

Assigned for all purposes
Judge David Hoffer
CX-103

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE – CIVIL COMPLEX CENTER

ERIC LIM, an individual; S.O.M., Inc. dba,
WESTERN APPLIANCE WAREHOUSE, a
California Corporation; VANESSA
DELGADO, an individual; JESUS
SERRANO, an individual; and JUAN
CARLOS GARCIA, an individual,

Plaintiffs,

vs.

GKN AEROSPACE TRANSPARENCY
SYSTEMS, INC., a California Corporation;
MELROSE INDUSTRIES PLC, a Foreign
Corporation; and DOES 1 to 50, inclusive,

Defendants.

Case No.: 30-2026-01587733-CU-MT-CXC

COMPLAINT FOR DAMAGES

- 1. NEGLIGENCE**
- 2. STRICT LIABILITY FOR**
- ULTRAHAZADOUS ACTIVITIES**
- 3. CONTINUING PRIVATE**
- NUISANCE**
- 4. PERMANENT PRIVATE NUISANCE**
- 5. CONTINUING PUBLIC NUISANCE**
- 6. PERMANENT PUBLIC NUISANCE**
- 7. TRESPASS**

DEMAND FOR JURY TRIAL

Complaint Filed:

1 **INTRODUCTION**

2 1. This action arises out of Defendants’ negligent, reckless, and unreasonable
3 operation of an aerospace manufacturing facility located at 12122 Western Avenue in the City of
4 Garden Grove, County of Orange, California (the “Facility”), and Defendants’ failure to safely
5 store and maintain a large quantity of methyl methacrylate, a highly volatile, flammable, and toxic
6 industrial chemical, in the midst of a densely populated residential community.

7 2. On or about May 21, 2026, a bulk storage tank containing methyl methacrylate at
8 the Facility overheated, lost containment integrity, and began venting hazardous vapors, creating
9 an imminent risk of a toxic chemical release, fire, and catastrophic explosion. The tank had a
10 capacity of approximately 34,000 gallons and is alleged to have been approximately 22 years old
11 at the time of the failure.

12 3. As a direct and proximate result of the emergency Defendants created, public-safety
13 authorities ordered the emergency evacuation of approximately 50,000 residents across portions
14 of Garden Grove, Anaheim, Cypress, Stanton, Buena Park, and Westminster, closed more than
15 two dozen school campuses, and opened emergency evacuation shelters. Governor Gavin Newsom
16 declared a state of emergency in Orange County, and a federal emergency declaration followed.

17 4. Methyl methacrylate (sometimes referred to as “MMA”) is a colorless, volatile
18 organic compound used in the manufacture of acrylic glass, plastics, and resins. Exposure to MMA
19 vapor can cause irritation of the eyes, nose, throat, and respiratory tract, headaches, dizziness,
20 nausea, chest tightness and, at higher levels or with sensitization, chronic respiratory impairment
21 and other serious health effects. Children, the elderly, pregnant persons, and individuals with pre-
22 existing respiratory conditions are particularly susceptible.

23 5. Defendants had a legal duty to safely store, maintain, inspect, monitor, cool, and
24 control the MMA stored at the Facility, and to operate the Facility so as not to endanger the
25 surrounding community. Defendants breached those duties, as alleged herein.

26 6. As a result of Defendants’ wrongdoing, Plaintiffs Eric Lim, S.O.M., Inc. dba,
27 Western Appliance Warehouse, Vanessa Delgado, Jesus Serrano, and Juan Carlos Garcia
28 (“Plaintiffs”) — each of whom lives, works and/or owns or occupies property in the vicinity of the

1 Facility — were forced from their homes or businesses, exposed or placed at risk of exposure to
2 hazardous vapors, and suffered substantial interference with the use and enjoyment of their
3 property and the comfortable enjoyment of life, together with related personal injury, economic,
4 and property damages.

5 **JURISDICTION AND VENUE**

6 7. This Court has jurisdiction over this unlimited civil action because the conduct
7 alleged herein occurred in California, Defendants conduct substantial business in California and
8 in the County of Orange, and Plaintiffs' damages exceed the jurisdictional minimum of this Court.

