

JUL 28 2026

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

30-2026

RITA GLENN,
Plaintiff,

Case No.: **0 1 5 8 6 4 8 2**

Assigned for All Purposes

v.

GKN AEROSPACE
TRANSPARENCY SYSTEMS INC., a
California corporation
Defendants.

COMPLAINT FOR DAMAGES

1. Negligence *(unlimited)*
2. Negligence Per Se (Evidence Code § 669)
3. Private Nuisance
4. Public Nuisance (Special Injury)

Judge Layne Melzer
Dept: CX102

DEMAND FOR JURY TRIAL

COMPLAINT FOR DAMAGES - 1

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3 **I. INTRODUCTION**

4 1. Plaintiff Rita Glenn (“Plaintiff”) brings this civil action against
5 Defendant GKN Aerospace Transparency Systems Inc. (“GKN” or
6 “Defendant”) for damages arising from a hazardous materials emergency
7 originating at Defendant’s aerospace manufacturing facility in Garden Grove,
8 California, that resulted in government-issued evacuation orders affecting
9 Plaintiff and thousands of nearby residents.

10 2. Defendant operated an industrial facility engaged in the storage,
11 handling, and use of hazardous chemicals in close proximity to densely
12 populated residential neighborhoods. By undertaking such operations,
13 Defendant assumed a duty to exercise reasonable care to protect nearby
14 residents from foreseeable harm resulting from its activities.

15 3. On or about May 21, 2026, a hazardous materials emergency occurred
16 at Defendant’s Garden Grove facility. Orange County emergency officials,
17 local fire authorities, hazardous materials teams, and other governmental
18 agencies responded to the incident. Public officials determined that conditions
19 at the facility presented a sufficient risk to require evacuation of
20 approximately 50,000 nearby residents while emergency personnel worked to
21 stabilize the hazardous condition.

22 4. Plaintiff resided at 12911 Dale Street, Apartment 56, Garden Grove,
23 California 92841, within the area subject to the evacuation orders.

24 5. Plaintiff complied with the mandatory evacuation orders issued by
25 public authorities and was forced to immediately leave her residence without
26 meaningful opportunity to prepare for an extended displacement.

27 6. At the time of the evacuation, Plaintiff was recovering from a stem cell
28 transplant and remained under continuing medical care with a severely
compromised immune system. Her treating physicians instructed her to avoid
unnecessary exposure to crowded public environments and infectious diseases
because of her immunocompromised condition.

7. Unlike the ordinary inconvenience experienced by many evacuees,
Plaintiff’s evacuation created extraordinary health risks because temporary
lodging required her to remain in shared public accommodations where
exposure to infectious illness was substantially greater than within her
medically controlled residence.

8. As a direct consequence of the evacuation, Plaintiff incurred expenses
for temporary lodging, meals, transportation, laundry, personal necessities,

1 and other evacuation-related costs. Plaintiff also suffered disruption of her
2 medical recovery, emotional distress, anxiety, fear, inconvenience, and loss of
3 the use and enjoyment of her home.

4 9. Plaintiff seeks compensation for all damages legally recoverable under
5 California law arising from Defendant's alleged negligent conduct and the
6 resulting evacuation.

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8 **II. JURISDICTION**

9 10. This Court has subject matter jurisdiction pursuant to Article VI,
10 section 10 of the California Constitution because this action seeks damages in
11 excess of the jurisdictional minimum of this Court.

12 11. Venue is proper in the County of Orange pursuant to Code of Civil
13 Procedure sections 392 and 395 because Defendant's principal place of
14 business is located within Orange County, the acts and omissions alleged
15 herein occurred within Orange County, and Plaintiff's injuries and damages
16 were sustained within Orange County.

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18 **III. PARTIES**

19 12. Plaintiff Rita Glenn is, and at all relevant times was, a resident of
20 Garden Grove, Orange County, California.

21 13. Defendant GKN Aerospace Transparency Systems Inc. is, and at all
22 relevant times was, a California corporation doing business in Orange
23 County, California, and owned, operated, maintained, controlled, managed,
24 and supervised the aerospace manufacturing facility located at or near 12122
25 Western Avenue, Garden Grove, California.

