

Francis S. Ryu, Esq., SB#176597

RYU LAW FIRM

915 Wilshire Blvd., Suite 1775

Los Angeles, California 90017

Telephone: (323) 931-5270

Facsimile: (323) 931-5271

Email: Francis@ryulaw.com

Attorney for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE – CENTRAL JUSTICE CENTER**

Jeff Rhee, an individual; Se Youn Lee, an individual; Anna Yoo, an individual; Mason Lee, a minor, by and through their Guardian Ad Litem, Se Youn Lee; Jacob Lee, a minor, by and through their Guardian Ad Litem, Se Youn Lee; Linda Yoo, an individual; Angela Lee, an individual; Jung Ja Chae, an individual; Youn Ju Cho, an individual; Chang Hee Kim, an individual; Sam Seyoung Choo, an individual; Sun Young Song, an individual; Irene Yerin Choo, a minor, by and through their Guardian Ad Litem, Sam Seyoung Choo; Claire Yesol Choo, a minor, by and through their Guardian Ad Litem, Sam Seyoung Choo; Diem H. Van, an individual; Jasmine Park, an individual; Hyo Sook Yi, an individual; Jesus Gonzalez, an individual; Antonio Dario Gonzalez, an individual; Jesus Tomas Gonzalez, an individual; Antonio Gonzalez, an individual; Suezy Li, an individual; Kyung Hee Choi Park, an individual; Chung Ku Sin, an individual; Hsueh Yen Cheng, an individual; Jishun Huang, an individual; Fengnu Li, an individual; Hee Soo Lee, an individual; Bok Soon Lee, an individual; Esther Y. Bartos, an individual; Hei Jung Inez Kim, an individual; Min Hee Lee, an individual; Ok Hee Hong, an individual; Grace Kim Lee, an individual;

CASE NO.:

COMPLAINT FOR:

- 1. NEGLIGENCE**
- 2. TRESPASS**
- 3. PRIVATE NUISANCE**
- 4. PUBLIC NUISANCE**
- 5. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

1 Yushun Jin, an individual; Wangxing Yuan, an)
individual; Ji Young Park, an individual; Laura)
2 Soon Oh, an individual; Joseph K. Oh, an)
individual; Sue Keun-Sook Park, an individual;)
3 Young Park, an individual; Yvette Hong, an)
individual; Wayne Lu, an individual; Young Ju)
4 Moon, an individual; Haemin Chang, an)
individual; Byung Sik Jang, an individual;)
5 Frank Sung, an individual; Yu Xin Chen, an)
individual; Bok Soon Sung, an individual;)
6 Cholkhyong Kim, an individual; Miguel Angel)
Gonzalez, an individual; Kyung Ah Lee, an)
7 individual; Ana Mary Kim, an individual; Miri)
8 Lee, an individual; Hongshik Shin, an)
individual; Jiho Shin, an individual; Gina Shin,)
9 an individual; Rong Guang Yu, an individual;)
10 Chun Jie Hu, an individual; German Acosta)
Vega, an individual; Guadalupe Cuevas, an)
11 individual; Luis J. Reyes, an individual;)
Alfonso Reyes, an individual; Elmar Salvador)
12 Perez Hernandez, an individual; Donsook)
Youm, an individual; Avril Perez, an)
13 individual; Andrew Perez, an individual;)
Andrea Christine Yanulaytis, an individual;)
14 Georgina Arellano, an individual; Juan C.)
Arellano, an individual; Sarah Arellano, an)
15 individual; Omar Martinez Catalan, an)
individual; Estela Caruente, an individual; Jose)
16 M. Miranda, an individual; Jose Miranda, a)
minor, by and through their Guardian Ad)
17 Litem, Estela Caruente; Emiliano Miranda, a)
minor, by and through their Guardian Ad)
18 Litem, Estela Caruente; Daiana Miranda, a)
minor, by and through their Guardian Ad)
19 Litem, Estela Caruente; Jamie Cho, an)
individual; Peter Cho, an individual; Jung Suk)
20 Lee, an individual; Kwang Kuk Lee, an)
individual; Hansun Lee, an individual; Seung)
21 Jin Lee, an individual; Nathan Lee, a minor, by)
and through their Guardian Ad Litem, Hansun)
22 Lee; Chloe Lee, a minor, by and through their)
Guardian Ad Litem, Hansun Lee; Yong Kon)
23 Yi, an individual; Young Sook Park, an)
individual; John Ho Yang Park, an individual;)
24 Young Hee Park, an individual; Areum Kim,)
25)
26)
27)
28)

1 an individual; On Peter Sim, a minor, by and)
2 through their Guardian Ad Litem, Areum Kim;)
3 Kwan Sik Kim, an individual; Sang Nam Kim,)
4 an individual; Sung Bok Moon, an individual;)
5 Sonny Kim, an individual; Susan J. Kim, an)
6 individual; Bok Sun Kwon, an individual;)
7 Christie Kwon, an individual; Haesung Enyart,)
8 an individual; Ryan Enyart, an individual; John)
9 Kim, an individual; Irene Su Cho, an)
10 individual; Myoung Ok Lee, an individual;)
11 Fernando Mujica, an individual; Jacob Lee, an)
12 individual; Shady Mohsen Shawky Basta, an)
13 individual; Eva Bautista, an individual;)
14 Jasmine Calvillo, an individual; Jesus Calvillo,)
15 an individual; Elizabeth Calvillo, a minor, by)
16 and through their Guardian Ad Litem, Eva)
17 Bautista; Patricia Calvillo, an individual;)
18 Servando Calvillo, a minor, by and through)
19 their Guardian Ad Litem, Eva Bautista; Javier)
20 Calvillo, an individual; Javier Calvillo, an)
21 individual; Jenny Kim, an individual; Ellen)
22 Lee, an individual; Ho Sun Lee, an individual;)
23 Jae Ok Eum, an individual; Jae Won Lee, an)
24 individual; Jae Kon Lee, an individual; Chung)
25 Ho Kim, an individual; Samuel Mctran, an)
26 individual; Chol Su Choe, an individual; Mi)
27 Suk Choe, an individual; Joe Jonghoon Kim,)
28 an individual; Efren Quezada, an individual;)
Sun Won Hong, an individual; Kelsey H.)
Hong, a minor, by and through their Guardian)
Ad Litem, Sun Won Hong; Yu Mi Kim, an)
individual; Jeong Ja Lee, an individual; Sarah)
Lee, an individual; Mai Do, an individual;)
Kimdinh Le, an individual; Justin Mun, an)
individual; Mi Yang Kim, an individual; James)
Hong, an individual; Austin Hong, an)
individual; Jessica Hong, an individual; Stella)
Kang, an individual; Min Ju Kook, an)
individual; Jee Hee Jun, an individual; Wan)
Sop Sim, an individual; Young Ki Youn, an)
individual; Nam Seog Son, an individual; Hyo)
Sook Jeong Son, an individual; Manuel)
Galdames, an individual; Mal Sun Ha, an)
individual; Soonbae Jung, an individual; Phu)
Thanh Le, an individual; Olivia Le, an)

individual; Yang Sook Kim, an individual;
Phuong Minh Le, an individual; Nho Le, an
individual; Hao Nguyen, an individual; Ki T
Han, an individual; Erin Joung, an individual;
Dae Young Joung, an individual; Phil Lee, an
individual; Joo Yeon Lee, an individual; Ok
Nam Kwon, an individual; Jung Ho Kwon, an
individual; Sara Hwang, an individual; Jenni S.
Min, an individual; Andrew Murjani, an
individual; Eunseon Murjani, an individual;
Kyung Sook An, an individual; Jemma Kim, an
individual; Young Soon Park, an individual;
Sang Kyu Han, an individual; Sang Yun, an
individual; Gu Nam Kang, an individual;
Doosun Kim, an individual; Steve Chang, an
individual; Solomon Flores, an individual;
Mary Grace Flores, an individual; Kwang Jin
Hwang, an individual; Lynn Tran Le, an
individual; Hye Joo Jung, an individual; Hyung
Won Choe, an individual; Jee Woong Choe, an
individual; Chong Hee Ha, an individual; Youk
Eun Seo, an individual; Sang Woo Kim, an
individual; Sun Sub Kim, an individual; Jung
Lim Park, an individual; Sak Soon Yang, an
individual; Kyung Hee Ko, an individual;
Kyeongmi Lee, an individual; Jose A. Reyna,
an individual; Pil Soon Kwon, an individual;
Yung Taek Choi, an individual; In Yong Yu,
an individual; Dong Soon Yu, an individual;
Yujie Qiao, an individual; Baoxin Pang, an
individual; Hyun Suk Na, an individual; Suk
Ku Lee, an individual; Bum Yong Ha, an
individual; Young Hee Lee, an individual;
Sung Ho Park, an individual; Joanne Eun
Hyun, an individual; Young Hyun, an
individual; David Myonghwan Son, an
individual; Julie K. Son, an individual; Sungil
Hong, an individual; Yong Jang, an individual;
Laura Jang, an individual; Eric Hongsoo Yang,
an individual; You Hwang, an individual; Jung
Kim, an individual; Min Yong Park, an
individual; Dong Yul Yoon, an individual;
Monica Jazmin Orozco, an individual; Soo
Hoon Owh, an individual; Bo K Chung, an
individual; Myeong Soo Lim, an individual; In

1 Sook Lim, an individual; Nancy Nguyen, an
individual; Dong Sook Shin, an individual;
2 Yulim Moon, an individual; Tammy Mai Kieu,
an individual; Tony Tran, an individual; Sophia
3 Tran, a minor, by and through their Guardian
Ad Litem, Tammy Mai Kieu; William Tran, a
4 minor, by and through their Guardian Ad
Litem, Tammy Mai Kieu; Alexander Tran, a
5 minor, by and through their Guardian Ad
Litem, Tammy Mai Kieu; Nguyet Tran, an
6 individual; Men Kieu, an individual; Simone
Song, an individual; Andrew Song, an
7 individual; Ethan Song, an individual; Lucy
8 Hoang, an individual; Benjamin Miranda
Najera, an individual; Jessica Soonmi Seung,
9 an individual; Steven Lee, an individual; Jay
Yoonjae Lee, an individual; Hyang Shil Moon,
10 an individual; Yesenia Ojeda, an individual;
Chan Hoi Choi, an individual; Bok Jin Jun, an
11 individual; Ki Ho Park, an individual; Ziyu
Pang Zhang, an individual; Silvia Mendoza, an
12 individual; Hye Na Kwak, an individual; Collin
Cho, a minor, by and through their Guardian
13 Ad Litem, Hye Na Kwak; Hyun Jo Oh, an
individual; Jasmine Oh, an individual; Jung
14 Yun Kim, an individual; Kyung Soon Kim, an
individual; Andrew Min Won, an individual;
15 Kevin Won, an individual; Eunju Kim, an
individual; Seongho Na, an individual; Seul Ki
16 Na, an individual; Myungsun Rho, an
individual; Aesim Rho, an individual; Soon
17 Seok Shin, an individual; Tony Shin, an
individual; Stella Shin, an individual; Sun Hee
18 Lim, an individual; Kyung Sam Lim, an
individual; Geun Taek Jung, an individual;
19 Byung Op Choe, an individual; Chun Hee
Choi, an individual; Seon Min Park, an
20 individual; Ji Min Park, an individual; Sunbee
Kim, an individual; Hyung Gak Kim, an
21 individual; Myung Suk Lee, an individual; Ji
Hyun Lee, an individual; Chonghwa Lee, an
22 individual; Rachel Choi, an individual; Sarah
Kim, an individual; Cheol Lee, an individual;
23 Doo Jae Park, an individual; Khang Mai, an
individual; Sung Joon Lim, an individual;
24
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26
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28

