

1 Joseph R. Saveri (State Bar No. 130064)
 Steven N. Williams (State Bar No. 175489)
 2 Kyle P. Quackenbush (State Bar No.322401)
 Anupama K. Reddy (State Bar No. 324873)
 3 JOSEPH SAVERI LAW FIRM, INC.
 601 California Street, Suite 1000
 4 San Francisco, California 94108
 Telephone: (415) 500-6800
 5 Facsimile: (415) 395-9940
 Email: jsaveri@saverilawfirm.com
 6 swilliams@saverilawfirm.com
 kquackenbush@saverilawfirm.com
 7 areddy@saverilawfirm.com

8 *Attorneys for Individual and Representative Plaintiffs*
 9 *Denise Redfield and Albert Riccelli*

10
 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 **IN RE: JUUL LABS, INC., MARKETING,
 14 SALES PRACTICES, AND PRODUCTS
 15 LIABILITY LITIGATION**

Case No. 19-md-02913-WHO

**DECLARATION OF JOSEPH R. SAVERI
 IN SUPPORT OF ADMINISTRATIVE
 MOTION TO RELATE CASES
 PURSUANT TO CIVIL L.R. 3-12 AND 7-11**

16 **This Document Relates to:**

- 17 *Reece v. Altria Group, Inc. et al.*, Case No. 3:20-cv-
 18 02345-WHO (N.D. Cal.);
 19 *Blomquist v. Altria Group, Inc. et al.*, Case No. 20-cv-
 20 02512-WHO (N.D. Cal.);
 21 *Martinez v. Altria Group, Inc. et al.*, Case No. 20-cv-
 02597-WHO (N.D. Cal.);
 22 *Deadwyler v. Altria Group, Inc. et al.*, Case No. 20-
 cv-02729-WHO (N.D. Cal.);
 23 *Stiles v. Altria Group, Inc. et al.*, Case No. 20-cv-
 24 02779-WHO (N.D. Cal.);
 25 *Licari v. Altria Group, Inc. et al.*, Case No. 20-cv-
 02778-WHO (N.D. Cal.);
 26 *Flannery v. Altria Group, Inc. et al.*, Case No. 20-cv-
 27 02891-WHO (N.D. Cal.);

28 [Caption continues on following page]

1 *Larimore, et al. v. Altria Group, Inc. et al.*, Case No.
20-cv-02999-WHO (N.D. Cal.);

2 *Walsh, et al. v Altria Group, Inc. et al.*, Case No. 20-
3 cv-03183-WHO (N.D. Cal.).

4
5 I, JOSEPH R. SAVERI, declare as follows:

6 1. I am a member of the bar of this Court and a partner of the law firm Joseph Saveri Law Firm,
7 Inc. I am attorney of record for the named plaintiff in *Redfield, et al. v. Altria Group, Inc., et al.*, Case No.
8 3:20-cv-03288-JCS. I make this declaration in support of Plaintiff's Administrative Motion to Consider
9 Whether Cases Should Be Related. I have personal knowledge of the facts stated herein, and if called as
10 a witness, I could and would competently testify thereto. I make this declaration pursuant to 28 U.S.C.
11 §1746.

12 2. I have reviewed the complaints filed in the cases listed below, and believe that these actions
13 assert similar claims under the federal antitrust laws, involve substantially the same parties, property,
14 transaction or event and it appears likely that there will be an unduly burdensome duplication of labor
15 and expense or conflicting results if the cases are conducted before different Judges.

- 16 a. *Reece v. Altria Group, Inc., et al.*, Case No. 20-cv-02345-WHO.
17 b. *Blomquist v. Altria Group, Inc., et al.*, Case No. 20-cv-2512-WHO.
18 c. *Martinez v. Altria Group, Inc., et al.*, Case No. 20-cv-02597-WHO.
19 d. *Deadwyler v. Altria Group, Inc., et al.*, Case No. 20-cv-02729-WHO.
20 e. *Stiles v. Altria Group, Inc., et al.*, Case No. 20-cv-02779-WHO.
21 f. *Licari v. Altria Group, Inc., et al.*, Case No. 20-cv-02778-WHO.
22 g. *Flannery v. Altria Group, Inc., et al.*, Case No. 20-cv-02891-WHO.
23 h. *Larimore, et al. v. Altria Group, Inc., et al.*, Case No. 20-cv-02999-WHO.
24 i. *Walsh, et al. v Altria Group, Inc., et al.*, Case No. 20-cv-03183-WHO.
25 j. *Redfield, et. al. v. Altria Group, Inc., et al.*, Case No. 20-cv-03288-JCS.

26 3. Plaintiffs have requested that Defendants agree that the Redfield actions is a related action
27 pursuant to Civil Local Rules 3-12 and 7-11. Defendants agree that Redfield should be related to the
28 Antitrust Actions.

1 I declare under penalty of perjury under the laws of the Unites States that the foregoing is true and
2 correct.

3 Executed this 27th day of May 2020 at St. Helena, California.

4
5 By: /s/ Joseph R. Saveri
6 Joseph R. Saveri
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28