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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

SANDRA RAMIREZ and RAUL ALVILLAR,
individuals, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

v.

GKN Aerospace Transparency Systems Inc., a
California corporation; and DOES 1-50,
Inclusive,

Defendant.

Case No: 30-2026-01577571-CU-MT-CXC

Class Action Complaint for:

- 1) Nuisance
- 2) Strict Liability
- 3) Negligence and Gross Negligence

Assigned for All purposes:

Judge Layne H. Melzer

Dep. CX102

1 **COLLECTIVE AND CLASS ACTION**

2 **COMPLAINT AND JURY DEMAND**

3 SANDRA RAMIREZ and RAUL ALVILLAR (“Plaintiffs”), by the undersigned counsel, on
4 behalf of themselves and all others similarly situated, hereby set forth the class action claims for relief
5 (hereafter “Complaint”). Plaintiffs allege, based upon their personal knowledge as to their own acts,
6 and upon information and belief as to all other acts, based upon their attorneys’ investigative efforts,
7 as follows:

8 **OVERVIEW**

9 1. This action involves complaints of nuisance, negligence and strict liability arising from
10 the recent emergency chemical spill incident at a facility owned and/or operated by Defendant GKN
11 Aerospace Transparency Systems Inc. (“GKN”), and their storage of Methyl Methacrylate (“MMA”).

12 2. Plaintiffs are informed and believe, and based upon information and belief, allege that
13 Defendant GKN, inclusive of DOES 1 through 50, named in this Complaint, are responsible in some
14 manner for one or more of the events and happenings that proximately caused the injuries and damages
15 hereinafter alleged.

16 3. Plaintiffs reside within the cities subjected to evacuation orders, including all or parts
17 of Garden Grove, Cypress, Stanton, Anaheim, Buena Park and Westminster.

18 4. The condition causes damage and interference with Plaintiffs’ use and enjoyment of
19 their property and otherwise disturbed their normal lifestyle and presents a public health risk.

20 5. This class action is necessary to protect the property rights of Plaintiffs, and all others
21 similarly situated, which have been unreasonably interfered with resulting from the condition,
22 evacuation, interference with use of property and related damages or material injury to Plaintiffs' person
23 and property through negligence, gross negligence, strict liability and private nuisance.

24 **JURISDICTION AND VENUE**

25 6. Defendant GKN Aerospace Transparency Systems, Inc. is registered in the State of
26 California as a corporation in active and good standing, with a principal address of 12122 Western
27 Avenue, Garden Grove, California 92841.¹

28 ¹ <https://bizfileonline.sos.ca.gov/search/business>

1 **FACTUAL ALLEGATIONS**

2 **A. The Incident and Its Escalation**

3 15. On or about Thursday, May 21, 2026, at approximately 3:30 p.m. PDT, The Orange
4 County Fire Authority (“OCFA”) and Garden Grove Police Department reported to GKN Aerospace
5 at 12122 Western Avenue in response to hazardous materials calls it had received regarding the Subject
6 Tank overheating. The Subject Tank contained methyl methacrylate, a highly flammable and toxic
7 chemical used in the manufacture of plastics and resins.

8 16. Upon arrival, OCFA Captain Sean Doran confirmed the overheating condition, stating:
9 “We arrived to a 34,000-gallon tank containing an industrial chemical that had been overheated inside
10 the vessel. The system activated as it was designed to, released vapors through the top and the sprinkler
11 system was activated to start the cooling process.”

12 17. At approximately 7:30 p.m. PDT, the Subject Tank’s temperature rose and activated an
13 on-site sprinkler system designed to cool the tank.

14 18. OCFA issued initial evacuation orders for residents in the immediate vicinity of the
15 Facility as a precautionary measure. Those initial evacuation orders were subsequently lifted later that
16 evening, as crews reported they were making progress in mitigating the situation.

17 19. At all times relevant, OCFA’s investigation confirmed that the Subject Tank was
18 equipped with a valve that failed or malfunctioned. The valve failure constituted a critical failure of
19 Defendants’ equipment and/or maintenance, inspection, and safety systems. Officials further reported
20 that the valve damage “created additional operational challenges, preventing complete mitigation” of
21 the crisis.

