

JUL 28 2026

DAVID H. YAMASAKI Clerk of the Court

BY _____ DEPUTY

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

Assigned for All Purposes
Judge Melissa McCormick R.

30-2026

Case No.: **01586483**

BRIONA QUARLES,
Plaintiff,

v.

GKN AEROSPACE
TRANSPARENCY SYSTEMS INC., a
California corporation; and DOES 1
through 50, inclusive, BQ

Defendants.

COMPLAINT FOR DAMAGES

Unlimited

- 1. Negligence (Including Negligence Per Se)**
- 2. Private Nuisance**
- 3. Public Nuisance (Special Injury, if supported)**

DEMAND FOR JURY TRIAL

COMPLAINT FOR DAMAGES 1. NEGLIGENCE (INCLUDING NEGLIGENCE PER SE) 2. PRIVATE
NUISANCE 3. PUBLIC NUISANCE (SPECIAL INJURY, IF SUPPORTED) - 1

1 **I. INTRODUCTION**

2 1. Plaintiff Briona Quarles ("Plaintiff") brings this civil action against
3 Defendant GKN Aerospace Transparency Systems Inc. ("Defendant" or
4 "GKN") for damages arising from the hazardous materials emergency that
5 originated at Defendant's aerospace manufacturing facility in Garden Grove,
6 California, and resulted in mandatory evacuation orders affecting Plaintiff
7 and thousands of surrounding residents.

8 2. At all relevant times, Defendant owned, operated, managed,
9 maintained, controlled, and supervised an industrial aerospace manufacturing
10 facility located at or near 12122 Western Avenue, Garden Grove, California,
11 where hazardous materials were stored and utilized in connection with
12 Defendant's business operations.

13 3. Defendant owed a duty to neighboring residents, including Plaintiff, to
14 exercise reasonable care in the ownership, maintenance, inspection, operation,
15 monitoring, and control of its facility so as to prevent foreseeable harm arising
16 from hazardous industrial conditions.

17 4. On or about May 21, 2026, a hazardous materials emergency occurred
18 at Defendant's Garden Grove facility, requiring an extensive response from
19 emergency personnel and governmental agencies.

20 5. Public officials determined that conditions at Defendant's facility
21 presented a sufficient risk to require the evacuation of approximately 50,000
22 residents living in the surrounding area while emergency responders worked
23 to stabilize the hazardous condition.

24 6. Plaintiff resided at 12911 Dale Street, Apartment 56, Garden Grove,
25 California 92841, which was located within the mandatory evacuation zone
26 established by emergency authorities.

27 7. Plaintiff complied with the mandatory evacuation orders and was
28 forced to immediately leave her residence for several days until public officials
determined it was safe for residents to return.

Plaintiff was deprived of the use, occupancy, comfort, and enjoyment of
her residence during the evacuation period.

Plaintiff incurred evacuation-related expenses, including but not limited
to temporary lodging, meals, transportation, personal necessities, and other
reasonable out-of-pocket costs associated with the mandatory evacuation.

Plaintiff also suffered inconvenience, disruption of her normal daily
activities, anxiety, emotional distress, uncertainty regarding the safety of her
residence, and loss of the peaceful use and enjoyment of her home.

11. Defendant's alleged negligence and failure to safely operate its industrial facility were a substantial factor in causing the emergency response, mandatory evacuation, and Plaintiff's resulting damages.

12. Plaintiff seeks all damages recoverable under California law, together with costs of suit, prejudgment interest where authorized, and such additional relief as the Court deems just and proper.

II. JURISDICTION AND VENUE

13. This Court has jurisdiction pursuant to Article VI, section 10 of the California Constitution because the amount in controversy exceeds the jurisdictional minimum of this Court.

14. Venue is proper in the Superior Court of California, County of Orange, pursuant to Code of Civil Procedure sections 392 and 395 because Defendant's principal place of business is located in Orange County, the events giving rise to this action occurred in Orange County, and Plaintiff's injuries and damages were sustained in Orange County.

III. PARTIES

15. Plaintiff Briona Quarles is, and at all relevant times was, a resident of Orange County, California.

16. Defendant GKN Aerospace Transparency Systems Inc. is a California corporation authorized to conduct business within the State of California and owned, operated, maintained, and controlled the aerospace manufacturing facility located in Garden Grove, California.

17. Plaintiff is presently unaware of the true names and capacities of DOES 1 through 50 and therefore sues those defendants by fictitious names pursuant to Code of Civil Procedure section 474. Plaintiff will amend this Complaint when their identities become known.

18. Plaintiff alleges that each Defendant was the agent, employee, servant, joint venturer, representative, or alter ego of every other Defendant and acted within the course and scope of those relationships.

1 —
2 **IV. GENERAL FACTUAL ALLEGATIONS**
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4 19. Defendant's Garden Grove facility utilized hazardous industrial
5 chemicals and manufacturing processes requiring the exercise of reasonable
6 care and compliance with applicable safety requirements.

