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ALEJANDRO RAMIREZ,

MARIA DE LOURDES RAMIREZ, AND

JUAN RAMON OLIVO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

ALEJANDRO RAMIREZ; MARIA DE
LOURDES RAMIREZ; JUAN RAMON
OLIVO,

Plaintiffs,

v.

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

Defendants.

Case No.:

COMPLAINT FOR DAMAGES FOR:

- 1. NEGLIGENCE**
- 2. PRIVATE NUISANCE**
- 3. TRESPASS TO REAL PROPERTY
AND CHATTEL**
- 4. STRICT LIABILITY FOR
ULTRAHAZARDOUS ACTIVITIES**

[JURY TRIAL DEMANDED ON ALL ISSUES
AND ALL CAUSES OF ACTION]

COME NOW Plaintiffs Alejandro Ramirez, Maria De Lourdes Ramirez, and Juan Ramon Olivo, who bring this Complaint against Defendants GKN Aerospace Transparency Systems, Inc., a California corporation; GKN Aerospace Chem-Tronics, Inc., a California corporation; GKN Aerospace, an entity of unknown form; and Does 1 through 50. Plaintiff alleges as follows:

PARTIES

A. Plaintiffs

1. At all times mentioned herein, Plaintiff Alejandro Ramirez was, and now is, a natural person domiciled in the City of Garden Grove, County of Orange, State of California.

2. At all times mentioned herein, Plaintiff Maria De Lourdes Ramirez was, and now is, a natural person domiciled in the City of Garden Grove, County of Orange, State of California.

3. At all times mentioned herein, Plaintiff Juan Ramon Olivo was, and now is, a natural person domiciled in the City of Garden Grove, County of Orange, State of California.

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

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

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

B. Defendants

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

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

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

10. Defendants GKN Aerospace Transparency Systems, Inc., GKN Aerospace Chem-

Tronics, Inc., and GKN Aerospace are collectively referred to in this Complaint as “GKN.”

11. The true names and capacities of defendants sued herein as Does 1 through 50, are unknown to the plaintiffs who therefore sues such defendants by such fictitious names pursuant to Code of Civil Procedure § 474. Plaintiffs allege that each fictitiously named defendant acted or failed

1 to act in such a manner that each has contributed in proximately causing the damages to the plaintiff
2 herein alleged. The plaintiffs will seek leave of court to amend the Complaint to set forth their true
3 names and capacities once ascertained.

4 12. The GKN Defendants and Does 1-50 planned, built, operated, and continue to operate
5 an aerospace manufacturing facility in Garden Grove, California. The GKN Defendants and Does 1-
6 50's acts and omissions, as more particularly described herein, harmed the Plaintiffs.

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

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

24 **JURISDICTION AND VENUE**

25 15. Venue in this court is proper as Orange County, California is the location where
26 Plaintiffs' injuries occurred and where the defendants' acts and omissions took place. Furthermore,
27 at least some of the defendants reside in Orange County, California. (Code of Civil Procedure §
28 395(a).)

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

4 **GENERAL FACTUAL ALLEGATIONS**

5 17. Defendants GKN operate an aerospace manufacturing facility at or near 12122
6 Western Avenue, Garden Grove, California 92841, sometimes referred to as the “Garden Grove
7 facility.”

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

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

18 20. MMA is both highly toxic and highly flammable and can quickly become explosive.
19 MMA is classified as a UN Class 3 Flammable Liquid. When exposed to open flames or high
20 temperatures, it can easily explode, resulting in fires and the release of toxic gases that pose serious
21 risk to both human life and property. Without an inhibitor, MMA may also spontaneously polymerize
22 – a runaway exothermic reaction that generates extreme heat and pressure.

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

25 22. Uncontrolled release of MMA is particularly dangerous. MMA is heavier than air,
26 meaning it settles closer to the ground when released, increasing the risk in surrounding areas.

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

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

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

11 26. Upon information and belief, some residents near the Garden Grove facility report
12 being exposed to toxic emissions. Some area residents report physical symptoms due to the exposure.

13 27. Defendants knew or should have known of the significant risks posed by the storage
14 and use of MMA, including the potential for catastrophic toxic emissions and environmental damage.

15 28. Defendants failed to implement adequate safety measures and emergency response
16 plans to mitigate the known risks associated with MMA storage and use, causing substantial damage
17 to the Plaintiffs.

18 29. Defendants' tortious conduct has caused the plaintiffs to suffer harm, injuries, and
19 damages including, but not limited to, those identified below.

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

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

FIRST CAUSE OF ACTION

NEGLIGENCE

(Against All Defendants)

32. Plaintiffs incorporate by reference all of the allegations in this Complaint, as though fully set forth herein.

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

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

35. Defendants knew or should have known that MMA tanks can become unstable with an increase in pressure and, therefore, cause explosions and otherwise releases of hazardous materials in the form of toxic plumes or leakage.