22 20. In the early morning hours of May 22, 2026, OCFA concluded that overnight mitigation
23 efforts had failed and that the situation had materially worsened. OCFA announced that the Subject
24 Tank “is in fact unable to be secured and mitigated,” reissued mandatory evacuation orders due to
25 “changing conditions,” and characterized the crisis as “unprecedented.” The cause of the overheating
26 remained under investigation.

27 21. In the evening on May 22, 2026, OCFA Division Chief Craig Covey publicly warned
28 that emergency responders faced only two remaining outcomes: “one, the tank fails and spills a total

1 of about 6- to 7,000 gallons of very bad chemicals into the parking lot in that area. Or two, the tank
2 goes into a thermal runaway and blows up, affecting the tanks that are around them that have fuel or
3 the chemicals in them as well.” Chief Covey further stated: “I’ve been in the fire service for 32 years
4 and it’s the most significantly dangerous event I’ve ever been a part of.” Chief Covey additionally
5 stated: “This thing is going to fail, and we don’t know when.”

6 22. On May 22, 2026, Orange County officials expanded the mandatory evacuation zone to
7 approximately ten (10) square miles across six (6) cities: Garden Grove, Cypress, Stanton, Anaheim,
8 Buena Park, and Westminster. The evacuation zone extended from Valley View Street on the west,
9 Ball Road on the north, and Trask Avenue on the south. Approximately 40,000 to 50,000 residents
10 were ordered to evacuate, and multiple shelters were established, including at three local high schools.

11 23. On or about May 23, 2026, officials reported that the Subject Tank’s temperature had
12 risen from approximately 77 degrees Fahrenheit on Friday morning to approximately 90 degrees
13 Fahrenheit, increasing at a rate of approximately one (1) degree Fahrenheit per hour. Officials further
14 reported that the Subject Tank had developed a visible bulge during the crisis.

15 24. In the early morning hours of May 23, 2026, aerial footage showed one of the three
16 storage tanks at the Facility beginning to physically “peel open.” OCFA reported modest overnight
17 temperature stabilization but described the situation as a “holding pattern.” Authorities maintained that
18 the Subject Tank would fail and that the question was not “if” but “when” a leak or explosion would
19 occur.

20 25. On or about Saturday, May 23, 2026, OCFA Division Chief Nick Freeman presented a
21 publicly disseminated blast zone map at a press conference, identifying specific areas within the
22 evacuation zone that would suffer “severe structural damage and significant harm” in the event the
23 Subject Tank exploded.

24 26. On or about Saturday, May 23, 2026, California Governor Gavin Newsom proclaimed
25 a State of Emergency in Orange County in connection with the ongoing chemical crisis at the Facility.

26 27. As a direct and proximate result of the incident and Defendants’ acts and omissions as
27 alleged herein, the mandatory evacuation orders remained in place through at least the afternoon of
28 Saturday, May 23, 2026, a period exceeding forty-eight (48) hours, and continue as of the filing of this

1 Complaint. At no time during this period were residents permitted to safely return to their homes and
2 properties.

3 28. As a further direct and proximate result of Defendants' acts and omissions, the following
4 public and civic disruptions occurred: (a) over a dozen schools within the Garden Grove Unified School
5 District temporarily closed or canceled outdoor activities; (b) the Orange County Registrar of Voters
6 closed one early-voting location at the Garden Grove Sports and Recreation Center and three ballot
7 drop-box locations in Garden Grove, Westminster, and Stanton, materially affecting residents' access
8 to the June 2, 2026 primary election; (c) the Garden Grove Annual Strawberry Parade and Strawberry
9 Stomp were postponed; (d) multiple roads within the evacuation zone were sealed off, disrupting
10 regional transportation; and (e) evacuation shelters were reported to be nearing capacity.

11 29. The emergency meant tens of thousands of concerned residents in the city southeast of
12 Los Angeles were ordered to evacuate their homes with no scheduled return date.

13 30. GKN Aerospace issued a limited public statement in connection with the incident,
14 acknowledging only that it was "currently responding to a situation" at its Garden Grove site.

15 **B. Public Health**

16 31. On May 23, 2026, Orange County Chief Health Officer Dr. Regina Chinsio-Kwong
17 issued a public health warning confirming that "very high levels of" MMA exposure can cause severe
18 respiratory distress and hospitalization, as well as skin and eye irritation. She further stated that the
19 long-term consequences of exposure to MMA at the concentrations associated with the event are not
20 fully known.