9 8. Venue is proper in the County of Orange pursuant to California Code of Civil
10 Procedure sections 393, 395, and 395.5 because the Facility is located in Orange County, the acts,
11 omissions, injuries, and damages complained of occurred and originated in Orange County, and
12 Plaintiffs reside in Orange County.

13 **PARTIES**

14 9. Plaintiffs are individuals who, at all times relevant to this action, resided in, owned
15 or occupied property in, worked in, and/or regularly visited the area affected by the release and
16 threatened release of methyl methacrylate and related hazardous substances from the Facility,
17 including the evacuation zone established in response to the May 21, 2026 incident. Plaintiffs have
18 smelled, and/or were exposed or placed at risk of exposure to, hazardous vapors and odors
19 emanating from the Facility, and have suffered harm including, but not limited to, personal injury,
20 fear of and increased risk of future injury, emotional distress, evacuation and displacement costs,
21 harm to real and personal property, diminution in property value, lost income and business losses,
22 medical expenses, and the loss of the comfortable use and enjoyment of life and their property.

23 10. Defendant GKN Aerospace Transparency Systems, Inc. ("GKN") is, and at all
24 relevant times was, a corporation organized under the laws of the State of California and doing
25 business in the County of Orange, California. GKN owns, operates, controls, manages, and/or
26 maintains the Facility at 12122 Western Avenue, Garden Grove, California, and is responsible for
27 the storage, handling, inspection, maintenance, and control of the methyl methacrylate and other
28 hazardous chemicals located there.

11. Defendant Melrose Industries PLC (“Melrose”) is, and at all relevant times was, a foreign corporation that is the parent company of GKN and that, on information and belief, exercised ownership, oversight, and/or operational control over the Facility and its safety practices. Melrose and its subsidiaries and predecessors were involved in the ownership, operation, and/or maintenance of the Facility at the times relevant herein.

12. Plaintiffs are unaware of the true names and capacities of the Defendants sued as Does 1 through 50, inclusive, and therefore sue those Defendants by such fictitious names. Plaintiffs are informed and believe that each fictitiously named Defendant participated in, or is otherwise legally responsible for, the harm alleged herein. Plaintiffs will seek leave to amend this Complaint to allege the true names and capacities of the Doe Defendants when ascertained.

13. There is a unity of interest and ownership between Defendants such that any individuality and separateness between them has ceased, and each such entity is the alter ego of each other entity. Adherence to the fiction of separate corporate existence would sanction fraud or promote injustice.

14. Each Defendant committed, conspired to commit, and/or ratified each of the acts and omissions alleged in this Complaint. Defendants, and each of them, were the agents, servants, employees, and/or joint venturers of each other and were acting within the course and scope of that agency, service, employment, and joint venture. All acts performed by any Defendant while acting as an agent, servant, employee, and/or joint venturer have been adopted and ratified by all other Defendants. Consequently, Defendants are jointly and severally liable to Plaintiffs for the injuries and damages sustained as a proximate result of their conduct.

GENERAL ALLEGATIONS

A. The Facility and the Surrounding Community

15. On information and belief, the Facility is an aerospace manufacturing plant that has operated at 12122 Western Avenue in Garden Grove since approximately 1993, producing aircraft transparencies, structural components, and related products for commercial and military aircraft. The Facility is located in a densely populated area of Orange County, immediately adjacent to

1 residential neighborhoods, schools, and businesses, and near the border between Garden Grove
2 and the City of Cypress.

3 16. In the course of its operations, Defendants, and each of them, stored, handled, and
4 used large quantities of hazardous industrial chemicals at the Facility, including methyl
5 methacrylate. At the time of the incident alleged herein, Defendants maintained a bulk storage tank
6 with a capacity of approximately 34,000 gallons that contained approximately 7,000 gallons of
7 MMA. On information and belief, the tank was approximately 22 years old.

