

1 Paige M. Tomaselli (SBN 237737)

2 Dylan D. Grimes (SBN 302981)

3 **GRIME LAW LLP**

4 730 Arizona Avenue

5 Santa Monica, CA 90401

6 Telephone: (310) 747-5095

7 ptomaselli@grimelaw.com

8 dgrimes@grimelaw.com

9 Gretchen Elsner (*pro hac vice*)

10 **ELSNER LAW & POLICY, LLC**

11 314 South Guadalupe Street, Suite 123

12 Santa Fe, NM 87501

13 Telephone: (505) 303-0980

14 gretchen@elsnerlaw.org

15 *Attorneys for Plaintiffs*

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **SOUTHERN DIVISION**

19 SARA SAFARI, PEYMON
20 KHAGHANI, on behalf of themselves
21 and all others similarly situated, and
22 FARM FORWARD, on behalf of the
23 general public,

24 Plaintiffs,

25 v.

26 WHOLE FOODS MARKET
27 SERVICES, INC., a Delaware
corporation, WHOLE FOODS
MARKET CALIFORNIA, INC., a
California corporation, MRS.
GOOCH'S NATURAL FOODS
MARKETS, INC. doing business as
Whole Foods Market, a California
Corporation,

Defendants.

Case No. 8:22-CV-01562-JWH-KES

**PLAINTIFF FARM FORWARD'S
RESPONSES TO DEFENDANTS'
INTERROGATORIES, SET NO.
ONE**

1 PROPOUNDING PARTY: DEFENDANTS WHOLE FOODS MARKET
2 SERVICES, INC., WHOLE FOODS MARKET
3 CALIFORNIA, INC. and MRS. GOOCH'S NATURAL
4 FOOD MARKETS, INC.

5 RESPONDING PARTY: PLAINTIFF FARM FORWARD

6 SET NO.: ONE

7
8 **INTERROGATORY NO. 1:**

9 Identify by date, store, product type, product b[r]and name and UPC number each and
10 every BEEF PRODUCT YOU purchased from a Whole Foods Market store or online
11 retail marketplace during the CLASS PERIOD.

12 **RESPONSE:**

13 Plaintiff objects to this interrogatory because it contains a compound, conjunctive, or
14 disjunctive question and requires Plaintiff to create a compilation of information.
15 Plaintiff objects to this Interrogatory to the extent that it calls for information protected
16 from disclosure by the attorney-client privilege, attorney work product doctrine, or any
17 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
18 in that it asks for "each and every" BEEF Product that "YOU" purchased from any
19 Whole Foods Market store during the CLASS PERIOD without limiting the request to
20 those items that Farm Forward purchased *and* tested. Plaintiff further objects to
21 Defendants' definition of "YOU" and "YOUR" as it relates to this interrogatory because
22 it would require Plaintiff to provide information on "each and every" BEEF PRODUCT
23 that Plaintiff Farm Forward's officers, directors, employees, representatives, agents
24 purchased at Farm Forward's direction, without limiting the Interrogatory to purchases
25 made in relation to this lawsuit and those purchases actually tested by Farm Forward or
26 its agents. Discovery is ongoing, and Plaintiff intends to supplement if or when further
27 information becomes available.

Without waiving the forgoing objections, Farm Forward produces the attached document, bates stamped as FF 0001-0007. Discovery is ongoing, and Plaintiff intends to supplement if or when additional information becomes available.

1 **INTERROGATORY NO. 2:**

2 Identify by name, address, telephone number, email address and point of contact each
3 entity YOU hired to test BEEF PRODUCTS purchased from a Whole Foods Market
4 store or online retail marketplace.