21 32. California's environmental safety prohibits discharge of air contaminants or other
22 materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons
23 or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the
24 public, or that cause, or have a natural tendency to cause, injury or damage to business or property.
25 Cal. Health & Safety Code § 41700.

26 33. Furthermore, California Health and Safety Code §§ 25100–25245 establish strict
27 liability for generators of hazardous wastes for injuries caused by exposure to those wastes, providing
28 a statutory basis for claims arising from chemical releases. Cal. Health & Safety Code § 25100.

1 **C. MMA Storage Tank Failure**

2 34. Upon information and belief, the precise cause of the incident was a failure in the tank's
3 recirculating refrigeration system. The triggering event was a valve in the refrigeration system—which
4 is required to keep the chemical at a safe 50°F—froze and stopped functioning. This prevented the
5 cooling agents from circulating.

6 35. Conditions escalated when, without cooling, the MMA began to polymerize and cure
7 into a solid state, generating its own heat. This initiated a dangerous chain reaction, causing the
8 chemical to self-heat, expand, and off-gas hazardous vapors.

9 36. The valve failure made it impossible for emergency crews to drain the tank or inject
10 stabilizers, putting the vessel at risk of a catastrophic rupture or explosion. Firefighters and hazardous
11 materials teams utilized continuous water cooling to slow the internal curing process until a crack
12 naturally relieved the pressure, allowing the chemical to solidify safely.

13 37. By Memorial Day, Monday May 25th, the State of California and federal officials
14 reported that the emergency crises had been averted. Fears of a possible disaster that threatened to
15 expose residents to toxic plumes and destroy buildings were not realized.

16 38. Temperatures had cooled and some of the material had “cured,” or turned into a solid
17 state, in good news for firefighters and response crews, officials said. Interim Orange County Fire
18 Chief TJ McGovern said Monday evening that while the threat of a catastrophic explosion was believed
19 to have passed, there was still more work to be done. McGovern said firefighters “still have to mitigate
20 a fire and very small explosion concern, and also a spill potential.”

21 39. The evacuation orders had grown to around 60,000 people, but by Monday evening, the
22 orders had been reduced to around 16,000 residents.

23 40. On Monday, President Donald Trump approved California’s request for a presidential
24 emergency declaration to free up more resources, such as equipment and personnel, from the Federal
25 Emergency Management Agency. California Gov. Gavin Newsom also declared a state of emergency
26 in Orange County on Saturday.

27 41. Defendant’s own response team has publicly accepted responsibility for the incident
28 and apologized:

1 “The team safely and successfully removed external insulation material from the tank
2 in order to help advance efforts to cool its contents,” the statement reads. It continues:
3 “We apologize for the ongoing disruption this incident is causing and our priority
4 remains its safe resolution, so that residents can return to their homes as quickly as
5 possible.”³

6 CLASS ACTION ALLEGATIONS

7 42. Plaintiffs incorporate the above paragraphs by reference.

8 43. Plaintiffs advance this class action on behalf of themselves and all others similarly
9 situated as members of the GKN Chemical Spill Class. The Class is defined as follows:

10 ***All persons residing or owning real property or businesses operating within the***
11 ***geographical boundaries of the evacuation zones established by local or state***
12 ***government authorities from any time beginning on May 21, 2026.***

13 Excluded from the proposed Class are (i) Defendant, any entity in which Defendant has a controlling
14 interest or which has a controlling interest in Defendant, and Defendant’s legal representatives,
15 predecessors, successors and assigns; (ii) the judicial officers to whom this case is assigned; and (iii)
16 any member of the immediate families of excluded persons.

17 44. This action is brought and may be maintained as a class action pursuant to Code of Civil
18 Procedure Section 382, California Rules of Court, Rules 3.760–3.771 and case related law.

19 45. Members of the Class are so numerous that joinder is impracticable.

20 46. Based on public reports, Plaintiffs believe that the number of class members exceeds
21 40,000 people and businesses. Plaintiffs’ counsel have been retained by several hundred citizens from
22 the putative Class.

23 47. Class members may be notified of the pendency of this action by published and/or
24 mailed notice.