1 Hang Nguyen, an individual; James Bong Cho, an individual; Jee Soo Lim, an individual; Wan
2 Soo Kim, an individual; Bok Soon Liu, an individual; Heng Hsi Liu, an individual; Jane
3 Liu, an individual; Soo Nam Hwang, an individual; Yoon Hee Lim, an individual; Jorge
4 Escobar, an individual; Super K Ko, an individual; Peter Woo Choi, an individual;
5 Yuuyoung Lee, an individual Jin Young Kim, an individual; Seon Young Kim, an individual;
6 Sin Ja Kim, an individual; Seong Hoon Kim, an individual; Hee Ryoung Kwon, an
7 individual; Hyunna Lee, an individual; Jong Sang Lee, an individual; Jason Lee, an
8 individual; Young Joo Lee, an individual; Chanyoung Lee, an individual; Youngin Lee,
9 an individual; Youngmin Lee, an individual; Jiye Lee, an individual; Joyce Hyunjo Park,
10 an individual; Rebekah Byun, an individual; Jae Suk Kim, an individual; Hajun Kim, an
11 individual; Sanghee Kim, an individual; Byeongseok Jeon, an individual; Joo Young
12 Cho, an individual; Mi Jin Lee, an individual; Huisoo Cho, an individual; Yeon Hee Kim, an
13 individual; Joel Velasquez Ruiz, an individual; Ofelia Hernandez Lopez, an individual;
14 Rogelio Velasquez, an individual; Cristopher Velasquez Sebastian, an individual; Young Ok
15 Kim, an individual; Jay Kim, an individual; Tai Sun Ryu, an individual; Ellie So Youn Shin, an
16 individual; Justin Hee Chan Shin, an individual; Eunsook Cho, an individual; Hayan
17 Charlston, an individual; Legend Macmillan, a minor, by and through their Guardian Ad
18 Litem, Eunsook Cho; Celestine Macmillan, a minor, by and through their Guardian Ad
19 Litem, Eunsook Cho; Aiden Macmillan, an individual; Judith Rios, an individual; Diana
20 Alvarez, an individual; Vanesa Alvarez, an individual; Anthony Alvarez, an individual;
21 Crystal Alvarez, an individual; Maria Del Rosario Bear, an individual; Diane Sosa, an
22 individual; Christian Sosa, an individual; Jose Ines Ocampo Damian, an individual; Lorenzo
23 Ocampo Damian, an individual; Inchae Yu, an

individual; Jinyong Lee, an individual; Jiwon Lee, an individual; Jiyoung Lee, an individual; Hojun Lee, an individual; Nguyen Hieu Trung Truong, an individual; Thi Kim Chi Nguyen, an individual; Hyejung Song, an individual; Bao Kim Hoang Phun, an individual; Goo Nam, an individual; Danny Kim, an individual; Young Soon Kim, an individual; Vivian Ok Seop Shim, an individual; Ha Sop Chang, an individual; Soon Ok Koga, an individual; Wan Yeong Jang, an individual; Stephen Grace, an individual; Cathy S. Grace, an individual; Zoe O. Grace, a minor, by and through their Guardian Ad Litem, Stephen Grace; Melissa Yen Hoang, an individual; Danny Dokeun Kim, an individual; Marites Jefferson, an individual; Eun Joo Kang, an individual; Hye Ran Lee, an individual; Clara Kim, an individual; John Kim, an individual; Bora Kim, an individual; Damian Kim, a minor, by and through their Guardian Ad Litem, John Kim; Lucas Kim, a minor, by and through their Guardian Ad Litem, John Kim; Eun Mi Jung, an individual; Hyemin Jung, an individual; Ann Hee Chong Choe, an individual; Joyce Jihee Kim, an individual; Nathaniel Hajoan Kim, a minor, by and through their Guardian Ad Litem, Joyce Jihee Kim Woohyun Lee, an individual; Hyun Joo Kee, an individual; Youn Hee Choi, an individual; Chanel Choi, an individual; Susan Yu, an individual; Ki Bok Youn, an individual; Danny Lee, an individual; Uin Yea Lee, an individual; Jay Lee, an individual; Kane Lee, an individual; Kyong Rae Yu, an individual; In Soon Yu, an individual; Mun Kyu Cho, an individual; Jackie M. Cho, an individual; Amy Y. Cho, an individual; Steve Cho, an individual; Tram Anh Thi Tran, an individual; Son Van Dinh, an individual; Kyung Kim, an individual; Seung Shin, an individual; Mu Sun Kim, an individual; Junwoo Sohn, an individual; Maurice Walker, an individual; Diamond Marie Grant, an individual; Hanna Park, an individual; Man Seo Park, an individual; Sara

1 Ahn Sung, an individual; Won Il Choi, an
individual; Heesook Choi, an individual; Kum
2 Ja Kim, an individual; Kyong Chul Kim, an
individual; Son Kim, an individual; Hye Sook
3 Lee, an individual; Vivian B. Park, an
individual; Cha Hyun Kim, an individual;
4 Myung Soon Kim, an individual; Jung In Ko,
5 an individual; Dennis Arthur Halford, an
individual; Choon Keun Suh, an individual;
6 Won Ja Suh, an individual; Jae M. Ko, an
individual; Woom Wha Choi, an individual;
7 Sam Sun Choi, an individual; Kiyong Kim, an
8 individual; Joon Ho Jung, an individual; Gong
9 Ye Pak, an individual; Richard Hong Chae, an
individual; Jung Ja Chae, an individual; Jung
10 Kyu Kim, an individual; Jee Sue Kim, an
individual; Jae Mun Lee, an individual; Grace
11 Hyosil Cho, an individual; Kyumin Lee, an
individual; Hee Geun Jang, an individual;
12 Myung Soon Jang, an individual; Kyong T.
13 Kim, an individual; Young Cho, an individual;
14 Jong Sun Chon, an individual; Jee Young
Chon, an individual; Ryung Ja Park, an
15 individual; Jung Im Shim, an individual;
16 Myoung Yeoun, an individual; Yoon Young
Park, an individual; Ho Yong De Thample, an
17 individual; Soon Ja Oh, an individual; Chang
Kun Oh, an individual; Gloria Kim, an
18 individual; Shaun Heungsik Choe, an
19 individual; Kum Nyo Choe, an individual;
Myung Ja Byun, an individual; Hyo Sook
20 Choe, an individual; Duk Ho An, an individual;
21 Jung Jin An, an individual; Zenaida Briones, an
individual; Diane Haynes, an individual;
22 Lacreasha Lightfoot, an individual; Taquoia
Chrisden, an individual; Won Woo Jung, an
23 individual; Kyung Hee Noh, an individual; Sun
Ha Hwang, an individual; Soon Du Hong, an
24 individual; Sun Ye Hong, an individual; Song
25 Jin Oh, an individual; Sang Kun Oh, an
individual; Tae K Kim, an individual; Eun
26 Kyung, an individual; Seung Ho Kim, an
27 individual; Young Sin Kim, an individual;
Seung Hee Kim, an individual; Byung Sig
28 Chin, an individual; Joyce Ko, an individual;

1 Jong Hyuk Choi , an individual; Myung Hee
2 Choi, an individual; John Tae No, an
3 individual; Tae Hyun Yang, an individual;
4 Young Sun You, an individual; Keum Boon
5 Kim, an individual; Seok Hwan You, an
6 individual; Keumsuk Ju, an individual; So
7 Hyun Youn, an individual; Seong Min Youn,
8 an individual; James Steven Lange, an
9 individual; Laura S. Valdez Gomez, an
10 individual; Juan Rodriguez Tapia, an
11 individual; Reynaldo Antonio Gonzalez Lira,
12 an individual; Joel Galeano Calderon, an
13 individual; Alvaro Calderon, an individual;
14 Hyun Ok Choi, an individual; Cheol Seon Cho,
15 an individual; Woo Young Lee, an individual;
16 Isabel Choi, an individual; James Lee, an
17 individual; Grace Lee, an individual; Lim Lee,
18 an individual; Song Lee, an individual; Sun Ae
19 Kim, an individual; Eunice Yuna Myuong, an
20 individual; Aaron Yi Kim, an individual; Jae
21 Yi, an individual; Lina Sun Kim, an individual;
22 Jun Suk Seo, an individual; Seung Mi Youm,
23 an individual; Paul Wangky Chung, an
24 individual; Deborah Meekyung Kim, an
25 individual; Christopher Chung, an individual;
26 Maria Lourdes Chung, an individual; Larry
27 Don Barton, an individual; Linda Gale Barton,
28 an individual; Lueree Dawn Barton, an
individual; Richard Lawson, an individual;
Haesook Hong, an individual; Min Kim, an
individual; Walter Tony Urrutia Gil, an
individual; Maria Del Carmen Ocampo, an
individual; Tony Urrutia, an individual; Heidi
Urrutia, a minor, by and through their Guardian
Ad Litem, Walter Tony Urrutia Gil; Jong Ho
Kwak, an individual; Jung Sook Kwak Yoon,
an individual; Karen Sun Ngo, an individual;
Phuong Anh Thi Nguyen, an individual;
Somphohn Thiphavong, an individual; Jae
Ryu, an individual; Misook Ryu, an individual;
Richard Ryu, an individual; Alice Song, an
individual; Kwan Soo Kim, an individual;
Elvia Heredia, an individual; Jasmine H. Lee,
an individual; Hong Ahn, an individual;
Elizabeth Ahn, a minor, by and through their