26 14. Plaintiff is presently unaware of the true names and capacities of
27 Defendants sued herein as DOES 1 through 50, inclusive, and therefore sues
28 such Defendants by fictitious names pursuant to Code of Civil Procedure
section 474. Plaintiff will amend this Complaint to allege their true names and
capacities when ascertained.

15. Plaintiff alleges that each Defendant was the agent, employee, servant,
representative, alter ego, joint venturer, partner, or co-conspirator of every

1 other Defendant and, in doing the things alleged herein, acted within the
2 course and scope of that relationship.

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5 **IV. GENERAL FACTUAL ALLEGATIONS**

6 16. Defendant's Garden Grove facility manufactured aerospace
7 transparency products and utilized industrial processes involving hazardous
8 materials requiring strict compliance with federal, state, and local safety
standards.

9 17. Defendant knew, or reasonably should have known, that any failure to
10 safely store, monitor, inspect, maintain, or control hazardous chemicals at its
11 facility could create an unreasonable and foreseeable risk of serious injury,
property damage, and disruption to neighboring residential communities.

12 18. Plaintiff is informed and believes that prior to the evacuation,
13 Defendant had exclusive possession, custody, management, and control over
14 the hazardous materials and equipment involved in the emergency that
prompted the governmental response.

15 19. Plaintiff is informed and believes that the hazardous condition
16 originated within Defendant's facility and was of such magnitude that
17 emergency officials determined evacuation of the surrounding community was
18 necessary to protect public health and safety.

19 20. The issuance of mandatory evacuation orders constitutes evidence that
20 governmental authorities reasonably concluded that nearby residents faced a
21 significant risk if they remained in the affected area.

22 21. Plaintiff fully complied with all evacuation directives issued by public
23 authorities.

24 22. During the evacuation, Plaintiff was forced to secure temporary housing
25 despite her medically compromised condition and physician-imposed
26 restrictions following her stem cell transplant.

27 23. Plaintiff's displacement substantially interfered with her medical
28 recovery, disrupted her daily treatment routine, increased her anxiety
regarding exposure to infectious disease, and caused significant emotional
distress.

29 24. Plaintiff incurred economic losses including temporary lodging, food,
transportation, laundry, personal necessities, and other out-of-pocket
expenses directly attributable to the evacuation.

1 25. Plaintiff has complied with all conditions precedent to maintaining this
2 action, except those excused by law.

3 **FIRST CAUSE OF ACTION**

4 **NEGLIGENCE**

5
6 (Against Defendant GKN Aerospace Transparency Systems Inc. and DOES
7 1-50)

8 26. Plaintiff realleges and incorporates by reference paragraphs 1 through
9 25 of this Complaint as though fully set forth herein.

10 27. At all relevant times, Defendant owned, operated, managed, controlled,
11 maintained, inspected, supervised, and was otherwise responsible for the
12 industrial aerospace manufacturing facility located in Garden Grove,
13 California.

14 28. Under California law, Defendant owed Plaintiff and other neighboring
15 residents a duty to exercise reasonable care in the ownership, operation,
16 inspection, maintenance, supervision, and control of its industrial facility so as
17 to avoid creating an unreasonable and foreseeable risk of harm. See *Rowland*
18 *v. Christian* (1968) 69 Cal.2d 108, 112-113.

19 29. Defendant further owed Plaintiff a duty to exercise reasonable care in
20 the storage, handling, monitoring, maintenance, and control of hazardous
21 materials used in its industrial operations.

22 30. Defendant knew, or in the exercise of reasonable care should have
23 known, that a failure to safely conduct its industrial operations could
24 foreseeably result in an emergency requiring evacuation of nearby residential
25 neighborhoods and causing injury to persons residing within the affected
26 area.

27 31. Plaintiff alleges that Defendant breached its duties of reasonable care by
28 negligently owning, operating, maintaining, inspecting, supervising,
monitoring, and controlling its industrial facility in a manner that allowed
hazardous conditions to develop, resulting in the emergency response and
evacuation orders described herein.

32. Plaintiff further alleges that Defendant failed to exercise the degree of
care that a reasonably prudent operator of an industrial facility handling
hazardous materials would have exercised under similar circumstances.