25 48. Common questions of law and fact exist as to all members of the Class. These questions
26 predominate over the questions affecting only individual class members. These common legal and
27 factual questions include, among other things:

28 a. Whether the GKN subject facility became compromised or failed, including the MMA

³ <https://www.nbcnews.com/news/us-news/chemical-tank-southern-california-what-we-know-rcna346822>

1 storage tank(s).

2 b. Whether GKN operations have violated applicable air pollution standards, limits,
3 permits or other chemical storage laws.

4 c. Whether GKN is strictly liable or the MMA related incident, including related property
5 right and use damages in this complaint.

6 d. Whether GKN has been negligent in its operation and chemical storage or emissions.

7 e. Whether the risk of explosion and air pollution conditions created by GKN constitutes
8 a nuisance under California nuisance law. Civ.Code, §§ 3479-3481; ” *San Diego Gas &*
9 *Electric Co. v. Superior Court* (1996) 13 Cal.4th 893, 940, 55 Cal.Rptr.2d 724, 920 P.2d
10 669 (1996); *Today's IV, Inc. v. Los Angeles Cnty. Metro. Transportation Auth.*, 83 Cal.
11 App. 5th 1137, 1165 (2022)

12 f. Whether GKN caused the claimed interference with use and enjoyment of property
13 rights alleged in this complaint.

14 49. Plaintiffs’ claims are typical of those of each class member because Plaintiffs, like every
15 other member of the Class, have been and continue to be exposed to Defendant’s conduct, pollution,
16 and are residents with the same legal property rights at stake, and the seek the same relief under the
17 same causes of action as the other members of the Class.

18 50. Plaintiffs are adequate representatives of the Class because their interests do not conflict
19 with the interests of the members of the Class they seek to represent; they have retained counsel
20 competent and experienced in class action litigation and complex environmental litigation; and they
21 intend to prosecute this action vigorously.

22 **COUNT I**

23 **NUISANCE**

24 51. Plaintiffs incorporate the allegations set forth in the above paragraphs.

25 52. California nuisance law is a creature of statute. Cal. Civil Code §§ 3479 - 3481;
26 *Mangini v. Aerojet-Gen. Corp.* (Cal. Ct. App. 1991) 230 Cal. App. 3d 1125, 1134.

27 53. Pursuant to Cal. Civil Code § 3479: “Anything which is injurious to health, or is
28 indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with

1 the comfortable enjoyment of life or property, or unlawfully obstructs the free passage or use, in the
2 customary manner, of any navigable lake, or river, bay, stream, canal, or basin, or any public park,
3 square, street, or highway, is a nuisance.” *Mangini, supra*,. at 1134.

4 54. A private nuisance claim requires proof that the defendant’s conduct caused an
5 intentional or unreasonable interference with the plaintiff’s use and enjoyment of property.

6 55. An interference may arise from intentional, negligent, reckless, or ultra-hazardous
7 conduct, with no requirement to prove the defendant’s degree of care if the nuisance is maintained
8 knowingly.

9 56. The California Supreme Court in *San Diego Gas & Electric Co. v. Superior Court*
10 (1996) 13 Cal.4th 893 established the definitive three-element framework for private nuisance: (a)
11 interference with the plaintiff’s use and enjoyment of property; (b) substantial interference causing
12 substantial actual damage; and (c) unreasonable interference with property rights.

13 57. The evacuation of class members living within the evacuation zone constitutes a
14 paradigm interference with use and enjoyment of property in that undeniably and substantially
15 interfered with their rights, up to an including completely eliminating use of the property during the
16 evacuation.

17 58. In addition, California courts have held that the mere apprehension of injury from a
18 dangerous condition may constitute a nuisance where it interferes with the comfortable enjoyment of
19 property. *McIvor v. Mercer-Fraser Co.* (1946) 76 Cal.App.2d 247.

20 59. All class members living or owning property within the evacuation zone suffered
21 interference with the private use and enjoyment of land as of May 21, 2026 when the risk of harm
22 from the MMA tank became known, which escalated once evacuation orders were issued, and reissued
23 and expanded. The interference continued in nature each day thereafter.

24 60. The interference was substantial — meaning by any objective standard, forced
25 evacuation due to dangerous conditions (such as a chemical spill, fire, or toxic release) clearly
26 constitutes a substantial interference under this standard, as being required to flee one’s home is among
27 the most severe disruptions to the use and enjoyment of property.