Guardian Ad Litem, Jasmine H. Lee; Ethan Ahn, a minor, by and through their Guardian Ad Litem, Jasmine H. Lee; Jae Hak Han, an individual; Hwa Soon Han, an individual; Ji Ho Yoon, an individual; Telma Malpica, an individual; Carlos Malpica, an individual; Maria Malpica, an individual; Melanie Malpica, a minor, by and through their Guardian Ad Litem, Telma Malpica; Kevin Quinones, a minor, by and through their Guardian Ad Litem, Telma Malpica; Sebastian Malpica, a minor, by and through their Guardian Ad Litem, Telma Malpica; Melchor Malpica, an individual; Ho Duck Won, an individual; Sony Park, an individual; Jeong Nan Yi, an individual; Chang Yol Chon, an individual; Jung Duk Kim, an individual; Sarah Hong, an individual; Jae Lim, an individual; Helen Sin, an individual; Kwan Yong Lee, an individual; Carmen Nava, an individual; Saturnino Nava, an individual; Hongseok Seo, an individual; Cynthia Elizabeth Kor, an individual; Darren Kor, an individual Robert A. Caserman, an individual; Hee S. Kim, an individual; Joo Rang Kim, an individual; Shin Ja Yi, an individual; Susan Hwa Lee, an individual; Won Hwa Choi, an individual; Fidela Dillanes, an individual; Jinboon Bok, an individual; Mark J. Kim, an individual; Nhi Kim, an individual; Anna Kim, an individual; Astrid Kim, a minor, by and through their Guardian Ad Litem, Mark J. Kim; Astron Kim, a minor, by and through their Guardian Ad Litem, Mark J. Kim; Eun Hee Yi, an individual; Alicia Sook Shin, an individual; Martha P. Serna Valenzuela, an individual; Domitila Sanchez, an individual; Humberto Sanchez, an individual; Vicki Sanchez, an individual; Eduardo Pelaez Lopez, an individual; Julio H. Sanchez, a minor, by and through their Guardian Ad Litem, Domitila Sanchez; Jesus J. Sanchez, an individual; Aliah Mora, an individual; Jung Youb Lee, an individual; Kyung Suk Sik, an individual; Young Soo Kim, an individual; Soon In Kim,

1 an individual; Duk Jin Kang, an individual;)
2 Tina Bae, an individual; Joshua Bae, an)
3 individual; Kanghyeon Bae, an individual;)
4 Jiwon Bae, an individual; Hyokyung Chung, an)
5 individual; Byung Soo Chung, an individual;)
6 Yongman Park, an individual; Sunmi Park, an)
7 individual; Jonathan Park, an individual;)
8 Jungrye Yong, an individual; Soo Gi Moon, an)
9 individual; Mi Kung Song, an individual; Mi)
10 Ran Lee, an individual; Peter Kim, an)
11 individual; Yeokyoung Lee, an individual; Adan)
12 Leonardo Vazquez Garcia, an individual;)
13 James Byun, an individual; Jae Byun, an)
14 individual; Michelle Byun, an individual; Tyler)
15 Simon, an individual; Jae Hee Lee, an)
16 individual; Dong Yoo, an individual; Ga Yi)
17 Kwon, an individual; Irma Gutierrez, an)
18 individual; Miguel A. Reyes, an individual;)
19 Juan Manuel Solorzano, an individual; Bertha)
20 Gonzalez, an individual; Maria Guadalupe)
21 Solorzano, an individual; Jose Saldana, an)
22 individual; Desiree Gutierrez, an individual;)
23 Alicia Gutierrez, an individual; Jose Rojas, an)
24 individual; Alberto Cazares, an individual; Jose)
25 Arnoldo Monzon Gutierrez, an individual;)
26 Brandon Nunez, an individual; Jaime Nunez)
27 Rivera, an individual; Evelia Gamez Azpeitia,)
28 an individual; April Nunez, an individual;)
Bryan Nunez, an individual; Shennahrie Aves)
Valenzuela, an individual; Hyon Yi, an)
individual; Cheol Ahn, an individual; Justin)
Ahn, an individual; Esther Ahn, a minor, by)
and through their Guardian Ad Litem, Hyon)
Yi; Lilian Sangjin Koo, an individual; James)
Koo, an individual; Guadalupe Ayala, an)
individual; Martina Ruiz Ayala, an individual;)
Hee Nam Lew, an individual; Dian Kyung)
Lew, an individual; Janice Dhayoung Lew, an)
individual; Se Jung Kim, an individual; So)
Young Park, an individual; Celine Sunyul Kim,)
a minor, by and through their Guardian Ad)
Litem, Se Jung Kim; Hanna Yoon, an)
individual; Daehan Bang, an individual; Rian)
Bang, a minor, by and through their Guardian)
Ad Litem, Hanna Yoon; Rayna Bang, a minor,)

1 by and through their Guardian Ad Litem,)
Hanna Yoon; Ray Christopher Bonilla, an)
2 individual; Carlette Sharrie, an individual;)
Anthony Adams, an individual; Jeramy)
3 Armando Alvarez, an individual; Sukhyun Lee,)
4 an individual; Joowon Lee-Ma, an individual;)
Jay Shin, an individual; Jung Shin, an)
5 individual; Phillip Choi, an individual; Kyung)
Soon Choi, an individual; Rayun Sim, an)
6 individual; Debra Yong Church, an individual;)
7 Ronald Wayne Church, an individual; Joong)
Sung Park, an individual; Jung Ae Park, an)
8 individual; Tae Hyun Kwon, an individual;)
9 Duck Kyung Kwon, an individual; Hyun Rok)
Park, an individual; Young Cho Kwon, an)
10 individual; Olivia Park, a minor, by and)
through their Guardian Ad Litem, Young Cho)
11 Kwon; Vivian Park, a minor, by and through)
their Guardian Ad Litem, Young Cho Kwon;)
12 Soo Chul Huh, an individual; Rose Truong, an)
13 individual; Thien Chau, an individual; Hanh)
Duong, an individual; Sung Hee Huh, an)
14 individual; Joyce Namkung, an individual;)
15 Yoon C. Namkung, an individual; InHye Ha,)
an individual; Guadalupe Pastor, an individual;)
16 Paul DongYul Lee, an individual; Sung Ae)
17 Lee, an individual; Dongyun Seo, an)
individual; Tommy Shin, an individual; Song)
18 Ja Kang, an individual; Kyung E Kim, an)
19 individual; Heedo Han, an individual; Grace)
Han, an individual; Eugene Han, an individual;)
20 Isaac Han, an individual; Ann I Park, an)
individual; Sam Park, an individual; Charlie)
21 Choi, an individual; Jin Sook Jung, an)
22 individual; Antonio Jung, an individual;)
Michael Jung, an individual; Rora Jung, a)
23 minor, by and through their Guardian Ad)
Litem, Michael Jung; Kairi Jung, a minor, by)
24 and through their Guardian Ad Litem, Michael)
Jung; Kyung Hee Kim, an individual; Joo Bong)
25 Han, an individual; Jung Mi Cho, an)
26 individual; Jong Min Kim, an individual; Eun)
27 Hee Kim, an individual; Wonil Lee, an)
individual; Minsook Lee, an individual;)
28 Hannah Yim, an individual; Cindi M. Park, an)

individual; Kweon Hee Lee, an individual;
Gary L. Agavel, an individual; Arin Harrell, an
individual; Kamille E. Harrell, a minor, by and
through their Guardian Ad Litem, Arin Harrell;
Edubith Villavicencio Sandoval, an individual;
Robert David Espinoza, an individual; Valerie
Castillo, an individual

Plaintiffs,

vs.

GKN AEROSPACE SERVICES LIMITED, a
UK Limited Liability Company, GKN
AEROSPACE CAMARILLO, INC., a
California Corporation, GKN CHEM-
TRONICS, INC., a California Corporation,
GKN AEROSPACE TRANSPARENCY
SYSTEMS, INC., a California Corporation,
DOES 1 through 100, inclusive

Defendants.

Plaintiffs identified herein hereby bring this Complaint against Defendants GKN
AEROSPACE SERVICES LIMITED, a UK Limited Liability Company, GKN AEROSPACE
CAMARILLO, INC., a California Corporation, GKN CHEM-TRONICS, INC., a California
Corporation, GKN AEROSPACE TRANSPARENCY SYSTEMS, INC., a California Corporation,
and DOES 1 through 100, inclusive, and in support thereof, allege as follows:

INTRODUCTION

1. Over 50,000 people in Garden Grove, Orange County, California and nearby areas
were issued mandatory evacuation orders due to the threat of a chemical leak or explosion on
Friday May 22, 2026. The leak was initially discovered on Thursday May 21, 2026 when
firefighters responded to the GKN Aerospace facility located at 12122 Western Ave, Garden
Grove, CA 92841.

2. Firefighters and other responders struggled to contain a pressurized tank filled
with 7,000 gallons of methyl methacrylate, a highly volatile chemical used in plastics
manufacturing, that threatened to burst from the tank or explode due to a “thermal runaway”

1 reaction.

2 3. Craig Covey, a division chief for the Orange County Fire Authority, warned that
3 one of two outcomes appeared inevitable: either the tank would burst and cause a massive
4 chemical leak or the chemicals would cause an explosion.

5 4. Police went house to house knocking on people's doors and advising them that
6 they had to leave immediately, giving them just a few minutes to gather clothes, pets, and
7 essentials before leaving, unsure how long it would be until they would be allowed to return.¹

8 5. Governor Gavin Newsom declared a state of emergency for Orange County
9 shortly thereafter.

10 6. The EPA has warned that even short-term exposure to methyl methacrylate can
11 cause skin and eye irritation, respiratory issues, and can cause dizziness and lethargy.²

12 **FACTUAL ALLEGATIONS**

13 7. GKN Aerospace's facility in Garden Grove is "the world's leading provider of
14 military transparency systems and commercial aircraft transparencies,"³ where the company
15 designs, tests, and makes windscreens, canopies, and windows for military and commercial
16 aircraft, including for the F-35 and for the Boeing 787 Dreamliner.

17 8. GKN Aerospace is a multinational aerospace "tier one" supplier that designs and
18 makes structures and parts for commercial and military aircraft with facilities in 12 countries.
19 GKN Aerospace has a significant presence in the US and in California, with facilities across the
20 country and three manufacturing facilities or offices in California, including the Garden Grove
21 facility. GKN Aerospace is based in Birmingham, England. Defendants include the parent
22 company GKN Aerospace Services Limited and its subsidiaries, including those based in
23 California ("Defendants").

24 9. The Garden Grove facility has been operating since 2004 and Defendants have
25

26 ¹ Los Angeles Times, <https://www.latimes.com/california/live/garden-grove-gas-leak-live-evacuation-maps-closures-and-updates#p=evacuees-discuss-suing-gkn-aerospace-at-shelter-we-had-to-spend-our-last-paycheck>.

