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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

AYKUT SARAYLI, individually and on behalf
 of all those similarly situated,

Plaintiff,

v.

HUEL, LTD., a British limited company,

Defendant.

Case No. 5:25-cv-02406-PCP

**DECLARATION OF LEE BOAKES IN
 SUPPORT OF DEFENDANT HUEL
 LIMITED'S MOTION TO DISMISS**

Judge: Hon. P. Casey Pitts
Courtroom: 8
Complaint Filed: March 10, 2025

1 I, Lee Boakes, declare:

2 1. I am the Product Director for Huel Limited (“Huel”). I make this declaration based
3 on my personal knowledge and if called as a witness, could and would testify competently to the
4 following facts.

5 2. The Protein Digestibility-Corrected Amino Acid Score, or PDCAAS, is a method
6 used to evaluate protein quality in food. PDCAAS measures how well a protein meets human
7 amino-acid requirements by considering both the protein’s amino-acid composition and its
8 digestibility. The score is calculated by identifying the limiting essential amino acid in a protein
9 and adjusting that value based on how digestible the protein is. PDCAAS values range from 0 to
10 1.0, with a score of 1.0 indicating that the protein provides all essential amino acids in sufficient
11 amounts and is highly digestible.

12 3. Individual plant proteins may contain limiting amino acids. For that reason, protein
13 formulations often combine complementary protein sources. Pea protein and rice protein are
14 commonly used together because each compensates for amino-acid limitations in the other,
15 resulting in an improved overall amino-acid profile when combined in appropriate ratios.

16 4. The Black Edition Powder (the “Product”) contains plant-based protein derived
17 from sources including pea and rice protein.

18 5. The PDCAAS level for the Product is determined through testing and analysis
19 conducted in the ordinary course of Huel’s business, and not by assumption based on the names of
20 the protein sources.

21 6. It is Huel’s practice, and industry standard, to extrapolate PDCAAS values based on
22 testing of raw ingredients.

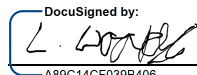
23 7. Based on laboratory testing of the raw ingredients used in chocolate and cookies and
24 cream Black Edition since July 2023, the PDCAAS values are approximately 1.0. These values
25 reflect the complementary nature of the pea- and rice-based protein formulation used in the Product
26 and are not assigned based solely on the identification of the protein sources.

1 8. The presence of pea and rice protein in the Product does not, by itself, establish that
2 the PDCAAS of the Product is significantly less than 1.0. PDCAAS depends on the amino-acid
3 profile and digestibility of the protein as formulated and tested.

4 I declare under penalty of perjury under the laws of the United States that the foregoing is
5 true and correct to the best of my knowledge, information, and belief.

6
7 Dated: January 16, 2026

Respectfully submitted,

8 By: 
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10 Lee Boakes