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61. The gravity of the harm outweighs any possible social utility of the defendant's conduct. Moreover, there is no social utility to storage of hazardous chemicals in failed conditions that give rise to evacuation or risk of explosion, fire and death.

62. Upon the failure of the MMA storage tank, there was no objective basis to find any social utility to the conditions Defendant forced upon the class. A reasonable person generally, looking at the whole situation impartially and objectively, would consider it unreasonable, and that the seriousness of the harm suffered outweighs the social utility of the defendant's operations, maintenance of a dangerous condition or conduct.

63. Plaintiffs allege a causal link between Defendant's conduct or the condition GKN created and the resulting interference with plaintiff's property rights and harm. This includes Defendant's dangerous condition as the proximate cause of the evacuation order or the need to vacate.

64. Plaintiffs all possess a property interest, i.e. are someone whose property is injuriously affected, or whose personal enjoyment is lessened by the nuisance under Cal. Code of Civil Proc. § 731. This includes not just fee owners but also lessees and others with a legal interest in the affected property. *San Diego County v. Carlstrom* (1961) 196 Cal.App.2d 485 (fire hazard from dilapidated structures constituted a nuisance because it created fear and interfered with the comfortable enjoyment of neighboring property).

65. Plaintiffs are entitled to recover, and hereby seek, damages, including but not limited to: loss of use and depreciation of rental or usable value (for continuing nuisance), diminution in fair market value (for permanent nuisance), lost profits, personal discomfort and emotional distress when caused by interference with a specific property right, and special out-of-pocket damages proved at trial, including displacement expenses. *Varjabedian v. City of Madera*, 20 Cal.3d 285 (1977); *Ingram v. City of Gridley* (1950) 100 Cal.App.2d 815; *Koll-Irvine Center Property Owners Assn. v. County of Orange* (1994) 24 Cal.App.4th 1036 (emotional distress damages are recoverable in private nuisance actions when caused by interference with a specific property right); *Spaulding v. Cameron* (1954) 127 Cal.App.2d 698 (diminution in rental value of property during nuisance is recoverable even when owner-occupied).

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66. Defendant's failing MMA tank, and contemplated explosion or discharges of toxic and hazardous substances into the environment, created a condition(s) that substantially and unreasonably interfered with the Plaintiffs and Class members' use and enjoyment of their real and personal property.

67. Under California law, property owners and tenants in Orange County who were ordered to evacuate their homes or businesses due to a dangerous condition at a neighboring chemical plant — specifically an imminent risk of explosion and fire — may bring a nuisance claim for damages under Cal. Civil Code § 3479, Cal. Civil Code §§ 3480-01, and Cal. Code of Civil Proc. § 731.

68. Defendant has created a condition that constitutes a continuing nuisance, and Plaintiffs did not consent to the condition.

COUNT II

STRICT LIABILITY

69. Plaintiffs incorporate the above paragraphs by reference.

70. Defendant's maintenance of MMA under the conditions outlined above constituted an unreasonable, indefensible and ultra hazardous activity and condition.

71. California's strict liability doctrine for abnormally dangerous activities was recognized by the California Supreme Court which imposes liability without fault. *Luthringer v. Moore* (1948) 31 Cal.2d 489.

72. California courts subsequently adopted the broader six-factor balancing test from Restatement (Second) of Torts § 520 to determine whether an activity qualifies as abnormally dangerous. *SKF Farms v. Superior Court* (1984) 153 Cal.App.3d 902 and *Goodwin v. Reilley* (1985) 176 Cal.App.3d 86. The determination of whether an activity is abnormally dangerous is a question of law for the court, not the jury. *Edwards v. Post Transportation Co.* (1991) 228 Cal.App.3d 980.

73. For strict liability to attach, a court must weigh the following factors: (a) existence of a high degree of risk of some harm to persons, land, or chattels; (b) likelihood that the harm will be great; (c) inability to eliminate the risk by the exercise of reasonable care; (d) extent to which the activity is not a matter of common usage; (e) inappropriateness of the activity to the place where it is carried on; and (f) extent to which the value of the activity to the community is outweighed by its

1 dangerous attributes. No single factor is dispositive—"[d]ue to the interplay of the various factors, it
2 is impossible to define abnormally dangerous activities"—and the court weighs each factor based on
3 the evidence presented. *SKF Farms, supra*, at 902.