27 ² NY Times, <https://www.nytimes.com/2026/05/22/us/methyl-methacrylate-garden-grove-chemical-leak.html>

28 ³GKN Aerospace Website, <https://www.gknaerospace.com/locations/americas/usa/?office=gardengrovecalifornia>.

1 been expanding the facility to include a new production line to be completed in 2027.

2 10. Garden Grove is a densely populated city in Orange County, approximately 30
3 miles south of Los Angeles with a population of about 170,000 people.

4 11. Stanton is located to the north of the Garden Grove facility and has a population
5 of 37,000 people.

6 12. Westminster is located to the south of the Garden Grove facility and has a
7 population of about 90,000 people.

8 13. Anaheim is located north of Garden Grove and has a population of about 346,000
9 people.

10 14. Within two miles of the GNK Aerospace chemical leak are several schools,
11 including the Patton Elementary School, the Loyal Barker Elementary School, and the Garden
12 Park Elementary School.

13 15. Within five miles of the GNK Aerospace chemical leak are several parks and
14 recreation areas, including the Chapman Sports Park, Eastgate Park, the Navy Golf Course, and
15 Manzanita Park.

16 16. In January 2025 GNK Aerospace settled with the South Coast Air Quality
17 Management District ("South Coast AQMD") for or \$909,935.95 over violations of permit
18 requirements, record-keeping requirements and nitrogen oxide emissions from the Garden Grove
19 facility.

20 17. In 2018, GNK Aerospace was penalized by the California Department of
21 Industrial Relations for failing to ensure that all machinery and equipment in service was
22 inspected and maintained at its Garden Grove facility following an April 2018 inspection.

23 18. Firefighters responded on Thursday May 21, 2026 to the GKN facility and found
24 that one of three tanks containing the dangerous chemical Methyl methacrylate was becoming
25 highly pressurized due to an increase in temperature within the tank. Over the course of several
26 days they attempted to maintain the temperature in a safe range, but the temperature of the tank
27 continued to rise. Efforts to introduce a chemical neutralizer through a valve in the tank failed
28 because of a fault in the valve due to the Defendants failure to properly maintain the storage tanks

1 and the valves.

2 19. The temperature control of the tank failed due to the defendants' failure to safely
3 and lawfully maintain and operate its Garden Grove facility or in the alternative due to the
4 defendants' failure to build the tank in a reliable and safe way.

5 20. As a gas, Methyl methacrylate is heavier than the atmosphere and settles close to
6 the ground and can also travel to an ignition source, presenting a hazard for anyone in the area
7 of the leak. Methyl Methacrylate is highly volatile, meaning that it begins to emit vapors at
8 temperatures as low as 50 degrees Fahrenheit.

9 21. Methyl methacrylate can cause irritation to the skin, eyes, and lungs after only
10 very short periods of time and cause shortness of breath, dizziness, and headaches. Long term
11 exposure to the chemical can cause chronic breathing problems and birth defects. Exposure to
12 high volumes of the chemical over time can lead to organ death.

13 22. The potential and actual chemical leak created the risk of harming the residents
14 of Garden Grove and the surrounding towns.

15 23. In sum, Defendants negligently failed to construct, operate, and maintain the
16 Garden Grove facility where they store and use extraordinarily hazardous chemicals.

17 24. Defendants' failure to abate the fluid and gas leak released hazardous gases,
18 chemicals, pollutants, and contaminants into Plaintiffs' land, homes, and/or their persons. These
19 leaks, releases, emissions, and/or migration of noxious odors, hazardous gases, chemicals,
20 pollutants, and contaminants into Plaintiffs' land, homes, and/or their persons constitute an
21 invasion of Plaintiffs' property.

22 25. The continuing threat of leaks, releases, emissions, and/or migration of noxious
23 odors, hazardous gases, chemicals, pollutants, and contaminants into Plaintiffs' land, homes,
24 and/or their persons has substantially impaired Plaintiffs' use and enjoyment of both their
25 property and all of the public property located in the area.

26 26. The mandatory and enforced evacuation of members of the class substantially
27 impaired their use and enjoyment of their property and caused them severe emotional distress
28 due to the fear of being injured by exposure to dangerous chemicals and due to the uncertainty

1 of when they would be able to return to their homes.

2 27. Each reference in this Complaint to “Defendant,” “Defendants” or a specifically
3 named Defendant also refers to the DOE defendants named in the same cause of action.

4 **JURISDICTION AND VENUE**

5 28. Each Defendant transacts business and/or have agents within Orange County. The
6 unlawful acts alleged herein took place in Orange County. The unlawful acts alleged herein have
7 a direct effect on Plaintiffs and those similarly situated within Orange County. Further, the
8 amount in controversy exceeds the jurisdictional minimum, exclusive of interests and costs.

9 29. Venue is proper in this Court pursuant to California Civil Procedure sections 395
10 and 395.5 since Defendant GKN Aerospace Transparency Systems, Inc. is headquartered in
11 Orange County and is regularly engaged in transactions in Orange County, and the action that
12 caused injuries to Plaintiffs occurred in Orange County.

13 **PARTIES**

14 30. Plaintiffs Jeff Rhee, an individual; Se Youn Lee, an individual; Anna Yoo, an
15 individual; Mason Lee, a minor, by and through their Guardian Ad Litem, Se Youn Lee; Jacob
16 Lee, a minor, by and through their Guardian Ad Litem, Se Youn Lee; Linda Yoo, an individual;
17 Angela Lee, an individual; Jung Ja Chae, an individual; Youn Ju Cho, an individual; Chang Hee
18 Kim, an individual; Sam Seyoung Choo, an individual; Sun Young Song, an individual; Irene
19 Yerin Choo, a minor, by and through their Guardian Ad Litem, Sam Seyoung Choo; Claire Yesol
20 Choo, a minor, by and through their Guardian Ad Litem, Sam Seyoung Choo; Diem H. Van, an
21 individual; Jasmine Park, an individual; Hyo Sook Yi, an individual; Jesus Gonzalez, an
22 individual; Antonio Dario Gonzalez, an individual; Jesus Tomas Gonzalez, an individual;
23 Antonio Gonzalez, an individual; Suezy Li, an individual; Kyung Hee Choi Park, an individual;
24 Chung Ku Sin, an individual; Hsueh Yen Cheng, an individual; Jishun Huang, an individual;
25 Fengnu Li, an individual; Hee Soo Lee, an individual; Bok Soon Lee, an individual; Esther Y.
26 Bartos, an individual; Hei Jung Inez Kim, an individual; Min Hee Lee, an individual; Ok Hee
27 Hong, an individual; Grace Kim Lee, an individual; Yushun Jin, an individual; Wangxing Yuan,
28 an individual; Ji Young Park, an individual; Laura Soon Oh, an individual; Joseph K. Oh, an

individual; Sue Keun-Sook Park, an individual; Young Park, an individual; Yvette Hong, an individual; Wayne Lu, an individual; Young Ju Moon, an individual; Haemin Chang, an individual; Byung Sik Jang, an individual; Frank Sung, an individual; Yu Xin Chen, an individual; Bok Soon Sung, an individual; Cholkyong Kim, an individual; Miguel Angel Gonzalez, an individual; Kyung Ah Lee, an individual; Ana Mary Kim, an individual; Miri Lee, an individual; Hongshik Shin, an individual; Jiho Shin, an individual; Gina Shin, an individual; Rong Guang Yu, an individual; Chun Jie Hu, an individual; German Acosta Vega, an individual; Guadalupe Cuevas, an individual; Luis J. Reyes, an individual; Alfonso Reyes, an individual; Elmar Salvador Perez Hernandez, an individual; Donsook Youm, an individual; Avril Perez, an individual; Andrew Perez, an individual; Andrea Christine Yanulaytis, an individual; Georgina Arellano, an individual; Juan C. Arellano, an individual; Sarah Arellano, an individual; Omar Martinez Catalan, an individual; Estela Caruente, an individual; Jose M. Miranda, an individual; Jose Miranda, a minor, by and through their Guardian Ad Litem, Estela Caruente; Emiliano Miranda, a minor, by and through their Guardian Ad Litem, Estela Caruente; Daiana Miranda, a minor, by and through their Guardian Ad Litem, Estela Caruente; Jamie Cho, an individual; Peter Cho, an individual; Jung Suk Lee, an individual; Kwang Kuk Lee, an individual; Hansun Lee, an individual; Seung Jin Lee, an individual; Nathan Lee, a minor, by and through their Guardian Ad Litem, Hansun Lee; Chloe Lee, a minor, by and through their Guardian Ad Litem, Hansun Lee; Yong Kon Yi, an individual; Young Sook Park, an individual; John Ho Yang Park, an individual; Young Hee Park, an individual; Areum Kim, an individual; On Peter Sim, a minor, by and through their Guardian Ad Litem, Areum Kim; Kwan Sik Kim, an individual; Sang Nam Kim, an individual; Sung Bok Moon, an individual; Sonny Kim, an individual; Susan J. Kim, an individual; Bok Sun Kwon, an individual; Christie Kwon, an individual; Haesung Enyart, an individual; Ryan Enyart, an individual; John Kim, an individual; Irene Su Cho, an individual; Myoung Ok Lee, an individual; Fernando Mujica, an individual; Jacob Lee, an individual; Shady Mohsen Shawky Basta, an individual; Eva Bautista, an individual; Jasmine Calvillo, an individual; Jesus Calvillo, an individual; Elizabeth Calvillo, a minor, by and through their Guardian Ad Litem, Eva Bautista; Patricia Calvillo, an individual; Servando Calvillo, a minor,

