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Assigned for All Purposes
Judge Michael Strickroth

Attorneys for Plaintiffs
Alyssa Petitt and Sonia Carillo

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

ALYSSA PETITT; SONIA CARILLO

Plaintiffs,

v.

GKN AEROSPACE TRANSPARENCY
SYSTEMS, INC., a California corporation;
GKN AEROSPACE CHEM-TRONICS, INC.,
a California corporation; GKN AEROSPACE,
an entity of unknown form; and Does 1 through
50

Defendants.

Case No.: 30-2026-01573403-CU-PO-CJC

COMPLAINT FOR DAMAGES

1. NEGLIGENCE

2. PRIVATE NUISANCE

**3. TRESPASS TO REAL PROPERTY
AND CHATTEL**

**4. STRICT LIABILITY FOR
ULTRAHAZARDOUS ACTIVITIES**

DEMAND FOR JURY TRIAL

COMES NOW Plaintiffs Alyssa Petitt and Sonia Carillo, who bring this Complaint
against Defendants GKN Aerospace Transparency Systems, Inc., a California corporation;
GKN Aerospace Chem-Tronics, Inc., a California corporation; GKN Aerospace, an entity of

1 unknown form, and Does 1 through 50. Plaintiff alleges as follows:

2
3 **PARTIES**

4 **A. Plaintiffs**

5 1. At all times mentioned herein, Plaintiff Alyssa Petitt was, and now is, a natural
6 person domiciled in the State of California.

7 2. At all times mentioned herein, Plaintiff Sonia Carillo was, and now is, a natural
8 person domiciled in the State of California.

9 3. At all relevant times hereto, Plaintiffs are individuals who were homeowners,
10 renters, residents, occupants, and/or had property and/or owned businesses in Orange County in
11 area impacted by the chemical incident at Defendants' aerospace manufacturing facility in
12 Garden Grove, California.

13 4. Plaintiffs have all suffered damages, losses, and harm from the Defendants'
14 tortious actions and inactions.

15 5. Plaintiffs have elected to join their individual lawsuits in a single action under
16 rules of permissive joinder. Plaintiffs do not seek class certification or relief on any class-wide,
17 collective, or other group basis, but seek the damages and other remedies identified herein on an
18 individual basis according to proof at trial.

19
20 **B. Defendants**

21 6. At all times mentioned herein, Defendant GKN Aerospace Transparency
22 Systems, Inc., was a California corporation.

23 7. At all times mentioned herein, Defendant GKN Aerospace Chem-Tronics, Inc.,
24 was a California corporation.

25 8. At all times mentioned herein, Defendant GKN Aerospace, was an entity of
26 unknown form.

27 9. Defendants GKN Aerospace Transparency Systems, Inc., GKN Aerospace
28 Chem-Tronics, Inc., and GKN Aerospace are collectively referred to in this Complaint as

1 “GKN.”

2 10. The true names and capacities of defendants sued herein as Does 1 through 50,
3 are unknown to the plaintiffs who therefore sues such defendants by such fictitious names
4 pursuant to *Code of Civil Procedure* § 474. Plaintiffs allege that each fictitiously named
5 defendant acted or failed to act in such a manner that each has contributed in proximately
6 causing the damages to the plaintiff herein alleged. The plaintiffs will seek leave of court to
7 amend the Complaint to set forth their true names and capacities once ascertained.

8 11. The GKN Defendants and Does 1-50 planned, built, operated, and continue to
9 operate an aerospace manufacturing facility in Garden Grove, California. The GKN Defendants
10 and Does 1-50’s acts and omissions, as more particularly described herein, harmed the
11 Plaintiffs.

12 12. Defendants are each jointly and severally liable to the Plaintiffs for the damages
13 Plaintiffs sustained as a direct and proximate result of Defendants’ conduct, as alleged in this
14 Complaint. Plaintiffs are informed and believe and thereon allege that each of the Defendants
15 were, at all pertinent times, the agents, servants, employees, officers, directors, joint venturers,
16 and/or partners, parents, affiliates, subsidiaries, successor-in-interests, related entities, of each of
17 the other Defendants, and are each liable for their own actions and inactions.