8 17. Operators that store volatile, flammable, and toxic chemicals such as MMA in bulk
9 quantities in a residential area have a duty to construct, maintain, inspect, monitor, cool, and
10 control those storage systems with the utmost care so as to prevent overheating, loss of
11 containment, vapor release, fire, and explosion. Defendants' negligence, recklessness, and/or
12 unreasonableness in those respects were a direct and proximate cause of the chemical emergency
13 and the harms associated with it.

14 **B. The May 21, 2026 Chemical Emergency**

15 18. On or about May 21, 2026, the bulk MMA storage tank at the Facility began
16 overheating. As the temperature inside the tank rose, internal pressure increased, the steel shell of
17 the tank bulged and lost integrity, and the tank began venting hazardous MMA vapors, creating an
18 imminent risk of a toxic release, fire, and catastrophic explosion.

19 19. The Orange County Fire Authority and other public-safety agencies responded to
20 the emergency. Authorities publicly warned that the tank could rupture or explode and worked
21 around the clock to cool the tank and prevent a further release. The condition was sufficiently
22 dangerous that officials characterized a failure of the tank as a serious risk to the surrounding
23 community.

24 20. As a direct and proximate result of the condition Defendants created, public-safety
25 authorities ordered the emergency evacuation of the surrounding community. At its peak, the
26 evacuation zone encompassed approximately 50,000 residents across portions of Garden Grove,
27 Anaheim, Cypress, Stanton, Buena Park, and Westminster. More than two dozen school campuses
28 were closed, and emergency evacuation shelters were opened across the affected area. Many

1 residents, including Plaintiffs, were ordered to leave their homes on short notice and were unable
2 to retrieve medications, pets, or essential belongings.

3 21. Evacuation orders were issued, expanded, and modified multiple times as
4 conditions changed before being lifted on or about May 22, 2026. On information and belief, a
5 crack subsequently identified in the tank shell relieved the internal pressure that had been building
6 since May 21, after which officials determined that the immediate explosion risk had been averted.
7 The full extent of the release of MMA and related substances, and of the resulting human exposure,
8 remains under investigation.

9 22. The scale and severity of the incident prompted emergency declarations at the state
10 and federal levels, including a declaration of a state of emergency in Orange County by the
11 Governor of California and a subsequent federal emergency declaration.

12 23. The condition Defendants created and/or permitted to exist caused, and the
13 threatened release continues to threaten to cause, odors, vapors, and air-quality and public-safety
14 conditions that: (a) are harmful to health; (b) are indecent and offensive to the senses; (c) obstruct
15 the free use of property in the surrounding communities; and (d) interfere with the comfortable
16 enjoyment of life and property in the surrounding communities. This condition affected a
17 substantial number of people at the same time, including Plaintiffs.

18 **C. Defendants' Prior Notice and Regulatory History**

19 24. Defendants were aware, or in the exercise of reasonable care should have been
20 aware, long before May 21, 2026, of the danger posed by the storage of volatile chemicals such as
21 MMA at the Facility, and of specific deficiencies in the storage, cooling, inspection, and
22 maintenance of such equipment.

23 25. On information and belief, in or about 2018, the California Division of
24 Occupational Safety and Health ("Cal/OSHA") cited the Facility in connection with the improper
25 cooling of volatile chemical tanks — the same category of hazard and failure mode that is alleged
26 to have caused the May 21, 2026 emergency.

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1 26. On information and belief, the Facility accumulated approximately ten safety
2 violations across four Cal/OSHA inspections beginning in or about 2018, and in or about 2019 a
3 state agency was required to bring an action in the Orange County Superior Court to collect unpaid
4 civil penalties assessed against the Facility’s operator.

5 27. On information and belief, the operator of the Facility entered into a settlement with
6 the South Coast Air Quality Management District (“SCAQMD”) in or about 2021, in the
7 approximate amount of \$1 million, relating to the operation of toxic equipment without proper
8 permits at the Facility, and a further SCAQMD settlement in or about 2025, in the approximate
9 amount of \$900,000, relating to air-quality safety violations at the Facility. On information and
10 belief, related compliance notices issued in or about March 2025 confirmed that certain violations
11 had not been fully corrected.