5 **RESPONSE:**

6 Plaintiff objects to this interrogatory because it contains a compound, conjunctive, or
7 disjunctive question and requires Plaintiff to create a compilation of information.
8 Plaintiff objects to this Interrogatory to the extent that it calls for information protected
9 from disclosure by the attorney-client privilege, attorney work product doctrine, or any
10 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
11 in that it asks for the contact information for each entity that “YOU” hired to test BEEF
12 PRODUCTS from any Whole Foods Market store without limiting the request to a
13 specific time period. Plaintiff further objects to Defendants’ definition of “YOU” and
14 “YOUR” as it relates to this interrogatory because it would require Plaintiff to provide
15 information on all BEEF PRODUCTS that Plaintiff Farm Forward’s officers, directors,
16 employees, representatives, agents had tested at Farm Forward’s direction, without
17 limiting the Interrogatory to testing completed in relation to this lawsuit. Discovery is
18 ongoing, and Plaintiff intends to supplement if or when additional information becomes
19 available.

20 Without waiving the forgoing objections, Farm Forward states:

- 21 1. HRI Laboratories, 505 Dimick Dr Suite 111, Fairfield, IA 52556, (641) 552-6258,
22 John Fagan, john@hrilabs.org.
- 23 2. Trilogy Analytical Laboratory, 870 Vossbrink Dr, Washington, MO 63090, (636)
24 239-1521, Julie Brunkhorst, julie@trilogylab.com

25 **INTERROGATORY NO. 3:**

26 For each entity identified in response to Interrogatory No. 2, identify by product type,
27 product brand and UPC number of the BEEF PRODUCT(S) they tested.

RESPONSE:

Plaintiff objects to this interrogatory because it contains a compound, conjunctive, or
disjunctive question and requires Plaintiff to create a compilation of information.
Plaintiff objects to this Interrogatory to the extent that it calls for information protected
from disclosure by the attorney-client privilege, attorney work product doctrine, or any

1 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
2 in that it does not limit the request to a specific time period. Plaintiff further objects to
3 Defendants' definition of "YOU" and "YOUR" as it relates to this interrogatory because
4 it would require Plaintiff to provide information on all BEEF PRODUCTS that Plaintiff
5 Farm Forward's officers, directors, employees, representatives, agents had tested at
6 Farm Forward's direction, without limiting the Interrogatory to testing completed in
7 relation to this lawsuit. Discovery is ongoing, and Plaintiff intends to supplement if or
8 when additional information becomes available.

9 Without waiving the forgoing objections, Farm Forward's response is attached and bates
10 stamped as FF 0001-0007.

11 **INTERROGATORY NO. 4:**

12 Identify by name, contact information and role each of YOUR employees, officers,
13 directors or agents involved in YOUR investigation of Whole Foods Market's alleged
14 misrepresentations regarding antibiotic and/or pharmaceutical use in the BEEF
15 PRODUCTS that it sells.

16 **RESPONSE:**

17 Plaintiff objects to this interrogatory because it contains a compound, conjunctive, or
18 disjunctive question and requires Plaintiff to create a compilation of information.
19 Plaintiff objects to this Interrogatory to the extent that it calls for information protected
20 from disclosure by the attorney-client privilege, attorney work product doctrine, or any
21 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
22 in that it does not limit the request to a specific time period. Plaintiff further objects to
23 Defendants' definition of "YOU" and "YOUR" as it relates to this interrogatory because
24 it would require Plaintiff to provide information on all BEEF PRODUCTS that Plaintiff
25 Farm Forward's officers, directors, employees, representatives, agents had obtained
26 related to any "investigation" at Farm Forward's direction, without limiting the
27 Interrogatory to any investigation in relation to this lawsuit. Plaintiff objects that the
28 terms "role" and "investigation" are vague and ambiguous and not defined by
29 Defendants. Discovery is ongoing, and Plaintiff intends to supplement if or when
30 additional information becomes available.

31 Without waiving the forgoing objections, Farm Forward states:

- 32 1. Andrew deCoriolis, Executive Director, Farm Forward
- 33 2. Aaron Gross, CEO, Board Chair, Farm Forward
- 34 3. Ben Goldsmith, Chief Strategist, Farm Forward
- 35 4. Ilana Braverman, Director of Outreach, Better Food Foundation

5. Kabrina Miller, Operations Manager, Farm Forward
6. Laura Lee Cascada, Campaign Director, Better Food Foundation

Each of the above may be contacted through Plaintiff's counsel.

