following acts which caused Plaintiffs' damages and injuries.

8 16. Plaintiffs are informed and believe, and thereon allege, that PREVAGEN, INC.,
9 a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC
10 HOLDINGS, LLC, a limited liability Company with its vast network of franchises within
11 Riverside and the State of California and DOES 1-100, inclusive, and each of them, and their
12 officers, directors and/or managing agents, sold, designed, manufactured, fabricated,
13 distributed, retailed, wholesaled, recommended, tested, modified, controlled, advertised,
14 created, processed, prepared, constructed, packaged, provided, warranted, repaired, maintained,
15 marketed, labeled, promoted, advertised, furnished, analyzed, inspected, supplied and placed
16 into the stream of commerce the subject Prevagen which STEVENSON HOPSON and
17 JUANITA HOPSON were using properly and caused them serious injuries and damages.

18 17. Plaintiffs are informed and believe, and thereon allege, that PREVAGEN, INC.,
19 a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC
20 HOLDINGS, LLC, a limited liability Company formed in California, with its headquarters in
21 Pennsylvania and their legal structure as a limited liability company, serving their vast
22 franchise/corporate store network in places like Riverside and beyond and DOES 1-100,
23 inclusive Prevagen and the fact that it was unsafe for its intended use and purpose when
24 employed in a reasonable and foreseeable manner was knowable by means of scientific
25 knowledge available to Prevagen and PREVAGEN, INC., a Wisconsin corporation;
26 AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited
27 liability Company formed in California, with its vast network of franchises within Riverside
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1 and the State of California and DOES 1-100, inclusive, and each of them, and their officers,
2 directors and/or managing agents.

3 18. Further, PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM
4 SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company
5 and DOES 1-100, inclusive, and each of them, and their officers, directors and/or managing
6 agents, knew, or by means of available scientific knowledge should have known, of the
7 numerous other earlier deaths, injuries, consumer complaints, warranty claims and lawsuits
8 caused by the defective Prevagen, including earlier versions and similar products, due to the
9 inadequate and improper design, defective manufacturing and lack of proper warnings, as
10 specifically described herein, and yet, in conscious disregard of the rights and safety of others,
11 including Plaintiffs, PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES,
12 INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its
13 vast network of franchises within Riverside and the State of California and DOES 1-100,
14 inclusive, and each of them, and their officers, directors and/or managing agents chose not to
15 recall and stop selling the similarly-designed defective supplement or to provide accurate
16 proper instructions and warnings, or conduct a proper, timely and reasonable recall.

17 19. Plaintiffs are informed and believe, and thereon allege, that despite said
18 knowledge on the part of the PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM
19 SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company
20 with its vast network of franchises within Riverside and the State of California and DOES 1-
21 100, inclusive, and each of them, and their officers, directors and/or managing agents, said
22 Defendants and each of them, acted in a reckless, wanton, and malicious manner with a willful
23 conscious disregard for the rights, safety and well-being of the Plaintiffs and other members of
24 the public, when they sold, marketed, and/or distributed defective Prevagen without alerting,
25 advising, warning, properly recalling or otherwise adequately informing purchasers and/or users
26 of the defective supplements of their defective and dangerous nature and/or character. Plaintiffs
27 are informed and believe, and thereon allege, that Defendants further failed to alert, advise,
28 warn, properly recall or otherwise adequately inform purchasers and/or users of the defective

1 Prevagen Product supplements, and warn consumers of its dangerous life-threatening side
 2 effects, the responsible overview of which would substantially decrease the risk of injuries and
 3 or mitigate its effects, and which would substantially decrease the risk and decrease the extent
 4 of any injury, if it occurred. In fact, Prevagen is known to have a sordid past of misrepresenting
 5 its purported benefits and risks to consumers, including consumers such as Plaintiffs.¹

6 20. Plaintiffs are informed and believe, and thereon allege, that PREVAGEN, INC.,
 7 a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC
 8 HOLDINGS, LLC, a limited liability Company with a vast network of franchises in and around
 9 Los Angeles and within the state of California and DOES 1-100, inclusive, and each of them,
 10 and their officers, directors and/or managing agents, further failed to alert, advise, warn,
 11 properly recall or otherwise adequately inform purchasers and/or users of the defective
 12 Prevagen Supplement and of its defective and dangerous nature and/or character, knowing that
 13 the defective supplement, Prevagen, would be used and would fail to protect consumers in
 14 foreseeable incidents. By failing to so alert, advise, warn or adequately maintain or inform users
 15 of the defective and dangerous nature and/or character of said products, the Defendants, and
 16 each of them, warranted and represented that the defective Prevagen Product were safe and
 17 suitable for the intended purpose and use by STEVENSON HOPSON, JUANITA HOPSON
 18 and other members of the public. As a direct, proximate and legal result thereof, Plaintiffs were
 19 using the defective Prevagen supplement for its intended purpose and thereby suffered severe
 20 personal injuries, and other damages.

21 21. Plaintiffs are informed and believe, and thereon allege, that despite said
 22 knowledge on the part of PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM
 23 SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company
 24 with a vast network of Riverside based franchises and DOES 1-100, inclusive, and each of
 25 them, and their officers, directors, and/or managing agents, directly, and in authorizing and
 26 ratifying the conduct of each of them, acted with malice by engaging in the misconduct
 27 despicably and in a reckless, wanton malicious manner with a willful, conscious disregard of
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¹ <https://www.wired.com/story/prevagen-made-millions-fda-questioned-safety/>

1 the rights and/or safety of others, and/or acted with oppression by engaging in the misconduct
 2 despicably and by subjecting others to cruel and unjust hardship in a reckless, wanton malicious
 3 manner with a willful conscious disregard of the rights of other persons, and/or acted with fraud
 4 by engaging in the misconduct through intentional misrepresentation, deceit, and/or
 5 concealment of a material fact known to the Defendants with the intention of thereby depriving
 6 a person or property of legal rights or otherwise causing injury, and are liable for exemplary and
 7 punitive damages. Plaintiffs are therefore entitled to an award of exemplary and punitive
 8 damages against PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC.,
 9 a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast
 10 network of franchises within Riverside and the State of California and DOES 1-100, inclusive,
 11 and each of them, in an amount to be shown according to proof at trial.

12 22. Plaintiffs are informed and believe that the Prevagen supplement, after its
 13 purchase online, was at all times, packaged and “fulfilled” by Defendant AMAZON and
 14 Defendant GNC and DOE defendants within the State of California.

15 23. Upon information and belief, the DOE-based managers and agents are
 16 responsible for overseeing the distribution of the product within the State of California,
 17 specifically in the County of Riverside. These managers, operating under the direction of
 18 the Defendants consumer supply chain and distribution framework or similarly designated
 19 authority, to ensure that the product reaches its intended recipients while complying with
 20 applicable state and local regulations. Their oversight includes coordinating logistics,
 21 monitoring supply channels, and facilitating the lawful dissemination of the product throughout
 22 the county.

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1 **IV. CAUSES OF ACTION**

2 **FIRST CAUSE OF ACTION**

3 **NEGLIGENCE**

4 ***(Against All Defendants Including Does 1-100)***

5 24. Plaintiffs hereby incorporate by reference and re-allege each and every
6 allegation set forth in each and every preceding paragraph of this Complaint, as though fully set
7 forth herein.

8 25. Plaintiffs are informed and believe, and thereon allege, that at all times herein
9 mentioned, Defendant PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES,
10 INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its
11 vast network of franchises within Riverside and the State of California and DOES 1-100,
12 inclusive, and each of them, owed to Plaintiffs a duty to exercise reasonable care in the
13 research, development, design, testing, manufacture, marketing, distribution, labeling, and sale
14 of the dietary supplement product known as Prevagen, including but not limited to the duty to
15 ensure said product was safe for human consumption when used as intended or as reasonably
16 foreseeable, the duty to conduct adequate and sufficient testing to identify and evaluate
17 potential adverse effects and health risks associated with the use of said product, the duty to
18 warn consumers and the medical community of any known or reasonably knowable dangers,
19 side effects, and adverse reactions associated with the use of Prevagen, including but not
20 limited to neurological effects, seizure activity, and other serious medical conditions, and the
21 duty to provide adequate warnings, instructions, and information regarding the safe use of said
22 product.

23 26. Plaintiffs are informed and believe, and thereon allege, that at all times herein
24 mentioned, Defendant PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES,
25 INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its
26 vast network of franchises within Riverside and the State of California and DOES 1-100,
27 inclusive, and each of them, had a duty to Plaintiffs to refrain from manufacturing, marketing,
28 distributing, and selling products that were defective, dangerous, or unsafe for their intended

1 use, to conduct adequate post-market surveillance and monitoring of adverse events associated
 2 with the use of Prevagen, to maintain accurate and complete records of reported adverse events
 3 and health complaints related to said product, to promptly investigate reports of serious adverse
 4 health effects including but not limited to seizures and neurological disorders, and to take
 5 appropriate action to warn consumers and health care providers of such dangers, and to cease
 6 distribution of said product if it was found to pose unreasonable risks of harm to consumers.

7 27. Plaintiffs are informed and believe, and thereon allege, that Defendant
 8 PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware
 9 Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of
 10 franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of
 11 them, breached the aforesaid duties of care owed to Plaintiffs by their careless, reckless, and
 12 negligent acts and omissions, including but not limited to failing to adequately test Prevagen for
 13 safety prior to marketing and distribution, failing to conduct sufficient clinical trials to identify
 14 potential adverse neurological effects including seizure activity, failing to warn Plaintiffs and
 15 the medical community of the risk of seizures, transient ischemic attacks, and other serious
 16 neurological events associated with the use of Prevagen, failing to provide adequate warnings
 17 and instructions for the safe use of said product, negligently marketing and distributing a
 18 product that was unsafe and posed unreasonable risks of serious harm to consumers including
 19 Plaintiffs, and failing to conduct adequate post-market surveillance to identify and respond to
 20 reports of adverse neurological events in users of Prevagen.

21 28. Plaintiffs are informed and believe, and thereon allege, that on or about
 22 December 25, 2023, and continuing thereafter through May of 2024, as a direct, proximate, and
 23 legal result of the aforesaid careless, reckless, and negligent conduct of Defendant
 24 PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware
 25 Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of
 26 franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of
 27 them, Plaintiffs were caused to suffer serious personal injuries, pain, suffering, and damages,
 28 including but not limited to neurological injuries, seizure disorder, transient ischemic attacks,

1 cognitive impairment, loss of consciousness, hospitalization, and the need for ongoing medical
 2 treatment and monitoring, and Plaintiffs have incurred damages, all to their general and special
 3 damage in a sum according to proof at trial.

4 **SECOND CAUSE OF ACTION**

5 **STRICT PRODUCT LIABILITY**

6 **(Against All Defendants)**

7 29. Plaintiffs hereby incorporate by reference and re-allege each and every
 8 allegation set forth in each and every preceding paragraph of this Complaint, as though fully set
 9 forth herein.

10 30. Plaintiffs are informed and believe, and thereon allege, that at all times herein
 11 mentioned, defendants PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM
 12 SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company
 13 with its vast network of franchises within Riverside and the State of California and DOES 1-
 14 100, inclusive, and each of them, manufactured, fabricated, planned, designed, assembled,
 15 distributed, leased, bought, sold, rented, recalled, inspected, repaired, imported, marketed,
 16 warranted, tested, serviced, and advertised the subject Prevagen and/or its parts, with
 17 instructions and warnings, in said product and/or its parts, as well as other models in that series
 18 all of which contained product defects, both in manufacturing, design and failure to warn in
 19 various components, including inadequate warnings regarding seizure risks

20 31. Said product defects rendered the Prevagen supplement defective under
 21 California Law.

22 32. Plaintiffs were not aware of any said defects at any time December 25, 2023, and
 23 said defects would not be detectable or appreciated by normal inspection prior to use. Said
 24 product defects were the direct, proximate, legal causes of the damages sustained by Plaintiffs.
 25 Plaintiffs have incurred damages to be shown by proof at trial.

26 ///

27 ///

28 ///

THIRD CAUSE OF ACTION**FAILURE TO WARN/NEGLIGENT RECALL****(Against All Defendants Including Does 1-100)**

33. Plaintiffs hereby incorporate by reference and re-allege each and every allegation set forth in each and every preceding paragraph of this Complaint, as though fully set forth herein.

34. Plaintiffs are informed and believe, and thereon allege, that defendants PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of them, had a duty to provide information, instructions and warnings, and each of them negligently and carelessly advertised, designed, manufactured, fabricated, planned, assembled, distributed, leased, rented, bought, sold, inspected, tested, serviced, repaired, marketed, recalled, warranted, provided instructions and warnings, as to Prevagen, while being used in a normal foreseeable manner.

35. Plaintiffs are informed and believe, and thereon allege, that defendants PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company and DOES 1-100, inclusive, and each of them, had a duty to warn Plaintiffs that there existed a condition that Prevagen was defective and Does 1 through 100, inclusive, and each of them, were well aware of, but failed to act through and actually inform the consuming public who use their manufactured supplement products of Prevagen while being consumed in a normal, advertised, foreseeable manner that Defendants were aware of for the allegedly affected Prevagen. Defendants complete lack of recalling, removing, warning or otherwise, constitutes negligence.

36. Manufacturers and their tracking services, such as PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of them, cannot

1 delegate responsibility for the safety of its products to dealers, much less purchasers.
 2 *Springmeyer v. Ford Motor Co.* (1998) 60 Cal.App.4th 1541, 1562–63; *Ford Motor Co. v.*
 3 *Robert J. Poeschl, Inc.* (1971) 21 Cal.App.3d 694, 698; *Southern Pac. Co. v. Unarco Industries,*
 4 *Inc.* (1974) 42 Cal.App.3d 142, 151. Manufacturers, such as Prevagen and Does 1 through 100,
 5 inclusive, and each of them, failed to conduct an adequate recall campaign which constitutes a
 6 separate issue and cause of action from a defective design cause of action. *Hernandez v. Badger*
 7 *Construction Equipment Co.* (1994) 28 Cal.App.4th 1791, 1827.

8 37. The failure of Defendants and Does 1 through 100, inclusive, and each of them,
 9 to warn and/or to recall the Subject Prevagen was the proximate, legal cause of the damages
 10 sustained by Plaintiffs. Plaintiffs have incurred damages to be shown by proof at trial.

11 FIFTH CAUSE OF ACTION

12 CONSUMER LEGAL REMEDIES ACT

13 *(Against All Defendants Including Does 1-100)*

14 38. Plaintiffs hereby incorporate by reference and re-allege each and every
 15 allegation set forth in each and every preceding paragraph of this Complaint.

16 39. This cause of action is brought pursuant to the Consumers Legal Remedies Act,
 17 Cal. Civ. Code §§ 1750, *et seq.* (the "Act"). Plaintiffs are consumers as defined by Cal. Civ.
 18 Code § 1761(d). The subject Prevagen is/was a good within the meaning of the Act.

19 40. The Act forbids "unfair methods of competition and unfair or deceptive acts or
 20 practices undertaken by any person in a transaction intended to result or which results in the
 21 sale or lease of goods or services to any consumers." Cal. Civ. Code § 1770(a).

22 41. Defendants and Does 1 through 100, inclusive, violated and continue to violate
 23 the Act by engaging in the following practices proscribed by Cal. Civ. Code § 1770(a) in
 24 transactions with STEVENSON HOPSON and JUANITA HOPSON, which were intended to
 25 result in, and did result in, the sale of dietary supplements:

26 i. Representing that Prevagen has characteristics, uses, benefits, or qualities that it
 27 does not have, including safety and efficacy for memory improvement and cognitive function;
 28

1 ii. Representing that Prevagen is of a particular standard, quality, or grade when it
2 is not, including representations regarding safety and freedom from adverse neurological
3 effects;

4 iii. Advertising Prevagen with intent not to sell it as advertised, including
5 representations regarding safety and absence of seizure risk;

6 iv. Representing that Prevagen has been supplied in accordance with previous
7 representations regarding safety and efficacy when it has not been.

8 42. Defendants violated the Act by representing through warranties, marketing and
9 advertisements (and by not disclosing known safety defects) that the Prevagen Supplements
10 were safe, reliable, and fit for their ordinary purpose, as described above, when they knew, or
11 should have known, that the representations and advertisements were unsubstantiated, false and
12 misleading. Defendants continue to make representations, as alleged above, that the Prevagen
13 Supplements are safe, reliable, and fit for their ordinary purpose, as described above, when they
14 knew, or should have known, that the representations and advertisements were unsubstantiated,
15 false and misleading.

16 43. Defendants continue to make representations, as alleged above, that the
17 Prevagen supplements are safe, reliable, and fit for their ordinary purpose even though they are
18 not.

19 44. Furthermore, Defendants omitted that they were aware of a safety defect(s)
20 related to the Prevagens.

21 45. Defendants had a duty to disclose the Prevagen's inherent dangers as described
22 above. These undisclosed facts about the safety and reliability of the Prevagens, including
23 potential to cause seizures, loss of consciousness, and injury to the brain and neurological
24 system, are material to reasonable consumers. Furthermore, as alleged above, Defendants had
25 exclusive knowledge of the dangerously nonconforming nature of the defects through, *inter*
26 *alia*, Defendants' own testing and knowledge, nonpublic consumer complaints, and concealed
27 these facts from Plaintiffs. These undisclosed facts about the safety and reliability of the
28

1 defective Prevagen Supplements, including potential to cause seizures, loss of consciousness,
 2 and injury to the brain and neurological system, are material to reasonable consumers.

3 46. Pursuant to Cal. *Civ. Code* § 1782(d), Plaintiffs seek a Court order enjoining the
 4 above-described wrongful acts and practices of Defendants and for restitution and
 5 disgorgement.

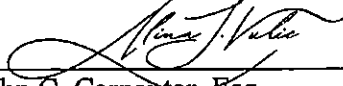
6 47. Plaintiffs seek equitable and injunctive relief requiring, *inter alia*, that
 7 Defendants fix and/or warn of the defective Prevagen's potential to cause seizures, loss of
 8 consciousness, and injury to the brain and neurological system while under normal foreseeable
 9 use, and to the extent possible, educate consumers through a corrective advertising campaign.

10 48. Pursuant to Cal. *Civ. Code* § 1780(d), filed concurrently herewith is an affidavit
 11 showing that this action has been commenced in the proper forum.

12 49. Pursuant to Section 1782, Plaintiffs intend to notify Defendants in writing of the
 13 particular violations of Section 1770 (the "Notice Letter"). If Defendants fail to comply with
 14 Plaintiffs' demands within thirty days of receipt of the Notice Letter, pursuant to Section 1782,
 15 Plaintiff will amend this Complaint to request damages and other monetary relief under the
 16 CLRA.

17
 18 Dated: December 18, 2025

CARPENTER & ZUCKERMAN

19 
 20 John C. Carpenter, Esq.
 Alina S. Vulic, Esq.

21 *Attorneys for Plaintiffs*
 22
 23
 24
 25
 26
 27
 28

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants, as follows:

1. Damages for past and future loss of earnings and benefits, and other damages in a sum to be determined at the time of trial;
2. For compensatory damages according to proof at trial;
3. An award of reasonable attorneys' fees and costs of suit as permitted by law;
4. Punitive and exemplary damages in an appropriate amount to punish or set an example of PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company formed in California, with its vast network of franchises within Riverside and the State of California and DOES 1-100, inclusive;
5. For pre-judgment interest and other interest as provided by law;
6. For costs of suit incurred herein;
7. Injunctive relief; and
8. For such other and proper relief as the Court deems just and proper.

Dated: December 18, 2025

CARPENTER & ZUCKERMAN



John C. Carpenter, Esq.

Alina S. Vulic, Esq.

Attorneys for Plaintiffs

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury on all issues which may be tried by a jury.

Dated: December 18, 2025

CARPENTER & ZUCKERMAN



John C. Carpenter, Esq.
Alina S. Vulic, Esq.