33. Plaintiff is informed and believes, and thereon alleges, that Defendant's
negligent acts and omissions were a substantial factor in causing the

1 hazardous condition that prompted emergency governmental action and the
2 mandatory evacuation of Plaintiff's neighborhood.

3 34. As a direct and foreseeable consequence of Defendant's alleged
4 negligence, Plaintiff was ordered to evacuate her residence and was deprived
5 of the use and enjoyment of her home.

6 35. Plaintiff's injuries were reasonably foreseeable because Defendant
7 operated an industrial facility containing hazardous materials in close
8 proximity to residential communities.

9 36. At the time of the evacuation, Plaintiff was recovering from a stem cell
10 transplant and remained immunocompromised, requiring a controlled living
11 environment and avoidance of unnecessary exposure to infectious disease.
12 Defendant's alleged negligence therefore subjected Plaintiff to risks and
13 hardships substantially greater than those experienced by an average
14 resident.

15 37. As a direct and proximate result of Defendant's conduct, Plaintiff
16 incurred economic damages, including but not limited to:

17 a. Hotel and temporary lodging expenses;

18 b. Transportation expenses;

19 c. Food and meal expenses;

20 d. Laundry and personal necessity expenses;

21 e. Medical-related expenses;

22 f. Other evacuation-related costs.

23 38. Plaintiff also suffered non-economic damages including, but not limited
24 to:

25 a. Emotional distress;

26 b. Anxiety;

27 c. Fear for her health and safety;

28 d. Mental suffering;

- 1
2 **e. Disruption of her prescribed medical recovery;**
3 **f. Loss of comfort;**
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5 **g. Loss of the use and enjoyment of her residence;**
6 **h. Inconvenience and hardship associated with the mandatory evacuation.**
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8 39. Defendant's negligence was a substantial factor in causing Plaintiff's
9 injuries and damages.

10 40. Plaintiff has sustained damages in an amount to be proven at trial and
11 seeks all compensatory damages recoverable under California law.

12 **SECOND CAUSE OF ACTION**

13 **PRIVATE NUISANCE**

14 **(Cal. Civ. Code §§ 3479–3481)**

15 **(Against Defendant GKN Aerospace Transparency Systems Inc. and DOES**
16 **1–50)**

17 51. Plaintiff realleges and incorporates by reference paragraphs 1 through
18 50 as though fully set forth herein.

19 52. California Civil Code section 3479 defines a nuisance as anything that is
20 injurious to health, offensive to the senses, or an obstruction to the free use of
21 property that interferes with the comfortable enjoyment of life or property.

22 53. At all relevant times, Plaintiff lawfully occupied and resided at 12911
23 Dale Street, Apartment 56, Garden Grove, California, where she enjoyed the
24 use, possession, comfort, and quiet enjoyment of her home.

25 54. Defendant's operation of its industrial facility created conditions that
26 allegedly posed a substantial risk to the surrounding community and resulted
27 in governmental authorities ordering Plaintiff and other residents to evacuate
28 their homes.

55. As a direct consequence of Defendant's alleged conduct, Plaintiff was
deprived of the use and enjoyment of her residence during the evacuation
period.

1 56. Plaintiff's interference with her property rights was substantial,
2 unreasonable, and materially greater than a minor inconvenience.

3 57. Plaintiff's injuries were especially severe because she was recovering
4 from a stem cell transplant and required a medically controlled living
environment to reduce the risk of infection and other health complications.

5 58. Plaintiff was forced to obtain temporary lodging despite medical
6 restrictions, disrupting her recovery and increasing her anxiety regarding
7 exposure to infectious illnesses.

8 59. As a direct and proximate result of Defendant's conduct, Plaintiff
suffered:

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

10 b. Emotional distress;

11 c. Anxiety and mental suffering;

12 d. Medical disruption;

13 e. Economic losses associated with temporary housing, transportation, meals,
14 and related evacuation expenses; and

15 f. Other damages according to proof.

16 60. Defendant's conduct was a substantial factor in causing Plaintiff's
17 injuries and damages.