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

- a. Failing to design, operate, maintain, and/or repair their Garden Grove facility, including the MMA tanks, in such a way as to ensure its safe and proper operation;
- b. Failing to monitor and mitigate risks associated with MMA storage and utilization;
- c. Failing to implement adequate safety protocols to prevent MMA tank failure;
- d. Failing to maintain a functional repair/mitigation system;
- e. Failing to properly maintain the valves on the MMA tanks;

- 1 f. Failing to ensure proper procedures or systems for timely identifying any
2 malfunctions or limitations of the MMA tanks;
- 3 g. Failing to ensure proper safety procedures in the event of a malfunction;
- 4 h. Failing to warn Plaintiffs and the public of the risks associated with the
5 facility;
- 6 i. Storing and utilizing large volumes of chemicals in such a way that the public
7 was likely to be exposed; and
- 8 j. Any other negligent acts and/or omissions which may be discovered and
9 proven at the trial of this matter.

10 37. As the direct and proximate result of the Defendants' negligence, the plaintiffs were
11 harmed.

12 38. The harm to the plaintiffs was reasonably foreseeable.

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

16 40. Accordingly, Plaintiffs each seek damages to be determined, on an individual basis,
17 according to proof at trial, including, but not limited to, compensatory damages for their evacuation
18 and other damages that result, including economic damages, pain and suffering, emotional anguish,
19 injury to real and personal property, loss of income and relocation and evacuation expenses.

20 **SECOND CAUSE OF ACTION**

21 **PRIVATE NUISANCE**

22 **(Against All Defendants)**

23 41. Plaintiffs incorporates by reference all of the allegations in this Complaint, as though
24 fully set forth herein.

25 42. Plaintiffs are in lawful possession of their property.

26 43. Defendants owned, maintained, operated, and otherwise controlled the Garden Grove
27 facility, including the MMA tanks.

52. Plaintiffs incorporate by reference all of the allegations in this Complaint, as though fully set forth herein.

53. Plaintiffs are in lawful possession of their properties.

54. As a result of the conduct and activities of the Defendants, contaminants from the incident physically intruded onto and wrongfully entered Plaintiffs' properties, thereby interfering with the Plaintiffs' possessory interests in their properties without Plaintiffs' permission.

55. The physical intrusion of the contaminants emitted by Defendants onto and into the Plaintiffs' properties physically injured and damaged Plaintiffs' properties by contaminating the soil, fixtures, structures and other physical aspects of Plaintiffs' properties. This would not have occurred but for the actions of the Defendants.

56. The actual and perceived physical intrusion of the contaminants onto and into the properties owned by the Plaintiffs will diminish the value of Plaintiffs' real properties.

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

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

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

FOURTH CAUSE OF ACTION

STRICT LIABILITY FOR ULTRAHAZARDOUS ACTIVITIES

(Against All Defendants)

60. Plaintiffs incorporate by reference all of the allegations in this Complaint, as though fully set forth herein.

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

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

7 63. The potential harm caused by the MMA release includes severe health effects
8 including death, property damage, and prolonged disruption to the lives and livelihoods of those
9 affected.

10 64. Despite safety protocols, risks associated with the operation of a large-scale MMA
11 storage and utilization facility cannot be fully eliminated through the exercise of reasonable care.
12 The inherent risks of grave harm remain present even with the implementation of safety measures.

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

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

20 67. Because the operation of a large-scale MMA storage and utilization facility is an
21 ultrahazardous activity, Defendants are strictly liable for any harm proximately resulting from these
22 activities.

23 68. As a direct and proximate result of Defendants' engagement in ultrahazardous
24 activities, Plaintiffs suffered injuries, damages and losses, including, but not limited to, those
25 damages previously described.

26 69. Accordingly, Plaintiffs each seek damages to be determined, on an individual basis,
27 according to proof at trial, including, but not limited to, compensatory damages for medical care,
28 pain and suffering, emotional anguish, injury to real and personal property, remediation costs, loss

1 of income, relocation and evacuation expenses, and substantial interference with their use and
2 enjoyment of their properties.

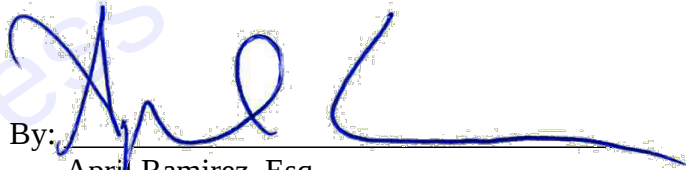
3 **PRAYER FOR RELIEF**

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

- 6 a) For special damages in an amount to be proven at trial;
7 b) For general damages in an amount to be proven at trial;
8 c) For punitive damages;
9 d) For pre- and post-judgment interest as allowed by law; and
10 e) For such other and further relief as this Court deems just and proper.

11
12 DATED: August 5, 2026

THE RAMIREZ LEGAL GROUP

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15 By: 

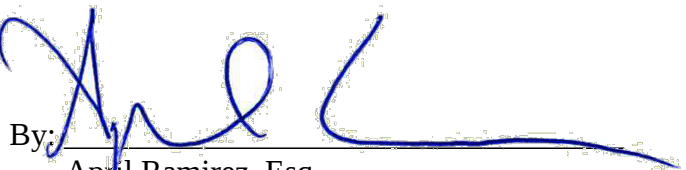
16 April Ramirez, Esq.
17 Attorneys for Plaintiffs

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19 **DEMAND FOR JURY TRIAL**

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

22
23 DATED: August 5, 2026

THE RAMIREZ LEGAL GROUP

24
25
26 By: 

27 April Ramirez, Esq.
28 Attorneys for Plaintiffs