18 13. At all times relevant to this pleading, Defendants, individually and/or jointly,
19 were the agents, servants, employees, partners, aiders and abettors, co-conspirators, and/or joint
20 venturers of each of the other Defendants; and were operating within the purpose and scope of
21 said agency, service, employment, partnership, enterprise, conspiracy, and/or joint venture; and
22 each of Defendants has ratified and approved the acts of each of the remaining Defendants.
23 Each of Defendants aided and abetted, encouraged, and rendered substantial assistance to the
24 other Defendants in breaching their obligations and duties to Plaintiffs, as alleged here. In
25 acting to aid and abet and substantially assist the commission of these wrongful acts and other
26 wrongdoings alleged here, each of Defendants acted with an awareness of his/her/its primary
27 wrongdoing and realized that his/her/its conduct would substantially assist the accomplishment
28 of the wrongful conduct, wrongful goals, and wrongdoing or was willfully ignorant of those

wrongdoings.

JURISDICTION AND VENUE

14. Venue in this court is proper as Orange County, California is the location where Plaintiffs' injuries occurred and where the defendants' acts and omissions took place. Furthermore, at least some of the defendants reside in Orange County, California. (Code of Civil Procedure § 395(a).

15. The Orange County Superior Court is a court of general jurisdiction and has subject-matter jurisdiction over this unlimited civil case, as well as personal jurisdiction over each of the defendants.

FACTUAL OVERVIEW

16. Defendants GKN operate an aerospace manufacturing facility at or near 12122 Western Avenue, Garden Grove, California 92841, sometimes referred to as the "Garden Grove facility."

17. The Garden Grove facility sits on more than 15 acres and is one of the largest providers of military transparency systems and commercial aircraft transparencies. GKN offers a full range of capabilities for design, analysis, testing, and certification of military canopies, cockpit windows, and passenger windows. The Garden Grove facility's products include the F-35 fighter jet canopy, as well as transparencies for the Boeing 787 Dreamliner, 737, Airbus A350, HondaJet, and Bombardier C-Series.

18. As part of these operations, GKN designs and manufactures aerospace parts, including glass, acrylic, and polycarbonate transparency systems. GKN uses methyl methacrylate ("MMA") on site to manufacture acrylic/plastic components. MMA is the raw monomer that gets polymerized into acrylic materials for the canopies and windows.

19. MMA is both highly toxic and highly flammable and can quickly become explosive. MMA is classified as a UN Class 3 Flammable Liquid. When exposed to open flames or high temperatures, it can easily explode, resulting in fires and the release of toxic

1 gases that pose serious risk to both human life and property. Without an inhibitor, MMA may
2 also spontaneously polymerize – a runaway exothermic reaction that generates extreme heat and
3 pressure.

4 20. MMA is exceptionally dangerous to human health. Inhalation of vapor or skin
5 contact will rapidly cause damage to skin, eyes, nose, throat, and lungs, among other injuries.

6 21. Uncontrolled release of MMA is particularly dangerous. MMA is heavier than
7 air, meaning it settles closer to the ground when released, increasing the risk in surrounding
8 areas.

9 22. On or about May 22, 2026, a 34,000-gallon tank designed, constructed, owned,
10 and operated by GKN at the Garden Grove facility began leaking and releasing MMA into the
11 surrounding communities. The tank was classified as being in a state of crisis.

12 23. A faulty valve and the inability to remove or neutralize the MMA inside the tank
13 caused authorities to determine that the tank is not able to be repaired and will either fail and
14 release thousands of gallons of MMA into the environment and/or will explode and release an
15 unprecedented plume of MMA over a significant portion of Orange County.