by and through their Guardian Ad Litem, Eva Bautista; Javier Calvillo, an individual; Javier Calvillo, an individual; Jenny Kim, an individual; Ellen Lee, an individual; Ho Sun Lee, an individual; Jae Ok Eum, an individual; Jae Won Lee, an individual; Jae Kon Lee, an individual; Chung Ho Kim, an individual; Samuel Mctran, an individual; Chol Su Choe, an individual; Mi Suk Choe, an individual; Joe Jonghoon Kim, an individual; Efren Quezada, an individual; Sun Won Hong, an individual; Kelsey H. Hong, a minor, by and through their Guardian Ad Litem, Sun Won Hong; Yu Mi Kim, an individual; Jeong Ja Lee, an individual; Sarah Lee, an individual; Mai Do, an individual; Kimdinh Le, an individual; Justin Mun, an individual; Mi Yang Kim, an individual; James Hong, an individual; Austin Hong, an individual; Jessica Hong, an individual; Stella Kang, an individual; Min Ju Kook, an individual; Jee Hee Jun, an individual; Wan Sop Sim, an individual; Young Ki Youn, an individual; Nam Seog Son, an individual; Hyo Sook Jeong Son, an individual; Manuel Galdames, an individual; Mal Sun Ha, an individual; Soonbae Jung, an individual; Phu Thanh Le, an individual; Olivia Le, an individual; Yang Sook Kim, an individual; Phuong Minh Le, an individual; Nho Le, an individual; Hao Nguyen, an individual; Ki T Han, an individual; Erin Joung, an individual; Dae Young Joung, an individual; Phil Lee, an individual; Joo Yeon Lee, an individual; Ok Nam Kwon, an individual; Jung Ho Kwon, an individual; Sara Hwang, an individual; Jenni S. Min, an individual; Andrew Murjani, an individual; Eunseon Murjani, an individual; Kyung Sook An, an individual; Jemma Kim, an individual; Young Soon Park, an individual; Sang Kyu Han, an individual; Sang Yun, an individual; Gu Nam Kang, an individual; Doosun Kim, an individual; Steve Chang, an individual; Solomon Flores, an individual; Mary Grace Flores, an individual; Kwang Jin Hwang, an individual; Lynn Tran Le, an individual; Hye Joo Jung, an individual; Hyung Won Choe, an individual; Jee Woong Choe, an individual; Chong Hee Ha, an individual; Youk Eun Seo, an individual; Sang Woo Kim, an individual; Sun Sub Kim, an individual; Jung Lim Park, an individual; Sak Soon Yang, an individual; Kyung Hee Ko, an individual; Kyeongmi Lee, an individual; Jose A. Reyna, an individual; Pil Soon Kwon, an individual; Yung Taek Choi, an individual; In Yong Yu, an individual; Dong Soon Yu, an individual; Yujie Qiao, an individual; Baoxin Pang, an individual; Hyun Suk Na, an individual; Suk Ku Lee, an individual; Bum Yong

Ha, an individual; Young Hee Lee, an individual; Sung Ho Park, an individual; Joanne Eun Hyun, an individual; Young Hyun, an individual; David Myonghwan Son, an individual; Julie K. Son, an individual; Sungil Hong, an individual; Yong Jang, an individual; Laura Jang, an individual; Eric Hongsoo Yang, an individual; You Hwang, an individual; Jung Kim, an individual; Min Yong Park, an individual; Dong Yul Yoon, an individual; Monica Jazmin Orozco, an individual; Soo Hoon Owh, an individual; Bo K Chung, an individual; Myeong Soo Lim, an individual; In Sook Lim, an individual; Nancy Nguyen, an individual; Dong Sook Shin, an individual; Yulim Moon, an individual; Tammy Mai Kieu, an individual; Tony Tran, an individual; Sophia Tran, a minor, by and through their Guardian Ad Litem, Tammy Mai Kieu; William Tran, a minor, by and through their Guardian Ad Litem, Tammy Mai Kieu; Alexander Tran, a minor, by and through their Guardian Ad Litem, Tammy Mai Kieu; Nguyet Tran, an individual; Men Kieu, an individual; Simone Song, an individual; Andrew Song, an individual; Ethan Song, an individual; Lucy Hoang, an individual; Benjamin Miranda Najera, an individual; Jessica Soonmi Seung, an individual; Steven Lee, an individual; Jay Yoonjae Lee, an individual; Hyang Shil Moon, an individual; Yesenia Ojeda, an individual; Chan Hoi Choi, an individual; Bok Jin Jun, an individual; Ki Ho Park, an individual; Ziyu Pang Zhang, an individual; Silvia Mendoza, an individual; Hye Na Kwak, an individual; Collin Cho, a minor, by and through their Guardian Ad Litem, Hye Na Kwak; Hyun Jo Oh, an individual; Jasmine Oh, an individual; Jung Yun Kim, an individual; Kyung Soon Kim, an individual; Andrew Min Won, an individual; Kevin Won, an individual; Eunju Kim, an individual; Seongho Na, an individual; Seul Ki Na, an individual; Myungsun Rho, an individual; Aesim Rho, an individual; Soon Seok Shin, an individual; Tony Shin, an individual; Stella Shin, an individual; Sun Hee Lim, an individual; Kyung Sam Lim, an individual; Geun Taek Jung, an individual; Byung Op Choe, an individual; Chun Hee Choi, an individual; Seon Min Park, an individual; Ji Min Park, an individual; Sunbee Kim, an individual; Hyung Gak Kim, an individual; Myung Suk Lee, an individual; Ji Hyun Lee, an individual; Chonghwa Lee, an individual; Rachel Choi, an individual; Sarah Kim, an individual; Cheol Lee, an individual; Doo Jae Park, an individual; Khang Mai, an individual; Sung Joon Lim, an individual; Hang Nguyen, an individual; James Bong Cho, an individual; Jee Soo Lim, an

individual; Wan Soo Kim, an individual; Bok Soon Liu, an individual; Heng Hsi Liu, an individual; Jane Liu, an individual; Soo Nam Hwang, an individual; Yoon Hee Lim, an individual; Jorge Escobar, an individual; Super K Ko, an individual; Peter Woo Choi, an individual; Yuuyoung Lee, an individual; Jin Young Kim, an individual; Seon Young Kim, an individual; Sin Ja Kim, an individual; Seong Hoon Kim, an individual; Hee Ryoung Kwon, an individual; Hyunna Lee, an individual; Jong Sang Lee, an individual; Jason Lee, an individual; Young Joo Lee, an individual; Chanyoung Lee, an individual; Youngin Lee, an individual; Youngmin Lee, an individual; Jiyu Lee, an individual; Joyce Hyunjoo Park, an individual; Rebekah Byun, an individual; Jae Suk Kim, an individual; Hajun Kim, an individual; Sanghee Kim, an individual; Byeongseok Jeon, an individual; Joo Young Cho, an individual; Mi Jin Lee, an individual; Huisoo Cho, an individual; Yeon Hee Kim, an individual; Joel Velasquez Ruiz, an individual; Ofelia Hernandez Lopez, an individual; Rogelio Velasquez, an individual; Cristopher Velasquez Sebastian, an individual; Young Ok Kim, an individual; Jay Kim, an individual; Tai Sun Ryu, an individual; Ellie So Youn Shin, an individual; Justin Hee Chan Shin, an individual; Eunsook Cho, an individual; Hayan Charlston, an individual; Legend Macmillan, a minor, by and through their Guardian Ad Litem, Eunsook Cho; Celestine Macmillan, a minor, by and through their Guardian Ad Litem, Eunsook Cho; Aiden Macmillan, an individual; Judith Rios, an individual; Diana Alvarez, an individual; Vanesa Alvarez, an individual; Anthony Alvarez, an individual; Crystal Alvarez, an individual; Maria Del Rosario Bear, an individual; Diane Sosa, an individual; Christian Sosa, an individual; Jose Ines Ocampo Damian, an individual; Lorenzo Ocampo Damian, an individual; Inchaе Yu, an individual; Jinyong Lee, an individual; Jiwon Lee, an individual; Jiyoung Lee, an individual; Hojun Lee, an individual; Nguyen Hieu Trung Truong, an individual; Thi Kim Chi Nguyen, an individual; Hyejung Song, an individual; Bao Kim Hoang Phun, an individual; Goo Nam, an individual; Danny Kim, an individual; Young Soon Kim, an individual; Vivian Ok Seop Shim, an individual; Ha Sop Chang, an individual; Soon Ok Koga, an individual; Wan Yeong Jang, an individual; Stephen Grace, an individual; Cathy S. Grace, an individual; Zoe O. Grace, a minor, by and through their Guardian Ad Litem, Stephen Grace; Melissa Yen Hoang, an individual; Danny Dokeun Kim, an individual; Marites Jefferson, an

individual; Eun Joo Kang, an individual; Hye Ran Lee, an individual; Clara Kim, an individual;
John Kim, an individual; Bora Kim, an individual; Damian Kim, a minor, by and through their
Guardian Ad Litem, John Kim; Lucas Kim, a minor, by and through their Guardian Ad Litem,
John Kim; Eun Mi Jung, an individual; Hyemin Jung, an individual; Ann Hee Chong Choe, an
individual; Joyce Jihee Kim, an individual; Nathaniel Hajoon Kim, a minor, by and through their
Guardian Ad Litem, Joyce Jihee Kim Woohyun Lee, an individual; Hyun Joo Kee, an individual;
Youn Hee Choi, an individual; Chanel Choi, an individual; Susan Yu, an individual; Ki Bok
Youn, an individual; Danny Lee, an individual; Uin Yea Lee, an individual; Jay Lee, an
individual; Kane Lee, an individual; Kyong Rae Yu, an individual; In Soon Yu, an individual;
Mun Kyu Cho, an individual; Jackie M. Cho, an individual; Amy Y. Cho, an individual; Steve
Cho, an individual; Tram Anh Thi Tran, an individual; Son Van Dinh, an individual; Kyung Kim,
an individual; Seung Shin, an individual; Mu Sun Kim, an individual; Junwoo Sohn, an
individual; Maurice Walker, an individual; Diamond Marie Grant, an individual; Hanna Park, an
individual; Man Seo Park, an individual; Sara Ahn Sung, an individual; Won Il Choi, an
individual; Heesook Choi, an individual; Kum Ja Kim, an individual; Kyong Chul Kim, an
individual; Son Kim, an individual; Hye Sook Lee, an individual; Vivian B. Park, an individual;
Cha Hyun Kim, an individual; Myung Soon Kim, an individual; Jung In Ko, an individual;
Dennis Arthur Halford, an individual; Choon Keun Suh, an individual; Won Ja Suh, an
individual; Jae M. Ko, an individual; Woom Wha Choi, an individual; Sam Sun Choi, an
individual; Kiyong Kim, an individual; Joon Ho Jung, an individual; Gong Ye Pak, an
individual; Richard Hong Chae, an individual; Jung Ja Chae, an individual; Jung Kyu Kim, an
individual; Jee Sue Kim, an individual; Jae Mun Lee, an individual; Grace Hyosil Cho, an
individual; Kyumin Lee, an individual; Hee Geun Jang, an individual; Myung Soon Jang, an
individual; Kyong T. Kim, an individual; Young Cho, an individual; Jong Sun Chon, an
individual; Jee Young Chon, an individual; Ryung Ja Park, an individual; Jung Im Shim, an
individual; Myoung Yeoun, an individual; Yoon Young Park, an individual; Ho Yong De
Thample, an individual; Soon Ja Oh, an individual; Chang Kun Oh, an individual; Gloria Kim,
an individual; Shaun Heungsik Choe, an individual; Kum Nyo Choe, an individual; Myung Ja