12 28. Despite this notice, Defendants failed to take adequate steps to maintain, inspect,
13 cool, monitor, repair, secure, and control the aging MMA storage tank and associated systems, and
14 failed to implement adequate safety measures to prevent the overheating, loss of containment, and
15 threatened release and explosion that occurred on May 21, 2026. Defendants’ conduct in acting or
16 failing to act was negligent, reckless, and/or unreasonable, if not intentional.

17 **D. Governmental Investigations of Defendants**

18 29. Various governmental agencies have oversight authority over the Facility and have
19 undertaken investigations relating to the incident. On information and belief, the Orange County
20 District Attorney opened a criminal investigation into the Facility and its operator on or about May
21 22, 2026, surveyed the Facility, opened a tip line for information, and directed the preservation of
22 records including maintenance logs, telemetry records, and internal communications.

23 30. On information and belief, Cal/OSHA opened a separate investigation into the
24 Facility relating to the incident, running parallel to the District Attorney’s investigation. The
25 investigations remain active as of the filing of this Complaint.

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1 **FIRST CAUSE OF ACTION**

2 **NEGLIGENCE**

3 **(Against All Defendants)**

4 31. Plaintiffs incorporate by reference all preceding paragraphs as though fully set forth
5 herein.

6 32. At all relevant times, Defendants, and each of them, owned, operated, inspected,
7 controlled, managed, and/or maintained the Facility and the methyl methacrylate and other
8 hazardous chemicals stored there.

9 33. At all relevant times, Defendants, and each of them, had a duty to exercise the
10 utmost care and diligence in the ownership, operation, inspection, management, maintenance,
11 and/or control of the Facility, including but not limited to compliance with relevant regulations
12 and industry standards, so as not to cause harm to persons, private and public property, the
13 environment, public resources, public health, and/or the comfortable use and enjoyment of
14 property and life by surrounding residents and business owners.

15 34. At all relevant times, Defendants, and each of them, negligently, carelessly,
16 recklessly, and/or unlawfully owned, operated, managed, supervised, maintained, and/or
17 controlled the Facility, including but not limited to: (a) failing to implement reasonable safety,
18 cooling, monitoring, and leak-and release-prevention practices for the MMA storage tank and
19 associated systems; (b) failing to properly inspect, assess, test, and/or evaluate the integrity and
20 condition of the aging storage tank in compliance with applicable safety standards and regulations;
21 (c) failing to maintain, repair, and/or replace the storage tank and associated equipment; and/or (d)
22 failing to have an adequate response plan to timely, adequately, and properly respond to, contain,
23 and abate the overheating, vapor release, and threatened explosion.

24 35. California Health and Safety Code section 41700 provides that, with exceptions not
25 applicable here, a person shall not discharge from any source whatsoever quantities of air
26 contaminants or other material that cause injury, detriment, nuisance, or annoyance to any
27 considerable number of persons or to the public, or that endanger the comfort, repose, health, or
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1 safety of any of those persons or the public, or that cause, or have a natural tendency to cause,
2 injury or damage to business or property.

3 36. Plaintiffs were and are among the class of persons that California Health and Safety
4 Code section 41700 was intended to protect, and the harm they suffered is the type of harm the
5 statute was designed to prevent.

6 37. At the times relevant hereto, Defendants, and each of them, violated California
7 Health and Safety Code section 41700 by, among other things, allowing the overheating of, loss
8 of containment from, and release and threatened release of methyl methacrylate vapors and related
9 contaminants from the Facility, which caused odor, air-quality, and public-safety conditions
10 injurious to and endangering a considerable number of persons, including Plaintiffs.

11 38. Plaintiffs are further informed and believe that Defendants violated additional
12 statutes, regulations, and permit conditions designed to protect public health and safety, including
13 regulations governing the safe storage and handling of hazardous and volatile chemicals.

14 39. As a direct and proximate result of the wrongful acts, omissions and violations by
15 Defendants, and each of them, Plaintiffs have each suffered injury and damages including, but not
16 limited to personal injury, evacuation and displacement costs, lost income and business losses,
17 medical and incidental expenses, harm to and diminution in the value of real and personal property,
18 and the loss of the comfortable use and enjoyment of life and their property, all in an amount
19 according to proof.

