

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

<p>MEGANNE NATALE and CHELSEA CHENG, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>9199-4467 QUEBEC INC., d/b/a EARTH RATED,</p> <p style="text-align: center;">Defendant.</p>
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Case No. 2:21-cv-6775-JS-SIL  
Hon. Joanna Seybert

**DECLARATION OF CHELSEA CHENG IN SUPPORT OF PLAINTIFFS’ MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR ATTORNEYS’ FEES, COSTS, EXPENSES, AND SERVICE AWARDS**

I, Chelsea Cheng, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Class Representative in the lawsuit entitled *Natale et al. v. 9199-4467 Quebec Inc., d/b/a Earth Rated*, Case No. 2:21-cv-6775-JS-SIL, currently pending in United States District Court for the Eastern District of New York.

2. I make this Declaration in support of Motion For Attorneys’ Fees, Costs, Expenses, And Service Awards. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

3. I purchased a 225 count package of Earth Rated Certified Compostable Poop Bags (the “Product”) from Amazon for \$17.99. My purchase was based on the premises that Defendant’s Products were “certified compostable”. I would not have purchased my Product, or would not have purchased the Product on the same terms, had I known that it was not in fact compostable.

4. I assisted with my lawyers' investigation of this case by describing the events surrounding my purchases of my Product. Specifically, I described when I purchased my Product, why I purchased it, how I purchased it, and what I expected from it. My purchase was premised on the belief that Product was "certified compostable". I would not have purchased the Product or would not have purchased the Product on the same terms, had I known the Product was not compostable.

5. I also discussed my use of my Product with my attorneys. Specifically, I described my personal experience with my Product, such as how it performed for me. I also worked with my lawyers to search for documents relating to my purchase.

6. I also worked with my attorneys to prepare the complaints that have been filed in this action. I carefully reviewed the complaints for accuracy and approved it before they were filed.

7. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, pending and anticipated motions, and the prospects of settlement.

8. My lawyers have kept me informed in regard to efforts to resolve this matter. I discussed the class action settlement with my lawyers, reviewed the settlement, and gave my prior approval prior to signing the settlement.

9. Based on my interactions and my relationship with my attorneys, I believe that they have fairly and adequately represented me and the Settlement Class and will continue to do so.

10. Throughout this litigation, I understood that, as a Class Representative, I have an obligation to protect the interests of other Settlement Class Members and not act just for my own personal benefit. I do not believe that I have any conflicts with other Settlement Class Members. I have done my best to protect the interests of other Settlement Class Members and will continue to fairly and adequately represent the Settlement Class to the best of my ability.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on 09/04/2024 in Roslyn, New York.

  

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Chelsea Cheng (Sep 4, 2024 15:18 EDT)  
Chelsea Cheng