18 61. California recognizes a cause of action for private nuisance where a
19 defendant's conduct substantially and unreasonably interferes with another's
20 use and enjoyment of land. See *San Diego Gas & Electric Co. v. Superior Court*
21 (1996) 13 Cal.4th 893.
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25 **THIRD CAUSE OF ACTION**

26 **PUBLIC NUISANCE (SPECIAL INJURY)**

27 (Cal. Civ. Code §§ 3480–3493)
28

1 (Against Defendant GKN Aerospace Transparency Systems Inc. and DOES
2 1-50)

3 62. Plaintiff realleges and incorporates by reference paragraphs 1 through
4 61.

5 63. Plaintiff alleges that Defendant's conduct created or contributed to a
6 condition that endangered the health, safety, and property of a substantial
portion of the surrounding community.

7 64. Government authorities determined that the condition was sufficiently
8 serious to require mandatory evacuation orders affecting approximately
50,000 residents.

9 65. Plaintiff suffered injuries that differed in kind from those suffered by
10 the public generally because:

11 a. She was recovering from a stem cell transplant;

12 b. She had a severely compromised immune system;

13 c. She faced heightened medical risks associated with displacement from her
14 controlled home environment;

15 d. Her prescribed medical recovery was disrupted; and

16 e. She experienced health-related hardships beyond those ordinarily
17 associated with evacuation.

18 66. Plaintiff therefore sustained a special injury sufficient to maintain an
19 individual action for public nuisance under California law.

20 67. Defendant's conduct was a substantial factor in causing Plaintiff's
21 injuries and damages.

22 68. Plaintiff has suffered damages in an amount to be proven at trial.

23 **DAMAGES**

24 69. As a direct and proximate result of Defendant's conduct, Plaintiff has
25 suffered and continues to suffer substantial economic and non-economic
26 damages.

27 70. Plaintiff incurred reasonable and necessary expenses for temporary
28 lodging during the mandatory evacuation.

1 71. Plaintiff incurred transportation expenses associated with evacuating
2 her residence, obtaining temporary housing, traveling to obtain food, medical
3 necessities, and returning to her residence following the termination of the
evacuation orders.

4 72. Plaintiff incurred additional expenses for meals, laundry, personal
5 necessities, and other evacuation-related costs that would not have been
incurred absent Defendant's alleged conduct.

6 73. Plaintiff experienced disruption of her medically necessary recovery
7 following a stem cell transplant. Plaintiff's physicians had advised her to
8 avoid exposure to crowded public environments because of her severely
9 compromised immune system. The evacuation forced Plaintiff to leave the
10 controlled environment of her home and seek temporary accommodations,
increasing her concern regarding exposure to infectious illnesses.

11 74. Plaintiff suffered emotional distress, anxiety, fear, inconvenience,
12 mental suffering, and loss of peace of mind resulting from the emergency
evacuation and the interruption of her medical recovery.

13 75. Plaintiff suffered loss of the use, comfort, and enjoyment of her
14 residence during the evacuation period.

15 76. Plaintiff has sustained general damages and special damages according
to proof at trial.

16 77. Plaintiff will continue to incur damages to the extent established by the
17 evidence.

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19 **PRAYER FOR RELIEF**

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21 **WHEREFORE, Plaintiff Rita Glenn respectfully requests judgment against**
22 **Defendant GKN Aerospace Transparency Systems Inc. and DOES 1 through**
50 as follows:

- 23 1. For general damages according to proof;
24 2. For special damages according to proof;
25 3. For all economic damages according to proof;
26 4. For all non-economic damages according to proof;
27 5. For reimbursement of evacuation-related expenses, including
28 temporary lodging, transportation, meals, laundry, personal necessities, and
other out-of-pocket losses;

- 1 6. For damages arising from the disruption of Plaintiff's medical recovery
2 and loss of the use and enjoyment of her residence;
3 7. For prejudgment interest where authorized by law;
4 8. For costs of suit incurred herein;
5 9. For such other and further relief as the Court deems just and proper.

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7 **DEMAND FOR JURY TRIAL**

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

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10 **Dated: 7/27/26**

11 **RITA GLENN**

12 **Plaintiff, In Pro Per**
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