Attorneys for Plaintiffs

SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

NOTICE TO DEFENDANT: PREVAGEN, INC., a Wisconsin corporation;
(AVISO AL DEMANDADO): AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company and DOES 1-100, inclusive

YOU ARE BEING SUED BY PLAINTIFF: JUANITA HOPSON, an individual;
(LO ESTÁ DEMANDANDO EL DEMANDANTE): STEVENSON HOPSON, an individual

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of Riverside
4050 Main Street
Riverside, California 92501

CASE NUMBER:
(Número del Caso):

CVRI 2507148

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

John Carpenter, Esq./ Alina S. Vulic, Esq. Carpenter & Zuckerman
8827 W. Olympic Blvd., Beverly Hills, CA 90211

DATE:
(Fecha) 12/18/2025

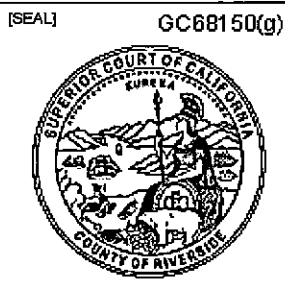
Clerk, by
(Secretario)

J Blackwell

Tel: (310) 273-1230
J Blackwell, Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☒ on behalf of (specify): Amazon.com Sales, Inc., a Delaware corporation
under: ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):
4. ☐ by personal delivery on (date):

Electronically FILED by Superior Court of California, County of Riverside on 12/18/2025 10:42 AM
Case Number CVRI2507148 0000151543476 - Jason B. Galkin, Executive Officer/Clerk of the Court By Janelle Blackwell, Clerk

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): John C. Carpenter, Esq./ Alina S. Vulic, Esq. SBN: 155610 / 337080 Carpenter & Zuckerman 8827 W. Olympic Blvd., Beverly Hills, CA 90211 TELEPHONE NO.: (310) 273-1230 FAX NO.: (310) 858-1063 EMAIL ADDRESS: teamcarpenter@cz.law ATTORNEY FOR (Name): Juanita Hopson, et al.		FOR COURT USE ONLY			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside, 92501 BRANCH NAME: Riverside Historic Courthouse					
CASE NAME: Juanita Hopson, et al. v. PREVAGEN, INC., et al.					
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> CIVIL CASE COVER SHEET ☒ Unlimited (Amount demanded exceeds \$35,000) </td> <td style="width: 50%; padding: 5px;"> ☐ Limited (Amount demanded is \$35,000 or less) </td> </tr> </table>			CIVIL CASE COVER SHEET ☒ Unlimited (Amount demanded exceeds \$35,000)	☐ Limited (Amount demanded is \$35,000 or less)	
CIVIL CASE COVER SHEET ☒ Unlimited (Amount demanded exceeds \$35,000)	☐ Limited (Amount demanded is \$35,000 or less)				
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> Complex Case Designation ☐ Counter ☐ Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) </td> <td style="width: 50%; padding: 5px;"> CASE NUMBER: CVRI 2507148 </td> </tr> <tr> <td colspan="2" style="padding: 5px;"> JUDGE: DEPT.: </td> </tr> </table>		Complex Case Designation ☐ Counter ☐ Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: CVRI 2507148	JUDGE: DEPT.:	
Complex Case Designation ☐ Counter ☐ Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: CVRI 2507148				
JUDGE: DEPT.:					

Items 1–6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

Auto Tort ☐ Auto (22) ☐ Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort ☐ Asbestos (04) ☒ Product liability (24) ☐ Medical malpractice (45) ☐ Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort ☐ Business tort/unfair business practice (07) ☐ Civil rights (08) ☐ Defamation (13) ☐ Fraud (16) ☐ Intellectual property (19) ☐ Professional negligence (25) ☐ Other non-PI/PD/WD tort (35) Employment ☐ Wrongful termination (36) ☐ Other employment (15)	Contract ☐ Breach of contract/warranty (06) ☐ Rule 3.740 collections (09) ☐ Other collections (09) ☐ Insurance coverage (18) ☐ Other contract (37) Real Property ☐ Eminent domain/Inverse condemnation (14) ☐ Wrongful eviction (33) ☐ Other real property (26) Unlawful Detainer ☐ Commercial (31) ☐ Residential (32) ☐ Drugs (38) Judicial Review ☐ Asset forfeiture (05) ☐ Petition re: arbitration award (11) ☐ Writ of mandate (02) ☐ Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) ☐ Antitrust/Trade regulation (03) ☐ Construction defect (10) ☐ Mass tort (40) ☐ Securities litigation (28) ☐ Environmental/Toxic tort (30) ☐ Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment ☐ Enforcement of judgment (20) Miscellaneous Civil Complaint ☐ RICO (27) ☐ Other complaint (not specified above) (42) Miscellaneous Civil Petition ☐ Partnership and corporate governance (21) ☐ Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. ☐ Large number of separately represented parties
b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
c. ☐ Substantial amount of documentary evidence | d. ☐ Large number of witnesses
e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
f. ☐ Substantial postjudgment judicial supervision |
|--|--|
3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): Four
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: December 18, 2025

John C. Carpenter, Esq./ Alina S. Vulic, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET**CM-010**

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES**Auto Tort**

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) *(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)*

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability *(not asbestos or toxic/environmental)* (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) *(not civil harassment)* (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice *(not medical or legal)*
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract *(not unlawful detainer or wrongful eviction)*
Contract/Warranty Breach—Seller Plaintiff *(not fraud or negligence)*
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage *(not provisionally complex)* (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property *(not eminent domain, landlord/tenant, or foreclosure)*

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) *(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)*

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims *(arising from provisionally complex case type listed above)* (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment *(non-domestic relations)*
Sister State Judgment
Administrative Agency Award *(not unpaid taxes)*
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint *(not specified above)* (42)
Declaratory Relief Only
Injunctive Relief Only *(non-harassment)*
Mechanics Lien
Other Commercial Complaint Case *(non-tort/non-complex)*
Other Civil Complaint *(non-tort/non-complex)*

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition *(not specified above)* (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

Sedgwick Claims Management Services, Inc.
Po Box 14184
Lexington, KY 40512



Phone: (844)693-0335 Fax: (859)280-2832

January 26, 2026

Perkins Coie LLP
Attn: Client Accounting P.O. Box 24643
Seattle WA 98124-0643

Defense Assignment Letter

Claimant Name:	Stevenson & Juanita Hopson	Claim Number:	4A2601RR261-0001
Jurisdiction:	WA	Date Prepared:	01/26/2026
Amazon Matter Number:	COM1202223	Claimant Age:	Unknown
Date of Loss:	05/06/2024	Claim Type:	BI
Client Name:	Amazon.com	Claims Examiner:	Erin Ficken
State of Loss:	CA	Location of Loss:	Riverside County
Date Claim Reported:	01/26/2026	Docket Number:	CVRI2507148
Opposing Counsel: (Name, Address, Phone)	John C. Carpenter, Esq. 8827 West Olympic Boulevard BEVERLY HILLS, CA 90211	Amazon Paralegal:	TBD
Amazon In House Attorney:	TBD		

Please find enclosed a copy of the pertinent file material in the above captioned matter. This matter is to be handled according to the Amazon Litigation Management Guidelines. If you require a copy of those Guidelines, please contact me immediately. In no event will you be reimbursed for any work that is not approved in accordance with those Guidelines.

If you have not already done so, please e-mail your acknowledgment of receipt of this suit within 24 hours. Please contact me within 5 days to discuss the assignment and to establish your Initial Case Evaluation. Please also place any appropriate state agencies on notice of your representation in this matter.

Nature of Assignment:

Please review the complaint and confirm the service and venue is proper. Please prepare an answer on Amazon's behalf to protect their interests. This is a first notice suit, and we have no file materials. We would like you to take on this new assignment after conflicts have cleared. Once cleared, please confirm Amazon was properly served. If so, please respond to the complaint to protect Amazon's interests.

Description of Accident, Facts & Investigation:

In or around May 6, 2024, after regularly consuming the Prevagen supplement in its directed course, Plaintiff Stevenson Hopson suddenly experienced a severe transient cerebral ischemic attack while with his wife.



Description of Damages/ Injury:**Amazon Legal Special Handling Requests:**

- Emails should contain a quick statement at the beginning calling out any necessary actions and deadlines.
- Email should be used when conveying requests or brief explanations.
- Lengthy analysis or memos should not be conveyed in the body of an email, but rather the executive summary and recommendation with memo attached. Do not conduct lengthy analysis unless directed by Amazon
- Always include Amazon's In-house Counsel and Paralegal as well as the adjuster on communications
- A proper subject line should always be used (as outlined below). Please always use the appropriate thread or begin a new thread when in doubt
 - Matter Name (Amazon Matter Number) | Sedgwick Claim Number | Subject of Email | PRIVILEGED & CONFIDENTIAL
 - Ex: Juanita Hopson v. Amazon | Sedgwick Claim # 4A2601RR261-0001 | Scheduling of Custodian Interviews | PRIVILEGED & CONFIDENTIAL
- All documents to be filed in Court require Amazon Legal review and approval. A minimum of 3 days lead time is required for this review process. Amazon Legal will copy Sedgwick on documents approved and filed
- Expert retention and dispositive motions must be approved by Amazon GRMC and Amazon Legal

Tender/Third Party Liability:**Budget:**

Please provide, within 30 business days, a proposed budget of legal fees and expenses. Your budget should contain two components:

1. Six Month Estimate of Fees & Expenses:
2. Estimated Fees & Expenses up to, but not including, Trial:

Your budget should provide some breakdown of expected activities, i.e., discovery, correspondence, motions, etc. or they may use the ABA's UTBMS activity codes.

Any and all legal correspondence requiring attention by the examiner, including those originating from applicant's attorney or your office including but not limited to awards, carbon copies, analysis, reviews, recommendations, and deposition summaries shall be emailed to Sedgwick at Amazonlegal@sedgwickcms.com utilizing the subject line outlined above. There are no exceptions. All correspondence shall have the claimant's name, date of loss, client name and claim number clearly marked. Any penalty as a result of Sedgwick not acting on correspondence due to it not being mailed and/or emailed will be the responsibility of your firm.

Legal invoices should be forwarded to adminamazon@sedgwick.com for processing. Invoices can be submitted via PDF files or Word documents. Please utilize the subject line outlined above.

All law firm billings must be sent monthly to Quovant via upload to Quovant's secure website www.quovant.com. Invoices can be submitted via PDF files, LEDES files, Text, or Word documents. Please contact lawfirmssupport@quovant.com or call (615) 661-5570 or (877) 534-2455 (toll free) with any questions regarding the submission of invoices.



If you have any questions, please contact me immediately.

Sedgwick manages claims on behalf of Amazon.com, INC..

We value your privacy. For more on what personal information we may collect, how we may use this information and other important areas relating to your privacy and data protection, please read our privacy notice www.sedgwick.com.

Very Truly Yours,

Erin Ficken
Claims Examiner - Liability
Sedgwick Claims Management Inc.
(844)693-0335
Erin.Ficken@Sedgwick.com
www.sedgwick.com | Caring counts®



SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

NOTICE OF DEPARTMENT ASSIGNMENT

The above entitled case is assigned to the Honorable O.G. Magno in Department 7 for All Purposes.

Any disqualification pursuant to CCP section 170.6 shall be filed in accordance with that section.

The court follows California Rules of Court, Rule 3.1308(a)(1) for tentative rulings (see Riverside Superior Court Local Rule 3316). Tentative Rulings for each law and motion matter are posted on the internet by 3:00 p.m. on the court day immediately before the hearing at <http://riverside.courts.ca.gov/tentativerulings.shtml>. If you do not have internet access, you may obtain the tentative ruling by telephone at (760) 904-5722.

To request oral argument, you must (1) notify the judicial secretary at (760) 904-5722 and (2) inform all other parties, no later than 4:30 p.m. the court day before the hearing. If no request for oral argument is made by 4:30 p.m., the tentative ruling will become the final ruling on the matter effective the date of the hearing.

The filing party shall serve a copy of this notice on all parties.

	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

Dated: 01/15/2026

JASON B. GALKIN,
Court Executive Officer/Clerk of the Court

by: 

J. Blackwell, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

ALINA S. VULIC
8827 WEST OLYMPIC BOULEVARD
Beverly Hills, CA 90211

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-766-6465 #

Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

JUANITA HOPSON

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

STEVENSON HOPSON

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

PREVAGEN, INC.

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

AMAZON.COM SALES

NOTICE OF CASE MANAGEMENT CONFERENCE

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Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

GNC HOLDINGS, LLC

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

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Notice has been printed for the following Firm/Attorneys or Parties: CVRI2507148

VULIC, ALINA S.
8827 WEST OLYMPIC BOULEVARD
Beverly Hills, CA 90211

HOPSON, JUANITA

PREVAGEN, INC.

HOPSON, STEVENSON

GNC HOLDINGS, LLC

AMAZON.COM SALES

Electronically FILED by Superior Court of California, County of Riverside on 12/18/2025 10:42 AM
Case Number CVRI2507148 0000151543478 - Jason B. Galkin, Executive Officer/Clerk of the Court By Janelle Blackwell, Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

☐ BANNING 311 E. Ramsey St., Banning, CA 92220
☐ BLYTHE 265 N. Broadway, Blythe, CA 92225
☐ CORONA 505 S. Buena Vista, Rm. 201, Corona, CA 92882
☐ MENIFEE 27401 Menifee Center Dr., Menifee, CA 92584

☐ MORENO VALLEY 13800 Heacock St., Ste. D201, Moreno Valley, CA 92553
☐ MURRIETA 30755-D Auld Rd., Suite 1226, Murrieta, CA 92563
☐ PALM SPRINGS 3255 E. Tahquitz Canyon Way, Palm Springs, CA 92262
☒ RIVERSIDE 4050 Main St., Riverside, CA 92501

RI-CI032

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address) John C. Carpenter, Esq./ Alina S. Vulic, Esq. SBN: 155610 / 337080 Carpenter & Zuckerman 8827 W. Olympic Blvd., Beverly Hills, CA 90211 TELEPHONE NO: (310) 273-1230 FAX NO. (Optional): (310) 858-1063 E-MAIL ADDRESS (Optional): teamcarpenter@cz.law ATTORNEY FOR (Name): Juanita Hopson, et al.	FOR COURT USE ONLY CASE NUMBER: CVRI 2507148
PLAINTIFF/PETITIONER: Juanita Hopson, et al. DEFENDANT/RESPONDENT: PREVAGEN, INC., et al.	
CERTIFICATE OF COUNSEL	

The undersigned certifies that this matter should be tried or heard in the court identified above for the reasons specified below:

☒ The action arose in the zip code of: 92880

☐ The action concerns real property located in the zip code of: _____

☐ The Defendant resides in the zip code of: _____

For more information on where actions should be filed in the Riverside County Superior Courts, please refer to Local Rule 3115 at www.riverside.courts.ca.gov.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date December 18, 2025

John C. Carpenter, Esq./ Alina S. Vulic, Esq.
 (TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY MAKING DECLARATION)

▶ 
 (SIGNATURE)

CIV-050

PLAINTIFF: Juanita Hopson, et al.
 DEFENDANT: PREVAGEN, INC., et al.

CASE NUMBER: CVRJ2507148

PROOF OF SERVICE

(After having the other party served as described below, with any of the documents identified in item 1, have the person who served the documents complete this Proof of Service. Plaintiff cannot serve these papers.)

1. I served the

- a. ☐ Statement of Damages ☐ Other (specify):
- b. on (name): AMAZON.COM SALES, INC., a Delaware Corporation
- c. by serving ☐ defendant ☐ other (name and title or relationship to person served):
- d. ☐ by delivery ☐ at home ☐ at business
- (1) date:
- (2) time:
- (3) address:
- e. ☐ by mailing
- (1) date:
- (2) place:

2. Manner of service (check proper box):

- a. ☐ **Personal service.** By personally delivering copies. (Code Civ. Proc., § 415.10.)
- b. ☐ **Substituted service on corporation, unincorporated association (including partnership), or public entity.** By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(a).)
- c. ☐ **Substituted service on natural person, minor, conservatee, or candidate.** By leaving copies at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household or a person apparently in charge of the office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(b).) (Attach separate declaration or affidavit stating acts relied on to establish reasonable diligence in first attempting personal service.)
- d. ☐ **Mail and acknowledgment service.** By mailing (by first-class mail or airmail, postage prepaid) copies to the person served, together with two copies of the form of notice and acknowledgment and a return envelope, postage prepaid, addressed to the sender. (Code Civ. Proc., § 415.30.) (Attach completed acknowledgment of receipt.)
- e. ☐ **Certified or registered mail service.** By mailing to an address outside California (by first-class mail, postage prepaid, requiring a return receipt) copies to the person served. (Code Civ. Proc., § 415.40.) (Attach signed return receipt or other evidence of actual delivery to the person served.)
- f. ☐ Other (specify code section):
- ☐ additional page is attached.

3. At the time of service I was at least 18 years of age and not a party to this action.

4. Fee for service: \$

5. Person serving:

- a. ☐ California sheriff, marshal, or constable
- b. ☐ Registered California process server
- c. ☐ Employee or independent contractor of a registered California process server
- d. ☐ Not a registered California process server
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, and telephone number and, if applicable, county of registration and number:

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

(For California sheriff, marshal, or constable use only)
 I certify that the foregoing is true and correct.

Date:

Date:



(SIGNATURE)



(SIGNATURE)

- DO NOT FILE WITH THE COURT -**CIV-050****- UNLESS YOU ARE APPLYING FOR A DEFAULT JUDGMENT UNDER CODE OF CIVIL PROCEDURE § 585 -**

ATTORNEY OR PARTY WITHOUT ATTORNEY (<i>Name and Address</i>): John C. Carpenter, Esq./ Alina S. Vulic, Esq. Carpenter & Zuckerman 8827 W. Olympic Blvd., Beverly Hills, CA 90211 fax number: (310) 858-1063 email: teamcarpenter@cz.law ATTORNEY FOR (<i>name</i>): Juanita Hopson, et al.		TELEPHONE NO.: (310) 273-1230 SBN: 155610 / 337080	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside, 92501 BRANCH NAME: Riverside Historic Courthouse			
PLAINTIFF: Juanita Hopson, et al. DEFENDANT: PREVAGEN, INC., et al.			
STATEMENT OF DAMAGES (Personal Injury or Wrongful Death)		CASE NUMBER: CVRI2507148	

To (*name of one defendant only*): GNC HOLDINGS, LLC, a limited liability CompanyPlaintiff (*name of one plaintiff only*): JUANITA HOPSON, an individual

seeks damages in the above-entitled action, as follows:

- | | AMOUNT |
|---|------------------|
| 1. General damages | |
| a. ☒ Pain, suffering, and inconvenience | \$ 10,000,000.00 |
| b. ☒ Emotional distress | \$ 10,000,000.00 |
| c. ☐ Loss of consortium | \$ |
| d. ☐ Loss of society and companionship (<i>wrongful death actions only</i>) | \$ |
| e. ☐ Other (<i>specify</i>) | \$ |
| f. ☐ Other (<i>specify</i>) | \$ |
| g. ☐ Continued on Attachment 1.g. | |
| 2. Special damages | |
| a. ☒ Medical expenses (<i>to date</i>) | \$ 5,000,000.00 |
| b. ☒ Future medical expenses (<i>present value</i>) | \$ 5,000,000.00 |
| c. ☐ Loss of earnings (<i>to date</i>) | \$ |
| d. ☐ Loss of future earning capacity (<i>present value</i>) | \$ |
| e. ☐ Property damage | \$ |
| f. ☐ Funeral expenses (<i>wrongful death actions only</i>) | \$ |
| g. ☐ Future contributions (<i>present value</i>) (<i>wrongful death actions only</i>) | \$ |
| h. ☐ Value of personal service, advice, or training (<i>wrongful death actions only</i>) | \$ |
| i. ☐ Other (<i>specify</i>) | \$ |
| j. ☐ Other (<i>specify</i>) | \$ |
| k. ☐ Continued on Attachment 2.k. | |
| 3. ☒ Punitive damages: Plaintiff reserves the right to seek punitive damages in the amount of (<i>specify</i>).. \$ <u>According to Proof</u>
when pursuing a judgment in the suit filed against you. | |

Date: January 20, 2026

John C. Carpenter, Esq./ Alina S. Vulic, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

(Proof of service on reverse)

Page 1 of 2

CIV-050

PLAINTIFF: Juanita Hopson, et al.
 DEFENDANT: PREVAGEN, INC., et al.

