

Paul J. Lopez
May 4, 2016

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE: BLUE BUFFALO)
COMPANY, LTD.)
MARKETING AND SALES) Case No. 4:14 MD 2562
PRACTICES LITIGATION) RWS
)
RELATES TO: ALL CASES)

ORAL DEPOSITION OF

PAUL J. LOPEZ

MAY 4, 2016

ORAL DEPOSITION of PAUL J. LOPEZ, produced as a witness at the instance of the Plaintiffs' Executive Committee, and duly sworn, was taken in the above-styled and numbered cause on May 4, 2016, from 1:02 p.m. to 3:00 p.m., before Denyce M. Sanders, RDR, CRR, TCRR, CCR (LA), in and for the State of Texas, recorded by machine shorthand, at the offices of LISKOW & LEWIS, 1001 Fannin, Suite 1800, Houston, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto; signature having been waived.

Paul J. Lopez

May 4, 2016

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A P P E A R A N C E S

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FOR THE WITNESS:

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1 system actually functions.

2 Q. Did you make any effort to obtain receipts
3 showing Blue Buffalo purchases through the loyalty
4 programs at either --

5 A. No, I did not.

6 Q. You did not? I'm sorry, I talked over you,
7 that's why --

8 A. No, I did not.

9 Q. Okay. Now, can I ask why?

10 A. I don't maintain receipts for pet food. I
11 don't maintain receipts for 99 percent of what I buy.

12 Q. Well, as I understand it, though, your main
13 complaint is you feel shortchanged, if I'm correct,
14 because you didn't provide receipts; right?

15 A. Not that I didn't provide receipts, it's that
16 I know that I purchased the product for several years,
17 you know, anywhere from three- to four-week period,
18 I'd buy a bag of dog food, Blue Buffalo dog food, and
19 now I'm only entitled to \$10 in compensation?

20 Q. Do you know why you're only entitled to \$10?

21 A. Because I don't have a receipt.

22 Q. And that is my question.

23 So as I understand it, your objection is you
24 were limited to \$10 because you didn't have a receipt;
25 right?