INTERROGATORY NO. 5:

Identify by name, contact information and role each of YOUR employees, officers, directors or agents who helped develop, support or promote GAP certified products from 2007 to 2020.

RESPONSE:

Plaintiff objects to this interrogatory because it contains a compound, conjunctive, or disjunctive question and requires Plaintiff to create a compilation of information. Plaintiff objects to this Interrogatory to the extent that it calls for information protected from disclosure by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege. Plaintiff further objects to Defendants' definition of "YOU" and "YOUR" as it relates to this interrogatory because it would require Plaintiff to provide information on all employees, officers, directors or agents who helped develop, support or promote GAP certified projects from 2007 to 2020 even if they did not do so at Farm Forward's direction. Plaintiff objects that the term "role" is vague and ambiguous and not defined by Defendants. Plaintiff objects to this interrogatory because it is unduly burdensome to request 13 years of information for employees, officers, directors or agents who helped develop, support, or promote GAP certified products. Due to the 13-year time period sought by Defendants, Plaintiff cannot guarantee that its list is complete for the entire 13-year time period. Discovery is ongoing, and Plaintiff intends to supplement if or when additional information becomes available.

Without waiving the forgoing objections, Farm Forward states:

1. Andrew deCoriolis, Executive Director, Farm Forward
2. Aaron Gross, CEO, board chair, Farm Forward
3. Ben Goldsmith, Chief Strategist, Farm Forward
4. Michael McFadden, Farm Forward board member, former staff
5. Steve Gross, Farm Forward consultant, former board member, former GAP board member
6. Luke Gilzean, Farm Forward former staff
7. Whitney Robinson, BLT Studios, developed BuyingPoultry.com.
8. Erin Eberle, Farm Forward former staff
9. Lara Prescott, Farm Forward former staff
10. Julie Ranney, Farm Forward former intern

- 1 11. Dr. Temple Grandin, BuyingPoultry.com scientific advisor
- 2 12. Dr. Ian Duncan, BuyingPoultry.com scientific advisor
- 3 13. Bill Niman, BuyingPoultry.com advisory committee
- 4 14. Nicolette Hahn Niman, BuyingPoultry.com advisory committee
- 5 15. Diane Halverson, BuyingPoultry.com advisory committee
- 6 16. Frank Reese, BuyingPoultry.com advisory committee
- 7 17. Dr. Bernard Rollin, BuyingPoultry.com advisory committee
- 8 18. Dr. Katherine Miller, BuyingPoultry.com advisory committee

9 Each of the above may be contacted through Plaintiff's counsel.

10 **INTERROGATORY NO. 6:**

11 Identify by name, contact information and role each of YOUR employees,
12 officers, directors or agents who worked on promoting Whole Foods Market's meat
13 products as "better" or "best" choices for consumers.

14 **RESPONSE:**

15 Plaintiff objects to this interrogatory because it contains a compound, conjunctive, or
16 disjunctive question and requires Plaintiff to create a compilation of information.
17 Plaintiff objects to this Interrogatory to the extent that it calls for information protected
18 from disclosure by the attorney-client privilege, attorney work product doctrine, or any
19 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
20 in that it does not limit the request to a specific time period. Plaintiff further objects to
21 Defendants' definition of "YOU" and "YOUR" as it relates to this interrogatory because
22 it would require Plaintiff to provide information on all employees, officers, directors or
23 agents who worked on prompting Whole Foods Market's meat products as "better" or
24 "best" choices for consumers, even if they did not do so at Farm Forward's direction.
25 Plaintiff objects that the term "role" is vague and ambiguous and not defined by
26 Defendants. Plaintiff objects to this interrogatory because it is unduly burdensome to
27 request years of information for employees, officers, directors or agents who worked on
promoting Whole Foods Market's meat product as "better" or "best" choices for
consumers for an unspecified period of time, which Farm Forward estimates to be more
than a decade. Due to the long time period sought by Defendants, Plaintiff cannot
guarantee that its list is complete for the entire unspecified time period. Discovery is
ongoing, and Plaintiff intends to supplement if or when additional information becomes
available.