CASE NUMBER: CVRI2507148

PROOF OF SERVICE

(After having the other party served as described below, with any of the documents identified in item 1, have the person who served the documents complete this Proof of Service. Plaintiff cannot serve these papers.)

1. I served the

- a. ☐ Statement of Damages ☐ Other (specify):
- b. on (name): GNC HOLDINGS, LLC, a limited liability Company
- c. by serving ☐ defendant ☐ other (name and title or relationship to person served):
- d. ☐ by delivery ☐ at home ☐ at business
- (1) date:
- (2) time:
- (3) address:
- e. ☐ by mailing
- (1) date:
- (2) place:

2. Manner of service (check proper box):

- a. ☐ **Personal service.** By personally delivering copies. (Code Civ. Proc., § 415.10.)
- b. ☐ **Substituted service on corporation, unincorporated association (including partnership), or public entity.** By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(a).)
- c. ☐ **Substituted service on natural person, minor, conservatee, or candidate.** By leaving copies at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household or a person apparently in charge of the office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(b).) **(Attach separate declaration or affidavit stating acts relied on to establish reasonable diligence in first attempting personal service.)**
- d. ☐ **Mail and acknowledgment service.** By mailing (by first-class mail or airmail, postage prepaid) copies to the person served, together with two copies of the form of notice and acknowledgment and a return envelope, postage prepaid, addressed to the sender. (Code Civ. Proc., § 415.30.) **(Attach completed acknowledgment of receipt.)**
- e. ☐ **Certified or registered mail service.** By mailing to an address outside California (by first-class mail, postage prepaid, requiring a return receipt) copies to the person served. (Code Civ. Proc., § 415.40.) **(Attach signed return receipt or other evidence of actual delivery to the person served.)**
- f. ☐ **Other (specify code section):**
- ☐ additional page is attached.

3. At the time of service I was at least 18 years of age and not a party to this action.

4. Fee for service: \$

5. Person serving:

- a. ☐ California sheriff, marshal, or constable
- b. ☐ Registered California process server
- c. ☐ Employee or independent contractor of a registered California process server
- d. ☐ Not a registered California process server
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, and telephone number and, if applicable, county of registration and number:

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

(For California sheriff, marshal, or constable use only)
 I certify that the foregoing is true and correct.

Date:

Date:



(SIGNATURE)



(SIGNATURE)

CIV-050

- DO NOT FILE WITH THE COURT -**- UNLESS YOU ARE APPLYING FOR A DEFAULT JUDGMENT UNDER CODE OF CIVIL PROCEDURE § 585 -**

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): John C. Carpenter, Esq./ Alina S. Vulic, Esq. Carpenter & Zuckerman 8827 W. Olympic Blvd., Beverly Hills, CA 90211 fax number: (310) 858-1063 email: teamcarpenter@cz.law ATTORNEY FOR (name): Juanita Hopson, et al.		TELEPHONE NO.: (310) 273-1230 SBN: 155610 / 337080	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside, 92501 BRANCH NAME: Riverside Historic Courthouse			
PLAINTIFF: Juanita Hopson, et al. DEFENDANT: PREVAGEN, INC., et al.			
STATEMENT OF DAMAGES (Personal Injury or Wrongful Death)		CASE NUMBER: CVRI2507148	

To (name of one defendant only): PREVAGEN, INC., a Wisconsin corporation

Plaintiff (name of one plaintiff only): JUANITA HOPSON, an individual

seeks damages in the above-entitled action, as follows:

- | | AMOUNT |
|--|------------------|
| 1. General damages | |
| a. ☒ Pain, suffering, and inconvenience | \$ 10,000,000.00 |
| b. ☒ Emotional distress. | \$ 10,000,000.00 |
| c. ☐ Loss of consortium | \$ |
| d. ☐ Loss of society and companionship (wrongful death actions only) | \$ |
| e. ☐ Other (specify) | \$ |
| f. ☐ Other (specify) | \$ |
| g. ☐ Continued on Attachment 1.g. | |
| 2. Special damages | |
| a. ☒ Medical expenses (to date) | \$ 5,000,000.00 |
| b. ☒ Future medical expenses (present value) | \$ 5,000,000.00 |
| c. ☐ Loss of earnings (to date) | \$ |
| d. ☐ Loss of future earning capacity (present value) | \$ |
| e. ☐ Property damage | \$ |
| f. ☐ Funeral expenses (wrongful death actions only) | \$ |
| g. ☐ Future contributions (present value) (wrongful death actions only) | \$ |
| h. ☐ Value of personal service, advice, or training (wrongful death actions only) | \$ |
| i. ☐ Other (specify) | \$ |
| j. ☐ Other (specify) | \$ |
| k. ☐ Continued on Attachment 2.k. | |
| 3. ☒ Punitive damages: Plaintiff reserves the right to seek punitive damages in the amount of (specify).. \$ <u>According to Proof</u>
when pursuing a judgment in the suit filed against you. | |

Date: January 20, 2026

John C. Carpenter, Esq./ Alina S. Vulic, Esq.
(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

(Proof of service on reverse)

Page 1 of 2

CIV-050

PLAINTIFF: Juanita Hopson, et al.
 DEFENDANT: PREVAGEN, INC., et al.

CASE NUMBER: CVRI2507148

PROOF OF SERVICE

(After having the other party served as described below, with any of the documents identified in item 1, have the person who served the documents complete this Proof of Service. Plaintiff cannot serve these papers.)

1. I served the

- a. ☐ Statement of Damages ☐ Other (specify):
- b. on (name): PREVAGEN, INC., a Wisconsin corporation
- c. by serving ☐ defendant ☐ other (name and title or relationship to person served):
- d. ☐ by delivery ☐ at home ☐ at business
 (1) date:
 (2) time:
 (3) address:
- e. ☐ by mailing
 (1) date:
 (2) place:

2. Manner of service (check proper box):

- a. ☐ **Personal service.** By personally delivering copies. (Code Civ. Proc., § 415.10.)
- b. ☐ **Substituted service on corporation, unincorporated association (including partnership), or public entity.** By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(a).)
- c. ☐ **Substituted service on natural person, minor, conservatee, or candidate.** By leaving copies at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household or a person apparently in charge of the office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(b).) (Attach separate declaration or affidavit stating acts relied on to establish reasonable diligence in first attempting personal service.)
- d. ☐ **Mail and acknowledgment service.** By mailing (by first-class mail or airmail, postage prepaid) copies to the person served, together with two copies of the form of notice and acknowledgment and a return envelope, postage prepaid, addressed to the sender. (Code Civ. Proc., § 415.30.) (Attach completed acknowledgment of receipt.)
- e. ☐ **Certified or registered mail service.** By mailing to an address outside California (by first-class mail, postage prepaid, requiring a return receipt) copies to the person served. (Code Civ. Proc., § 415.40.) (Attach signed return receipt or other evidence of actual delivery to the person served.)
- f. ☐ Other (specify code section):
☐ additional page is attached.

3. At the time of service I was at least 18 years of age and not a party to this action.

4. Fee for service: \$

5. Person serving:

- a. ☐ California sheriff, marshal, or constable
- b. ☐ Registered California process server
- c. ☐ Employee or independent contractor of a registered California process server
- d. ☐ Not a registered California process server
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, and telephone number and, if applicable, county of registration and number:

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

(For California sheriff, marshal, or constable use only)
 I certify that the foregoing is true and correct.

Date:

Date:



(SIGNATURE)



(SIGNATURE)

- DO NOT FILE WITH THE COURT -**CIV-050****- UNLESS YOU ARE APPLYING FOR A DEFAULT JUDGMENT UNDER CODE OF CIVIL PROCEDURE § 585 -**

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): John C. Carpenter, Esq./ Alina S. Vulic, Esq. Carpenter & Zuckerman 8827 W. Olympic Blvd., Beverly Hills, CA 90211 fax number: (310) 858-1063 email: teamcarpenter@cz.law ATTORNEY FOR (name): Juanita Hopson, et al.		TELEPHONE NO.: (310) 273-1230 SBN: 155610 / 337080	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside, 92501 BRANCH NAME: Riverside Historic Courthouse			
PLAINTIFF: Juanita Hopson, et al. DEFENDANT: PREVAGEN, INC., et al.			
STATEMENT OF DAMAGES (Personal Injury or Wrongful Death)		CASE NUMBER: CVRI2507148	

To (name of one defendant only): AMAZON.COM SALES, INC., a Delaware Corporation

Plaintiff (name of one plaintiff only): STEVENSON HOPSON, an individual
seeks damages in the above-entitled action, as follows:**1. General damages**

AMOUNT

- a. ☒ Pain, suffering, and inconvenience \$ 10,000,000.00
- b. ☒ Emotional distress \$ 10,000,000.00
- c. ☐ Loss of consortium \$
- d. ☐ Loss of society and companionship (wrongful death actions only) \$
- e. ☐ Other (specify) \$
- f. ☐ Other (specify) \$
- g. ☐ Continued on Attachment 1.g.

2. Special damages

- a. ☒ Medical expenses (to date) \$ 5,000,000.00
- b. ☒ Future medical expenses (present value) \$ 5,000,000.00
- c. ☐ Loss of earnings (to date) \$
- d. ☐ Loss of future earning capacity (present value) \$
- e. ☐ Property damage \$
- f. ☐ Funeral expenses (wrongful death actions only) \$
- g. ☐ Future contributions (present value) (wrongful death actions only) \$
- h. ☐ Value of personal service, advice, or training (wrongful death actions only) \$
- i. ☐ Other (specify) \$
- j. ☐ Other (specify) \$
- k. ☐ Continued on Attachment 2.k.

3. ☒ **Punitive damages:** Plaintiff reserves the right to seek punitive damages in the amount of (specify).. \$ According to Proof when pursuing a judgment in the suit filed against you.

Date: January 20, 2026

John C. Carpenter, Esq./ Alina S. Vulic, Esq.
(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

(Proof of service on reverse)

Page 1 of 2

CIV-050

PLAINTIFF: Juanita Hopson, et al.
 DEFENDANT: PREVAGEN, INC., et al.

CASE NUMBER: CVRI2507148

PROOF OF SERVICE

(After having the other party served as described below, with any of the documents identified in item 1, have the person who served the documents complete this Proof of Service. Plaintiff cannot serve these papers.)

1. I served the

- a. ☐ Statement of Damages ☐ Other (specify):
- b. on (name): AMAZON.COM SALES, INC., a Delaware Corporation
- c. by serving ☐ defendant ☐ other (name and title or relationship to person served):
- d. ☐ by delivery ☐ at home ☐ at business
 (1) date:
 (2) time:
 (3) address:
- e. ☐ by mailing
 (1) date:
 (2) place:

2. Manner of service (check proper box):

- a. ☐ **Personal service.** By personally delivering copies. (Code Civ. Proc., § 415.10.)
- b. ☐ **Substituted service on corporation, unincorporated association (including partnership), or public entity.** By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(a).)
- c. ☐ **Substituted service on natural person, minor, conservatee, or candidate.** By leaving copies at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household or a person apparently in charge of the office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(b).) **(Attach separate declaration or affidavit stating acts relied on to establish reasonable diligence in first attempting personal service.)**
- d. ☐ **Mail and acknowledgment service.** By mailing (by first-class mail or airmail, postage prepaid) copies to the person served, together with two copies of the form of notice and acknowledgment and a return envelope, postage prepaid, addressed to the sender. (Code Civ. Proc., § 415.30.) **(Attach completed acknowledgment of receipt.)**
- e. ☐ **Certified or registered mail service.** By mailing to an address outside California (by first-class mail, postage prepaid, requiring a return receipt) copies to the person served. (Code Civ. Proc., § 415.40.) **(Attach signed return receipt or other evidence of actual delivery to the person served.)**
- f. ☐ **Other (specify code section):**
☐ additional page is attached.

3. At the time of service I was at least 18 years of age and not a party to this action.

4. Fee for service: \$

5. Person serving:

- a. ☐ California sheriff, marshal, or constable
- b. ☐ Registered California process server
- c. ☐ Employee or independent contractor of a registered California process server
- d. ☐ Not a registered California process server
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, and telephone number and, if applicable, county of registration and number:

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

(For California sheriff, marshal, or constable use only)
 I certify that the foregoing is true and correct.

Date:

Date:



(SIGNATURE)



(SIGNATURE)

- DO NOT FILE WITH THE COURT -

CIV-050

- UNLESS YOU ARE APPLYING FOR A DEFAULT JUDGMENT UNDER CODE OF CIVIL PROCEDURE § 585 -

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): John C. Carpenter, Esq./ Alina S. Vulic, Esq. Carpenter & Zuckerman 8827 W. Olympic Blvd., Beverly Hills, CA 90211 fax number: (310) 858-1063 email: teamcarpenter@cz.law ATTORNEY FOR (name): Juanita Hopson, et al.		TELEPHONE NO.: (310) 273-1230 SBN: 155610 / 337080	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside, 92501 BRANCH NAME: Riverside Historic Courthouse			
PLAINTIFF: Juanita Hopson, et al. DEFENDANT: PREVAGEN, INC., et al.			
STATEMENT OF DAMAGES (Personal Injury or Wrongful Death)		CASE NUMBER: CVRJ2507148	

To (name of one defendant only): GNC HOLDINGS, LLC, a limited liability Company

Plaintiff (name of one plaintiff only): STEVENSON HOPSON, an individual
seeks damages in the above-entitled action, as follows:

- | | AMOUNT |
|--|-----------------------|
| 1. General damages | |
| a. ☒ Pain, suffering, and inconvenience | \$ 10,000,000.00 |
| b. ☒ Emotional distress | \$ 10,000,000.00 |
| c. ☐ Loss of consortium | \$ |
| d. ☐ Loss of society and companionship (wrongful death actions only) | \$ |
| e. ☐ Other (specify) | \$ |
| f. ☐ Other (specify) | \$ |
| g. ☐ Continued on Attachment 1.g. | |
| 2. Special damages | |
| a. ☒ Medical expenses (to date) | \$ 5,000,000.00 |
| b. ☒ Future medical expenses (present value) | \$ 5,000,000.00 |
| c. ☐ Loss of earnings (to date) | \$ |
| d. ☐ Loss of future earning capacity (present value) | \$ |
| e. ☐ Property damage | \$ |
| f. ☐ Funeral expenses (wrongful death actions only) | \$ |
| g. ☐ Future contributions (present value) (wrongful death actions only) | \$ |
| h. ☐ Value of personal service, advice, or training (wrongful death actions only) | \$ |
| i. ☐ Other (specify) | \$ |
| j. ☐ Other (specify) | \$ |
| k. ☐ Continued on Attachment 2.k. | |
| 3. ☒ Punitive damages: Plaintiff reserves the right to seek punitive damages in the amount of (specify).. | \$ According to Proof |
| when pursuing a judgment in the suit filed against you. | |

Date: January 20, 2026

John C. Carpenter, Esq./ Alina S. Vulic, Esq.
(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

(Proof of service on reverse)

Page 1 of 2

CIV-050

PLAINTIFF: Juanita Hopson, et al.
 DEFENDANT: PREVAGEN, INC., et al.

CASE NUMBER: CVRI2507148

PROOF OF SERVICE

(After having the other party served as described below, with any of the documents identified in item 1, have the person who served the documents complete this Proof of Service. Plaintiff cannot serve these papers.)

1. I served the

- a. ☐ Statement of Damages ☐ Other (specify):
- b. on (name): GNC HOLDINGS, LLC, a limited liability Company
- c. by serving ☐ defendant ☐ other (name and title or relationship to person served):
- d. ☐ by delivery ☐ at home ☐ at business
 (1) date:
 (2) time:
 (3) address:
- e. ☐ by mailing
 (1) date:
 (2) place:

2. Manner of service (check proper box):

- a. ☐ **Personal service.** By personally delivering copies. (Code Civ. Proc., § 415.10.)
- b. ☐ **Substituted service on corporation, unincorporated association (including partnership), or public entity.** By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(a).)
- c. ☐ **Substituted service on natural person, minor, conservatee, or candidate.** By leaving copies at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household or a person apparently in charge of the office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(b).) (Attach separate declaration or affidavit stating acts relied on to establish reasonable diligence in first attempting personal service.)
- d. ☐ **Mail and acknowledgment service.** By mailing (by first-class mail or airmail, postage prepaid) copies to the person served, together with two copies of the form of notice and acknowledgment and a return envelope, postage prepaid, addressed to the sender. (Code Civ. Proc., § 415.30.) (Attach completed acknowledgment of receipt.)
- e. ☐ **Certified or registered mail service.** By mailing to an address outside California (by first-class mail, postage prepaid, requiring a return receipt) copies to the person served. (Code Civ. Proc., § 415.40.) (Attach signed return receipt or other evidence of actual delivery to the person served.)
- f. ☐ **Other (specify code section):**
☐ additional page is attached.

3. At the time of service I was at least 18 years of age and not a party to this action.

4. Fee for service: \$

5. Person serving:

- a. ☐ California sheriff, marshal, or constable
- b. ☐ Registered California process server
- c. ☐ Employee or independent contractor of a registered California process server
- d. ☐ Not a registered California process server
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, and telephone number and, if applicable, county of registration and number:

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

(For California sheriff, marshal, or constable use only)
 I certify that the foregoing is true and correct.

Date:

Date:



(SIGNATURE)



(SIGNATURE)

CIV-050

- DO NOT FILE WITH THE COURT -**- UNLESS YOU ARE APPLYING FOR A DEFAULT JUDGMENT UNDER CODE OF CIVIL PROCEDURE § 585 -**

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): John C. Carpenter, Esq./ Alina S. Vulic, Esq. Carpenter & Zuckerman 8827 W. Olympic Blvd., Beverly Hills, CA 90211 fax number: (310) 858-1063 email: teamcarpenter@cz.law ATTORNEY FOR (name): Juanita Hopson, et al.		TELEPHONE NO.: (310) 273-1230 SBN: 155610 / 337080	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside, 92501 BRANCH NAME: Riverside Historic Courthouse			
PLAINTIFF: Juanita Hopson, et al. DEFENDANT: PREVAGEN, INC., et al.			
STATEMENT OF DAMAGES (Personal Injury or Wrongful Death)		CASE NUMBER: CVRI2507148	

To (name of one defendant only): PREVAGEN, INC., a Wisconsin corporation

Plaintiff (name of one plaintiff only): STEVENSON HOPSON, an individual
seeks damages in the above-entitled action, as follows:**1. General damages**

AMOUNT

- a. ☒ Pain, suffering, and inconvenience \$ 10,000,000.00
- b. ☒ Emotional distress \$ 10,000,000.00
- c. ☐ Loss of consortium \$ _____
- d. ☐ Loss of society and companionship (wrongful death actions only) \$ _____
- e. ☐ Other (specify) \$ _____
- f. ☐ Other (specify) \$ _____
- g. ☐ Continued on Attachment 1.g.

2. Special damages

- a. ☒ Medical expenses (to date) \$ 5,000,000.00
- b. ☒ Future medical expenses (present value) \$ 5,000,000.00
- c. ☐ Loss of earnings (to date) \$ _____
- d. ☐ Loss of future earning capacity (present value) \$ _____
- e. ☐ Property damage \$ _____
- f. ☐ Funeral expenses (wrongful death actions only) \$ _____
- g. ☐ Future contributions (present value) (wrongful death actions only) \$ _____
- h. ☐ Value of personal service, advice, or training (wrongful death actions only) \$ _____
- i. ☐ Other (specify) \$ _____
- j. ☐ Other (specify) \$ _____
- k. ☐ Continued on Attachment 2.k.

