

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

Rachel Lumbra, individually and on behalf of  
all others similarly situated,

Plaintiff,

- against -

Suja Life, LLC,

Defendant

Case No. 1:22-cv-893 (MAD/DJS)

Class Action Complaint

Jury Trial Demanded

Plaintiff alleges upon information and belief, except for allegations pertaining to Plaintiff, which are based on personal knowledge:

1. Suja Life, LLC (“Defendant”) manufactures, labels, and sells juices including blends of apple and beet represented as “Cold-Pressed” under the Suja brand (“Product”).



2. Juice refers to the aqueous liquid contained in fruits and vegetables.
3. To obtain juice, fruits and vegetables are squeezed and/or pressed.
4. Such juices can be sold to consumers as “fresh” because they have not been subject to any other treatment method to extend their shelf life.
5. Consumers value the sensory, nutritional, and organoleptic properties of fresh juice.
6. For decades, companies have described juices in ways that truthfully inform consumers of their qualities and allow for comparisons between different products.
7. Where juice has not been subject to treatment beyond being extracted, terms used include “fresh squeezed,” “fresh pressed,” and “cold-pressed.”
8. For instance, though the apple juice below is made from “100% Freshly Pressed Apples,” it prominently discloses it is “Flash Pasteurized,” while the adjacent orange juice states, “Pasteurized” in large capital letters.



9. Other brands of cold-pressed juices prominently disclose the treatment that occurs after the juice is obtained from fruits and vegetables through being cold-pressed.

10. For instance, the 7-Select brand of cold-pressed juice prominently states, “Flash Pasteurized” directly beneath “Cold Pressed Juice,” while the Suja product vaguely references “High Pressure Certified” in a seal at the bottom of the bottle, where consumers are unlikely to notice it and have no idea what it refers to.



11. The Product is often sold in produce aisles where groceries are sold, in proximity to juices made at those stores, though such competitor juices have not been subject to any treatment beyond being cold-pressed, which furthers the impression it is not subsequently treated.

12. By describing the Product as “Cold-Pressed” without any prominent, clear disclaimers of other processing steps, consumers expect it will be fresh.

13. However, the Product is not fresh and has more in common with juices sold in standard refrigerator cases because it is highly processed after being cold-pressed.



14. The front label purports to reference this, by the small seal stating “High Pressure Certified” at the bottom of the bottle.



15. No visible explanation is provided for what this term means.
16. Given that all juices are made by applying pressure, even if consumers notice this seal, they will believe it refers to the cold-pressing.
17. The back of the label refers to the component fruit and vegetables being subject to “cold pressure to keep them feeling fresh” followed by a webpage about “HPP.”



### CAN'T STOP THE BEET

Suja is made sunny in San Diego, where we pick our favorite local fruits and veggies and then **chill them out with cold pressure to keep them feeling fresh** and tasting delicious. We bottle up the power of plants so you can make nutrition your bliss!

[SUJAJUICE.COM/HPP](https://www.sujajuice.com/hpp)

18. HPP refers to high pressure processing, a non-thermal treatment method to preserve juice for up to 60 days.
19. Juice subjected to this treatment method is no longer fresh, and it is misleading to describe such a juice as “cold-pressed” without an equivalent and conspicuous disclosure of this processing step.
20. Defendant makes other representations and omissions with respect to the Product

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.