16 24. Due to safety concerns from toxic vapor and environmental contamination, tens
17 of thousands of Orange County residents were ordered to evacuate the area, including in the
18 cities of Garden Grove, Cypress, Stanton, Anaheim, Buena Park, and Westminster.

19 25. Upon information and belief, Some residents near the Garden Grove facility
20 report being exposed to toxic emissions. Some area residents report physical symptoms due to
21 the exposure.

22 26. Defendants knew or should have known of the significant risks posed by the
23 storage and use of MMA, including the potential for catastrophic toxic emissions and
24 environmental damage.

25 27. Defendants failed to implement adequate safety measures and emergency
26 response plans to mitigate the known risks associated with MMA storage and use, causing
27 substantial damage to the Plaintiffs.

28 28. Defendants' tortious conduct has caused the plaintiffs to suffer harm, injuries,

1 and damages including, but not limited to, those identified below.

2 29. The MMA tank's failure resulted and will continue to result in the release of
3 toxic chemicals into the surrounding communities. Those exposed to these emissions have
4 and/or will suffer from inconvenience, annoyance, and/or personal discomfort. It is medically
5 understood that MMA exposure results in the following, without limitation: Nasal and eye
6 irritation, difficulty breathing, headaches, sore/scratchy throat, lung congestion, fatigue,
7 inability to focus, unusual smells, lung irritation, and skin irritation. Those with respiratory
8 disorders are expected to see their conditions exacerbated.

9 30. Plaintiffs' mental health has been adversely impacted because by the injury to
10 the peaceful enjoyment of the property that they occupied, and Plaintiffs have suffered fear,
11 severe emotional distress, anxiety, and mental anguish.

12
13 **FIRST CAUSE OF ACTION**

14 **NEGLIGENCE**

15 **(Against All Defendants)**

16 31. Plaintiffs incorporates by reference all of the allegations in this Complaint, as
17 though fully set forth herein.

18 32. As operators large-scale MMA storage and utilization facility, Defendants, who
19 have superior knowledge of the dangers associated with MMA release and toxicity, owed the
20 Plaintiffs a non-delegable duty to conduct their operations in a safe manner, including a duty to
21 design, maintain and operate their Garden Grove facility including the MMA tanks safely, in a
22 manner that protected the public, including the Plaintiffs, from chemical exposure and
23 environmental hazards.

24 33. Defendants' duties included but were not limited to a duty to ensure proper
25 safety protocols and storage and handling procedures to mitigate the risk of unsafe chemical
26 reactions, explosions and harmful emissions of toxic substances.

27 34. Defendants knew or should have known that MMA tanks can become unstable
28 with an increase in pressure and, therefore, cause explosions and otherwise releases of

hazardous materials in the form of toxic plumes or leakage.

35. Defendants breached duties owed to the Plaintiffs by, among other things:

- a. Failing to design, operate, maintain, and/or repair their Garden Grove facility, including the MMA tanks, in such a way as to ensure its safe and proper operation;
- b. Failing to monitor and mitigate risks associated with MMA storage and utilization;
- c. Failing to implement adequate safety protocols to prevent MMA tank failure;
- d. Failing to maintain a functional repair/mitigation system;
- e. Failing to properly maintain the valves on the MMA tanks;
- f. Failing to ensure proper procedures or systems for timely identifying any malfunctions or limitations of the MMA tanks;
- g. Failing to ensure proper safety procedures in the event of a malfunction;
- h. Failing to warn Plaintiffs and the public of the risks associated with the facility;
- i. Storing and utilizing large volumes of chemicals in such a way that the public was likely to be exposed; and
- j. Any other negligent acts and/or omissions which may be discovered and proven at the trial of this matter.

36. As the direct and proximate result of the Defendants' negligence, the plaintiffs were harmed.

37. The harm to the plaintiffs was reasonably foreseeable.

38. Plaintiffs have suffered injuries, damages and losses, including, but not limited to, those damages previously described. Such harms were unique to each Plaintiff and different from damages suffered by other Plaintiffs.

