

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI**

TOMMY ROBBINS, DANIEL CAMEY,  
RAYMOND ALVANDI and GERARD BUTLER,  
Individually and on behalf of all others similarly  
situated,

Civil Action No. 16AC-CC00366

The Hon. Jon E. Beetem

Plaintiffs,

v.

GENCOR NUTRIENTS, INC., GENCOR  
PACIFIC, INC., GE NUTRIENTS, INC., DIRECT  
DIGITAL, LLC, PHARMAFREAK HOLDINGS,  
INC., FORCE FACTOR, LLC, DREAMBRANDS,  
INC., GENERAL NUTRITION CENTERS, INC.,  
GENERAL NUTRITION CORPORATION, GNC  
CORPORATION, S&G PROPERTIES, LLC, KING  
FISHER MEDIA, LLC, and PREVENTION, LLC  
d/b/a NATURADE,

Defendants.

**PLAINTIFFS’ UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

Plaintiffs Tommy Robbins, Daniel Camey, Raymond Alvandi, and Gerard Butler (“Plaintiffs”), and as Class Representatives on Behalf of All Similarly Situated Persons and a proposed Settlement Class, respectfully request that the Court preliminary approve the class action Settlement that is described in detail in the *Settlement Agreement* and exhibits attached thereto and filed contemporaneously herewith; grant certification of the proposed class for the purposes of the Settlement; approve the provision of Notice to the Settlement class; and appoint the Plaintiffs as the class representatives and their counsel as Class Counsel.

Dated: May 14, 2018

Respectfully submitted,

TOMMY ROBBINS, DANIEL CAMEY,  
RAYMOND ALVANDI, AND GERARD BUTLER,

Individually, and on Behalf of a Class of Similarly Situated  
Individuals, Plaintiffs

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was delivered on this 14<sup>th</sup> day of May 2018, via the Missouri Court System's Electronic Filing System to all counsel of record.

By: /s/ Stephen F. Gaunt  
Stephen F. Gaunt