3. ☒ **Punitive damages:** Plaintiff reserves the right to seek punitive damages in the amount of (specify).. \$ According to Proof
when pursuing a judgment in the suit filed against you.

Date: January 20, 2026

John C. Carpenter, Esq./ Alina S. Vulic, Esq.
(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

(Proof of service on reverse)

Page 1 of 2

CIV-050

PLAINTIFF: Juanita Hopson, et al.
 DEFENDANT: PREVAGEN, INC., et al.

CASE NUMBER: CVRI2507148

PROOF OF SERVICE

(After having the other party served as described below, with any of the documents identified in item 1, have the person who served the documents complete this Proof of Service. Plaintiff cannot serve these papers.)

1. I served the

- a. ☐ Statement of Damages ☐ Other (specify):
- b. on (name): PREVAGEN, INC., a Wisconsin corporation
- c. by serving ☐ defendant ☐ other (name and title or relationship to person served):
- d. ☐ by delivery ☐ at home ☐ at business
- (1) date:
- (2) time:
- (3) address:
- e. ☐ by mailing
- (1) date:
- (2) place:

2. Manner of service (check proper box):

- a. ☐ **Personal service.** By personally delivering copies. (Code Civ. Proc., § 415.10.)
- b. ☐ **Substituted service on corporation, unincorporated association (including partnership), or public entity.** By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(a).)
- c. ☐ **Substituted service on natural person, minor, conservatee, or candidate.** By leaving copies at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household or a person apparently in charge of the office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (Code Civ. Proc., § 415.20(b).) (Attach separate declaration or affidavit stating acts relied on to establish reasonable diligence in first attempting personal service.)
- d. ☐ **Mail and acknowledgment service.** By mailing (by first-class mail or airmail, postage prepaid) copies to the person served, together with two copies of the form of notice and acknowledgment and a return envelope, postage prepaid, addressed to the sender. (Code Civ. Proc., § 415.30.) (Attach completed acknowledgment of receipt.)
- e. ☐ **Certified or registered mail service.** By mailing to an address outside California (by first-class mail, postage prepaid, requiring a return receipt) copies to the person served. (Code Civ. Proc., § 415.40.) (Attach signed return receipt or other evidence of actual delivery to the person served.)
- f. ☐ Other (specify code section):
- ☐ additional page is attached.

3. At the time of service I was at least 18 years of age and not a party to this action.

4. Fee for service: \$

5. Person serving:

- a. ☐ California sheriff, marshal, or constable
- b. ☐ Registered California process server
- c. ☐ Employee or independent contractor of a registered California process server
- d. ☐ Not a registered California process server
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, and telephone number and, if applicable, county of registration and number:

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

(For California sheriff, marshal, or constable use only)
 I certify that the foregoing is true and correct.

Date:

Date:



(SIGNATURE)



(SIGNATURE)

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

ALINA S. VULIC
8827 WEST OLYMPIC BOULEVARD
Beverly Hills, CA 90211

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-766-6465 #
Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

JUANITA HOPSON

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-766-6465 #
Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

STEVENSON HOPSON

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-766-6465 #
Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

PREVAGEN, INC.

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

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	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

AMAZON.COM SALES

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

GNC HOLDINGS, LLC

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
07/14/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-766-6465 #
Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

Notice has been printed for the following Firm/Attorneys or Parties: CVRI2507148

VULIC, ALINA S.
8827 WEST OLYMPIC BOULEVARD
Beverly Hills, CA 90211

HOPSON, JUANITA

PREVAGEN, INC.

HOPSON, STEVENSON

GNC HOLDINGS, LLC

AMAZON.COM SALES

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

NOTICE OF DEPARTMENT ASSIGNMENT

The above entitled case is assigned to the Honorable O.G. Magno in Department 7 for All Purposes.

Any disqualification pursuant to CCP section 170.6 shall be filed in accordance with that section.

The court follows California Rules of Court, Rule 3.1308(a)(1) for tentative rulings (see Riverside Superior Court Local Rule 3316). Tentative Rulings for each law and motion matter are posted on the internet by 3:00 p.m. on the court day immediately before the hearing at <http://riverside.courts.ca.gov/tentativerulings.shtml>. If you do not have internet access, you may obtain the tentative ruling by telephone at (760) 904-5722.

To request oral argument, you must (1) notify the judicial secretary at (760) 904-5722 and (2) inform all other parties, no later than 4:30 p.m. the court day before the hearing. If no request for oral argument is made by 4:30 p.m., the tentative ruling will become the final ruling on the matter effective the date of the hearing.

The filing party shall serve a copy of this notice on all parties.

	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

Dated: 01/15/2026

JASON B. GALKIN,
Court Executive Officer/Clerk of the Court

by:



J. Blackwell, Deputy Clerk

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address)		FOR COURT USE ONLY	
Carpenter & Zuckerman 8827 West Olympic Boulevard Beverly Hills, CA 90211 TELEPHONE NO.: (310) 273-1230 FAX NO. (310) 858-1063 E-MAIL ADDRESS ATTORNEY FOR (Name): Defendant: Juanita Hopson, et al.		Electronically FILED by Superior Court of California, County of Riverside on 01/23/2026 02:19 PM Case Number CVRI2507148 0000155023163 - Jason B. Galkin, Executive Officer/Clerk of the Court By Kristen King, Clerk	
Riverside County Superior Court - Main Courthouse STREET ADDRESS: 4050 Main Street MAILING ADDRESS: CITY AND ZIP CODE: Riverside, CA 92501-3704 BRANCH NAME: Riverside - Main Civil and Probate			
PLAINTIFF: Juanita Hopson, an individual; Stevenson Hopson, an individual DEFENDANT: Prevagen, Inc., a Wisconsin corporation; Amazon.com Sales, Inc., a Delaware corporation; GNC Holdings, LLC, a limited liability Co			
PROOF OF SERVICE OF SUMMONS		CASE NUMBER: CVRI2507148 Ref. No. or File No.: Hopson. Juanita 12-25-23	

1. At the time of service I was at least 18 years of age and not a party to this action.

2. I served copies of:

- a. ☒ Summons
- b. ☒ Complaint
- c. ☐ Alternative Dispute Resolution (ADR) package
- d. ☒ Civil Case Cover Sheet
- e. ☐ Cross-complaint
- f. ☒ other (specify documents): **Notice of Department Assignment; Notice of Case Management Conference (6); Certificate of Counsel; Statement of Damages (6)**

3. a. Party served (specify name of party as shown on documents served):

GNC Holdings, LLC, a limited liability Company

- b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):

C T Corporation System, Inc., c/o Diana Ruiz - Registered Agent for Service of Process

Age: 30 Weight: 140 Hair: Black Sex: Female Height: 5'4" Eyes: Brown Race: Hispanic

4. Address where the party was served: **C T Corporation System, Inc.,**

330 N Brand Blvd

Glendale, CA 91203-2308

5. I served the party (check proper box)

- a. ☒ **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **1/22/2026** (2) at (time): **11:00 AM**

- b. ☐ **by substituted service.** On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):

(1) ☐ **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him of her of the general nature of the papers.

(2) ☐ **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.

(3) ☐ **(physical address unknown)** a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him of her of the general nature of the papers.

(4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.

(5) ☐ I attach a **declaration of diligence** stating actions taken first to attempt personal service.

PETITIONER: Juanita Hopson, an individual; Stevenson Hopson, an individual

CASE NUMBER

CVRI2507148

RESPONDENT: Prevagen, Inc., a Wisconsin corporation; Amazon.com Sales, Inc., a Delaware corporation; GNC Holdings, LLC, a limited liability Company and Does 1- 100, inclusive

- c. ☐ **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgement of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ **by other means** (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **GNC Holdings, LLC, a limited liability Company**
under the following Code of Civil Procedure section:

- | | |
|---|---|
| ☐ 416.10 (corporation) | ☐ 415.95 (business organization, form unknown) |
| ☐ 416.20 (defunct corporation) | ☐ 416.60 (minor) |
| ☐ 416.30 (joint stock company/association) | ☐ 416.70 (ward or conservatee) |
| ☒ 416.40 (association or partnership) | ☐ 416.90 (authorized person) |
| ☐ 416.50 (public entity) | ☐ 415.46 (occupant) |
| | ☐ other: |

7. **Person who served papers**

- a. Name: **Mark Simental - ON-CALL LEGAL**
- b. Address: **2476 Overland Avenue, Third Floor Los Angeles, CA 90064**
- c. Telephone number: **(310) 858-9800**
- d. **The fee** for service was: **\$ 146.58**
- e. I am:

- (1) ☐ not a registered California process server.
- (2) ☒ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:
- (i) ☐ owner ☐ employee ☒ independent contractor.
- (ii) Registration No.: **2018048510**
- (iii) County: **Los Angeles**



8. ☒ **I declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ **I am a California sheriff or marshal and** I certify that the foregoing is true and correct.

Date: **1/22/2026**

ON-CALL LEGAL
2476 Overland Avenue, Third Floor
Los Angeles, CA 90064
(310) 858-9800
www.OnCallLegal.com



Mark Simental

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): John C. Carpenter, Esq. SBN: 155610 Carpenter & Zuckerman 8827 West Olympic Boulevard Beverly Hills, CA 90211 TELEPHONE NO.: (310) 273-1230 FAX NO. (310) 858-1063 E-MAIL ADDRESS ATTORNEY FOR (Name): Plaintiff: Juanita Hopson, et al.		FOR COURT USE ONLY	
Riverside County Superior Court - Main Courthouse STREET ADDRESS: 4050 Main Street MAILING ADDRESS: Case Number CVRI2507148 000015537756 - Jason B. Galkin, Executive Officer/Clerk of the Court By Kristen King, Clerk CITY AND ZIP CODE: Riverside, CA 92501-3704 BRANCH NAME: Riverside - Main Civil and Probate		Electronically FILED by Superior Court of California, County of Riverside on 01/27/2026 05:27 PM	
PLAINTIFF: Juanita Hopson, an individual; Stevenson Hopson, an individual DEFENDANT: Prevagen, Inc., a Wisconsin corporation; Amazon.com Sales, Inc., a Delaware corporation; GNC Holdings, LLC, a limited liability Co		CASE NUMBER: CVRI2507148	
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.: Hopson. Juanita 12-25-23	

1. At the time of service I was at least 18 years of age and not a party to this action.

2. I served copies of:

- a. ☒ Summons
- b. ☒ Complaint
- c. ☐ Alternative Dispute Resolution (ADR) package
- d. ☒ Civil Case Cover Sheet
- e. ☐ Cross-complaint
- f. ☒ other (specify documents): Notice of Department Assignment; Notice of Case Management Conference (6); Certificate of Counsel; Statement of Damages (6)

3. a. Party served (specify name of party as shown on documents served):

Amazon.com Sales, Inc., a Delaware corporation

- b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):

CSC- Lawyers Incorporating Service, c/o Rebecca Vang - Registered Agent for Service of Process

Age: 35 Weight: 150 Hair: Black Sex: Female Height: 5'5" Eyes: Brown Race: Asian

4. Address where the party was served: **CSC- Lawyers Incorporating Service
2710 Gateway Oaks Dr
Sacramento, CA 95833-3505**

5. I served the party (check proper box)

- a. ☒ **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **1/22/2026** (2) at (time): **12:25 PM**
- b. ☐ **by substituted service.** On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
 - (1) ☐ **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) ☐ **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) ☐ **(physical address unknown)** a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
 - (5) ☐ I attach a **declaration of diligence** stating actions taken first to attempt personal service.

PETITIONER: Juanita Hopson, an individual; Stevenson Hopson, an individual

CASE NUMBER:

RESPONDENT: Prevagen, Inc., a Wisconsin corporation; Amazon.com Sales, Inc., a Delaware corporation; GNC Holdings, LLC, a limited liability Company and Does 1- 100, inclusive

CVRI2507148

- c. ☐ **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgement of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ **by other means** (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **Amazon.com Sales, Inc., a Delaware corporation**
under the following Code of Civil Procedure section:

- | | |
|---|---|
| ☒ 416.10 (corporation) | ☐ 415.95 (business organization, form unknown) |
| ☐ 416.20 (defunct corporation) | ☐ 416.60 (minor) |
| ☐ 416.30 (joint stock company/association) | ☐ 416.70 (ward or conservatee) |
| ☐ 416.40 (association or partnership) | ☐ 416.90 (authorized person) |
| ☐ 416.50 (public entity) | ☐ 415.46 (occupant) |
| | ☐ other: |

7. **Person who served papers**

- a. Name: **Robert J. Mason - ON-CALL LEGAL**
- b. Address: **2476 Overland Avenue, Third Floor Los Angeles, CA 90064**
- c. Telephone number: **(310) 858-9800**
- d. **The fee** for service was: **\$ 186.58**
- e. I am:

- (1) ☐ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:
- (i) ☐ owner ☐ employee ☒ independent contractor.
- (ii) Registration No.: **03-007**
- (iii) County: **Placer**



8. ☒ **I declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

or

9. ☐ **I am a California sheriff or marshal and** I certify that the foregoing is true and correct.

Date: **1/23/2026**

ON-CALL LEGAL
2476 Overland Avenue, Third Floor
Los Angeles, CA 90064
(310) 858-9800
www.OnCallLegal.com

Robert J. Mason

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)



Notice of Service of Process

null / ALL
Transmittal Number: 33157014
Date Processed: 01/23/2026

Primary Contact: Vivian Ching
Amazon.Com, Inc.
440 Terry Ave N
Seattle, WA 98109-5210

Electronic copy provided to: Lizette Fernandez
Lacy O'Block
Kimberly Thomas
Stephanie Habben
Lynn Foley-Jefferson
Marchand Waldal
Karen Curtis
Maria Catana
Theresa Nixon

Entity: Amazon.com Sales, Inc.
Entity ID Number 1934167

Entity Served: Amazon.com Sales, Inc.

Title of Action: Juanita Hopson vs. Prevagen, Inc.

Matter Name/ID: Juanita Hopson vs. Prevagen, Inc. (18510299)

Document(s) Type: Summons/Complaint

Nature of Action: Product Liability

Court/Agency: Riverside County Superior Court, CA

Case/Reference No: CVRI2507148

Jurisdiction Served: California

Date Served on CSC: 01/22/2026

Answer or Appearance Due: 30 Days

Originally Served On: CSC

How Served: Personal Service

Sender Information: Carpenter & Zuckerman
310-273-1230

Client Requested Information: Amazon Case Type: Lawsuit - Product Liability

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

Electronically FILED by Superior Court of California, County of Riverside on 02/09/2026 11:12 PM
Case Number CVRI2507148 0000156884535 - Jason B. Galkin, Executive Officer/Clerk of the Court By Kristen King, Clerk

John C. Carpenter, Esq. (SBN 155610)
carpenter@cz.law
Alina S. Vulic, Esq. (SBN 337080)
avulic@cz.law
CARPENTER & ZUCKERMAN
8827 West Olympic Boulevard
Beverly Hills, CA 90211
Telephone: 310-273-1230
Facsimile: 310-858-1063
teamcarpenter@cz.law

Attorneys for Plaintiffs

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE**

JUANITA HOPSON, an individual;
STEVENSON HOPSON, an individual,

Plaintiffs,

vs.

PREVAGEN, INC., a Wisconsin
corporation; AMAZON.COM SALES,
INC., a Delaware Corporation; GNC
HOLDINGS, LLC, a limited liability
Company and DOES 1-100, inclusive,

Defendants.

) Case No. CVRI2507148

) **FIRST AMENDED COMPLAINT FOR**
) **DAMAGES**

) **1. NEGLIGENCE**

) **2. STRICT PRODUCT LIABILITY**

) **3. FAILURE TO WARN/NEGLIGENT**
) **RECALL**

) **4. CONSUMER LEGAL REMEDIES**
) **ACT**

) **DEMAND FOR JURY TRIAL**

COMES NOW plaintiffs STEVENSON HOPSON, an individual, and JUANITA
HOPSON, an individual (hereinafter collectively referred to as "Plaintiffs") and alleges causes
of action against defendants PREVAGEN, INC., AMAZON.COM SALES, INC., GNC
HOLDINGS, LLC and DOES 1 through 100 (collectively referred to throughout portions of
this Complaint as "Defendants") inclusive for damages and injunctive relief.

I. INTRODUCTION

1. Plaintiff STEVENSON HOPSON is an adult, and his true name is used throughout this Complaint.

2. Plaintiff JUANITA HOPSON is an adult, and her true name is used throughout this Complaint.

3. In or around, December 25, 2023, Plaintiffs placed an order from the Prevagen Official Store on Amazon and on GNC Online for Prevagen, a supplement touted to improve the cognitive function of its consumer. These orders were fulfilled and shipped to Plaintiffs within the confines of the State of California.

4. On December 28, 2023, the Prevagen supplement, which was manufactured and sold by the defendants was fulfilled and shipped and delivered to the Plaintiffs at their California home.

5. Upon the supplement's arrival, 87-year-old Stevenson Hopson, and his wife Juanita Hopson used the supplement as directed and for its advertised purpose of "cognitive support."

6. In or around May 6, 2024, after regularly consuming the Prevagen supplement in its directed course, Plaintiff Stevenson Hopson suddenly experienced a severe transient cerebral ischemic attack while with his wife.

7. This episode caused confusion, blurred vision, garbled speech, and temporary loss of ability to speak, lasting approximately ten minutes. He subsequently suffered additional episodes of transient cerebral ischemia and partial seizures on May 7, 9, and 10, 2024, resulting in recurrent loss of consciousness, expressive aphasia, left arm weakness, confusion, and multiple emergency hospitalizations at Kaiser Permanente Downey and Anaheim.

8. These events led to permanent neurological injury, including partial epilepsy, abnormal EEG findings showing left temporal lobe abnormalities, and the need for anti-seizure medication (levetiracetam), ongoing neurological monitoring, and driving restrictions with mandatory reporting to the Department of Motor Vehicles.

9. At the same time and in that time frame, Plaintiff Juanita Hopson began to likewise experience symptoms of confusion, brain fog, excruciating headaches, irritation, memory loss, dizziness, cognitive dysregulation, neurological abnormalities, and other adverse effects as a result of her consumption of the dangerous and defective Prevagen supplements.

10. This action is brought against the Defendants to recover all damages to which Plaintiffs are entitled as a result of the severe injuries and damages Plaintiff sustained as set forth herein.

II. VENUE AND JURISDICTION

11. Jurisdiction and venue are proper in Superior Court, County of Riverside, in the State of California. The subject incident occurred in Riverside County. The products were shipped and orders fulfilled, by Defendants in the State of California and received in the County of Riverside. There is specific jurisdiction over all of the Defendants. Further, at all times relevant, Plaintiffs live and reside in Riverside County.

12. Defendants are subject to specific personal jurisdiction in this venue because they have continuous and systematic contacts with this District through their marketing efforts and services that target this venue and the State of California, and the exercise of personal jurisdiction over Defendants in this jurisdiction does not offend traditional notions of fair play or substantial justice.

13. Diversity jurisdiction, as is required in federal district court for a case of this nature, does not exist here. Diversity jurisdiction requires "complete diversity," which does not exist if any plaintiff is from the same State as any defendant as dictated under 28 U.S.C. § 1332.

14. Here, all Plaintiffs and at least one Defendant(s) are residents and/or otherwise hold their nexus in the State of California. Furthermore, none of the causes of action involved "substantial" questions of federal law under 28 U.S.C. § 1331. Therefore, there is neither complete diversity nor federal question jurisdiction and this matter is properly venued in this Court, given both the Plaintiffs and Defendants' ties to the state of California.

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III. FURTHER ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

(Against All Defendants Including DOES 1-100)

15. Plaintiffs are informed and believe, and thereon allege, that PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company and DOES 1-100, inclusive, and each of them, and their officers, directors and/or managing agents, knew of, intended for, ratified and committed the following acts in California which caused Plaintiffs' damages and injuries.