Byun, an individual; Hyo Sook Choe, an individual; Duk Ho An, an individual; Jung Jin An, an individual; Zenaida Briones, an individual; Diane Haynes, an individual; Lacresha Lightfoot, an individual; Taquoia Chrisden, an individual; Won Woo Jung, an individual; Kyung Hee Noh, an individual; Sun Ha Hwang, an individual; Soon Du Hong, an individual; Sun Ye Hong, an individual; Song Jin Oh, an individual; Sang Kun Oh, an individual; Tae K Kim, an individual; Eun Kyung, an individual; Seung Ho Kim, an individual; Young Sin Kim, an individual; Seung Hee Kim, an individual; Byung Sig Chin, an individual; Joyce Ko, an individual; Jong Hyuk Choi , an individual; Myung Hee Choi, an individual; John Tae No, an individual; Tae Hyun Yang, an individual; Young Sun You, an individual; Keum Boon Kim, an individual; Seok Hwan You, an individual; Keumsuk Ju, an individual; So Hyun Youn, an individual; Seong Min Youn, an individual; James Steven Lange, an individual; Laura S. Valdez Gomez, an individual; Juan Rodriguez Tapia, an individual; Reynaldo Antonio Gonzalez Lira, an individual; Joel Galeano Calderon, an individual; Alvaro Calderon, an individual; Hyun Ok Choi, an individual; Cheol Seon Cho, an individual; Woo Young Lee, an individual; Isabel Choi, an individual; James Lee, an individual; Grace Lee, an individual; Lim Lee, an individual; Song Lee, an individual; Sun Ae Kim, an individual; Eunice Yuna Myuong, an individual; Aaron Yi Kim, an individual; Jae Yi, an individual; Lina Sun Kim, an individual; Jun Suk Seo, an individual; Seung Mi Youm, an individual; Paul Wangky Chung, an individual; Deborah Meekyung Kim, an individual; Christopher Chung, an individual; Maria Lourdes Chung, an individual; Larry Don Barton, an individual; Linda Gale Barton, an individual; Lueree Dawn Barton, an individual; Richard Lawson, an individual; Haesook Hong, an individual; Min Kim, an individual; Walter Tony Urrutia Gil, an individual; Maria Del Carmen Ocampo, an individual; Tony Urrutia, an individual; Heidi Urrutia, a minor, by and through their Guardian Ad Litem, Walter Tony Urrutia Gil; Jong Ho Kwak, an individual; Jung Sook Kwak Yoon, an individual; Karen Sun Ngo, an individual; Phuong Anh Thi Nguyen, an individual; Somphohn Thiphavong, an individual; Jae Ryu, an individual; Misook Ryu, an individual; Richard Ryu, an individual; Alice Song, an individual; Kwan Soo Kim, an individual; Elvia Heredia, an individual; Jasmine H. Lee, an individual; Hong Ahn, an individual; Elizabeth Ahn, a minor, by and through their Guardian Ad

1 Litem, Jasmine H. Lee; Ethan Ahn, a minor, by and through their Guardian Ad Litem, Jasmine
2 H. Lee; Jae Hak Han, an individual; Hwa Soon Han, an individual; Ji Ho Yoon, an individual;
3 Telma Malpica, an individual; Carlos Malpica, an individual; Maria Malpica, an individual;
4 Melanie Malpica, a minor, by and through their Guardian Ad Litem, Telma Malpica; Kevin
5 Quinones, a minor, by and through their Guardian Ad Litem, Telma Malpica; Sebastian Malpica,
6 a minor, by and through their Guardian Ad Litem, Telma Malpica; Melchor Malpica, an
7 individual; Ho Duck Won, an individual; Sony Park, an individual; Jeong Nan Yi, an individual;
8 Chang Yol Chon, an individual; Jung Duk Kim, an individual; Sarah Hong, an individual; Jae
9 Lim, an individual; Helen Sin, an individual; Kwan Yong Lee, an individual; Carmen Nava, an
10 individual; Saturnino Nava, an individual; Hongseok Seo, an individual; Cynthia Elizabeth Kor,
11 an individual; Darren Kor, an individual Robert A. Caserman, an individual; Hee S. Kim, an
12 individual; Joo Rang Kim, an individual; Shin Ja Yi, an individual; Susan Hwa Lee, an
13 individual; Won Hwa Choi, an individual; Fidela Dillanes, an individual; Jinboon Bok, an
14 individual; Mark J. Kim, an individual; Nhi Kim, an individual; Anna Kim, an individual; Astrid
15 Kim, a minor, by and through their Guardian Ad Litem, Mark J. Kim; Astron Kim, a minor, by
16 and through their Guardian Ad Litem, Mark J. Kim; Eun Hee Yi, an individual; Alicia Sook Shin,
17 an individual; Martha P. Serna Valenzuela, an individual; Domitila Sanchez, an individual;
18 Humberto Sanchez, an individual; Vicki Sanchez, an individual; Eduardo Pelaez Lopez, an
19 individual; Julio H. Sanchez, a minor, by and through their Guardian Ad Litem, Domitila
20 Sanchez; Jesus J. Sanchez, an individual; Aliah Mora, an individual; Jung Youb Lee, an
21 individual; Kyung Suk Sik, an individual; Young Soo Kim, an individual; Soon In Kim, an
22 individual; Duk Jin Kang, an individual; Tina Bae, an individual; Joshua Bae, an individual;
23 Kanghyeon Bae, an individual; Jiwon Bae, an individual; Hyokyung Chung, an individual;
24 Byung Soo Chung, an individual; Yongman Park, an individual; Sunmi Park, an individual;
25 Jonathan Park, an individual; Jungrye Yong, an individual; Soo Gi Moon, an individual; Mi Kung
26 Song, an individual; Mi Ran Lee, an individual; Peter Kim, an individual; Yeokyung Lee, an
27 individual; Adan Leonardo Vazquez Garcia, an individual; James Byun, an individual; Jae Byun,
28 an individual; Michelle Byun, an individual; Tyler Simon, an individual; Jae Hee Lee, an

individual; Dong Yoo, an individual; Ga Yi Kwon, an individual; Irma Gutierrez, an individual; Miguel A. Reyes, an individual; Juan Manuel Solorzano, an individual; Bertha Gonzalez, an individual; Maria Guadalupe Solorzano, an individual; Jose Saldana, an individual; Desiree Gutierrez, an individual; Alicia Gutierrez, an individual; Jose Rojas, an individual; Alberto Cazares, an individual; Jose Arnoldo Monzon Gutierrez, an individual; Brandon Nunez, an individual; Jaime Nunez Rivera, an individual; Evelia Gamez Azpeitia, an individual; April Nunez, an individual; Bryan Nunez, an individual; Shennahrie Aves Valenzuela, an individual; Hyon Yi, an individual; Cheol Ahn, an individual; Justin Ahn, an individual; Esther Ahn, a minor, by and through their Guardian Ad Litem, Hyon Yi; Lilian Sangjin Koo, an individual; James Koo, an individual; Guadalupe Ayala, an individual; Martina Ruiz Ayala, an individual; Hee Nam Lew, an individual; Dian Kyung Lew, an individual; Janice Dhayoung Lew, an individual; Se Jung Kim, an individual; So Young Park, an individual; Celine Sunyul Kim, a minor, by and through their Guardian Ad Litem, Se Jung Kim; Hanna Yoon, an individual; Daehan Bang, an individual; Rian Bang, a minor, by and through their Guardian Ad Litem, Hanna Yoon; Rayna Bang, a minor, by and through their Guardian Ad Litem, Hanna Yoon; Ray Christopher Bonilla, an individual; Carlette Sharrie, an individual; Anthony Adams, an individual; Jeramy Armando Alvarez, an individual; Sukhyun Lee, an individual; Joowon Lee-Ma, an individual; Jay Shin, an individual; Jung Shin, an individual; Phillip Choi, an individual; Kyung Soon Choi, an individual; Rayun Sim, an individual; Debra Yong Church, an individual; Ronald Wayne Church, an individual; Joong Sung Park, an individual; Jung Ae Park, an individual; Tae Hyun Kwon, an individual; Duck Kyung Kwon, an individual; Hyun Rok Park, an individual; Young Cho Kwon, an individual; Olivia Park, a minor, by and through their Guardian Ad Litem, Young Cho Kwon; Vivian Park, a minor, by and through their Guardian Ad Litem, Young Cho Kwon; Soo Chul Huh, an individual; Rose Truong, an individual; Thien Chau, an individual; Hanh Duong, an individual; Sung Hee Huh, an individual; Joyce Namkung, an individual; Yoon C. Namkung, an individual; InHye Ha, an individual; Guadalupe Pastor, an individual; Paul DongYul Lee, an individual; Sung Ae Lee, an individual; Dongyun Seo, an individual; Tommy Shin, an individual; Song Ja Kang, an individual; Kyung E Kim, an individual; Heedo Han, an individual; Grace Han,

an individual; Eugene Han, an individual; Isaac Han, an individual; Ann I Park, an individual; Sam Park, an individual; Charlie Choi, an individual; Jin Sook Jung, an individual; Antonio Jung, an individual; Michael Jung, an individual; Rora Jung, a minor, by and through their Guardian Ad Litem, Michael Jung; Kairi Jung, a minor, by and through their Guardian Ad Litem, Michael Jung; Kyung Hee Kim, an individual; Joo Bong Han, an individual; Jung Mi Cho, an individual; Jong Min Kim, an individual; Eun Hee Kim, an individual; Wonil Lee, an individual; Minsook Lee, an individual; Hannah Yim, an individual; Cindi M. Park, an individual; Kweon Hee Lee, an individual; Gary L. Agavel, an individual; Arin Harrell, an individual; Kamille E. Harrell, a minor, by and through their Guardian Ad Litem, Arin Harrell; Edubith Villavicencio Sandoval, an individual; Robert David Espinoza, an individual; Valerie Castillo, an individual; (collectively “Plaintiffs”) who currently and at all times relevant to this action, reside or own businesses and property in Orange County, California. Their residences, businesses, and property are located in Garden Grove, Anaheim, Stanton, and Westminster, California, as well as other surrounding cities and townships near the Defendants’ Garden Grove facility.

31. Defendant GKN Aerospace Services Limited is a UK based company with its headquarters in Birmingham, England. Upon information and belief, GKN Aerospace Services Limited is the parent company and owner of Defendants GKN Aerospace Camarillo, Inc., GKN Chem-Tronics, Inc., GKN Aerospace Transparency Systems, Inc.