39. Accordingly, Plaintiffs each seek damages to be determined, on an individual basis, according to proof at trial, including, but not limited to, compensatory damages for their

1 evacuation and other damages that result, including economic damages, pain and suffering,
2 emotional anguish, injury to real and personal property, loss of income and relocation and
3 evacuation expenses.

4
5 **SECOND CAUSE OF ACTION**

6 **PRIVATE NUISANCE**

7 **(Against All Defendants)**

8 40. Plaintiffs incorporates by reference all of the allegations in this Complaint, as
9 though fully set forth herein.

10 41. Plaintiffs are in lawful possession of their property.

11 42. Defendants owned, maintained, operated, and otherwise controlled the Garden
12 Grove facility, including the MMA tanks.

13 43. Defendants' negligent, reckless, intentional and/or abnormally dangerous actions
14 and inactions created conditions and/or permitted conditions to exist that were harmful to
15 health, offensive to the senses, obstructed and/or entirely prevented free use of property, as to
16 substantially interfere with the comfortable use and enjoyment of property by persons of
17 ordinary sensibilities.

18 44. These conditions, including, but not limited to, the failure of the tank caused
19 mandatory evacuations due to the likelihood of toxic chemicals being emitted and significantly
20 interfered with Plaintiffs' right of use and quiet enjoyment of their property in a way unique to
21 each Plaintiff.

22 45. Plaintiffs' enjoyment of life and property has been rendered materially
23 uncomfortable and annoying. As the result of the incident at Defendants' facility, Plaintiffs'
24 homes and properties unfit for occupancy and use.

25 46. Those exposed to these emissions have suffered, and continue to suffer damages
26 from inconvenience, annoyance, and/or personal discomfort.

27 47. In addition, Plaintiffs' mental health has been adversely impacted by the injury
28 to the peaceful enjoyment of the property that they occupied, and Plaintiffs have suffered fear,

1 severe emotional distress, anxiety, and mental anguish.

2 48. At no time did the Plaintiffs consent to the Defendants' actions and inactions in
3 creating these conditions.

4 49. As a direct and proximate result of the Defendants' creation of the nuisance,
5 Plaintiffs have suffered damages and losses. Such harms were unique to each Plaintiff and
6 different from damages suffered by other Plaintiffs.

7 50. Accordingly, Plaintiffs each seek damages to be determined, on an individual
8 basis, according to proof at trial, including, but not limited to compensatory damages for injury
9 to property and interference with its use and enjoyment, and damages for physical discomfort,
10 loss of peace of mind, unhappiness and annoyance caused by the nuisance.

11
12 **THIRD CAUSE OF ACTION**

13 **TRESPASS TO REAL PROPERTY AND CHATTEL**

14 **(Against All Defendants)**

15 51. Plaintiffs incorporates by reference all of the allegations in this Complaint, as
16 though fully set forth herein.

17 52. Plaintiffs are in lawful possession of their properties.

18 53. As a result of the conduct and activities of the Defendants, contaminants from
19 the incident are expected to physically intrude onto and wrongfully enter Plaintiffs' properties,
20 thereby interfering with the Plaintiffs' possessory interests in their properties without Plaintiffs'
21 permission.

22 54. The expected physical intrusion of the contaminants emitted by Defendants onto
23 and into the Plaintiffs' properties is expected to physically injure and damage Plaintiffs'
24 properties by contaminating the soil, fixtures, structures and other physical aspects of Plaintiffs'
25 properties. Also, Defendants' trespass to Plaintiffs' personal property will physically injure and
26 damage Plaintiffs' personal properties by contaminating the properties, fixtures, structures, and
27 other physical aspects of Plaintiffs' personal properties. This would not have occurred but for
28 the actions of the Defendants.

1 55. The expected physical intrusion of the contaminants onto and into the properties
2 owned by the Plaintiffs will diminish the value of Plaintiffs' real properties.

3 56. The trespass will cause Plaintiffs to suffer, and continue to suffer, from
4 inconvenience, annoyance, and personal discomfort.