Without waiving the forgoing objections, Farm Forward states:

1 See list provided in response to Interrogatory No. 5.
2

3 **INTERROGATORY NO. 7:**

4 Identify by name, contact information and role each of YOUR employees or agents
5 involved in YOUR “Pandemic and factory farming” campaign.

6 **RESPONSE:**

7 Plaintiff objects to this interrogatory because it contains a compound, conjunctive, or
8 disjunctive question and requires Plaintiff to create a compilation of information.
9 Plaintiff objects to this Interrogatory to the extent that it calls for information protected
10 from disclosure by the attorney-client privilege, attorney work product doctrine, or any
11 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
12 in that it does not limit the request to a specific time period. Plaintiff objects that the
13 term “role” is vague and ambiguous and not defined by Defendants. Plaintiff objects to
14 this interrogatory because it is unduly burdensome to request years of information for
15 employees, officers, directors or agents who were involved in Farm Forward’s
16 “Pandemic and factory farming” campaign for an unspecified period of time. Discovery
17 is ongoing, and Plaintiff intends to supplement if or when additional information
18 becomes available.

19 Without waiving the forgoing objections, Farm Forward states:

- 20 1. Andrew deCoriolis, Executive Director, Farm Forward
- 21 2. Aaron Gross, CEO, Board Chair, Farm Forward
- 22 3. Ben Goldsmith, Chief Strategist, Farm Forward
- 23 4. Erin Eberle, Director of Engagement, Farm Forward
- 24 5. Laura Lee Cascada, Campaigns Director, Better Food Foundation
- 25 6. Jonathan Safran Foer, Board Member, Farm Forward
- 26 7. Dr. Joseph Tuminello, Program Coordinator, Farm Forward
- 27 8. Cage Free Productions, video production firm

Each of the above may be contacted through Plaintiff’s counsel.

INTERROGATORY NO. 8:

Identify by name, contact information and role each of YOUR employees or agents
involved in YOUR 2021 consumer survey to determine whether consumers were being
misled by Whole Foods Market.

1 **RESPONSE:**

2 Plaintiff objects to this interrogatory because it contains a compound, conjunctive, or
3 disjunctive question and requires Plaintiff to create a compilation of information.
4 Plaintiff objects to this Interrogatory to the extent that it calls for information protected
5 from disclosure by the attorney-client privilege, attorney work product doctrine, or any
6 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
7 in that it does not limit the request to a specific time period. Plaintiff further objects to
8 Defendants’ definition of “YOU” and “YOUR” as it relates to this interrogatory because
9 it would require Plaintiff to provide information on all employees or agents involved in
10 2021 consumer surveys to determine whether consumers were being misled by Whole
11 Foods Market without limiting the Interrogatory to any consumer survey in relation to
12 this lawsuit. Plaintiff objects that the term “role” is vague and ambiguous and not
13 defined by Defendants. Plaintiff objects that “consumer survey” is vague and ambiguous
14 and not defined by Defendants. Plaintiff responds to this interrogatory on the assumption
15 that Defendants meant to specify the survey referenced in ¶ 93 in the First Amended
16 Complaint (ECF No. 35). Discovery is ongoing, and Plaintiff intends to supplement if or
17 when additional information becomes available.

18 Without waiving the forgoing objections, Farm Forward states:

- 19 1. Andrew deCoriolis, Executive Director, Farm Forward
- 20 2. Ben Goldsmith, Chief Strategist, Farm Forward
- 21 3. Trevor McCarty, Policy Manager, Farm Forward
- 22 4. Laura Lee Cascada, Campaigns Director, Better Food Foundation
- 23 5. OnePoll, market research firm, contact Aleksandra Vayntraub

24 Each of the above may be contacted through Plaintiff’s counsel.

25 **INTERROGATORY NO. 9:**

26 Identify all facts supporting YOUR contention that routine or subtherapeutic antibiotics
27 are administered to the animals used in the BEEF PRODUCTS sold by Whole Foods
Market.