16. Plaintiffs are informed and believe, and thereon allege, that PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of them, and their officers, directors and/or managing agents, sold, designed, manufactured, fabricated, distributed, retailed, wholesaled, recommended, tested, modified, controlled, advertised, created, processed, prepared, constructed, packaged, provided, warranted, repaired, maintained, marketed, labeled, promoted, advertised, furnished, analyzed, inspected, supplied and placed into the stream of commerce the subject Prevagen which STEVENSON HOPSON and JUANITA HOPSON were using properly and caused them serious injuries and damages.

17. Plaintiffs are informed and believe, and thereon allege, that PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company formed in California, with its headquarters in Pennsylvania and their legal structure as a limited liability company, serving their vast franchise/corporate store network in places like Riverside and beyond and DOES 1-100, inclusive Prevagen and the fact that it was unsafe for its intended use and purpose when employed in a reasonable and foreseeable manner was knowable by means of scientific knowledge available to Prevagen and PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company formed in California, with its vast network of franchises within Riverside

1 and the State of California and DOES 1-100, inclusive, and each of them, and their officers,
2 directors and/or managing agents.

3 18. Further, PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM
4 SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company
5 and DOES 1-100, inclusive, and each of them, and their officers, directors and/or managing
6 agents, knew, or by means of available scientific knowledge should have known, of the
7 numerous other earlier deaths, injuries, consumer complaints, warranty claims and lawsuits
8 caused by the defective Prevagen, including earlier versions and similar products, due to the
9 inadequate and improper design, defective manufacturing and lack of proper warnings, as
10 specifically described herein, and yet, in conscious disregard of the rights and safety of others,
11 including Plaintiffs, PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES,
12 INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its
13 vast network of franchises within Riverside and the State of California and DOES 1-100,
14 inclusive, and each of them, and their officers, directors and/or managing agents chose not to
15 recall and stop selling the similarly-designed defective supplement or to provide accurate
16 proper instructions and warnings, or conduct a proper, timely and reasonable recall.

17 19. Plaintiffs are informed and believe, and thereon allege, that despite said
18 knowledge on the part of the PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM
19 SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company
20 with its vast network of franchises within Riverside and the State of California and DOES 1-
21 100, inclusive, and each of them, and their officers, directors and/or managing agents, said
22 Defendants and each of them, acted in a reckless, wanton, and malicious manner with a willful
23 conscious disregard for the rights, safety and well-being of the Plaintiffs and other members of
24 the public, when they sold, marketed, and/or distributed defective Prevagen without alerting,
25 advising, warning, properly recalling or otherwise adequately informing purchasers and/or users
26 of the defective supplements of their defective and dangerous nature and/or character. Plaintiffs
27 are informed and believe, and thereon allege, that Defendants further failed to alert, advise,
28 warn, properly recall or otherwise adequately inform purchasers and/or users of the defective

1 Prevagen Product supplements, and warn consumers of its dangerous life-threatening side
 2 effects, the responsible overview of which would substantially decrease the risk of injuries and
 3 or mitigate its effects, and which would substantially decrease the risk and decrease the extent
 4 of any injury, if it occurred. In fact, Prevagen is known to have a sordid past of misrepresenting
 5 its purported benefits and risks to consumers, including consumers such as Plaintiffs.¹

6 20. Plaintiffs are informed and believe, and thereon allege, that PREVAGEN, INC.,
 7 a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC
 8 HOLDINGS, LLC, a limited liability Company with a vast network of franchises in and around
 9 Los Angeles and within the state of California and DOES 1-100, inclusive, and each of them,
 10 and their officers, directors and/or managing agents, further failed to alert, advise, warn,
 11 properly recall or otherwise adequately inform purchasers and/or users of the defective
 12 Prevagen Supplement and of its defective and dangerous nature and/or character, knowing that
 13 the defective supplement, Prevagen, would be used and would fail to protect consumers in
 14 foreseeable incidents. By failing to so alert, advise, warn or adequately maintain or inform users
 15 of the defective and dangerous nature and/or character of said products, the Defendants, and
 16 each of them, warranted and represented that the defective Prevagen Product were safe and
 17 suitable for the intended purpose and use by STEVENSON HOPSON, JUANITA HOPSON
 18 and other members of the public. As a direct, proximate and legal result thereof, Plaintiffs were
 19 using the defective Prevagen supplement for its intended purpose and thereby suffered severe
 20 personal injuries, and other damages.

21 21. Plaintiffs are informed and believe, and thereon allege, that despite said
 22 knowledge on the part of PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM
 23 SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company
 24 with a vast network of Riverside based franchises and DOES 1-100, inclusive, and each of
 25 them, and their officers, directors, and/or managing agents, directly, and in authorizing and
 26 ratifying the conduct of each of them, acted with malice by engaging in the misconduct
 27 despicably and in a reckless, wanton malicious manner with a willful, conscious disregard of
 28

¹ <https://www.wired.com/story/prevagen-made-millions-fda-questioned-safety/>

the rights and/or safety of others, and/or acted with oppression by engaging in the misconduct despicably and by subjecting others to cruel and unjust hardship in a reckless, wanton malicious manner with a willful conscious disregard of the rights of other persons, and/or acted with fraud by engaging in the misconduct through intentional misrepresentation, deceit, and/or concealment of a material fact known to the Defendants with the intention of thereby depriving a person or property of legal rights or otherwise causing injury, and are liable for exemplary and punitive damages. Plaintiffs are therefore entitled to an award of exemplary and punitive damages against PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of them, in an amount to be shown according to proof at trial.

22. Plaintiffs are informed and believe that the Prevagen supplement, after its purchase online, was at all times, packaged and “fulfilled” by Defendant AMAZON and Defendant GNC and DOE defendants within the State of California.

23(a). Upon information and belief, the DOE-based managers and agents are responsible for overseeing the distribution of the product within the State of California, specifically in the County of Riverside. These managers, operating under the direction of the Defendants consumer supply chain and distribution framework or similarly designated authority, to ensure that the product reaches its intended recipients while complying with applicable state and local regulations. Their oversight includes coordinating logistics, monitoring supply channels, and facilitating the lawful dissemination of the product throughout the county.

23 (b). The true names and/or capacities, whether individual, corporate, agent, associate or otherwise of the defendants identified as Does 1 to 100, are unknown to the plaintiffs who therefore sue these defendants by such fictitious names. Plaintiffs are ignorant of their names and/or identities and is further informed and believes that each defendant fictitiously named as a Doe is legally responsible, negligent, or in some other actionable manner liable for the events alleged in this Complaint. Plaintiffs will seek leave of court to amend this Complaint to insert the true names and/or capacities of the fictitiously-named defendants when their identities have been ascertained.

1 **IV. CAUSES OF ACTION**

2 **FIRST CAUSE OF ACTION**

3 **NEGLIGENCE**

4 ***(Against All Defendants Including Does 1-100)***

5 24. Plaintiffs hereby incorporate by reference and re-allege each and every
6 allegation set forth in each and every preceding paragraph of this Complaint, as though fully set
7 forth herein.

8 25. Plaintiffs are informed and believe, and thereon allege, that at all times herein
9 mentioned, Defendant PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES,
10 INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its
11 vast network of franchises within Riverside and the State of California and DOES 1-100,
12 inclusive, and each of them, owed to Plaintiffs a duty to exercise reasonable care in the
13 research, development, design, testing, manufacture, marketing, distribution, labeling, and sale
14 of the dietary supplement product known as Prevagen, including but not limited to the duty to
15 ensure said product was safe for human consumption when used as intended or as reasonably
16 foreseeable, the duty to conduct adequate and sufficient testing to identify and evaluate
17 potential adverse effects and health risks associated with the use of said product, the duty to
18 warn consumers and the medical community of any known or reasonably knowable dangers,
19 side effects, and adverse reactions associated with the use of Prevagen, including but not
20 limited to neurological effects, seizure activity, and other serious medical conditions, and the
21 duty to provide adequate warnings, instructions, and information regarding the safe use of said
22 product.

23 26. Plaintiffs are informed and believe, and thereon allege, that at all times herein
24 mentioned, Defendant PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES,
25 INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its
26 vast network of franchises within Riverside and the State of California and DOES 1-100,
27 inclusive, and each of them, had a duty to Plaintiffs to refrain from manufacturing, marketing,
28 distributing, and selling products that were defective, dangerous, or unsafe for their intended

1 use, to conduct adequate post-market surveillance and monitoring of adverse events associated
 2 with the use of Prevagen, to maintain accurate and complete records of reported adverse events
 3 and health complaints related to said product, to promptly investigate reports of serious adverse
 4 health effects including but not limited to seizures and neurological disorders, and to take
 5 appropriate action to warn consumers and health care providers of such dangers, and to cease
 6 distribution of said product if it was found to pose unreasonable risks of harm to consumers.

7 27. Plaintiffs are informed and believe, and thereon allege, that Defendant
 8 PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware
 9 Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of
 10 franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of
 11 them, breached the aforesaid duties of care owed to Plaintiffs by their careless, reckless, and
 12 negligent acts and omissions, including but not limited to failing to adequately test Prevagen for
 13 safety prior to marketing and distribution, failing to conduct sufficient clinical trials to identify
 14 potential adverse neurological effects including seizure activity, failing to warn Plaintiffs and
 15 the medical community of the risk of seizures, transient ischemic attacks, and other serious
 16 neurological events associated with the use of Prevagen, failing to provide adequate warnings
 17 and instructions for the safe use of said product, negligently marketing and distributing a
 18 product that was unsafe and posed unreasonable risks of serious harm to consumers including
 19 Plaintiffs, and failing to conduct adequate post-market surveillance to identify and respond to
 20 reports of adverse neurological events in users of Prevagen.

21 28. Plaintiffs are informed and believe, and thereon allege, that on or about
 22 December 25, 2023, and continuing thereafter through May of 2024, as a direct, proximate, and
 23 legal result of the aforesaid careless, reckless, and negligent conduct of Defendant
 24 PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware
 25 Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of
 26 franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of
 27 them, Plaintiffs were caused to suffer serious personal injuries, pain, suffering, and damages,
 28 including but not limited to neurological injuries, seizure disorder, transient ischemic attacks,

1 cognitive impairment, loss of consciousness, hospitalization, and the need for ongoing medical
 2 treatment and monitoring, and Plaintiffs have incurred damages, all to their general and special
 3 damage in a sum according to proof at trial.

4 **SECOND CAUSE OF ACTION**

5 **STRICT PRODUCT LIABILITY**

6 **(Against All Defendants)**

7 29. Plaintiffs hereby incorporate by reference and re-allege each and every
 8 allegation set forth in each and every preceding paragraph of this Complaint, as though fully set
 9 forth herein.

10 30. Plaintiffs are informed and believe, and thereon allege, that at all times herein
 11 mentioned, defendants PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM
 12 SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company
 13 with its vast network of franchises within Riverside and the State of California and DOES 1-
 14 100, inclusive, and each of them, manufactured, fabricated, planned, designed, assembled,
 15 distributed, leased, bought, sold, rented, recalled, inspected, repaired, imported, marketed,
 16 warranted, tested, serviced, and advertised the subject Prevagen and/or its parts, with
 17 instructions and warnings, in said product and/or its parts, as well as other models in that series
 18 all of which contained product defects, both in manufacturing, design and failure to warn in
 19 various components, including inadequate warnings regarding seizure risks

20 31. Said product defects rendered the Prevagen supplement defective under
 21 California Law.

22 32. Plaintiffs were not aware of any said defects at any time December 25, 2023, and
 23 said defects would not be detectable or appreciated by normal inspection prior to use. Said
 24 product defects were the direct, proximate, legal causes of the damages sustained by Plaintiffs.
 25 Plaintiffs have incurred damages to be shown by proof at trial.

26 ///

27 ///

28 ///

THIRD CAUSE OF ACTION**FAILURE TO WARN/NEGLIGENT RECALL****(Against All Defendants Including Does 1-100)**

33. Plaintiffs hereby incorporate by reference and re-allege each and every allegation set forth in each and every preceding paragraph of this Complaint, as though fully set forth herein.

34. Plaintiffs are informed and believe, and thereon allege, that defendants PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of them, had a duty to provide information, instructions and warnings, and each of them negligently and carelessly advertised, designed, manufactured, fabricated, planned, assembled, distributed, leased, rented, bought, sold, inspected, tested, serviced, repaired, marketed, recalled, warranted, provided instructions and warnings, as to Prevagen, while being used in a normal foreseeable manner.

35. Plaintiffs are informed and believe, and thereon allege, that defendants PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company and DOES 1-100, inclusive, and each of them, had a duty to warn Plaintiffs that there existed a condition that Prevagen was defective and Does 1 through 100, inclusive, and each of them, were well aware of, but failed to act through and actually inform the consuming public who use their manufactured supplement products of Prevagen while being consumed in a normal, advertised, foreseeable manner that Defendants were aware of for the allegedly affected Prevagen. Defendants complete lack of recalling, removing, warning or otherwise, constitutes negligence.

36. Manufacturers and their tracking services, such as PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company with its vast network of franchises within Riverside and the State of California and DOES 1-100, inclusive, and each of them, cannot

1 delegate responsibility for the safety of its products to dealers, much less purchasers.
 2 *Springmeyer v. Ford Motor Co.* (1998) 60 Cal.App.4th 1541, 1562–63; *Ford Motor Co. v.*
 3 *Robert J. Poeschl, Inc.* (1971) 21 Cal.App.3d 694, 698; *Southern Pac. Co. v. Unarco Industries,*
 4 *Inc.* (1974) 42 Cal.App.3d 142, 151. Manufacturers, such as Prevagen and Does 1 through 100,
 5 inclusive, and each of them, failed to conduct an adequate recall campaign which constitutes a
 6 separate issue and cause of action from a defective design cause of action. *Hernandez v. Badger*
 7 *Construction Equipment Co.* (1994) 28 Cal.App.4th 1791, 1827.

8 37. The failure of Defendants and Does 1 through 100, inclusive, and each of them,
 9 to warn and/or to recall the Subject Prevagen was the proximate, legal cause of the damages
 10 sustained by Plaintiffs. Plaintiffs have incurred damages to be shown by proof at trial.

11 **FIFTH CAUSE OF ACTION**

12 **CONSUMER LEGAL REMEDIES ACT**

13 ***(Against All Defendants Including Does 1-100)***

14 38. Plaintiffs hereby incorporate by reference and re-allege each and every
 15 allegation set forth in each and every preceding paragraph of this Complaint.

16 39. This cause of action is brought pursuant to the Consumers Legal Remedies Act,
 17 Cal. Civ. Code §§ 1750, *et seq.* (the "Act"). Plaintiffs are consumers as defined by Cal. Civ.
 18 Code § 1761(d). The subject Prevagen is/was a good within the meaning of the Act.

19 40. The Act forbids "unfair methods of competition and unfair or deceptive acts or
 20 practices undertaken by any person in a transaction intended to result or which results in the
 21 sale or lease of goods or services to any consumers." Cal. Civ. Code § 1770(a).

22 41. Defendants and Does 1 through 100, inclusive, violated and continue to violate
 23 the Act by engaging in the following practices proscribed by Cal. Civ. Code § 1770(a) in
 24 transactions with STEVENSON HOPSON and JUANITA HOPSON, which were intended to
 25 result in, and did result in, the sale of dietary supplements:

26 i. Representing that Prevagen has characteristics, uses, benefits, or qualities that it
 27 does not have, including safety and efficacy for memory improvement and cognitive function;
 28

1 ii. Representing that Prevagen is of a particular standard, quality, or grade when it
2 is not, including representations regarding safety and freedom from adverse neurological
3 effects;

4 iii. Advertising Prevagen with intent not to sell it as advertised, including
5 representations regarding safety and absence of seizure risk;

6 iv. Representing that Prevagen has been supplied in accordance with previous
7 representations regarding safety and efficacy when it has not been.

8 42. Defendants violated the Act by representing through warranties, marketing and
9 advertisements (and by not disclosing known safety defects) that the Prevagen Supplements
10 were safe, reliable, and fit for their ordinary purpose, as described above, when they knew, or
11 should have known, that the representations and advertisements were unsubstantiated, false and
12 misleading. Defendants continue to make representations, as alleged above, that the Prevagen
13 Supplements are safe, reliable, and fit for their ordinary purpose, as described above, when they
14 knew, or should have known, that the representations and advertisements were unsubstantiated,
15 false and misleading.

16 43. Defendants continue to make representations, as alleged above, that the
17 Prevagen supplements are safe, reliable, and fit for their ordinary purpose even though they are
18 not.

19 44. Furthermore, Defendants omitted that they were aware of a safety defect(s)
20 related to the Prevagens.

21 45. Defendants had a duty to disclose the Prevagen's inherent dangers as described
22 above. These undisclosed facts about the safety and reliability of the Prevagens, including
23 potential to cause seizures, loss of consciousness, and injury to the brain and neurological
24 system, are material to reasonable consumers. Furthermore, as alleged above, Defendants had
25 exclusive knowledge of the dangerously nonconforming nature of the defects through, *inter*
26 *alia*, Defendants' own testing and knowledge, nonpublic consumer complaints, and concealed
27 these facts from Plaintiffs. These undisclosed facts about the safety and reliability of the
28

defective Prevagen Supplements, including potential to cause seizures, loss of consciousness, and injury to the brain and neurological system, are material to reasonable consumers.

46. Pursuant to Cal. Civ. Code § 1782(d), Plaintiffs seek a Court order enjoining the above-described wrongful acts and practices of Defendants and for restitution and disgorgement.

47. Plaintiffs seek equitable and injunctive relief requiring, *inter alia*, that Defendants fix and/or warn of the defective Prevagen's potential to cause seizures, loss of consciousness, and injury to the brain and neurological system while under normal foreseeable use, and to the extent possible, educate consumers through a corrective advertising campaign.

48. Pursuant to Cal. Civ. Code § 1780(d), filed concurrently herewith is an affidavit showing that this action has been commenced in the proper forum.

49. Pursuant to Section 1782, Plaintiffs intend to notify Defendants in writing of the particular violations of Section 1770 (the "Notice Letter"). If Defendants fail to comply with Plaintiffs' demands within thirty days of receipt of the Notice Letter, pursuant to Section 1782, Plaintiff will amend this Complaint to request damages and other monetary relief under the CLRA.

Dated: December 18, 2025

CARPENTER & ZUCKERMAN


 John C. Carpenter, Esq.
 Alina S. Vulic, Esq.

Attorneys for Plaintiffs

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants, as follows:

1. Damages for past and future loss of earnings and benefits, and other damages in a sum to be determined at the time of trial;
2. For compensatory damages according to proof at trial;
3. An award of reasonable attorneys' fees and costs of suit as permitted by law;
4. Punitive and exemplary damages in an appropriate amount to punish or set an example of PREVAGEN, INC., a Wisconsin corporation; AMAZON.COM SALES, INC., a Delaware Corporation; GNC HOLDINGS, LLC, a limited liability Company formed in California, with its vast network of franchises within Riverside and the State of California and DOES 1-100, inclusive;
5. For pre-judgment interest and other interest as provided by law;
6. For costs of suit incurred herein;
7. Injunctive relief; and
8. For such other and proper relief as the Court deems just and proper.

Dated: December 18, 2025

CARPENTER & ZUCKERMAN



John C. Carpenter, Esq.
Alina S. Vulic, Esq.

Attorneys for Plaintiffs

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury on all issues which may be tried by a jury.

Dated: February 9, 2026

CARPENTER & ZUCKERMAN

A handwritten signature in cursive script, appearing to read "Alina S. Vulic", is written over a horizontal line.

John C. Carpenter, Esq.
Alina S. Vulic, Esq.

Attorneys for Plaintiffs

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-17-

SERVICE LIST

Prevagen, Inc.
CSC - Lawyers Incorporating Service
2710 Gateway Oaks Dr
Sacramento, CA 95833-3505

Amazon.com Sales, Inc.
CSC - Lawyers Incorporating Service
2710 Gateway Oaks Dr
Sacramento, CA 95833-3505

GNC Holdings, LLC
330 N Brand Blvd
Glendale CA, 91203-2308

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address)

FOR COURT USE ONLY

John C. Carpenter, Esq. | SBN: 155610
 Carpenter & Zuckerman
 8827 West Olympic Boulevard Beverly Hills, CA 90211

TELEPHONE NO.: (310) 273-1230 | FAX NO. (310) 858-1063

E-MAIL ADDRESS

ATTORNEY FOR (Name): plaintiff: Juanita Hopson, et al.

