

Wm. Kelly Nash (4888)
kelly.nash@dentons.com

Justin T. Rich (18519)
justin.rich@dentons.com

Mina S. Ghobrial (20214)
mina.ghobrial@dentons.com

DENTONS DURHAM JONES PINEGAR, P.C.

1557 W. Innovation Way, Ste. 400

Lehi, Utah 84043

Telephone (801) 375-6600

Attorneys for Plaintiffs

**IN THE FOURTH JUDICIAL DISTRICT COURT IN AND FOR
UTAH COUNTY, STATE OF UTAH**

BAM FRANCHISING, INC., a Delaware corporation; AMMON MCNEFF, an individual; MATTHEW MCNEFF, an individual; JOSH JOHNSON, an individual; BRANDON BEST, an individual; BAKER BRICKS, LLC, a Utah limited liability company, and dba SALEM-BAKER BRICKS INC., an Oregon corporation,

Plaintiffs,

vs.

BENJAMIN PAUL SCHNEIDER, an individual, dba and aka "RECKLESS BEN"; RECKLESS BEN LLC, a California limited liability company; BRYAN MANSELL, an individual; VICTOR NGUYEN, an individual; and DOES 1-15,

Defendants.

**NOTICE OF ERRATA RE:
CASE CAPTION PAGE OF THE
VERIFIED COMPLAINT**

Case No.: 260402353

Judge: Tony F. Graf, Jr.

Plaintiffs, through their counsel, hereby submit this Notice of Errata regarding the case caption page of their *Verified Complaint* filed on May 27th, 2026. The case caption page that was filed contained a scrivener's error in that it did not contain the following statement:

CAUTION: If you do not respond to this document within applicable time limits, judgment could be entered against you as requested.

Attached to this Notice as Exhibit A is a copy of the new case caption page to the *Verified Complaint* that corrects the error. The corrected case caption page will be used when serving the Defendants.

DATED this 28th day of May 2026.

DENTONS DURHAM JONES PINEGAR P.C.

/s/ Wm. Kelly Nash
Wm. Kelly Nash
Justin T. Rich
Mina S. Ghobrial
Attorneys for Plaintiffs

EXHIBIT A

EXHIBIT A

Wm. Kelly Nash (4888)
kelly.nash@dentons.com

Justin T. Rich (18519)
justin.rich@dentons.com

Mina S. Ghobrial (20214)
mina.ghobrial@dentons.com

DENTONS DURHAM JONES PINEGAR, P.C.

1557 W. Innovation Way, Ste. 400

Lehi, Utah 84043

Telephone (801) 375-6600

CAUTION: If you do not respond to this document within applicable time limits, judgment could be entered against you as requested.

Attorneys for Plaintiffs

**IN THE FOURTH JUDICIAL DISTRICT COURT IN AND FOR
UTAH COUNTY, STATE OF UTAH**

BAM FRANCHISING, INC., a Delaware corporation; AMMON MCNEFF, an individual; MATTHEW MCNEFF, an individual; JOSH JOHNSON, an individual; BRANDON BEST, an individual; BAKER BRICKS, LLC, a Utah limited liability company, and dba SALEM-BAKER BRICKS INC., an Oregon corporation,

Plaintiffs,

vs.

BENJAMIN PAUL SCHNEIDER, an individual, dba and aka “RECKLESS BEN”; RECKLESS BEN LLC, a California limited liability company; BRYAN MANSELL, an individual; VICTOR NGUYEN, an individual; and DOES 1-15,

Defendants.

VERIFIED COMPLAINT

(Tier 3)

Case No.:

Judge:

Plaintiffs BAM Franchising, Inc. (“**BAM**”), Ammon McNeff (“**Ammon**”), Matthew McNeff (“**Matthew**”), Josh Johnson (“**Josh**”), Brandon Best (“**Brandon**”), Baker Bricks, LLC