32. GKN Aerospace Camarillo, Inc., is a California corporation with its principal place of business in Camarillo, California.

33. Defendant GKN Chem-Tronics, Inc., is a California Corporation with its principal place of business in El Cajon, California.

34. Defendant GKN Aerospace Transparency Systems, Inc., is a California Corporation with its principal place of business in Garden Grove, California.

35. Does 1 through 100, inclusive are the partners, agents, employees or principals, and the co-conspirators of the named Defendants, and of each other whose true names and capacities are currently unknown to Plaintiffs; the named defendants and Does 1 through 100, inclusive, performed the acts and conduct herein alleged, aided and abetted the performance

thereof, or knowingly acquiesced in, ratified, and accepted the benefits of such acts and conduct; and therefore, Does 1 through 100, inclusive, are liable to Plaintiffs to the extent of the liability of the named Defendants. Plaintiffs will seek leave of the Court to amend its Complaint to reflect the true names and capacities of the Defendants designated herein as DOES when such identities and capacities become known.

36. Based on information and belief, Plaintiffs allege that at all times mentioned herein, each and every Defendant was acting as an agent and/or employee of each of the other Defendants, and at all relevant times mentioned was acting within the course and scope of said agency and/or employment with the full knowledge, permission, and consent of each of the other Defendants. In addition, each of the acts and/or omissions of each Defendant alleged herein were made known to, and ratified by, each of the other Defendants.

FIRST CAUSE OF ACTION
NEGLIGENCE / NEGLIGENCE PER SE
(Against Defendants)

37. Plaintiffs re-allege and incorporate the foregoing paragraphs as though fully set forth herein.

38. Plaintiffs are individuals who each own or rent residential property or own businesses or other property within a short distance of the Garden Grove facility owned and/or operated by Defendants.

39. Defendants own, operate, or service a manufacturing facility that uses highly volatile and dangerous chemicals Plaintiffs' residences and property. Defendants thus have a duty to use reasonable care in the construction, operation, maintenance and abandonment of all such operations and equipment. Defendants possessed a significant duty that was commensurate with and proportionate to the serious danger posed by these activities.

40. Defendants breached that duty by negligently and carelessly constructing, operating, and/or maintaining the Garden Grove facility and its chemical storage tanks. This negligence directly and foreseeably caused actual leaks, releases, emissions, and/or migration of noxious odors, hazardous gases, chemicals, pollutants, and contaminants into Plaintiffs' land,

1 property and homes.

2 41. Defendants knew or should have known that their operations would result in the
3 leaks, releases, emissions, and/or migration of pollutants including but not limited to noxious
4 odors, hazardous gases, chemicals, pollutants, and contaminants, and that such pollutants would
5 contaminate Plaintiffs' land, homes, and/or persons.

6 42. The breach of their duty to Plaintiffs by Defendants directly increased the
7 concentration of noxious odors, hazardous gases, chemicals, pollutants, and contaminants on
8 Plaintiffs' land, property and person to such an extent that Plaintiff has suffered both personal
9 and property damage.

10 43. The breach of duty by Defendants was the legal and proximate cause of the
11 injuries and damages suffered by Plaintiffs. The damages caused by the breach included polluted
12 land and air in and around Plaintiffs' properties and adverse health effects suffered by Plaintiffs
13 due to exposure.

14 44. Additionally, Defendants had an obligation not to violate the law with respect to
15 construction, operation, and maintenance of its Garden Grove facility.

16 45. By reason of said negligence and carelessness of the aforesaid Defendants, and
17 each of them, and as a proximate result thereof, plaintiffs received severe injuries to their bodies.
18 The injuries sustained by plaintiffs have greatly impaired their health, strength and activity and
19 have thereby caused and continued to cause them great mental, physical and nervous pain and
20 suffering and an extreme shock to their nervous systems. Plaintiffs are informed and believe, and
21 thereon allege, that said injuries will result in some disability to plaintiffs, all to his damage in an
22 amount according to proof.

23 46. As a further, direct and proximate result of the negligence of Defendants, and each
24 of them, as herein alleged, plaintiffs were required to, and did employ, and continues to employ,
25 physicians, surgeons, and others for medical care of said injuries, and did incur medical, and
26 incidental expenses in an amount according to proof. Plaintiffs are informed, and thereon allege,
27 that they will incur further medical and incidental expenses for the care and treatment of said
28 injuries, the amount of which is unknown at this time, all to their further damage in an amount

1 according to proof.

2 47. As a further, direct and proximate result of the negligence of defendants, and each
3 of them, as herein alleged, plaintiffs were prevented from performing their usual occupations, or
4 any occupation whatsoever, or has otherwise suffered a reduction in their capacities to work, and
5 as a result has been damaged in an amount according to proof. Plaintiffs are informed and believe,
6 and on such information and belief allege, that by reason of said carelessness and negligence of
7 defendants, and each of them, plaintiffs will, in the future, be prevented from attending to their
8 usual occupations for an undetermined period of time, or will continue to have a reduced capacity
9 to earn income, all to their further damage in an amount according to proof.

10 48. Defendants have shown a willful disregard for public health and health and safety
11 of Plaintiffs, to others similarly situated, and the community through its failure to abate the harm.

12 49. Defendants failed to meet the standard of care set by the above statutes and
13 regulations, which were intended for the benefit of individuals such as Plaintiffs, making
14 Defendants' conduct negligent per se. As a result of violation of the above statutes, Plaintiffs
15 suffered injuries and damages as alleged herein.

16 50. Plaintiffs are within the class of persons the above statutes and regulations are
17 designed to protect, and their injuries are the type of harm these statutes are designed to prevent.

18 51. Defendants' actions resulted in the pollution of air and deprived residents of
19 Garden Grove and the surrounding areas of their ability to live in their homes free of health
20 problems. Defendants took these actions with a willful and knowing disregard of the rights and
21 safety of the community. Plaintiffs should, therefore, be awarded punitive and exemplary
22 damages under Civil Code section 3294 sufficient to punish Defendants for engaging in this
23 conduct and to deter similar conduct in the future.

24 52. As a further result of this wrongful conduct, Plaintiffs suffered, and will continue
25 to suffer, the loss of the quiet use and enjoyment of its property in addition to all of their general
26 damages in an amount to be set forth according to proof at trial.

SECOND CAUSE OF ACTION
TRESPASS
(Against Defendants)

53. Plaintiffs re-allege and incorporate the foregoing paragraphs as though fully set forth herein.

54. In the construction, operation, and/or maintenance of the Garden Grove facility and its chemical storage tanks owned and/or operated by Defendants, Defendants intentionally, recklessly, willfully, and/or negligently caused dangerous levels of noxious odors, hazardous gases, chemicals, pollutants, and contaminants to enter onto Plaintiffs' properties by leaks, releases, emissions, and/or migration from the Garden Grove facility.

55. Plaintiffs did not give permission for this entry.

56. Plaintiffs suffered harm from Defendants' conduct including, but not limited to, polluted land and air in and around Plaintiffs' property and adverse health effects due to exposure.

57. Defendants' actions were a substantial factor in causing the harm to the Plaintiffs as there were no other independent causes of the trespass onto Plaintiffs' properties.

58. Defendants' actions resulted in the pollution of air and deprived residents of Garden Grove and the surrounding areas of their ability to live in their homes free of health problems. Defendants took these actions with a willful and knowing disregard of the rights and safety of the community. Plaintiffs should, therefore, be awarded punitive and exemplary damages under Civil Code section 3294 sufficient to punish Defendants for engaging in this conduct and to deter similar conduct in the future.

59. As a further result of this wrongful conduct, Plaintiffs suffered, and will continue to suffer, the loss of the quiet use and enjoyment of its property in addition to all of their general damages in an amount to be set forth according to proof at trial. These acts have also damaged Plaintiffs' property.

60. By reason of said negligence and carelessness of the aforesaid Defendants, and each of them, and as a proximate result thereof, plaintiffs received severe injuries to their bodies. The injuries sustained by plaintiffs have greatly impaired their health, strength and activity and have thereby caused and continued to cause them great mental, physical and nervous pain and

1 suffering and an extreme shock to their nervous systems. Plaintiffs are informed and believe, and
2 thereon allege, that said injuries will result in some disability to plaintiffs, all to his damage in an
3 amount according to proof.

4 61. As a further, direct and proximate result of the negligence of defendants, and each
5 of them, as herein alleged, plaintiffs were prevented from performing their usual occupations, or
6 any occupation whatsoever, or has otherwise suffered a reduction in their capacities to work, and
7 as a result has been damaged in an amount according to proof. Plaintiffs are informed and believe,
8 and on such information and belief allege, that by reason of said carelessness and negligence of
9 defendants, and each of them, plaintiffs will, in the future, be prevented from attending to their
10 usual occupations for an undetermined period of time, or will continue to have a reduced capacity
11 to earn income, all to their further damage in an amount according to proof.

12 **THIRD CAUSE OF ACTION**
13 **PRIVATE NUISANCE**
14 **(Against Defendants)**

15 62. Plaintiffs re-allege and incorporate the foregoing paragraphs as though fully set
16 forth herein.

17 63. Defendants failed to exercise reasonable care in the course of constructing,
18 operating, and/or maintaining their Garden Grove facility and its and continue to allow leaks,
19 releases, emissions, and/or migration of pollutants to the surrounding area including Plaintiffs'
20 properties. Defendants created a condition that is harmful to Plaintiffs' health and free use of
21 their properties so as to seriously interfere with comfortable enjoyment of their life and property,
22 including creating conditions such that Plaintiffs had to physically flee from their homes.
23 Plaintiffs suffer from the ongoing contamination of the air surrounding their homes and the threat
24 of continued leaks, releases, emissions, and/or migration of pollutants to the surrounding area
25 including Plaintiffs' property.

26 64. The continuing condition created by the Defendants harmed Plaintiffs. This harm
27 includes, but is not limited to, polluted land and air in and around Plaintiffs' properties and
28 adverse health effects due to exposure.

65. Plaintiffs did not consent to Defendants' conduct.

1 66. An ordinary person of reasonable sensibility would reasonably be annoyed and/or
2 disturbed by the conditions created by Defendants.

3 67. Defendants' aforementioned conduct constitutes a nuisance within the meaning
4 of section 3749 of the Civil Code in that it is injurious to health and/or offensive to the senses of
5 Plaintiffs and/or unreasonably interferes with the comfortable enjoyment of Plaintiffs' land
6 and/or the free and customary use of Plaintiffs' property.

7 68. Defendants' conduct, including constructing, operating, and/or maintaining the
8 Garden Grove facility and its chemical storage tanks was a substantial factor, and likely the only
9 cognizable factor, in causing the harm. Further, continuing harm remains due to the current and
10 ongoing contamination of Plaintiffs' properties.