20 **SECOND CAUSE OF ACTION**

21 **STRICT LIABILITY FOR ULTRAHAZARDOUS ACTIVITIES**

22 **(Against All Defendants)**

23 40. Plaintiffs incorporate by reference all preceding paragraphs as though fully set forth
24 herein.

25 41. Defendants' operation of the Facility involved ultrahazardous activities, including
26 but not limited to the storage, handling, and use of large quantities of methyl methacrylate — a
27 highly volatile, highly flammable, and highly toxic chemical — in bulk, in close proximity to a
28 densely populated residential community.

42. The bulk storage of volatile, flammable, and toxic chemicals in a residential area creates a foreseeable risk of serious harm that cannot be eliminated by the exercise of reasonable care and is not a matter of common usage in such a setting. Defendants, and each of them, are responsible for the harm such ultrahazardous activities caused others, regardless of how carefully they carried out those activities.

43. Plaintiffs were each harmed by Defendants' ultrahazardous activities.

44. Plaintiffs' harm was the kind of harm that would be anticipated as a result of the risk created by Defendants' ultrahazardous activities, including the overheating, loss of containment, release, and threatened explosion of stored methyl methacrylate.

45. Plaintiffs each suffered injuries and damages as a proximate result of Defendants' ultrahazardous activities, and Defendants, and each of them, were a substantial factor in causing Plaintiffs' harm.

46. Defendants, and each of them, acted with malice, oppression, or fraud, and with a conscious disregard for the health and safety of Plaintiffs and their community, such that Plaintiffs are entitled to punitive and exemplary damages pursuant to California Civil Code section 3294.

THIRD CAUSE OF ACTION

CONTINUING PRIVATE NUISANCE

(Against All Defendants)

47. Plaintiffs incorporate by reference all preceding paragraphs as though fully set forth herein.

48. At all relevant times, Plaintiffs owned, leased, and/or occupied property near the Facility and were exposed, or placed at risk of exposure, to the effects of the chemical emergency and the release and threatened release of methyl methacrylate and related substances.

49. Defendants, and each of them, by acting or failing to act, created a condition, or permitted a condition to exist, that was: (a) harmful to health; (b) indecent or offensive to the senses; and/or (c) an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.

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1 50. This condition substantially interfered with Plaintiffs' use or enjoyment of their
2 land.

3 51. An ordinary person would reasonably be annoyed or disturbed by Defendants'
4 conduct.

5 52. Plaintiffs did not consent to Defendants' conduct.

6 53. Plaintiffs were harmed and continue to be harmed by the condition, and
7 Defendants' conduct was a substantial factor in causing that harm.

8 54. The seriousness of the harm outweighs any alleged public benefit of Defendants'
9 conduct.

10 55. The condition is a continuing nuisance in that it is an ongoing and repeated
11 disturbance that can be reasonably abated. In maintaining the nuisance, Defendants, and each of
12 them, are acting with full knowledge of the consequences and damage being caused, and their acts
13 and omissions were done with malice, fraud, and/or oppression, and with a conscious disregard
14 for the health and safety of Plaintiffs and their community, such that Plaintiffs are entitled to
15 punitive and exemplary damages pursuant to California Civil Code section 3294.

16 **FOURTH CAUSE OF ACTION**

17 **PERMANENT PRIVATE NUISANCE**

18 **(Against All Defendants)**

19 56. Plaintiffs incorporate by reference all preceding paragraphs as though fully set forth
20 herein.

21 57. Defendants, and each of them, by acting or failing to act, created or permitted a
22 condition to exist that was harmful to health, indecent or offensive to the senses, and/or an
23 obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or
24 property, and that substantially interfered with Plaintiffs' use or enjoyment of their land.

25 58. An ordinary person would reasonably be annoyed or disturbed by Defendants'
26 conduct; Plaintiffs did not consent to that conduct; Plaintiffs were harmed; Defendants' conduct
27 was a substantial factor in causing the harm; and the seriousness of the harm outweighs any alleged
28 public benefit of Defendants' conduct.