Riverside County Superior Court - Main Courthouse

STREET ADDRESS: 4050 Main Street Electronically FILED by Superior Court of California, County of Riverside on 02/19/2026 08:44 AM

MAILING ADDRESS: Case Number CVRI2507148 0000157936304 - Jason B. Galkin, Executive Officer/Clerk of the Court By Olga Ramirez-Chavez, Clerk

CITY AND ZIP CODE: Riverside, CA 92501-3704

BRANCH NAME: Riverside - Main Civil and Probate

PLAINTIFF: **Juanita Hopson, an individual; Stevenson Hopson, an individual**

CASE NUMBER:

DEFENDANT: **Prevagen, Inc., a Wisconsin corporation; Amazon.com Sales, Inc., a Delaware corporation; GNC Holdings, LLC, a limited liability Co**

CVRI2507148**PROOF OF SERVICE**

Ref. No. or File No.:

Hopson. Juanita 12-25-23

AT THE TIME OF SERVICE I WAS AT LEAST 18 YEARS OF AGE AND NOT A PARTY TO THIS ACTION
 I SERVED COPIES OF THE FOLLOWING DOCUMENTS:

First Amended ComplaintPARTY SERVED: **Amazon.com Sales, Inc., a Delaware corporation**

BY LEAVING WITH: **CSC - Lawyers Incorporating Service, c/o Rebecca Vang - Service of Process Intake Clerk**

DATE & TIME OF DELIVERY: **2/12/2026
 1:05 PM**

ADDRESS, CITY, AND STATE: **2710 Gateway Oaks Dr
 Sacramento, CA 95833-3505**

PHYSICAL DESCRIPTION: **Age: 35 Weight: 150 Hair: Black**
Sex: Female Height: 5'5" Eyes: Brown
Race: Asian

MANNER OF SERVICE:

Personal Service - By personally delivering copies.

Fee for Service: \$ 181.08

County: Placer

Registration No.: 03-007

ON-CALL LEGAL

2476 Overland Avenue, Third Floor
 Los Angeles, CA 90064

(310) 858-9800

Ref: Hopson. Juanita 12-25-23



I declare under penalty of perjury under the laws of the
 The State of California that the foregoing information
 contained in the return of service and statement of
 service fees is true and correct and that this declaration
 was executed on February 13, 2026.

Signature: _____

Robert J. Mason

PROOF OF SERVICE

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address)

FOR COURT USE ONLY

John C. Carpenter, Esq. | SBN: 155610
 Carpenter & Zuckerman
 8827 West Olympic Boulevard Beverly Hills, CA 90211

TELEPHONE NO.: (310) 273-1230 | FAX NO. (310) 858-1063

E-MAIL ADDRESS

ATTORNEY FOR (Name): Plaintiff: Juanita Hopson, et al.

Riverside County Superior Court - Main Courthouse

STREET ADDRESS: 4050 Main Street Electronically FILED by Superior Court of California, County of Riverside on 02/19/2026 08:39 AM

MAILING ADDRESS: Case Number CVRI2507148 0000157935980 - Jason B. Galkin, Executive Officer/Clerk of the Court By Olga Ramirez-Chavez, Clerk

CITY AND ZIP CODE: Riverside, CA 92501-3704

BRANCH NAME: Riverside - Main Civil and Probate

PLAINTIFF: **Juanita Hopson, an individual; Stevenson Hopson, an individual**

CASE NUMBER:

DEFENDANT: **Prevagen, Inc., a Wisconsin corporation; Amazon.com Sales, Inc., a Delaware corporation; GNC Holdings, LLC, a limited liability Co**

CVRI2507148**PROOF OF SERVICE**

Ref. No. or File No.:

Hopson. Juanita 12-25-23

AT THE TIME OF SERVICE I WAS AT LEAST 18 YEARS OF AGE AND NOT A PARTY TO THIS ACTION
 I SERVED COPIES OF THE FOLLOWING DOCUMENTS:

First Amended ComplaintPARTY SERVED: **Prevagen, Inc., a Wisconsin corporation**BY LEAVING WITH: **CSC - Lawyers Incorporating Service, c/o Rebecca Vang - Service of Process Intake Clerk**

DATE & TIME OF DELIVERY: **2/12/2026**
1:05 PM

ADDRESS, CITY, AND STATE: **2710 Gateway Oaks Dr**
Sacramento, CA 95833-3505

PHYSICAL DESCRIPTION: **Age: 35** **Weight: 150** **Hair: Black**
Sex: Female **Height: 5'5"** **Eyes: Brown**
Race: Asian

MANNER OF SERVICE:

Personal Service - By personally delivering copies.

Fee for Service: \$ 181.08

County: Placer

Registration No.: 03-007

ON-CALL LEGAL

2476 Overland Avenue, Third Floor
 Los Angeles, CA 90064

(310) 858-9800

Ref: Hopson. Juanita 12-25-23



I declare under penalty of perjury under the laws of the
 The State of California that the foregoing information
 contained in the return of service and statement of
 service fees is true and correct and that this declaration
 was executed on February 13, 2026.

Signature: _____

Robert J. Mason

PROOF OF SERVICE

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) John C. Carpenter, Esq. SBN: 155610 Carpenter & Zuckerman 8827 West Olympic Boulevard Beverly Hills, CA 90211 TELEPHONE NO.: (310) 273-1230 FAX NO. (310) 858-1063 E-MAIL ADDRESS ATTORNEY FOR (Name): Plaintiff: Juanita Hopson, et al.		FOR COURT USE ONLY Electronically FILED by Superior Court of California, County of Riverside on 02/24/2026 02:48 PM Case Number CVRI2507148 0000158563450 - Jason B. Galkin, Executive Officer/Clerk of the Court By Araceli Amezcua, Clerk
Riverside County Superior Court - Main Courthouse STREET ADDRESS: 4050 Main Street MAILING ADDRESS: CITY AND ZIP CODE: Riverside, CA 92501-3704 BRANCH NAME: Riverside - Main Civil and Probate		
PLAINTIFF: Juanita Hopson, an individual; Stevenson Hopson, an individual DEFENDANT: Prevagen, Inc., a Wisconsin corporation; Amazon.com Sales, Inc., a Delaware corporation; GNC Holdings, LLC, a limited liability Co		CASE NUMBER: CVRI2507148
PROOF OF SERVICE		Ref. No. or File No.: Hopson. Juanita 12-25-23

AT THE TIME OF SERVICE I WAS AT LEAST 18 YEARS OF AGE AND NOT A PARTY TO THIS ACTION
I SERVED COPIES OF THE FOLLOWING DOCUMENTS:

First Amended Complaint

PARTY SERVED: **GNC Holdings, LLC, a limited liability Company**

BY LEAVING WITH: **C T Corporation System, Inc., c/o John Montijo - Agent in charge authorized to accept**

DATE & TIME OF DELIVERY: **2/13/2026**
10:56 AM

ADDRESS, CITY, AND STATE: **330 N Brand Blvd**
Glendale, CA 91203-2308

PHYSICAL DESCRIPTION:	Age: 20s	Weight: 190	Hair: Black curly
	Sex: Male	Height: 5'8"	Eyes: Brown
	Race: Hispanic		

MANNER OF SERVICE:

Personal Service - By personally delivering copies.

Fee for Service: \$ 141.08

County: Los Angeles

Registration No.: 2018048510

ON-CALL LEGAL

2476 Overland Avenue, Third Floor

Los Angeles, CA 90064

(310) 858-9800

Ref: Hopson. Juanita 12-25-23



I declare under penalty of perjury under the laws of the The State of California that the foregoing information contained in the return of service and statement of service fees is true and correct and that this declaration was executed on February 23, 2026.

Signature: _____

Steven Phillips

PROOF OF SERVICE

1 M. RAY HARTMAN III (CA SBN 211205)
RHartman@mofo.com
2 MORRISON & FOERSTER LLP
12531 High Bluff Drive, Suite 200
3 San Diego, California 92130-3588
Telephone: 858.720.5100
4 Facsimile: 858.720.5125

5 Attorney for Defendant
AMAZON.COM SALES, INC.
6
7

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF RIVERSIDE**
10

11 JUANITA HOPSON, an individual;
12 STEVENSON HOPSON, an individual,

13 Plaintiffs,

14 v.

15 PREVAGEN, INC., a Wisconsin corporation;
16 AMAZON.COM SALES, INC., a Delaware
corporation; GNC HOLDINGS LLC, a limited
17 liability Company and DOES 1-100, inclusive,

18 Defendants.
19

Case No. CVRI2507148

**DEFENDANT AMAZON.COM SALES,
INC.'S GENERAL DENIAL TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

20 Defendant Amazon.com Sales, Inc. ("Amazon"), severing itself from any co-defendant and
21 answering for itself only, answers Plaintiff's Complaint as follows:

22 **GENERAL DENIAL**

23 Pursuant to California Code of Civil Procedure 431.30(d), Amazon generally denies each
24 and every allegation in the Complaint, and the whole thereof, including each and every purported
25 cause of action set forth therein. Amazon specifically denies that Plaintiff has sustained injury or
26 damage and that he is entitled to any relief as a result of any act, conduct, or omission on the part
27 of Amazon.
28

1 **AFFIRMATIVE AND ADDITIONAL DEFENSES**

2 Without admitting any of the allegations in the Complaint and without admitting or
3 acknowledging that Amazon bears any burden of proof as to any of them, Amazon asserts the
4 additional and affirmative defenses listed below. Amazon intends to rely upon any additional
5 defenses that become available or apparent during pretrial proceedings and discovery in this action,
6 and Amazon reserves the right to amend this Answer to assert any such further defenses.

7 **FIRST AFFIRMATIVE DEFENSE**

8 The Complaint and each cause of action therein fail to set forth a claim upon which relief
9 may be granted.

10 **SECOND AFFIRMATIVE DEFENSE**

11 Plaintiff's claims against Amazon fail because Amazon did not market, sell, retail, facilitate,
12 test, inspect, promote, assemble, produce, manufacture, design, fabricate, or distribute the product
13 at issue, nor did it place the product at issue into the stream of commerce.

14 **THIRD AFFIRMATIVE DEFENSE**

15 Some of Plaintiff's claims may be preempted and barred by the Communications Decency
16 Act, 47 U.S.C. § 230, to the extent they are based on third-party content published on Amazon's
17 website.

18 **FOURTH AFFIRMATIVE DEFENSE**

19 The Complaint and each purported cause of action therein are barred, in whole or in part,
20 because Plaintiff may have failed to join all necessary and indispensable parties.

21 **FIFTH AFFIRMATIVE DEFENSE**

22 Plaintiff's claims against Amazon are barred completely or must be reduced in proportion
23 to the fault attributable to such other parties or third parties as are found liable.

24 **SIXTH AFFIRMATIVE DEFENSE**

25 Plaintiff's damages, if any, were proximately caused by the acts and omissions of others
26 over whom Amazon had no control or right of control. Said acts or omissions were the superseding
27 and/or sole, direct, and proximate cause of Plaintiff's damages, if any.

1 **SEVENTH AFFIRMATIVE DEFENSE**

2 Amazon places at issue the negligence, fault, and responsibility, if any, of all persons or
3 entities who contributed in any degree to Plaintiff's alleged injuries, damages, and/or losses in
4 proportion to each person's or entity's negligence, fault, or responsibility. Amazon does not
5 presently know the identity of non-parties that may have contributed to Plaintiff's alleged damages
6 and Amazon reserves the right to identify such non-parties after they become known.

7 **EIGHTH AFFIRMATIVE DEFENSE**

8 All or some of Plaintiff's claims may be barred by the doctrines of laches, waiver, and
9 estoppel.

10 **NINTH AFFIRMATIVE DEFENSE**

11 Plaintiff's claims may be barred in whole or in part by the applicable statutes of limitations
12 or repose, including California Code of Civil Procedure § 335.1.

13 **TENTH AFFIRMATIVE DEFENSE**

14 Plaintiff's claims may be precluded by res judicata and/or collateral estoppel.

15 **ELEVENTH AFFIRMATIVE DEFENSE**

16 Plaintiff's recovery may be barred or subject to reduction due to the comparative fault or
17 contributory negligence of Plaintiff or another party.

18 **TWELFTH AFFIRMATIVE DEFENSE**

19 Plaintiff's alleged loss, damage, injury, harm, expense, diminution, or deprivation may have
20 been caused in whole or in part by Plaintiff's failure to exercise reasonable care and to mitigate
21 damages of Plaintiff and/or the damages of another party.

22 **THIRTEENTH AFFIRMATIVE DEFENSE**

23 Plaintiff may have received reimbursement or compensation from alternate sources, and
24 any recovery must be reduced accordingly.

25 **FOURTEENTH AFFIRMATIVE DEFENSE**

26 No act or omission on the part of Amazon either caused or contributed to whatever injury
27 or damages that Plaintiff may have sustained.
28

FIFTEENTH AFFIRMATIVE DEFENSE

Based on the state of scientific, medical, and technological knowledge existing at the time Plaintiff allegedly used the product at issue in this action, the product was reasonably safe for its normal and foreseeable use at all relevant times. Moreover, the product complied with all applicable industry standards and reflected the current state of the art at the time it was manufactured, sold, and distributed.

SIXTEENTH AFFIRMATIVE DEFENSE

Amazon did not owe Plaintiff any duty in law nor any general duty in law to warn regarding the product at issue. If Amazon did owe Plaintiff a duty of care, Amazon did not breach that duty.

SEVENTEENTH AFFIRMATIVE DEFENSE

The benefits of the design and composition of the product outweigh the risks, if any, associated with the product.

EIGHTEENTH AFFIRMATIVE DEFENSE

The injury, damage, or loss that Plaintiff sustained, if any, was caused and/or contributed to by the actions or inactions of persons or entities other than Amazon, over whom Amazon exercised no control including, but not limited to, Plaintiff and/or another party. Parties other than Amazon, including the named and unnamed co-defendants and/or Plaintiff, may have misused, abused, altered, and/or improperly maintained, and/or used the product in a manner other than it was intended to be used, and disregarded the warnings, instructions, and directions for the product's use.

TWENTIETH AFFIRMATIVE DEFENSE

All or part of the injuries, damages, and/or losses Plaintiff sustained, if any, may have been a direct and proximate result of a pre-existing condition that Plaintiff incurred before the events alleged in the Complaint.

TWENTY-FIRST AFFIRMATIVE DEFENSE

The damages Plaintiff claims were caused or enhanced by superseding or intervening events that occurred after the events described in the Complaint.

TWENTY-SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, because Plaintiff would be unjustly enriched if he were allowed to recover any part of the damages alleged.

TWENTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff may lack capacity or standing to bring this action.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

If Plaintiff sustained injuries and damages from a product Amazon sold, which is denied, Plaintiff's claims are barred, in whole or in part, because the danger, or potentiality of danger, concerning the product was open and obvious and/or generally known and recognized.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff and/or his agent(s) may have failed to preserve and/or permitted and/or intentionally caused the spoliation of material evidence, including but not limited to the product which Plaintiff alleges gives rise to each and every cause of action in Plaintiff's Complaint. Such conduct would bar Plaintiff's action and/or give rise to liability for damages payable to Amazon.

TWENTY-SIXTH AFFIRMATIVE DEFENSE

The product at issue in this lawsuit may have contained specific warnings regarding the consequences of its use or instructions regarding the proper administration of its use. Plaintiff and/or other persons or entities may have used the product in disregard of these warnings and/or instructions.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

The product at issue suffered no manufacturing or design defect and was accompanied by adequate warnings.

TWENTY-EIGHTH AFFIRMATIVE DEFENSE

If the product at issue was defective and/or dangerous, Amazon did not know and had no reason to know that was the case.

TWENTY-NINTH AFFIRMATIVE DEFENSE

Any foreseeable and unreasonable risk of personal injury or death that is the subject of this litigation was a risk which Amazon did not create and/or could not reduce or eliminate.

THIRTIETH AFFIRMATIVE DEFENSE

Plaintiff did not rely upon any representations made by Amazon. To the extent Plaintiff did rely upon any alleged representations, such reliance was unjustified and unreasonable.

THIRTY-FIRST AFFIRMATIVE DEFENSE

Amazon is an improper party to this lawsuit because it had no involvement in the occurrence that underlies this lawsuit and should be dismissed with prejudice.

THIRTY-SECOND AFFIRMATIVE DEFENSE

Amazon breached no duty it may have owed to Plaintiff.

THIRTY-THIRD AFFIRMATIVE DEFENSE

No cause of action for breach of warranty may be asserted against Amazon, as there is no privity between Amazon and Plaintiff.

THIRTY-FOURTH AFFIRMATIVE DEFENSE

Amazon was not in contractual privity with Plaintiff and, therefore, Plaintiff has no contractual rights for recovery against Amazon.

THIRTY-FIFTH AFFIRMATIVE DEFENSE

Amazon owed no warranties implied under the law.

THIRTY-SIXTH AFFIRMATIVE DEFENSE

Amazon reserves its right to amend its answer with additional affirmative defenses as discovery in this matter continues.

PRAYER FOR RELIEF

WHEREFORE, Amazon prays for the following relief:

1. That Plaintiff take nothing by reason of the Complaint;
2. Dismissal of Plaintiff's claims with prejudice;
3. Amazon's cost of suit, including reasonable attorney's fees; and
4. For such other relief as the Court deems proper.

1 Dated: March 11, 2026

MORRISON & FOERSTER LLP

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3 By: /s/ M. Ray Hartman III

4 M. Ray Hartman III

5 *Attorneys for Defendant*
6 AMAZON.COM SERVICES, LLC
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PROOF OF SERVICE

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 12531 High Bluff Drive, San Diego, California, 92130-2040. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on March 11, 2026, I served a copy of:

**DEFENDANT AMAZON.COM SALES, INC.'S GENERAL DENIAL TO
PLAINTIFF'S FIRST AMENDED COMPLAINT**

☒ **BY ELECTRONIC SERVICE [Code Civ. Proc. sec. 1010.6; CRC 2.251]** by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system from asmith@mof.com at 12531 High Bluff Drive, Suite 200, San Diego, California 92130, to the email address(es) set forth below, or as stated on the attached service list per agreement in accordance with Code of Civil Procedure section 1010.6 and CRC Rule 2.251.

Counsel for Plaintiffs

John Carpenter
carpenter@cz.law
Alina Vulic
avulic@cz.law
CARPENTER & ZUCKERMAN
8827 W. Olympic Boulevard
Beverly Hills, CA 90211
Tel: (310) 273-1230
Fax: (310) 858-1063

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

Executed at San Diego, California, this 11th day of March, 2026.

Ashley Smith
(typed name)

/s/ Ashley Smith
(signature)

Arron Nesbitt (202948)
 QUINTAIROS PRIETO WOOD & BOYER
 216 16th Street, Suite 1100
 Denver CO 80202
 (720) 798-1620
 arron.nesbitt@qpwbllaw.com
*Attorneys for Defendants Prevagen, Inc.
 and GNC Holdings, LLC*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

JUANITA HOPSON, an individual,
 STEVENSON HOPSON, an individual

Plaintiffs,

v.

PREVAGEN, INC., a Wisconsin
 corporation, AMAZON.COM SALES, INC.,
 a Delaware corporation, GNC HOLDINGS,
 LLC, a limited liability company and DOES
 1-100, inclusive,

Defendants.