28 **RESPONSE:**

29 Plaintiff objects to this Interrogatory to the extent that it calls for information protected
30 from disclosure by the attorney-client privilege, attorney work product doctrine, or any
31 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
32 in that it does not limit the request to a specific time period. Plaintiff objects that “all

1 facts” for an unspecified period of time is overly broad, unduly burdensome, and not
2 proportionate to the needs of the case. Plaintiff objects to the extent that it is a contention
3 interrogatory to which Plaintiff cannot fully respond at this stage of the litigation.
Discovery is ongoing, and Plaintiff intends to supplement.

4 Without waiving the forgoing objections, Farm Forward states:

- 5 1. Anne Malleau, employed as both Whole Foods Market Executive Leader of Meat
6 and Poultry and GAP Executive Director, exchanged email correspondence with
7 Farm Forward in 2017 regarding antibiotics use in cattle, the possibility of testing
8 for antibiotics use in GAP certified cattle, and Ms. Malleau’s resistance to test due
9 to potential liability for cattle that tested positive for antibiotics use.
- 10 2. Trilogly Analytical Laboratory’s report confirming monensin sodium present in
11 beef purchased at Whole Foods by Farm Forward.
- 12 3. FoodID’s peer-reviewed and published article in *Science* documenting antibiotics
13 use in GAP certified cattle.

14 **INTERROGATORY NO. 10:**

15 Identify all facts supporting YOUR contention that Whole Foods Market does not take
16 the necessary steps to ensure that all BEEF PRODUCTS it sells are raised without
17 antibiotics.

18 **RESPONSE:**

19 Plaintiff objects to this Interrogatory to the extent that it calls for information protected
20 from disclosure by the attorney-client privilege, attorney work product doctrine, or any
21 other applicable privilege. Plaintiff objects to this Interrogatory because it is overbroad
22 in that it does not limit the request to a specific time period. Plaintiff objects that “all
23 facts” for an unspecified period of time is overly broad, unduly burdensome and not
24 proportionate to the needs of the case. Plaintiff objects to the extent that is a contention
25 interrogatory to which Plaintiff cannot fully respond at this stage of the litigation.
26 Discovery is ongoing, and Plaintiff intends to supplement.
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VERIFICATION

I, Andrew deCoriolis, Farm Forward’s Executive Director, have read Farm Forward’s Responses to Defendants’ Interrogatories, Set No. One and know its contents. The matters stated in it are true of my own knowledge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed April 20, 2023.



Andrew deCoriolis

DATED: April 20, 2023

Respectfully submitted,

/s/ Paige M. Tomaselli

Paige M. Tomaselli (SBN 237737)

Dylan D. Grimes (SBN 302981)

GRIME LAW LLP

730 Arizona Avenue

Santa Monica, CA 90401

Telephone: (310) 747-5095

ptomaselli@grimelaw.com

dgrimes@grimelaw.com

Gretchen Elsner (*pro hac vice*)

ELSNER LAW & POLICY, LLC

314 South Guadalupe Street, Suite 123

Santa Fe, NM 87501

Telephone: (505) 303-0980

gretchen@elsnerlaw.org

Attorneys for Plaintiffs

Plaintiff Farm Forward's Response to Defendants' Interrogatories, Set No. One

Date of Purchase	Store	Store Location	Product	Product Brand	Product's UPC/barcode	Lab	GAP Rating
10/26/2020	Whole Foods Market	Chicago, IL 60657	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002904000	Trilogy	GAP (no step number listed)
11/9/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	48649 18620	Trilogy	GAP Step 4
11/9/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45514	Trilogy	GAP Step 4
11/9/2020	Whole Foods Market	Chicago, IL 60657	Ground beef	WF Meat Counter	(01)002901020	Trilogy	GAP Step 4
11/16/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	48649 18620	Trilogy	GAP Step 4
11/16/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45514	Trilogy	GAP Step 4
11/16/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Whole Foods Market (from Meat Counter)	(01)002477060	Trilogy	GAP Step 4
11/16/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Whole Foods Market (from Meat Counter)	(01)002954700	Trilogy	GAP Step 4
11/23/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	48649 18620	Trilogy	GAP Step 4
11/23/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45513	Trilogy	GAP Step 4
11/24/2020	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	0 53196 09630	Trilogy	GAP Step 4
11/24/2020	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 62688 00031	Trilogy	GAP Step 4
11/24/2020	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 92659 00589	Trilogy	GAP Step 1
12/4/2020	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	8 53196 00119	Trilogy	USDA Organic, GAP Step 4

