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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SUMMER WHITESIDE, individually and on behalf of all others similarly situated,  
  
Plaintiff,  
  
vs.  
  
KIMBERLY-CLARK CORP.,  
  
Defendant.

Case No.: 5:22-cv-01988

**CLASS ACTION COMPLAINT**

- 1. Violation of Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200, *et seq.*)
- 2. Violation of False Advertising Law (Cal. Bus. & Prof. Code §§ 17500, *et seq.*)
- 3. Violation of Consumers Legal Remedies Act (Cal. Civ. Code §§ 1750, *et seq.*)
- 4. Breach of Warranty
- 5. Unjust Enrichment

**JURY TRIAL DEMANDED**

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**COMPLAINT**

1  
2 1. Plaintiff Summer Whiteside (“**Plaintiff**”), individually and on behalf of all others  
3 similarly situated, as more fully described herein (the “**Class**” and/or “**Class Members**”), brings  
4 this class action against Defendant Kimberly-Clark Corp. (“**Defendant**” and or “**Kimberly-**  
5 **Clark**”), and alleges the following based upon information and belief, unless otherwise expressly  
6 stated as based upon personal knowledge.

7 **I. INTRODUCTION**

8 2. **Synopsis.** In an effort to increase profits and to obtain an unfair advantage over its  
9 lawfully acting competitors, Defendant falsely and misleadingly labels certain of its Huggies brand  
10 wipe products with the following claims: “**Plant-based wipes**” and “**natural care**” deliberately  
11 leading reasonable consumers, including Plaintiff, to incorrectly believe that the Products are  
12 composed of only water, natural ingredients, and ingredients that come from plants and that have  
13 not undergone substantial processing (hereinafter, “**Plant-Based Representation,**” and/or  
14 “**Natural Care Representation,**” and/or “**Challenged Representations**”). Defendant reinforces  
15 the Challenged Representations on the Products’ packaging by displaying images of plants,  
16 including leaves and trees, and by using green/blue coloring, further perpetuating the notion that the  
17 Products are natural and plant-based. Fair and accurate depictions of the Products’ top-facing labels  
18 or packaging (Huggies *Natural Care*® Baby Wipes (Sensitive) and Huggies *Natural Care*® Baby  
19 Wipes (Refreshing)), are depicted below with the Challenged Representations circled in red.

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1 Huggies Natural Care® Baby Wipes (Sensitive, 56 Count—Original Packaging) (Exhibit 1-1A):

2 Plant-based wipes,



3 natural care®

4 (see also Huggies Natural Care® Baby Wipes (Sensitive), Exhibit 1-1A to 1-1M); and

5 Huggies Natural Care® Baby Wipes (Refreshing, 56 Count—Original Packaging) (Exhibit 1-2A):

6 Plant-based wipes,



7 natural care®

8 (see also Huggies Natural Care® Baby Wipes (Refreshing), Exhibit 1-2A to 1-2M)

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