7 20. Defendant knew or reasonably should have known that failure to safely
8 monitor, maintain, inspect, or control hazardous materials could create an
9 unreasonable risk of harm to neighboring residential communities.

10 21. On or about May 21, 2026, an emergency developed involving
11 hazardous materials at Defendant's facility, prompting a coordinated
12 response from public safety agencies.

13 22. Government officials determined that the surrounding community
14 faced a sufficient risk to justify mandatory evacuation orders affecting
15 approximately 50,000 residents.

16 23. Plaintiff's residence was located within the designated evacuation area.

17 24. Plaintiff was required to leave her residence, obtain temporary
18 accommodations, transport personal belongings, and remain displaced until
19 evacuation orders were lifted.

20 25. As a direct and proximate result of Defendant's alleged conduct,
21 Plaintiff incurred economic losses and suffered emotional distress,
22 inconvenience, disruption of her daily life, and loss of the use and enjoyment
23 of her residence.

24 26. Plaintiff has complied with all conditions precedent to maintaining this
25 action or such conditions have been excused by law.
26

27 **FIRST CAUSE OF ACTION**
28

29 **NEGLIGENCE (INCLUDING NEGLIGENCE PER SE)**
30

31 **(Against GKN Aerospace Transparency Systems Inc. and DOES 1-50)**
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33 27. Plaintiff realleges and incorporates by reference paragraphs 1 through
34 26 of this Complaint as though fully set forth herein.

35 28. At all relevant times, Defendant GKN Aerospace Transparency Systems
36 Inc. owned, operated, managed, maintained, inspected, supervised, controlled,
37

1 and was otherwise responsible for the industrial aerospace manufacturing
2 facility located in Garden Grove, California.

3 29. Defendant owed Plaintiff and other neighboring residents a duty to
4 exercise ordinary and reasonable care in the ownership, operation,
5 maintenance, inspection, supervision, monitoring, and control of its industrial
6 facility so as to prevent foreseeable injury to persons and property. See
7 *Rowland v. Christian* (1968) 69 Cal.2d 108.

8 30. Defendant further owed a duty to safely store, maintain, monitor,
9 inspect, and control hazardous materials utilized in its manufacturing
10 operations and to exercise reasonable care to prevent conditions that would
11 endanger neighboring residents.

12 31. Defendant knew or reasonably should have known that failure to safely
13 conduct its industrial operations could result in a hazardous materials
14 emergency requiring governmental evacuation of surrounding residential
15 neighborhoods.

16 32. Plaintiff alleges that Defendant breached its duties of reasonable care by
17 negligently owning, operating, maintaining, inspecting, supervising,
18 monitoring, and controlling its industrial facility, thereby allowing hazardous
19 conditions to develop that resulted in emergency governmental action.

20 33. Plaintiff is informed and believes, and thereon alleges, that Defendant
21 failed to exercise the degree of care that a reasonably prudent operator of an
22 industrial facility handling hazardous materials would have exercised under
23 the same or similar circumstances.

24 34. Plaintiff is informed and believes that Defendant's acts and omissions
25 were a substantial factor in causing the hazardous condition that prompted
26 emergency officials to order the mandatory evacuation of Plaintiff's
27 neighborhood.

28 35. As a direct and foreseeable consequence of Defendant's alleged
negligence, Plaintiff was ordered by governmental authorities to evacuate her
residence located at 12911 Dale Street, Apartment 56, Garden Grove,
California 92841.

36. Plaintiff was displaced from her home for several days and lost the use,
occupancy, comfort, security, and enjoyment of her residence during the
evacuation period.

37. Plaintiff incurred reasonable and necessary expenses for temporary
lodging, meals, transportation, fuel, laundry, personal necessities, and other
costs directly resulting from the mandatory evacuation.

1 38. Plaintiff further suffered substantial inconvenience, disruption of her
2 daily activities, emotional distress, anxiety, fear, uncertainty regarding the
3 safety of her residence, and loss of the peaceful use and enjoyment of her
4 home.

5 39. Defendant's negligence was a substantial factor in causing Plaintiff's
6 injuries and damages.

7 40. To the extent discovery establishes that Defendant violated statutes,
8 regulations, fire safety requirements, hazardous materials laws, or other
9 mandatory safety standards enacted to protect nearby residents from the type
10 of harm alleged herein, Plaintiff will rely upon California Evidence Code
11 section 669 as creating a presumption of negligence where applicable.

12 41. As a direct and proximate result of Defendant's negligence, Plaintiff has
13 sustained economic and non-economic damages according to proof at trial.

14 SECOND CAUSE OF ACTION

15 PRIVATE NUISANCE

16 (California Civil Code §§ 3479-3481)

17 42. Plaintiff realleges and incorporates by reference paragraphs 1 through
18 41 as though fully set forth herein.

