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17 *Attorneys for Defendants*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 STEVEN PRESCOTT and MIKE XAVIER,
21 individually and on behalf of all Others
22 Similarly Situated,

23 Plaintiffs,

24 v.
25 BAYER HEALTHCARE LLC, a Delaware
26 limited liability company; BEIERSDORF,
INC., a Delaware corporation,

Defendants.

Case No. 5:20-cv-00102

**DECLARATION OF TERESA
GONZALEZ-RUIZ**

1 **DECLARATION OF TERESA GONZALEZ-RUIZ**

2 I, TERESA GONZALEZ-RUIZ, hereby declare under penalty of perjury as follows:

3
4 1. I am the current General Manager and Vice President, Nutritionals and Digestive
5 Health at Bayer Corporation.

6
7 2. LGFB is “a non-medical, brand-neutral” charitable organization that “teaches beauty
8 techniques to people with cancer to help them manage the appearance-related side effects of
9 cancer treatment.”¹ The goal of the program is to help people with cancer find some normalcy
10 in life through “lessons on skin and nail care, cosmetics, wigs and turbans, accessories and
11 styling.” *Id.* LGFB helps “all women with cancer who are undergoing chemotherapy, radiation,
12 and other forms of cancer treatment.” *Id.*

13
14 3. Bayer HealthCare LLC (“Bayer”) does not have an ownership interest in LGFB. Bayer is
15 neither a donor for LGFB nor a corporate partner, and none of its employees or officers are
16 employees or officers of LGFB.

17
18 4. Bayer has not discussed with LGFB the possibility of a *cy pres* award to LGFB
19 stemming from this litigation.

20 I declare under penalty of perjury under the laws of the United States that the foregoing is true
21 and correct and that this declaration was executed on July 13, 2021.

22
23 /s/ Teresa Gonzalez-Ruiz
24 Teresa Gonzalez-Ruiz

25
26

¹ <https://lookgoodfeelbetter.org/about/about-the-program/> (last accessed July 7, 2021)