59. To the extent the nuisance cannot be reasonably abated, it constitutes a permanent nuisance. To the extent it is doubtful whether the nuisance is continuing or permanent, Plaintiffs reserve their right to treat the nuisance as either continuing or permanent. The condition has caused harm including a diminution in the value and marketability of Plaintiffs' property.

60. In maintaining the nuisance, Defendants, and each of them, are acting with full knowledge of the consequences and damage being caused, and their acts and omissions were done with malice, fraud, and/or oppression, and with a conscious disregard for the health and safety of Plaintiffs and their community, such that Plaintiffs are entitled to punitive and exemplary damages pursuant to California Civil Code section 3294.

FIFTH CAUSE OF ACTION
CONTINUING PUBLIC NUISANCE
(Against All Defendants)

61. Plaintiffs incorporate by reference all preceding paragraphs as though fully set forth herein.

62. Defendants, and each of them, by acting or failing to act, created or permitted a condition to exist that was harmful to health, indecent or offensive to the senses, and/or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.

63. The condition affected a substantial number of people at the same time, including the approximately 50,000 residents ordered to evacuate the area surrounding the Facility.

64. An ordinary person would reasonably be annoyed or disturbed by the condition, and the seriousness of the harm outweighs the alleged social utility of Defendants' conduct.

65. Plaintiffs did not consent to Defendants' conduct.

66. Plaintiffs suffered, and continue to suffer, harm that was different in kind from the harm suffered by the general public, including personal injury, evacuation and displacement losses, property damage and diminution in value, and the loss of the use and enjoyment of their property. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

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67. The condition is a continuing nuisance in that it is an ongoing and repeated disturbance that can be reasonably abated. In maintaining the nuisance, Defendants, and each of them, are acting with full knowledge of the consequences and damage being caused, and their acts and omissions were done with malice, fraud, and/or oppression, and with a conscious disregard for the health and safety of Plaintiffs and their community, such that Plaintiffs are entitled to punitive and exemplary damages pursuant to California Civil Code section 3294.

SIXTH CAUSE OF ACTION
PERMANENT PUBLIC NUISANCE
(Against All Defendants)

68. Plaintiffs incorporate by reference all preceding paragraphs as though fully set forth herein.

69. Defendants, and each of them, by acting or failing to act, created or permitted a condition to exist that has affected, and continues to affect, a substantial number of people at the same time, and that was harmful to health, indecent or offensive to the senses, and/or an obstruction to the free use of property.

70. An ordinary person would reasonably be annoyed or disturbed by the condition; the seriousness of the harm outweighs the social utility of Defendants' conduct; and Plaintiffs did not consent to that conduct.

71. Plaintiffs suffered, and continue to suffer, harm that was different in kind from the harm suffered by the general public, including a diminution in the fair market value and marketability of their property and a reasonable fear that the area remains dangerous. To the extent the nuisance cannot be reasonably abated, it constitutes a permanent nuisance, and to the extent it is doubtful whether the nuisance is continuing or permanent, Plaintiffs reserve the right to treat it as either.

72. In maintaining the nuisance, Defendants, and each of them, are acting with full knowledge of the consequences and damage being caused, and their acts and omissions were done with malice, fraud, and/or oppression, and with a conscious disregard for the health and safety of

1 Plaintiffs and their community, such that Plaintiffs are entitled to punitive and exemplary damages
2 pursuant to California Civil Code section 3294.

3 **SEVENTH CAUSE OF ACTION**

4 **TRESPASS**

5 **(Against All Defendants)**

6 73. Plaintiffs incorporate by reference all preceding paragraphs as though fully set forth
7 herein.

8 74. Plaintiffs own and/or occupy property near the Facility and had the right to occupy,
9 enjoy, and use that property without interference by Defendants, and each of them.

10 75. Defendants, and each of them, intentionally, recklessly, and/or negligently caused
11 methyl methacrylate vapors and other contaminants, particulate matter, and/or chemicals to be
12 released beyond the boundaries of the Facility in such a manner that it was reasonably foreseeable
13 the contaminants would, in due course, invade Plaintiffs' real property, including the air space
14 surrounding, above, and within Plaintiffs' residences.