19 43. At all relevant times, Plaintiff lawfully occupied and possessed her
20 residence located at 12911 Dale Street, Apartment 56, Garden Grove,
21 California.

22 44. California Civil Code section 3479 defines a nuisance as anything that is
23 injurious to health, offensive to the senses, or an obstruction to the free use of
24 property so as to interfere with the comfortable enjoyment of life or property.

25 45. Plaintiff alleges that Defendant's operation of its industrial facility
26 created conditions that substantially and unreasonably interfered with
27 Plaintiff's use and enjoyment of her residence.

28 46. The hazardous materials emergency originating from Defendant's
facility resulted in mandatory governmental evacuation orders requiring
Plaintiff to immediately vacate her home.

47. Plaintiff was deprived of the use, occupancy, comfort, security, and
enjoyment of her residence throughout the evacuation period.

1 48. Plaintiff suffered inconvenience, disruption of her ordinary living
2 conditions, emotional distress, and economic losses associated with the
evacuation.

3 49. Defendant's conduct was a substantial factor in causing Plaintiff's loss
4 of the use and enjoyment of her property.

5 50. As a direct and proximate result of Defendant's conduct, Plaintiff has
6 sustained damages according to proof at trial.

7 **THIRD CAUSE OF ACTION**

8 **PUBLIC NUISANCE**

9 (California Civil Code §§ 3480–3493)

10 (Against GKN Aerospace Transparency Systems Inc. and DOES 1–50)

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12 51. Plaintiff realleges and incorporates by reference paragraphs 1 through
50 as though fully set forth herein.

13 52. California Civil Code section 3480 defines a public nuisance as one that
14 affects an entire community, neighborhood, or a considerable number of
persons.

15 53. Plaintiff alleges that the hazardous materials emergency originating
16 from Defendant's facility created conditions that affected a substantial
portion of the Garden Grove community and surrounding areas.

17 54. Public officials determined that conditions at Defendant's facility
18 required the mandatory evacuation of approximately 50,000 nearby residents
in order to protect public health and safety.

19 55. Plaintiff's residence was located within the evacuation zone established
20 by emergency authorities.

21 56. Plaintiff was required to immediately vacate her residence and remain
22 displaced until governmental authorities determined that the evacuation
orders could safely be lifted.

23 57. As a direct result of Defendant's alleged conduct, Plaintiff suffered
24 injuries including:

25 a. Loss of the use and enjoyment of her residence;

26 b. Temporary displacement from her home;

1 **c. Hotel and lodging expenses;**

2 **d. Transportation expenses;**

3 **e. Meal expenses;**

4 **f. Emotional distress;**

5 **g. Anxiety and uncertainty;**

6 **h. Loss of comfort and convenience;**

7 **i. Other damages according to proof.**

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9
10
11 **58. Plaintiff alleges that her damages were directly and proximately caused**
12 **by Defendant's conduct and are compensable under California law to the**
13 **extent permitted by the evidence.**

14 **59. Defendant's conduct was a substantial factor in causing Plaintiff's**
15 **injuries and damages.**

16 **60. Plaintiff therefore seeks all damages recoverable according to proof at**
17 **trial.**

18 **DAMAGES**

19 **61. As a direct and proximate result of Defendant's conduct, Plaintiff**
20 **suffered economic damages including, but not limited to:**

21 **a. Temporary lodging expenses;**

22 **b. Hotel costs;**

23 **c. Transportation expenses;**

24 **d. Fuel expenses;**

25 **e. Meal expenses;**

1
2 **f. Laundry expenses;**

3 **g. Personal necessity expenses;**

4
5 **h. Other evacuation-related expenditures.**

6 **62. Plaintiff also suffered non-economic damages including:**

7 **a. Emotional distress;**

8
9 **b. Anxiety;**

10 **c. Mental suffering;**

11 **d. Fear and uncertainty concerning the safety of her residence;**

12
13 **e. Inconvenience;**

14 **f. Disruption of her normal daily activities;**

15
16 **g. Loss of the use and enjoyment of her residence.**

17 **63. Plaintiff has suffered damages in an amount according to proof at trial.**

18
19 —

20 **PRAYER FOR RELIEF**

21 **WHEREFORE, Plaintiff Briona Quarles respectfully prays for judgment**
22 **against Defendant GKN Aerospace Transparency Systems Inc. and DOES 1**
23 **through 50, inclusive, as follows:**

- 24 1. **For general damages according to proof;**
25 2. **For special damages according to proof;**
26 3. **For all economic damages according to proof;**
27 4. **For all non-economic damages according to proof;**

5. For reimbursement of all reasonable evacuation-related expenses, including hotel, transportation, meals, fuel, laundry, personal necessities, and other out-of-pocket costs;
6. For prejudgment interest as permitted by law;
7. For costs of suit incurred herein;
8. For such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Dated: 7/27/26

BRIONA QUARLES
Plaintiff, In Pro Per