Plaintiff Farm Forward's Response to Defendants' Interrogatories, Set No. One

Date of Purchase	Store	Store Location	Product	Product Brand	Product's UPC/barcode	Lab	GAP Rating
12/4/2020	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 50001 59169	Trilogy	GAP Step 4
12/4/2020	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 96297 00899	Trilogy	GAP Step 1
12/12/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45514	Trilogy	GAP Step 4
12/14/2020	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 92659 00889	Trilogy	GAP Step 1
12/14/2020	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	8 53196 00119	Trilogy	GAP Step 4
12/14/2020	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 62688 00031	Trilogy	GAP Step 4
12/26/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	6 48649 18618	Trilogy	GAP Step 4
12/26/2020	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45514	Trilogy	GAP Step 4
1/9/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	6 48649 25232	Trilogy	GAP Step 4
1/9/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	50014 45514	Trilogy	GAP Step 4
1/16/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	6 48649 18620	Trilogy	GAP Step 4
1/16/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45514	Trilogy	GAP Step 4
1/24/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	92659 00719	Trilogy	GAP Step 1
1/24/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	52846 44925	Trilogy	GAP Step 4
1/24/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	53196 09630	Trilogy	GAP Step 4
1/30/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	6 48649 25232	Trilogy	GAP Step 4

Plaintiff Farm Forward's Response to Defendants' Interrogatories, Set No. One

Date of Purchase	Store	Store Location	Product	Product Brand	Product's UPC/barcode	Lab	GAP Rating
1/30/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45514	Trilogy	GAP Step 4
2/3/2021	Whole Foods Market	San Francisco, CA 94117	Beef strips	Panorama Meats	2 37819 00551	Trilogy	GAP Step 4
2/3/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	97819 00551	Trilogy	GAP Step 1
2/3/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	62688 00031	Trilogy	GAP Step 4
2/3/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	53196 09630	Trilogy	GAP Step 4
2/3/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	97819 00495	Trilogy	GAP Step 1
2/3/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	50001 59169	Trilogy	GAP Step 4
2/3/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	53196 00119	Trilogy	GAP Step 4
2/6/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	6 48649 18620	Trilogy	GAP Step 4
2/6/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45514	Trilogy	GAP Step 4
2/27/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch 80/20	48649 18618	Trilogy	GAP Step 4
2/27/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River 85/15	50014 45513	Trilogy	GAP Step 4
3/1/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 96651 01035	Trilogy	GAP Step 1
3/1/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 50001 59169	Trilogy	GAP Step 4
3/1/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	8 53196 00119	Trilogy	GAP Step 4
3/8/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 97819 00607	Trilogy	GAP Step 1

Plaintiff Farm Forward's Response to Defendants' Interrogatories, Set No. One

Date of Purchase	Store	Store Location	Product	Product Brand	Product's UPC/barcode	Lab	GAP Rating
3/8/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 62688 00031	Trilogy	GAP Step 4
3/8/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	0 53196 09630	Trilogy	GAP Step 4
3/13/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch 80/20	6 48649 18618	Trilogy	GAP Step 4
3/13/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River 85/15	8 50014 45513	Trilogy	GAP Step 4
3/20/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch 85/15	6 48649 25232	Trilogy	GAP Step 4
3/20/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River 85/15	8 50014 45513	Trilogy	GAP Step 4
3/27/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch 80/20	6 48649 18618	Trilogy	GAP Step 4
3/27/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River 85/15	8 50014 45513	Trilogy	GAP Step 4
3/28/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 97819 00583	Trilogy	GAP Step 1
3/28/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 62688 00031	Trilogy	GAP Step 4
3/28/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	0 53196 09630	Trilogy	GAP Step 4
4/6/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 97819 00639	Trilogy	GAP Step 1
4/6/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 62688 00031	Trilogy	GAP Step 4
4/6/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	0 53196 09630	Trilogy	GAP Step 4
4/7/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch 80/20	6 48649 18618	Trilogy	GAP Step 4
4/7/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River 85/15	8 50014 45513	Trilogy	GAP Step 4