15 76. Plaintiffs did not give permission for the entry, and said entry and invasion
16 interfered with Plaintiffs' possessory interests in their property and caused actual harm.

17 77. Defendants' entry and conduct were a substantial factor in causing Plaintiffs' harm.
18 As a direct and proximate result of Defendants' trespass, Plaintiffs have suffered legal injury and
19 damages in an amount to be proven at trial.

20 78. Defendants, and each of them, acted with full knowledge of the consequences and
21 damage being caused, and their acts and omissions were done with malice, fraud, and/or
22 oppression, and with a conscious disregard for the health and safety of Plaintiffs and their
23 community, such that Plaintiffs are entitled to punitive and exemplary damages pursuant to
24 California Civil Code section 3294.

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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiffs request relief against all Defendants as follows:

3 a. A judgment in favor of Plaintiffs on all claims;

4 b. For compensatory and general damages in an amount to be determined at trial, in
5 excess of the jurisdictional limit of this Court including, but not limited to, damages for personal
6 injury, evacuation and displacement costs, lost wages and earning capacity, business interruption
7 losses, past and future medical and incidental expenses, property damage and remediation costs,
8 and diminution in the value of property;

9 c. An immediate temporary and preliminary injunction against Defendants, and each
10 of them, to prevent further harm to Plaintiffs, including provisions for ongoing monitoring of
11 Plaintiffs' property, air-quality and environmental monitoring, and potential remediation by
12 Defendants, and to prevent Defendants from operating the Facility without adequate safety
13 precautions and ongoing monitoring;

14 d. A permanent injunction providing the same relief in c;

15 e. General damages for fear, worry, annoyance, discomfort, disturbance,
16 inconvenience, mental anguish, emotional distress, and loss of quiet enjoyment of property;

17 f. Punitive and exemplary damages according to proof on the appropriate causes of
18 action;

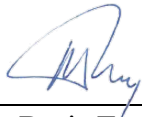
19 g. All costs of suit, including attorneys' fees where appropriate, appraisal fees,
20 engineering fees, and related costs;

21 h. Pre- and post-judgment interest at the legal rate on all amounts awarded; and

22 i. For all other relief as this Court may deem just and proper.
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24 DATED: July 29, 2026

ABIR COHEN TREYZON SALO, LLP

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26 By: 

27 Boris Treyzon, Esq.
28 Attorney for Plaintiffs

1 DATED: July 24, 2026

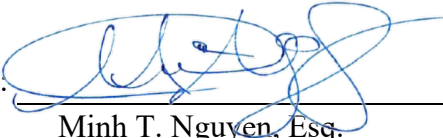
BECKER LAW GROUP

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3 By: /s/ Brian E. Shear

4 Todd B. Becker, Esq.
5 Brian E. Shear, Esq.
6 Attorney for Plaintiffs

7 DATED: July 24, 2026

NGUYEN LAWYERS, ALC

8
9 By: 

10 Minh T. Nguyen, Esq.
11 Attorney for Plaintiffs
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1 **DEMAND FOR JURY TRIAL**

2 Plaintiffs hereby demand a trial by jury as to all triable issues in this action.

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4 DATED: July 29, 2026

ABIR COHEN TREYZON SALO, LLP

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6 By: 

7 _____
8 Boris Treyzon, Esq.
9 Attorney for Plaintiffs

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11 DATED: July 24, 2026

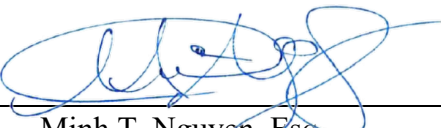
BECKER LAW GROUP

12 By: */s/ Brian E. Shear*

13 _____
14 Todd B. Becker, Esq.
15 Brian E. Shear, Esq.
16 Attorney for Plaintiffs

17
18 DATED: July 24, 2026

NGUYEN LAWYERS, ALC

19 By: 

20 _____
21 Minh T. Nguyen, Esq.
22 Attorney for Plaintiffs
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