11 69. The seriousness of Defendants' conduct referenced above outweighs the public
12 benefits of the Defendants' operation of its manufacturing facility because chemical and gas leaks
13 seriously deprive Plaintiffs of peaceful enjoyment of their homes and pollute the air of the
14 surrounding properties and neighborhoods. In comparison, the social value and primary purpose
15 of such activity is the maximization of profit for corporations with no incentive to take
16 precautions to ensure the safety and environmental integrity of the storage facility.

17 70. Plaintiffs have no speedy, plain, or adequate remedy of law for the injuries
18 presently being suffered or for the aggravation of such injuries. Unless the nuisance created by
19 Defendants is restrained by a preliminary and permanent injunction, Plaintiffs will suffer great
20 and irreparable injury in that dangerous levels of noxious odors, hazardous gases, chemicals,
21 pollutants, and contaminants will continue to emanate from Defendants' Garden Grove facility,
22 pollute the air, Plaintiffs' properties, and continue to damage the right of Plaintiffs and their
23 families to live in their homes without harmful exposure.

24 71. Defendants' actions resulted in the pollution of air and deprived residents of
25 Orange County of their ability to live in their homes free of health problems. Defendants took
26 these actions with a willful and knowing disregard of the rights and safety of the community.
27 Plaintiffs should, therefore, be awarded punitive and exemplary damages under Civil Code
28 section 3294 sufficient to punish Defendants for engaging in this conduct and to deter similar

1 conduct in the future.

2 72. As a further result of this wrongful conduct, Plaintiffs suffered, and will continue
3 to suffer, the loss of the quiet use and enjoyment of its property in addition to all of their general
4 damages in an amount to be set forth according to proof at trial.

5 73. By reason of said negligence and carelessness of the aforesaid Defendants, and
6 each of them, and as a proximate result thereof, plaintiffs received severe injuries to their bodies.
7 The injuries sustained by plaintiffs have greatly impaired their health, strength and activity and
8 have thereby caused and continued to cause them great mental, physical and nervous pain and
9 suffering and an extreme shock to their nervous systems. Plaintiffs are informed and believe, and
10 thereon allege, that said injuries will result in some disability to plaintiffs, all to his damage in an
11 amount according to proof

12 74. As a further, direct and proximate result of the negligence of Defendants, and each
13 of them, as herein alleged, plaintiffs were required to, and did employ, and continues to employ,
14 physicians, surgeons, and others for medical care of said injuries, and did incur medical, and
15 incidental expenses in an amount according to proof. Plaintiffs are informed, and thereon allege,
16 that they will incur further medical and incidental expenses for the care and treatment of said
17 injuries, the amount of which is unknown at this time, all to their further damage in an amount
18 according to proof.

19 75. As a further, direct and proximate result of the negligence of defendants, and each
20 of them, as herein alleged, plaintiffs were prevented from performing their usual occupations, or
21 any occupation whatsoever, or has otherwise suffered a reduction in their capacities to work, and
22 as a result has been damaged in an amount according to proof. Plaintiffs are informed and believe,
23 and on such information and belief allege, that by reason of said carelessness and negligence of
24 defendants, and each of them, plaintiffs will, in the future, be prevented from attending to their
25 usual occupations for an undetermined period of time, or will continue to have a reduced capacity
26 to earn income, all to their further damage in an amount according to proof.

FOURTH CAUSE OF ACTION
PUBLIC NUISANCE
(Against Defendants)

76. Plaintiffs re-allege and incorporate the foregoing paragraphs as though fully set forth herein.

77. Defendants failed to exercise reasonable care in the course of constructing, operating, and/or maintaining the Garden Grove facility and its chemical storage tanks, and continue to allow noxious odors, hazardous gases, chemicals, pollutants, and contaminants to be leaked, released, emitted or migrated to the surrounding areas including Plaintiffs' properties. Defendants created a continuing condition that is harmful to Plaintiffs' health and free use of their homes so as to seriously interfere with comfortable enjoyment of their life and property.

78. The continuing conditions created by the Defendants harmed residents in Garden Grove and the areas, and a substantial number of people at the same time. The harmful condition includes pollution of the Plaintiffs' land, homes, and persons from noxious odors, hazardous gases, chemicals, pollutants, and contaminants emanating and/or migrating from Defendants' Garden Grove facility.

79. Plaintiffs did not consent to the Defendants' conduct.

80. Defendants' aforementioned conduct constitutes a nuisance within the meaning of section 3749 of the Civil Code in that it is injurious to health and/or offensive to the senses of Plaintiffs and/or unreasonably interferes with the comfortable enjoyment of Plaintiffs' properties and/or the free use, in the customary manner, of Plaintiffs' properties.

81. As a result of Defendants' conduct, Plaintiffs suffered a type of harm that is different from the type of harm suffered by the general public. Specifically, Plaintiffs have lost the use and enjoyment of their land, including, but not limited to exposure to an array of pollutants in their persons and on their land, and the continuing threat of leaks, releases, emissions, and/or migration of dangerous levels of noxious odors, hazardous gases, chemicals, pollutants, and contaminants.

82. An ordinary person of reasonable sensibilities would be reasonably annoyed and/or disturbed by the condition created by Defendants.

1 83. The seriousness of Defendants' conduct referenced above outweighs the public
2 benefits of the Defendants' Garden Grove facility operations because gas leaks seriously deprive
3 Plaintiffs of peaceful enjoyment of their homes and pollute the air of the surrounding properties
4 and neighborhoods. In comparison, the social value and primary purpose of such activity is the
5 maximization of profit for corporations with no incentive to take precautions to ensure the safety
6 and environmental integrity of the storage facility.

7 84. Defendants' conduct, including constructing, operating, and/or maintaining the
8 Garden Grove facility was a substantial factor, and likely the only cognizable factor, in causing
9 the harm. Further, continuing harm remains due to the current and ongoing contamination of
10 Plaintiffs' properties.

11 85. Plaintiffs further allege that as a consequence of Defendants' acts and/or failures
12 to act, this public nuisance must be abated.

13 86. Plaintiffs have no speedy, plain, or adequate remedy of law for the injuries
14 presently being suffered or for the aggravation of such injuries. Unless the nuisance created by
15 Defendants is restrained by a preliminary and permanent injunction, Plaintiffs will suffer great
16 and irreparable injury in that dangerous levels of noxious odors, hazardous gases, chemicals,
17 pollutants, and contaminants will continue to emanate from Defendants' Garden Grove facility,
18 pollute the air, Plaintiffs' properties, and continue to damage the right of Plaintiffs and their
19 families to live in their homes without harmful exposure.

20 87. Defendants' actions resulted in the pollution of air and deprived residents of
21 Garen Grove and the surrounding areas of their ability to live in their homes free of health
22 problems. Defendants took these actions with a willful and knowing disregard of the rights and
23 safety of the community. Plaintiffs should, therefore, be awarded punitive and exemplary
24 damages under Civil Code section 3294 sufficient to punish Defendants for engaging in this
25 conduct and to deter similar conduct in the future.

26 88. As a further result of this wrongful conduct, Plaintiffs suffered, and will continue
27 to suffer, the loss of the quiet use and enjoyment of its property in addition to all of their general
28 damages in an amount to be set forth according to proof at trial.

90. As a further, direct and proximate result of the negligence of Defendants, and each of them, as herein alleged, plaintiffs were prevented from performing their usual occupations, or any occupation whatsoever, or has otherwise suffered a reduction in their capacities to work, and as a result has been damaged in an amount according to proof. Plaintiffs are informed and believe, and on such information and belief allege, that by reason of said carelessness and negligence of defendants, and each of them, plaintiffs will, in the future, be prevented from attending to their usual occupations for an undetermined period of time, or will continue to have a reduced capacity to earn income, all to their further damage in an amount according to proof.

91. Plaintiffs re-allege and incorporate the foregoing paragraphs as though fully set forth herein.

92. Plaintiffs are individuals who each own or rent residential property or own businesses or other property within a short distance of the Garden Grove facility owned and/or operated by Defendants.

93. Defendants own, operate, or service a manufacturing facility that uses highly volatile and dangerous chemicals Plaintiffs' residences and property. Defendants thus have a duty to use reasonable care in the construction, operation, maintenance and abandonment of all such operations and equipment. Defendants' possessed a significant duty that was commensurate with and proportionate to the serious danger posed by these activities.

1 94. Defendants breached that duty by negligently and carelessly constructing,
2 operating, and/or maintaining the Garden Grove facility and its chemical storage tanks. This
3 negligence directly and foreseeably caused actual leaks, releases, emissions, and/or migration of
4 noxious odors, hazardous gases, chemicals, pollutants, and contaminants into Plaintiffs' land,
5 property and homes.

6 95. Defendants knew or should have known that their operations would result in the
7 leaks, releases, emissions, and/or migration of pollutants including but not limited to noxious
8 odors, hazardous gases, chemicals, pollutants, and contaminants, and that such pollutants would
9 contaminate Plaintiffs' land, homes, and/or persons.

10 96. The breach of their duty to Plaintiffs by Defendants directly increased the
11 concentration of noxious odors, hazardous gases, chemicals, pollutants, and contaminants on
12 Plaintiffs' land, property and person to such an extent that Plaintiff has suffered both personal
13 and property damage.

14 97. The breach of duty by Defendants was the legal and proximate cause of the
15 injuries and damages suffered by Plaintiffs.

16 98. As a result of Defendants' negligent conduct, Plaintiffs were forced to evacuate
17 their homes, causing them fear, anxiety, and uncertainty about when, if ever, they would be able
18 to return to their homes. This constitutes severe emotional distress.

19 99. The harm to Plaintiffs was foreseeable because of their proximity to the Garden
20 Grove facility.

21 100. Plaintiffs were further harmed to the extent they witnessed their children, spouses,
22 or other close relatives suffer actual injury as a result of Defendants' conduct, causing them
23 severe emotional distress.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request relief against Defendants as follows:

- A. A judgment in favor of Plaintiffs on all claims;
- B. An award to Plaintiffs for the amount of damages, including property damage, as proven at trial;
- C. An award to Plaintiffs for punitive damages;
- D. An immediate temporary injunction against Defendants to prevent further harm to Plaintiffs and to include provisions for further ongoing monitoring of Plaintiffs' property and potential remediation by Defendants;
- E. For interest at the legal rate on all amounts awarded;
- F. Such other and further relief as this Court may deem just and proper.

DATED: July 30, 2026

RYU LAW FIRM

By: 

FRANCIS S. RYU, ESQ.
Attorney for Plaintiffs