Plaintiff Farm Forward's Response to Defendants' Interrogatories, Set No. One

Date of Purchase	Store	Store Location	Product	Product Brand	Product's UPC/barcode	Lab	GAP Rating
4/17/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 92659 00629	Trilogy	GAP Step 1
4/17/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 50001 59169	Trilogy	GAP Step 4
4/17/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	8 53196 00119	Trilogy	GAP Step 4
4/26/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 97819 00607	Trilogy	GAP Step 1
4/26/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 5001 59169 0	Trilogy	GAP Step 4
4/26/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	8 53196 00119	Trilogy	GAP Step 4
5/1/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 92659 00619	Trilogy	GAP Step 1
5/1/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 62688 00031	Trilogy	GAP Step 4
5/1/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	0 53196 09630	Trilogy	GAP Step 4
5/10/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch 85/15	6 48649 25232	Trilogy	GAP Step 4
5/11/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 97819 00607	Trilogy	GAP Step 1
5/11/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 62688 0031 0	Trilogy	GAP Step 4
5/11/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Panorama Meats	0 53196 09630	Trilogy	GAP Step 4
5/17/2021	Whole Foods Market	Chicago, IL 60642	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002973740	Trilogy	GAP Step 4
5/20/2021	Whole Foods Market	San Francisco, CA 94117	Beef	365 by Whole Foods Market	2 97819 00615	Trilogy	GAP Step 1

Plaintiff Farm Forward's Response to Defendants' Interrogatories, Set No. One

Date of Purchase	Store	Store Location	Product	Product Brand	Product's UPC/barcode	Lab	GAP Rating
5/26/2021	Whole Foods Market	Chicago, IL 60642	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002904000	Trilogy	GAP (no step number listed)
6/9/2021	Whole Foods Market	Chicago, IL 60642	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002973740	Trilogy	GAP Step 4
6/21/2021	Whole Foods Market	San Francisco, CA 94117	Ground beef	Country Natural Beef	8 50001 59169	Trilogy	GAP Step 4
6/22/2021	Whole Foods Market	Salt Lake City, UT 84102	Ground beef	Whole Foods Market (from Meat Counter)	(01)002477060	Trilogy	GAP Step 4
7/2/2021	Whole Foods Market	Chicago, IL 60642	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002904000	Trilogy	GAP (no step number listed)
7/19/2021	Whole Foods Market	Salt Lake City, UT 84102	Ground beef	Whole Foods Market (from Meat Counter)	(01)002477060	Trilogy	GAP Step 4
7/19/2021	Whole Foods Market	Salt Lake City, UT 84102	Boneless beef New York strip steak	Whole Foods Market (from Meat Counter)	(01)002959310	Trilogy	GAP Step 4
7/19/2021	Whole Foods Market	Salt Lake City, UT 84102	Boneless beef New York strip steak	Whole Foods Market (from Meat Counter)	(01)002959310	Trilogy	GAP Step 4
7/28/2021	Whole Foods Market	Chicago, IL, 60642	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002973740	Trilogy	GAP Step 4
9/22/2021	Whole Foods Market	Salt Lake City, UT, 84121	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002904000	HRI	GAP (no step number listed)
9/22/2021	Whole Foods Market	Salt Lake City, UT 84102	Cattle kidney	Whole Foods Market (from Meat Counter)	(01)002599770	Trilogy	GAP Step 2