Case No. ~~CV RI 2507148~~ CVRI2507148

**DEFENDANTS PREVAGEN, INC.
 AND GNC HOLDINGS, LLC'S
 ANSWER TO PLAINTIFFS' FIRST
 AMENDED COMPLAINT**

COMES NOW Defendants, Prevagen, Inc. and GNC Holdings, LLC (collectively, "Defendants"), by and through undersigned counsel, and answers Plaintiffs' First Amended Complaint as follows:

GENERAL DENIAL

- Pursuant to California Code of Civil Procedure § 431.30, Defendants deny generally and specifically, each and every allegation of the First Amended Complaint and the whole thereof and further deny that Plaintiffs have been injured or damaged as a result of Defendants' actions or inactions, as alleged in said First Amended Complaint in any sums alleged, or in any sum whatsoever, or at all.

1st DEFENSE

2. Defendants allege that the First Amended Complaint and each cause of action set forth therein fails to state facts sufficient to constitute a cause of action against Defendants.

2nd DEFENSE

3. Defendants allege, on information and belief, that Plaintiffs' injuries and damages, if any, were and are the direct and proximate result of the Plaintiffs' own recklessness, carelessness, and/or negligence at or near the time and place of the incident referred to in the First Amended Complaint, and that said carelessness and/or negligence by Plaintiffs proximately caused and contributed to Plaintiffs' alleged injuries and damages, if any there were or will be. Accordingly, the doctrine of comparative negligence should be applied in the event liability, which is expressly denied, is found against Defendants.

3rd DEFENSE

4. Defendants allege, on information and belief, that Plaintiffs' injuries and damages, if any, were and are the direct and proximate result of the recklessness, carelessness, and/or negligence of third persons other than Defendants, and in the event Defendants are found to be liable to Plaintiffs in any manner, or at all, then Defendants pray for leave of court to compare their fault with that of such other third persons whose conduct proximately caused and contributed to Plaintiffs' alleged injuries and damages, if any, and to require that any judgment rendered in favor of Plaintiffs and against Defendants be an amount directly proportional to the individual degrees of fault of third persons, where appropriate.

4th DEFENSE

5. Defendants allege, on information and belief, that Plaintiffs' injuries and damages, if any, were and are the direct and proximate result of Plaintiffs' failure to exercise reasonable diligence to mitigate, care for, and heal the injuries complained of and to employ reasonable means to prevent their aggravation. Therefore, any damages awarded to Plaintiffs should be limited to the damages they would have sustained had they mitigated said damages.

5th DEFENSE

6. Defendants allege, on information and belief, that Plaintiffs' claims were proximately caused by unforeseen, independent, or superseding events beyond the control of and unrelated to the conduct of Defendants.

6th DEFENSE

7. Defendants allege, on information and belief, that Plaintiffs' injuries and damages, if any, were and are the direct and proximate result of Plaintiffs' unforeseeable misuse of products sold or marketed by Defendants. Therefore, Plaintiffs claims against Defendants are barred by the Plaintiffs' unforeseeable misuse of Defendants' products.

7th DEFENSE

8. Defendants allege, on information and belief, that Plaintiffs' claims are subject to contractual agreements where Plaintiffs agreed to bring their claims, if at all, in a different venue or in a non-judicial forum (e.g., arbitration). Therefore, Plaintiffs claims should be stayed pending arbitration or transferred to the venue Plaintiffs agreed to bring them in.

At this time, Defendants cannot fully anticipate all defenses that may be applicable to this action and accordingly reserve the right to assert any additional defenses to the extent applicable.

WHEREFORE, having fully answered the First Amended Complaint herein, Defendants pray for judgment as follows:

1. That Plaintiffs take nothing herein against these Defendants;
2. That Defendants have a judgment against Plaintiffs together with their recoverable litigation costs;
3. That any liability of Defendants be reduced by the comparative fault of Plaintiffs and/or third parties; and
4. For such other relief as the Court deems just and proper.

1 Respectfully submitted this 13th day of March 2026.

2
3 QUINTAIROS PRIETO WOOD & BOYER

4
5 By: /s/ Arron Nesbitt
6 Arron Nesbitt
7 Attorneys for Defendants
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PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is 216 16th Street, Suite 1100, Denver CO 80202.

On March 13, 2026, I served true copies of the following document(s): **DEFENDANTS PREVAGEN, INC. AND GNC HOLDINGS, LLC'S ANSWER TO PLAINTIFFS' FIRST AMENDED COMPLAINT**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

John C. Carpenter, Esq.
Alina S. Vulie, Esq.
CARPENTER & ZUCKERMAN
8827 West Olympic Boulevard
Beverly Hills, CA 90211
Telephone: 310-273-1230
Facsimile: 310-858-1063
carpenter@cz.law
avulic@cz.law
teamcarpenter@cz.law

BY EMAIL. Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused via a Court-appointed electronic service for the above-referenced document to be sent in electronic PDF format as an attachment to an email addressed to the persons on whom such document is to be served at the email addresses shown below, as last given by those persons or as obtained from an internet website relating to such persons, and I did not receive an email response upon sending such emails indicating that such emails were not delivered.

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

Executed on March 13, 2026.

By: /s/ Alyssa Romero
Legal Assistant

1 M. RAY HARTMAN III (CA SBN 211205)
RHartman@mofo.com
2 MORRISON & FOERSTER ^{LLP}
12531 High Bluff Drive, Suite 200
3 San Diego, California 92130-3588
Telephone: 858.720.5100
4 Facsimile: 858.720.5125

5 Attorneys for Defendant
AMAZON.COM SALES, INC.
6
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF RIVERSIDE**
10

11 JUANITA HOPSON, an individual;
12 STEVENSON HOPSON, an individual,

13 Plaintiffs,

14 v.

15 PREVAGEN, INC., a Wisconsin corporation;
16 AMAZON.COM SALES, INC., a Delaware
corporation; GNC HOLDINGS LLC, a limited
17 liability Company and DOES 1-100, inclusive,

18 Defendants.
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Case No. CVRI2507148

**NOTICE OF HEARING RE
APPLICATION TO APPEAR PRO
HAC VICE; MEMORANDUM IN
SUPPORT; VERIFIED APPLICATION
OF MICHAEL A. FINE;
DECLARATION OF M. RAY
HARTMAN III IN SUPPORT**

Date: April 8, 2026
Time: 8:30 a.m.
Department: 7

Judge: Honorable O.G. Magno

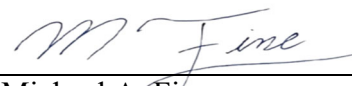
Reservation ID: 683508524741

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT ON** April 8, 2026, at 8:30 a.m. in Department 7 of the
3 Superior Court of California, County of Riverside, located at 4550 Main Street, Riverside,
4 California, 92501, this Application to Appear *Pro Hac Vice* filed by Michael A. Fine will be heard.
5 The application is supported by this Notice, the attached verified application Michael A. Fine, and
6 the attached declaration of M. Ray Hartman III.

7
8 Dated: March 16, 2026

MORRISON & FOERSTER LLP

9
10 By: 

Michael A. Fine

11 *Attorneys for Defendant*
12 AMAZON.COM SALES, INC.
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1 **MEMORANDUM IN SUPPORT OF APPLICATION OF MICHAEL A. FINE TO**
2 **APPEAR *PRO HAC VICE* FOR AMAZON.COM SALES, INC.**

3 Rule 9.40 of the California Rules of Court governs applications of counsel to appear *pro*
4 *hac vice*. The rule requires counsel desiring to appear *pro hac vice* to file a verified application with
5 proof of service by mail in accordance with Code of Civil Procedure section 1013a of a copy of the
6 application and of the notice of hearing of the application on all parties who have appeared in the
7 cause and on the State Bar of California.

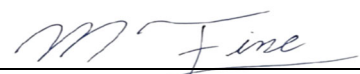
8 The attached verified application of Michael A. Fine shows that Michael A. Fine satisfies
9 the requirements of Rule 9.40 admission to appear in this action *pro hac vice* as counsel for
10 Amazon.com Sales, Inc. Michael A. Fine is not a licensee of the State Bar of California or a resident
11 of the State of California; is not regularly employed in the State of California; is not regularly
12 engaged in substantial business, professional, or other activities in the State of California; is an
13 attorney in good standing of and eligible to practice before the bar of the Commonwealth of
14 Massachusetts; and has been retained to appear in this action.

15 Counsel for Amazon.com Sales, Inc. has notified and provided copies of this application
16 and supporting documents to the State Bar of California and submitted the required fifty-dollar fee
17 for the application of Michael A. Fine.

18 Based on these facts and the supporting information provided in the attached verified
19 application of Michael A. Fine and declaration of M. Ray Hartman III, counsel for Amazon.com
20 sales, Inc. hereby requests that Michael A. Fine be permitted to appear as counsel *pro hac vice* for
21 Amazon.com Sales, Inc. in this action.

22 Dated: March 16, 2026

MORRISON & FOERSTER LLP

23
24 By: 

25 Michael A. Fine

26 Attorneys for Defendant
27 AMAZON.COM SALES, INC.
28

**VERIFIED APPLICATION OF MICHAEL A. FINE FOR *PRO HAC VICE*
ADMISSION TO APPEAR AS COUNSEL FOR AMAZON.COM SALES, INC.**

I, Michael A. Fine, hereby petition the above-entitled court to permit me to appear and participate in this case, and in support of petition state:

1. My residential address is 1365 Boylston Street, Unit 1149, Boston, MA 02215.

2. My office address is Morrison & Foerster LLP, 200 Clarendon Street, 21st Floor, Boston, Massachusetts, 02116.

3. I was admitted to the State Bar of Massachusetts (Bar No. 713088).

4. I was admitted, am member of good standing of, and am eligible to practice before the following federal courts on the following dates:

Court	Date Admitted
USDC District of Massachusetts	1/16/2024

5. I am not currently suspended or disbarred in any court.

6. I am not regularly engaged in the practice of law or other business in the State of California.

7. Local counsel of record with whom I am associated in this matter is M. Ray Hartman III, Morrison & Foerster LLP, 12531 High Bluff Drive, Suite 200, San Diego, California 92130-3588, (858) 720-5100.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 16, 2026

MORRISON & FOERSTER LLP

By: 
Michael A. Fine

Attorneys for Defendant
AMAZON.COM SALES, INC.

**DECLARATION OF M. RAY HARTMAN III IN SUPPORT OF APPLICATION OF
MICHAEL A. FINE FOR PRO HAC VICE ADMISSION TO APPEAR
AS COUNSEL FOR AMAZON.COM SALES, INC.**

I, M. Ray Hartman III, declare:

1. I am a member of the State Bar of California and of Morrison & Foerster LLP, attorneys for Amazon.com Sales, Inc. I have personal knowledge of the facts set forth below, and if called as a witness, could testify to them.

2. I have been acting as local counsel for Amazon.com Sales, Inc. in the above-captioned matter.

3. I have reviewed the executed applications for admission *pro ha vice* of Michael A. Fine, and am informed and believe that all the information contained therein is true and correct.

4. I am informed and believe that Michael A. Fine is member of the State Bar of Massachusetts and was admitted to practice in 2023.

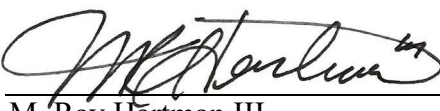
5. This declarant requests that this Court allow Michael A. Fine to appear as counsel *pro hac vice* and to be associated as co-counsel in connection with the above entitled case and to participate in all aspects thereof, including all trial and pre-trial proceedings.

6. I have served a copy of this declaration and the application for admission on the San Diego offices of the State Bar of California with the necessary fee.

I certify and declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed at San Diego, CA.

Dated: March 16, 2026

MORRISON & FOERSTER LLP

By: 
M. Ray Hartman III

Attorneys for Defendant
AMAZON.COM SALES, INC.

1 M. Ray Hartman, III (CA SBN 211205)
RHartman@mofo.com
2 MORRISON & FOERSTER LLP
12531 High Bluff Drive, Suite 200
3 San Diego, California 92130
Telephone: 858.720.5100
4 Facsimile: 858.720.5125

5 Attorneys for Defendants
6 AMAZON.COM SALES, LLC

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF RIVERSIDE**

9 JUANITA HOPSON, an individual;
10 STEVENSON HOPSON, an individual,

11 Plaintiffs,

12 v.

13 PREVAGEN, INC., a Wisconsin corporation;
14 AMAZON.COM SALES, INC., a Delaware
Corporation; GNC HOLDINGS, LLC, a
limited liability company and DOES 1-100,
inclusive,

15 Defendants.
16

Case No. CVRI2507148

PROOF OF SERVICE

Date:

Time:

Dept:

Complaint Filed: December 18, 2025

PROOF OF SERVICE

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 12531 High Bluff Drive, Suite 200, San Diego, California 92130-3588. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on March 16, 2026, I served a copy of:

**NOTICE OF HEARING RE APPLICATION TO APPEAR PRO HAC VICE;
MEMORANDUM IN SUPPORT; VERIFIED APPLICATION OF MICHAEL A. FINE;
DECLARATION OF M. RAY HARTMAN III IN SUPPORT**

☒ **BY ELECTRONIC SERVICE [Code Civ. Proc. sec. 1010.6; CRC 2.251]** by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system from ASmith@mofo.com to the email address(es) set forth below, or as stated on the attached service list per agreement in accordance with Code of Civil Procedure section 1010.6 and CRC Rule 2.251.

John C. Carpenter, Esq.

Attorneys for Plaintiff

carpenter@cz.law

Asa Eaton, Esq.

eaton@cz.law

Mona Viera

mviaera@cz.law

CARPENTER & ZUCKERMAN

8827 West Olympic Boulevard

Beverly Hills, CA 90211

Telephone: 310-273-1230

Facsimile: 310-858-1063

teamcarpenter@cz.law

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

Executed at San Diego, California, this 16th day of March, 2026.

Ashley Smith

(typed)

/s/ Ashley Smith

(signature)

1 M. RAY HARTMAN III (CA SBN 211205)
RHartman@mofo.com
2 MORRISON & FOERSTER ^{LLP}
12531 High Bluff Drive, Suite 200
3 San Diego, California 92130-3588
Telephone: 858.720.5100
4 Facsimile: 858.720.5125

5 Attorneys for Defendant
AMAZON.COM SALES, INC.
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7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF RIVERSIDE**
10

11 JUANITA HOPSON, an individual;
12 STEVENSON HOPSON, an individual,

13 Plaintiffs,

14 v.

15 PREVAGEN, INC., a Wisconsin corporation;
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Case No. CVRI2507148

**NOTICE OF HEARING RE
APPLICATION TO APPEAR PRO
HAC VICE; MEMORANDUM IN
SUPPORT; VERIFIED APPLICATION
OF MICHAEL A. FINE;
DECLARATION OF M. RAY
HARTMAN III IN SUPPORT**

Date: May 29, 2026
Time: 8:30 a.m.
Department: 7

Judge: Honorable O.G. Magno

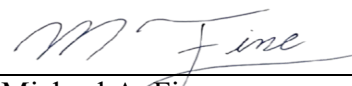
Reservation ID: 047497367776

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT ON** May 29, 2026, at 8:30 a.m. in Department 7 of the
3 Superior Court of California, County of Riverside, located at 4550 Main Street, Riverside,
4 California, 92501, this Application to Appear *Pro Hac Vice* filed by Michael A. Fine will be heard.
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6 the attached declaration of M. Ray Hartman III.

7
8 Dated: April 17, 2026

MORRISON & FOERSTER LLP

9
10 By: 

Michael A. Fine

11 *Attorneys for Defendant*
12 AMAZON.COM SALES, INC.
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**MEMORANDUM IN SUPPORT OF APPLICATION OF MICHAEL A. FINE TO
APPEAR *PRO HAC VICE* FOR AMAZON.COM SALES, INC.**

Rule 9.40 of the California Rules of Court governs applications of counsel to appear *pro hac vice*. The rule requires counsel desiring to appear *pro hac vice* to file a verified application with proof of service by mail in accordance with Code of Civil Procedure section 1013a of a copy of the application and of the notice of hearing of the application on all parties who have appeared in the cause and on the State Bar of California.

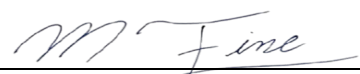
The attached verified application of Michael A. Fine shows that Michael A. Fine satisfies the requirements of Rule 9.40 admission to appear in this action *pro hac vice* as counsel for Amazon.com Sales, Inc. Michael A. Fine is not a licensee of the State Bar of California or a resident of the State of California; is not regularly employed in the State of California; is not regularly engaged in substantial business, professional, or other activities in the State of California; is an attorney in good standing of and eligible to practice before the bar of the Commonwealth of Massachusetts; and has been retained to appear in this action.

Counsel for Amazon.com Sales, Inc. has notified and provided copies of this application and supporting documents to the State Bar of California and submitted the required fifty-dollar fee for the application of Michael A. Fine.

Based on these facts and the supporting information provided in the attached verified application of Michael A. Fine and declaration of M. Ray Hartman III, counsel for Amazon.com sales, Inc. hereby requests that Michael A. Fine be permitted to appear as counsel *pro hac vice* for Amazon.com Sales, Inc. in this action.

Dated: April 17, 2026

MORRISON & FOERSTER LLP

By: 

Michael A. Fine

Attorneys for Defendant
AMAZON.COM SALES, INC.

**VERIFIED APPLICATION OF MICHAEL A. FINE FOR *PRO HAC VICE*
ADMISSION TO APPEAR AS COUNSEL FOR AMAZON.COM SALES, INC.**

I, Michael A. Fine, hereby petition the above-entitled court to permit me to appear and participate in this case, and in support of petition state:

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7. Local counsel of record with whom I am associated in this matter is M. Ray Hartman III, Morrison & Foerster LLP, 12531 High Bluff Drive, Suite 200, San Diego, California 92130-3588, (858) 720-5100.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 17, 2026

MORRISON & FOERSTER LLP

By: 
Michael A. Fine

Attorneys for Defendant
AMAZON.COM SALES, INC.

**DECLARATION OF M. RAY HARTMAN III IN SUPPORT OF APPLICATION OF
MICHAEL A. FINE FOR PRO HAC VICE ADMISSION TO APPEAR
AS COUNSEL FOR AMAZON.COM SALES, INC.**

I, M. Ray Hartman III, declare:

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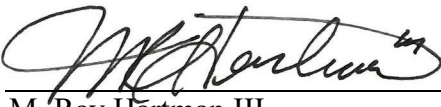
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I certify and declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed at San Diego, CA.

Dated: April 17, 2026

MORRISON & FOERSTER LLP

By: 
M. Ray Hartman III

Attorneys for Defendant
AMAZON.COM SALES, INC.

1 M. Ray Hartman, III (CA SBN 211205)
RHartman@mofo.com
2 MORRISON & FOERSTER LLP
12531 High Bluff Drive, Suite 200
3 San Diego, California 92130
Telephone: 858.720.5100
4 Facsimile: 858.720.5125

5 Attorneys for Defendants
6 AMAZON.COM SALES, LLC

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF RIVERSIDE**

9 JUANITA HOPSON, an individual;
10 STEVENSON HOPSON, an individual,

11 Plaintiffs,

12 v.

13 PREVAGEN, INC., a Wisconsin corporation;
14 AMAZON.COM SALES, INC., a Delaware
Corporation; GNC HOLDINGS, LLC, a
limited liability company and DOES 1-100,
inclusive,

15 Defendants.
16

Case No. CVRI2507148

PROOF OF SERVICE

Date:

Time:

Dept:

Complaint Filed: December 18, 2025

PROOF OF SERVICE

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 12531 High Bluff Drive, Suite 200, San Diego, California 92130-3588. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on April 17, 2026, I served a copy of:

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John C. Carpenter, Esq.

Attorneys for Plaintiff

carpenter@cz.law

Asa Eaton, Esq.

eaton@cz.law

Mona Viera

mviaera@cz.law

CARPENTER & ZUCKERMAN

8827 West Olympic Boulevard

Beverly Hills, CA 90211

Telephone: 310-273-1230

Facsimile: 310-858-1063

teamcarpenter@cz.law

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

Executed at San Diego, California, this 17th day of April, 2026.