4 74. California courts have applied this framework to hazardous chemical and explosive
5 contexts with results that strongly support the imposition of strict liability. *Goodwin, supra* at 86;
6 *Green v. General Petroleum Corp.* (1928) 205 Cal. 328 (strict liability for an oil well blowout in a
7 settled area, holding the operator liable regardless of care); *Ahrens v. Superior Court* (1988) 197
8 Cal.App.3d 1134 (use of PCBs could constitute an abnormally dangerous activity and confirmed that
9 familiar examples of activities subject to strict liability include the storage of explosives, blasting, crop
10 dusting, and fumigation.)

11 75. Defendant's storage of MMA in the failed manner described above constitutes an
12 ultrahazardous activity in that it necessarily involves a risk of serious harm to persons, land or chattels
13 of others which cannot be eliminated by the exercise of the reasonable care; is not a matter of common
14 usage; inappropriate for the densely populated Los Angeles cities and neighborhoods in which the
15 class resides; and offers no compelling value to outweigh its danger to the class members and public.

16 76. Specifically, reasonable care in the storage of a dangerous chemical does not include
17 waiting for the chemical to internally heat itself to the point of destroying the storage tank in the form
18 of a crack and hope dangerous pressure is released at sufficient pace and quantity to avoid the
19 otherwise expected explosion and fire of the chemicals.

20 77. Defendant's ultrahazardous activities resulted in evacuation on threat of death or injury,
21 all of which is actionable under California strict liability law.

22 78. Furthermore, the nature of the condition as ultra hazardous is sufficient to support a
23 nuisance claim, *supra*.

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1 **COUNT III**

2 **NEGLIGENCE AND GROSS NEGLIGENCE**

3 79. Plaintiffs incorporate the allegations set forth in the above paragraphs.

4 80. Defendant owed Plaintiffs and Class Members a duty to act reasonably under the
5 existing circumstances, including not to create conditions that threaten nearby residents' safety or use
6 and enjoyment of their property.

7 81. Questions such as when was the last time the MMA tank was inspected, and what was
8 found; were SOP's established and followed; whether designated personnel were properly trained and
9 performed as expected, and many others will illuminate Defendant's fulfillment, or failure, of its duty
10 of care.

11 82. Defendant's storage of MMA was a failure in parts or process, or otherwise arising from
12 Defendant's operation, control, maintenance or other acts or omissions, all of which constitute a breach
13 of the duty of care owed to Plaintiffs and the Class, and as such, give rise to claims for negligence and
14 gross negligence. Therefore questions as to how often the tank was maintained or cleaned out or
15 whether the chemical itself had solidified and clogged the valves will be important to answer.

16 83. Plaintiffs and Class Members' personal property, right to quiet enjoyment of real
17 property, health and welfare and mental well-being have been and are being jeopardized as a direct and
18 proximate result of Defendant's actions.

19 84. Plaintiffs have suffered, and will likely continue to suffer non-economic and economic
20 damages that are compensable under California negligence laws, for which Defendant is liable in
21 money damages and other relief.

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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiffs and Class members request the following relief:

- 3 a. A finding by the court that Defendant created a nuisance, including its handling and storage
4 of MMA, that has caused actionable injury and damage to Plaintiffs and Class Members.
- 5 b. A finding by the court that Defendant's operation amounts to strict liability, has been
6 negligent, grossly negligent, and has caused injury and damage to Plaintiffs and Class
7 Members.
- 8 c. An Order requiring the Defendant to reimburse Plaintiffs and Class Members for all damage
9 to their real and personal property attributable to Defendant's actions and for their loss of
10 quiet enjoyment of property and associated emotional and mental distress, and lost profits.
- 11 d. An order certifying the class and appointing plaintiffs and their counsel as class
12 representatives and class counsel.
- 13 e. Award costs, interest, exemplary damages and attorney fees.
- 14 f. Other, further, and additional relief as the nature of the case may require or as may be
15 determined to be just, equitable, and proper by this Court.
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Date: June 12, 2026

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CLASS ACTION COMPLAINT AND JURY DEMAND