Plaintiff Farm Forward's Response to Defendants' Interrogatories, Set No. One

Date of Purchase	Store	Store Location	Product	Product Brand	Product's UPC/barcode	Lab	GAP Rating
9/29/2021	Whole Foods Market	Salt Lake City, UT 84102	Cattle kidney	Whole Foods Market (from Meat Counter)	(01)002599770	Trilogy	GAP Step 4
11/11/2021	Whole Foods Market	Salt Lake City, UT 84121	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002274640	Trilogy	GAP (no step number listed)
12/6/2021	Whole Foods Market	Salt Lake City, UT, 84121	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002973740	HRI	GAP Step 4
12/6/2021	Whole Foods Market	Salt Lake City, UT, 84121	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002973740	HRI	GAP Step 4
12/6/2021	Whole Foods Market	Salt Lake City, UT, 84121	Cattle liver	Whole Foods Market (from Meat Counter)	(01)002973740	HRI	GAP Step 4
12/19/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Niman Ranch	48649 18620	Trilogy	GAP Step 4
12/19/2021	Whole Foods Market	Chicago, IL 60642	Ground beef	Eel River	8 50014 45514	Trilogy	GAP Step 4

1 Paige M. Tomaselli (SBN 237737)
2 Dylan D. Grimes (SBN 302981)
3 **GRIME LAW LLP**
4 730 Arizona Avenue
5 Santa Monica, CA 90401
6 Telephone: (310) 747-5095
7 ptomaselli@grimelaw.com
8 dgrimes@grimelaw.com

9 *Attorneys for Plaintiffs*

Gretchen Elsner
ELSNER LAW & POLICY, LLC
314 South Guadalupe Street, Suite 123
Santa Fe, NM 87501
Telephone: (505) 303-0980
gretchen@elsnerlaw.org

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **SOUTHERN DIVISION**

14 SARA SAFARI, PEYMON
15 KHAGHANI, on behalf of themselves
16 and all others similarly situated, and
17 FARM FORWARD, on behalf of the
18 general public,

19 Plaintiffs,

20 v.

21 WHOLE FOODS MARKET
22 SERVICES, INC., a Delaware
23 corporation, WHOLE FOODS
24 MARKET CALIFORNIA, INC., a
25 California corporation, MRS.
26 GOOCH'S NATURAL FOODS
27 MARKETS, INC. doing business as
Whole Foods Market, a California
Corporation,

Defendants.

Case No. 8:22-cv-01562-JWH-KES

CERTIFICATE OF SERVICE

Complaint Filed: August 23, 2022
Trial Date: Not Set

Jury Trial Demanded

I am employed in the county of Los Angeles. My business address is 3631 Truxel Road #1155, Sacramento, CA 95834. I am over the age of eighteen years and not a party to the foregoing action. I am readily familiar with the business practice at my place of business. I served:

**PLAINTIFF FARM FORWARD'S RESPONSES TO
DEFENDANTS' INTERROGATORIES, SET NO. ONE**

1	<input checked="" type="checkbox"/> by Electronic Service. I caused the documents to be sent to the persons listed below at the corresponding email addresses. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
2	<input type="checkbox"/> by US Mail on the following party(ies) in said action, in accordance with Code of Civil Procedure §1013(a), by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth, below. The mail placed in that designated area is given the correct amount of postage and deposited that same day, in the ordinary course of business, in a United States mailbox in Los Angeles, California.
3	<input type="checkbox"/> by overnight delivery on the following party(ies) in said action, in accordance with Code of Civil Procedure §1013(c), by placing a true copy thereof enclosed in a sealed envelope, with delivery fees paid or provided for, and delivering that envelope to an overnight express service carrier as defined in Code of Civil Procedure §1013 (c).
4	<input type="checkbox"/> by facsimile transmission, accordance with Code of Civil Procedure § 1013(e).

8 I declare under penalty of perjury under the laws of the state of California that the foregoing is true and
9 correct and that this document was executed on April 20, 2023.

10 

11 _____
Denise M. Tacdol

12 E-mail Service List:

13 Brian R Blackman bblackman@blaxterlaw.com

14 Wells Blaxter wblaxter@blaxterlaw.com

15 David Adams dadams@blaxterlaw.com

16 Erin W. Keefe ekeefe@blaxterlaw.com

17 Paige M. Tomaselli ptomaselli@grimelaw.com

18 Dylan D. Grimes dgrimes@grimelaw.com

19 Gretchen M. Elsner gretchen@elsnerlaw.org