Ashley Smith

(typed)

/s/ Ashley Smith

(signature)

Electronically FILED by Superior Court of California, County of Riverside on 04/17/2026 04:39 PM
Case Number CVRI2507148 0000164408621 - Jason B. Galkin, Executive Officer/Clerk of the Court By Olga Ramirez-Chavez, Clerk

M. RAY HARTMAN III (CA SBN 211205)
RHartman@mofo.com
MORRISON & FOERSTER ^{LLP}
12531 High Bluff Drive, Suite 200
San Diego, California 92130-3588
Telephone: 858.720.5100
Facsimile: 858.720.5125

Attorneys for Defendant
AMAZON.COM SALES, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

JUANITA HOPSON, an individual;
STEVENSON HOPSON, an individual,

Plaintiffs,

v.

PREVAGEN, INC., a Wisconsin corporation;
AMAZON.COM SALES, INC., a Delaware
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Defendants.

Case No. CVRI2507148

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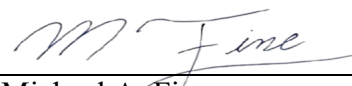
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7
8 Dated: April 17, 2026

MORRISON & FOERSTER LLP

9
10 By: 

Michael A. Fine

11 *Attorneys for Defendant*
12 AMAZON.COM SALES, INC.
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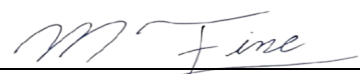
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Dated: April 17, 2026

MORRISON & FOERSTER LLP

By: 

Michael A. Fine

Attorneys for Defendant
AMAZON.COM SALES, INC.

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7. Local counsel of record with whom I am associated in this matter is M. Ray Hartman III, Morrison & Foerster LLP, 12531 High Bluff Drive, Suite 200, San Diego, California 92130-3588, (858) 720-5100.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 17, 2026

MORRISON & FOERSTER LLP

By: 
Michael A. Fine

Attorneys for Defendant
AMAZON.COM SALES, INC.

**DECLARATION OF M. RAY HARTMAN III IN SUPPORT OF APPLICATION OF
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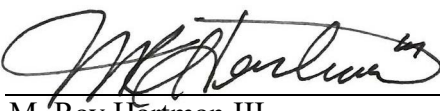
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Dated: April 17, 2026

MORRISON & FOERSTER LLP

By: 
M. Ray Hartman III

Attorneys for Defendant
AMAZON.COM SALES, INC.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

AMAZON.COM SALES

NOTICE OF HEARING
(Civil)

Notice is hereby given that the above entitled case has been scheduled for: Hearing to Appear Pro Hac Vice on 05/29/2026 at 8:30 AM. The party requesting the hearing (moving party) shall serve a copy of this notice to all named parties in this case.

Date	Time	Department
05/29/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-766-6465 #
 Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

For more information on the court's response to the Coronavirus, go to www.riverside.courts.ca.gov and click on the red COVID-19 banner.

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CERTIFICATE OF ELECTRONIC SERVICE

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with electronic transmittal of documents. I certify that I served electronically the **Notice of Hearing** on this date to the party(ies) listed above.

Dated: 04/24/2026

JASON B. GALKIN,
Court Executive Officer/Clerk of the Court

by:

A handwritten signature in black ink, appearing to read 'O. Ramirez-Chavez', written over a horizontal line.

O. Ramirez-Chavez, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

GNC HOLDINGS, LLC

**NOTICE OF HEARING
 (Civil)**

Notice is hereby given that the above entitled case has been scheduled for: Hearing to Appear Pro Hac Vice on 05/29/2026 at 8:30 AM. The party requesting the hearing (moving party) shall serve a copy of this notice to all named parties in this case.

Date	Time	Department
05/29/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-766-6465 #
 Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

M. RAY HARTMAN
 12531 High Bluff Dr Ste 200
 San Diego, CA 92130

NOTICE OF HEARING
(Civil)

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O. Ramirez-Chavez, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

JUANITA HOPSON

**NOTICE OF HEARING
 (Civil)**

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O. Ramirez-Chavez, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

STEVENSON HOPSON

**NOTICE OF HEARING
 (Civil)**

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by:

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O. Ramirez-Chavez, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

PREVAGEN, INC.

**NOTICE OF HEARING
 (Civil)**

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2507148

Case Name: HOPSON vs PREVAGEN, INC.

ALINA S. VULIC
 8827 WEST OLYMPIC BOULEVARD
 Beverly Hills, CA 90211

NOTICE OF HEARING
(Civil)

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Date	Time	Department
05/29/2026	8:30 AM	Department 7
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

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by:

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O. Ramirez-Chavez, Deputy Clerk

Notice has been printed for the following Firm/Attorneys or Parties: CVRI2507148

VULIC, ALINA S.
8827 WEST OLYMPIC BOULEVARD
Beverly Hills, CA 90211

HOPSON, JUANITA

PREVAGEN, INC.

HOPSON, STEVENSON

AMAZON.COM SALES

HARTMAN, M. RAY
12531 High Bluff Dr Ste 200
San Diego, CA 92130

GNC HOLDINGS, LLC

Electronically FILED by Superior Court of California, County of Riverside on 04/28/2026 01:13 PM
Case Number CVRI2507148 0000165549701 - Jason B. Galkin, Executive Officer/Clerk of the Court By Joseline DeRosier, Clerk

1 M. Ray Hartman, III (CA SBN 211205)
RHartman@mofo.com
2 MORRISON & FOERSTER LLP
12531 High Bluff Drive, Suite 200
3 San Diego, California 92130
Telephone: 858.720.5100
4 Facsimile: 858.720.5125

5 Attorneys for Defendants
6 AMAZON.COM SALES, LLC

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF RIVERSIDE**

9 JUANITA HOPSON, an individual;
10 STEVENSON HOPSON, an individual,

11 Plaintiffs,

12 v.

13 PREVAGEN, INC., a Wisconsin corporation;
14 AMAZON.COM SALES, INC., a Delaware
Corporation; GNC HOLDINGS, LLC, a
15 limited liability company and DOES 1-100,
inclusive,

16 Defendants.

Case No. CVRI2507148

PROOF OF SERVICE

Date: May 29, 2026

Time: 8:30 a.m.

Dept: 7

Judge: Honorable O.G. Magno

Complaint Filed: December 18, 2025

Reservation ID: 047497367776

PROOF OF SERVICE

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 12531 High Bluff Drive, Suite 200, San Diego, California 92130-3588. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on April 17, 2026, I served a copy of:

**NOTICE OF HEARING RE APPLICATION TO APPEAR PRO HAC VICE;
MEMORANDUM IN SUPPORT; VERIFIED APPLICATION OF MICHAEL A. FINE;
DECLARATION OF M. RAY HARTMAN III IN SUPPORT**

☒ **BY ELECTRONIC SERVICE [Code Civ. Proc sec. 1010.6; CRC 2.251]** by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system from ASmith@mofo.com to the email address(es) set forth below, or as stated on the attached service list per agreement in accordance with Code of Civil Procedure section 1010.6 and CRC Rule 2.251.

John C. Carpenter, Esq.

Attorneys for Plaintiff

carpenter@cz.law

Asa Eaton, Esq.

eaton@cz.law

Mona Viera

mviaera@cz.law

CARPENTER & ZUCKERMAN

8827 West Olympic Boulevard

Beverly Hills, CA 90211

Telephone: 310-273-1230

Facsimile: 310-858-1063

teamcarpenter@cz.law

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

Executed at San Diego, California, this 17th day of April, 2026.

Ashley Smith

(typed)

/s/ Ashley Smith

(signature)

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House

Ex Parte Hearing re: to Appear Pro Hac Vice as to AMAZON.COM SALES

05/29/2026
8:30 AM
Department 7

CVRI2507148
HOPSON vs PREVAGEN, INC.

Judicial Officer: None
Courtroom Assistant: None
Court Reporter: None

APPEARANCES:

No Appearances

Hearing off calendar, reason: hearing reset to update hearing type. Notice of Hearing re Application to Appear Pro Hac Vice;

EXHIBIT B

THE SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

CVRI2507148**HOPSON vs PREVAGEN, INC.**Filed Date: **12/18/2025****Unlimited Civil Product Liability**Case Status: **Active****Riverside - Department 7**[Case Summary](#)[Case Summary](#)**Case Summary**

▼ COMPLAINTS/PETITIONS

Filings	Represented By	Status	Dispositions
HOPSON vs PREVAGEN, INC. Unlimited Civil Product Liability		Active	
1st Amended Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON		Filed: 02/09/2026	
Plaintiff: STEVENSON HOPSON			
Plaintiff: JUANITA HOPSON	ALINA S. VULIC		
Defendant: GNC HOLDINGS, LLC	ARRON NESBITT	Answered as of 03/13/2026	
Defendant: AMAZON.COM SALES, INC.	M. Ray HARTMAN, III	Answered as of 03/11/2026	
Defendant: PREVAGEN, INC.	ARRON NESBITT	Answered as of 03/13/2026	

▼ HEARINGS

Date Time	Type	Judicial Officer	Location/Courtroom	Disposition
04/08/2026 08:30 AM	Ex Parte Hearing re: of Michael Fine	O.G. Magno	Department 7	Taken off calendar
05/29/2026 08:30 AM	Hearing to Appear Pro Hac Vice	O.G. Magno	Department 7	Held - Other pre-disposition hearing

Date Time	Type	Judicial Officer	Location/Courtroom	Disposition
05/29/2026 08:30 AM	Ex Parte Hearing re: to Appear Pro Hac Vice as to AMAZON.COM SALES, INC.	O.G. Magno	Department 7	Hearing Off-Calendar
07/14/2026 08:30 AM	Case Management Conference	O.G. Magno	Department 7	

▼ DOCUMENTS

Search

[Document Download](#)

Status	Date	Description	Filed By	Confidential
Filed	12/18/2025	Certificate of Counsel.		
Filed	12/18/2025	Summons Issued and Filed		
Filed	12/18/2025	Civil Case Cover Sheet		
Filed	12/18/2025	Complaint for Damages		
Generated	01/15/2026	Notice of Case Management Conference Complaint for Product Liability (Over \$35,000)		
Generated	01/15/2026	Notice of Department Assignment		
Filed	01/23/2026	Proof of Service of Summons on Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON	JUANITA HOPSON	
Filed	01/27/2026	Proof of Service of Summons on Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON		
Filed	02/09/2026	1st Amended Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON	JUANITA HOPSON; STEVENSON HOPSON	
Filed	02/19/2026	Proof of Service of Summons on Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON	JUANITA HOPSON	
Filed	02/19/2026	Proof of Service of Summons on 1st Amended Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON	JUANITA HOPSON	
Filed	02/24/2026	Proof of Service on 1st Amended Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON		

Status	Date	Description	Filed By	Confidential
Filed	03/11/2026	Defendant Amazon.Com Sales, Inc.'s General Denial to Plaintiff's First Amended Complaint on 1st Amended Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON	AMAZON.COM SALES, INC.	
Filed	03/13/2026	Defendants Prevagen, Inc.and GNC Holdings, LLC's Answer to Plaintiff's First Amended Complaint on 1st Amended Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON	PREVAGEN, INC.; GNC HOLDINGS, LLC	
Generated	04/16/2026	Notice of Document Return.		
Filed	04/17/2026	Notice of Hearing re Application to Appear Pro Hac Vice; Memorandum in Support; Verified Application of Michael A. Fine; Declaration	AMAZON.COM SALES, INC.	
Generated	04/24/2026	Notice of Hearing (eFiling) on on 1st Amended Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON		
Generated	04/24/2026	Notice of Document Return.		
Filed	04/28/2026	Proof of Service on 1st Amended Complaint for Product Liability (Over \$35,000) of JUANITA HOPSON	AMAZON.COM SALES, INC.	
Generated	05/29/2026	Minute Order: Hearing to Appear Pro Hac Vice		
Generated	05/29/2026	Minute Order: Ex Parte Hearing re: to Appear Pro Hac Vice as to AMAZON.COM SALES, INC.		

▼ CASE LEDGER

	Amount	Paid	Balance
Fines and Fees Totals	\$2,320.35	\$2,311.00	\$0.00
Restitution Totals	\$0.00	\$0.00	\$0.00

[Go Back](#)

EXHIBIT C

Wisconsin.Gov



State of Wisconsin

Department of Financial Institutions

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Corporate Records

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PREVAGEN, INC.

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Vital Statistics

Entity ID Q003468

Registered Effective Date 07/08/2004

Period of Existence PER

Status Incorporated/Qualified/Registered [Request a Certificate of Status](#)

Status Date 07/08/2004

Entity Type Domestic Business

Annual Report Requirements Business Corporations are required to file an Annual Report under s.180.1622 WI Statutes.

Addresses

Registered Agent Office ANTHONY J CORDS
8401 GREENWAY BLVD
STE 800
MIDDLETON , WI 53562-3539
[File a Registered Agent/Office Update Form](#)

Principal Office 8401 GREENWAY BLVD
STE 800
MIDDLETON , WI 53562-3539

Historical Information

Annual Reports

Year	Reel	Image	Filed By	Stored On
2025	000	0000	online	database
2024	000	0000	online	database
2023	000	0000	online	database

2022	000	0000	online	database
2021	000	0000	online	database
2020	000	0000	online	database
2019	000	0000	online	database
2018	000	0000	online	database
2017	000	0000	online	database
2016	000	0000	online	database
2015	000	0000	online	database
2014	000	0000	online	database
2013	000	0000	online	database
2012	000	0000	online	database
2011	000	0000	online	database
2010	000	0000	online	database
2009	000	0000	online	database
2008	000	0000	online	database
2007	000	0000	online	database
2006	000	0000	online	database
2005	000	0000	online	database

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**Certificates of
Newly-elected
Officers/Directors**

None

Old Names

Change Date	Name
Current	PREVAGEN, INC.
01/24/2014	QUINCY BIOSCIENCE MANUFACTURING, INC.
12/22/2005	QRG BIOSCIENCE MANUFACTURING, INC.
03/28/2005	QRG BIOSCIENCE, INC.

Chronology

Effective Date	Transaction	Processed Date	Description
07/08/2004	Incorporated/Qualified/Registered	07/09/2004	
03/28/2005	Amendment	03/29/2005	Old Name = QRG BIOSCIENCE, INC.
09/20/2005	Change of Registered Agent	09/20/2005	FM16-E-Form
12/22/2005	Amendment	12/29/2005	Old Name = QRG BIOSCIENCE MANUFACTURING, INC.
09/19/2006	Change of Registered Agent	09/19/2006	FM16-E-Form
10/25/2007	Change of Registered Agent	10/25/2007	FM16-E-Form
09/24/2008	Change of Registered Agent	09/24/2008	FM16-E-Form
09/06/2011	Change of Registered Agent	09/06/2011	FM16-E-Form
01/24/2014	Amendment	01/27/2014	Old Name = QUINCY BIOSCIENCE MANUFACTURING, INC.
05/22/2014	Change of Registered Agent	05/27/2014	FM13-E-Form
08/04/2014	Change of Registered Agent	08/04/2014	FM16-E-Form

10/07/2014	Change of Registered Agent	10/14/2014	FM13-E-Form
09/28/2016	Change of Registered Agent	09/28/2016	Form16 OnlineForm
09/22/2017	Change of Registered Agent	09/22/2017	Form16 OnlineForm
09/13/2018	Change of Registered Agent	09/13/2018	Form16 OnlineForm
09/18/2019	Change of Registered Agent	09/18/2019	Form16 OnlineForm
09/22/2020	Change of Registered Agent	09/22/2020	Form16 OnlineForm
09/22/2023	Change of Registered Agent	09/22/2023	Form16 OnlineForm
01/02/2024	Change of Registered Agent	01/02/2024	FM13-E-Form

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EXHIBIT D

Arron Nesbitt (202948)
 QUINTAIROS, PRIETO, WOOD & BOYER, P.A.
 1099 18th Street, Suite 1800
 Denver, CO 80202
 (720) 798-1620
 arron.nesbitt@qpwbllaw.com
*Attorney for Defendants Prevagen, Inc.
 and GNC Holdings, LLC*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF RIVERSIDE

JUANITA HOPSON, an individual,	)	Case No. CV RI 2507148
STEVENSON HOPSON, an individual,	)	
	)	
Plaintiffs,	)	DEFENDANT GNC HOLDINGS, LLC'S
	)	RESPONSE TO AMAZON.COM SALES,
v.	)	INC.'S FIRST SET OF SPECIAL
	)	INTERROGATORIES TO DEFENDANT
PREVAGEN, INC., a Wisconsin	)	GNC HOLDINGS, LLC
corporation, AMAZON.COM SALES,	)	
INC., a Delaware corporation, GNC	)	Dept: 7
HOLDINGS, LLC, a limited liability	)	
company and DOES 1-100, inclusive,	)	Judge: Honorable O.G. Magno
	)	
Defendants.	)	Complaint Filed: December 18, 2025
	)	
	)	Trial Date: None

PROPOUNDING PARTIES: AMAZON.COM SALES, Inc.

RESPONDING PARTIES: GNC Holdings, LLC

SPECIAL INTERROGATORY NO. 1:

IDENTIFY each of YOUR members as of December 18, 2025.

RESPONSE: As of December 18, 2025, GNC Holdings, LLC's sole member is ZT Biopharmaceutical LLC, a Delaware limited liability corporation.

SPECIAL INTERROGATORY NO. 2:

For each PERSON identified in YOUR response to Special Interrogatory No. 1 please identify the state where they were each deemed to be a citizen of, if any, as of December 18, 2025.

RESPONSE: As of December 18, 2025, ZT Biopharmaceutical LLC is a Delaware limited liability company. ZT Biopharmaceutical LLC's sole member is Jacks Enterprise Management (Suzhou) Co. Ltd., an entity formed in the Peoples Republic of China. Jacks Enterprise Management is wholly owned by Harbin Pharmaceutical Group Holding Co. Ltd., an entity formed in the Peoples Republic of China.

SPECIAL INTERROGATORY NO. 3:

For each PERSON identified in YOUR response to Special Interrogatory No. 1, please identify whether they were a citizen of the United States as of December 18, 2025.

RESPONSE: As of December 18, 2025, ZT Biopharmaceutical LLC is a Delaware limited liability company. ZT Biopharmaceutical LLC's sole member is Jacks Enterprise Management (Suzhou) Co. Ltd., an entity formed in the Peoples Republic of China. Jacks Enterprise Management is wholly owned by Harbin Pharmaceutical Group Holding Co. Ltd., an entity formed in the Peoples Republic of China.

Respectfully submitted this 22nd day of June 2026.

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.

By: /s/ Arron Nesbitt
Arron Nesbitt
State Bar No. 202948
*Attorney for Defendants Prevagen, Inc.
and GNC Holdings, LLC*

I swear or affirm that to the best of my knowledge, the forgoing responses to Amazon.com Sales, Inc's First Set of Special Interrogatories are true and correct.

For and on behalf of GNC Holdings, LLC

Guy Gato
Its: SVP, General Counsel
Date: JUNE 22, 2026

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is 1099 18th Street, Suite 1800, Denver CO 80202.

On June 22, 2026, I served true copies of the following document(s): **DEFENDANT GNC HOLDINGS, LLC'S RESPONSE TO AMAZON.COM SALES, INC.'S FIRST SET OF SPECIAL INTERROGATORIES TO DEFENDANT GNC HOLDINGS, LLC**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

John C. Carpenter, Esq.
Alina S. Vulie, Esq.
CARPENTER & ZUCKERMAN
8827 West Olympic Boulevard
Beverly Hills, CA 90211
Telephone: 310-273-1230
Facsimile: 310-858-1063
carpenter@cz.law
avulic@cz.law
teamcarpenter@cz.law

BY EMAIL. Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused via a Court-appointed electronic service for the above-referenced document to be sent in electronic PDF format as an attachment to an email addressed to the persons on whom such document is to be served at the email addresses shown below, as last given by those persons or as obtained from an internet website relating to such persons, and I did not receive an email response upon sending such emails indicating that such emails were not delivered.

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

Executed on June 22, 2026.

By: /s/ Alyssa Romero
Legal Assistant