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Attorneys for Plaintiff Michelle Moran

**UNITED STATES DISTRICT COURT
NORHTERN DISTRICT OF CALIFORNIA**

MICHELLE MORAN, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

EDGEWELL PERSONAL CARE, LLC

Defendant.

Case No.:

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 Michelle Moran (“**Plaintiff**”), individually and on behalf of all others
3 similarly situated, as more fully described herein (the “**Class**” and “**Class Members**”), brings this
4 class action complaint against Defendant Edgewell Personal Care Brands, LLC (“**Defendant**”), and
5 alleges the following upon information and belief, unless otherwise expressly stated as based upon
6 personal knowledge:

7 2. **Synopsis.** To obtain an unfair competitive advantage in the billion-dollar sunscreen
8 market, Defendant is exposing consumers and the environment (*e.g.* coral reefs and marine life) to
9 harmful chemical active ingredients in their sunscreens by falsely labeling them as “REEF
10 FRIENDLY.” Defendant has reaped millions of dollars through this fraudulent scheme based on a
11 calculated business decision to put profits over people and the environment. Specifically, Defendant
12 falsely and misleadingly labels certain of its Banana Boat® brand sunscreen products as “REEF
13 FRIENDLY” (hereinafter, “**Reef Friendly Representation**,” “**False Advertising Claim**” and/or
14 “**Challenged Representation**”). An example of the Challenged Representation is depicted on the
15 following page:

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