5 57. In addition, Plaintiffs' mental health has been adversely impacted by the injury
6 to the peaceful enjoyment of the property that they occupied, and Plaintiffs have suffered fear,
7 severe emotional distress, anxiety, and mental anguish.

8 58. Defendants' trespass was the actual and proximate cause of the Plaintiffs'
9 damages and losses including, but not limited to, diminution of the value and marketability of
10 their properties and their property rights; the loss of use of their properties; the loss of use and
11 enjoyment of their properties; and discomfort, inconvenience and annoyance. Defendants are
12 thus liable for the compensatory damages to the Plaintiffs, to be determined on an individual
13 basis, according to proof at trial.

14
15 **FOURTH CAUSE OF ACTION**

16 **STRICT LIABILITY FOR ULTRAHAZARDOUS ACTIVITIES**

17 **(Against All Defendants)**

18 59. Plaintiffs incorporates by reference all of the allegations in this Complaint, as
19 though fully set forth herein.

20 60. The operation of a large-scale MMA storage and utilization facility involves
21 ultrahazardous activities that pose significant risks to public health and safety.

22 61. Operation of a large-scale MMA storage and utilization facility, creates a high
23 degree of risk to the surrounding community. As shown by this incident, any failure of the
24 tanks has the potential to result in widespread harm, including the release of toxic chemicals
25 that endangered the health of thousands of residents in the surrounding area.

26 62. The potential harm caused by the MMA release includes severe health effects,
27 property damage, and prolonged disruption to the lives and livelihoods of those affected.

28 63. Despite safety protocols, risks associated with the operation of a large-scale

1 MMA storage and utilization facility cannot be fully eliminated through the exercise of
2 reasonable care. The inherent risks of grave harm remain present even with the implementation
3 of safety measures.

4 64. Operation of a large-scale MMA facility near residential neighborhoods and
5 businesses is not a common or appropriate activity. The Garden Grove facility was near a
6 densely populated area, increasing the potential harm to the community in the event of an
7 incident.

8 65. While Garden Grove facility may serve a commercial purpose, the extreme
9 danger posed by these facilities far outweighs any value it may provide to the community. The
10 resulting health hazards, evacuations, business closures, and environmental damage underscore
11 the ultrahazardous nature of Defendants' operations.

12 66. Because the operation of a large-scale MMA storage and utilization facility is an
13 ultrahazardous activity, Defendants are strictly liable for any harm proximately resulting from
14 these activities.

15 67. As a direct and proximate result of Defendants' engagement in ultrahazardous
16 activities, Plaintiffs suffered injuries, damages and losses, including, but not limited to, those
17 damages previously described.

18 68. Accordingly, Plaintiffs each seek damages to be determined, on an individual
19 basis, according to proof at trial, including, but not limited to, compensatory damages for
20 medical care, pain and suffering, emotional anguish, injury to real and personal property,
21 remediation costs, loss of income, relocation and evacuation expenses, and substantial
22 interference with their use and enjoyment of their properties.

23
24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their
26 favor and against Defendants as follows:

- 27 a. For compensatory damages in an amount to be proven at trial;
28 b. For punitive damages sufficient to deter future misconduct;

- 1 c. For pre- and post-judgment interest as allowed by law; and
2 d. For such other and further relief as this Court deems just and proper.

3
4 DATED: May 23, 2026

CARPENTER & ZUCKERMAN

5
6 By: Robert J. Ounjian

7 Lance C. Behringer

8 Robert J. Ounjian

9 Attorneys for Plaintiffs

10 **DEMAND FOR JURY TRIAL**

11 Plaintiffs hereby demand a jury trial on all matters in this Complaint for which a jury is
12 permitted by law.

13
14 DATED: May 23, 2026

CARPENTER & ZUCKERMAN

15
16 By: Robert J. Ounjian

17 Lance C. Behringer

18 Robert J. Ounjian

19 Attorneys for Plaintiffs
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