

Assigned for all purposes

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Judge Layne H. Melzer

CX-102

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ORANGE**

FRANCISCO OCHOA CASTANEDA, an  
individual,

Plaintiff,

v.

GKN AEROSPACE TRANSPARENCY  
SYSTEMS INC., a California Corporation;  
GKN AEROSPACE SERVICES LTD., a  
United Kingdom Private Limited Company;  
MELROSE INDUSTRIES PLC, a United  
Kingdom Public Company; and  
DOES 1-100, inclusive,

Defendants.

CASE NO: 30-2026-01572318-CU-TT-CXC

**COMPLAINT FOR DAMAGES**

- 1. NEGLIGENCE**
- 2. TRESPASS**
- 3. PRIVATE NUISANCE**
- 4. PUBLIC NUISANCE**
- 5. STRICT LIABILITY FOR  
ULTRAHAZARDOUS ACTIVITY**
- 6. TRESPASS TO CHATTELS**

**DEMAND FOR JURY TRIAL**

COMES NOW, the Plaintiff, FRANCISCO OCHOA CASTANEDA, for causes of action against the Defendants, and DOES 1-100, who complains and alleges as follows:

**I. INTRODUCTION**

1. Plaintiff brings this action against Defendants GKN AEROSPACE TRANSPARENCY SYSTEMS INC., a California Corporation (“GATS”), GKN AEROSPACE SERVICES LTD., a United Kingdom Private Limited Company (“GAS”), and MELROSE INDUSTRIES PLC, a United Kingdom Public Company (“MIP”) (collectively, the “GKN Defendants”), arising from the negligent storage, containment, handling, monitoring, and release of methyl methacrylate (“MMA”) and related hazardous chemical vapors from Defendants’ facility located at 12122 Western Ave., Garden Grove, California.

2. As a result of the MMA release and resulting toxic plume, surrounding residents and property owners, including Plaintiff, were subjected to evacuation orders, shelter-in-place directives, exposure concerns, noxious chemical odors, fear of contamination, interference with the use and enjoyment of their homes and properties, emotional distress, and other damages.

**II. PARTIES**

3. Plaintiff FRANCISCO OCHOA CASTANEDA is a resident of real property in Orange County, California, and is a citizen of the State of California.

4. Defendant GKN AEROSPACE TRANSPARENCY SYSTEMS INC. (“GATS”) is a California Corporation with its principal place of business at 12122 Western Ave., Garden Grove, California.

5. Defendant GKN AEROSPACE SERVICES LTD. (“GAS”) is a United Kingdom Private Limited Company, with its principal place of business at 1301 Solana Boulevard, Suite 1528, Westlake, Texas 76262.

6. Defendant MELROSE INDUSTRIES PLC (“MIP”) is a United Kingdom Public Company, with its principal place of business at 1301 Solana Boulevard, Suite 1528, Westlake, Texas 76262.

7. Defendant GKN Aerospace Transparency Systems Inc. is a wholly owned United States subsidiary and operating business within the broader GKN Aerospace group, which is

1 headquartered in the United Kingdom and operates globally through Defendant GKN Aerospace  
2 Services Ltd.

3 8. Defendant GKN Aerospace Transparency Systems Inc. specializes in the design  
4 and manufacture of aerospace transparency products, including aircraft windows, cockpit  
5 windshields, and military canopies, and functions as part of GKN Aerospace's "transparencies"  
6 business line.

7 9. Public corporate records and industry databases identify Defendant GKN  
8 Aerospace Transparency Systems Inc. as an affiliated subsidiary operating under Defendant  
9 GKN Aerospace Services Ltd.'s "GKN Aerospace" brand and corporate structure.

10 10. Defendant GKN Aerospace Services Ltd. is wholly owned by Defendant Melrose  
11 Industries PLC, a UK-based aerospace and engineering group.

12 11. Defendant GKN Aerospace Services Ltd. oversees global operations involving  
13 airframe systems, transparencies, engine structures, and related aerospace technologies, with  
14 facilities in multiple countries, including the United States.

15 12. Defendant GKN Aerospace Transparency Systems Inc. is a wholly owned  
16 subsidiary of Defendant GKN Aerospace Services Ltd.

17 13. Defendant GKN Aerospace Services Ltd. is a wholly owned subsidiary of  
18 Defendant Melrose Industries PLC.

19 14. At all relevant times, Defendants GKN Aerospace Services Ltd. and Melrose  
20 Industries PLC exercised centralized oversight, management, direction, and control over  
21 hazardous materials policies, operational safety protocols, environmental compliance  
22 procedures, risk management practices, industrial safety systems, and corporate governance  
23 affecting the operations of Defendant GKN Aerospace Transparency Systems Inc., including the  
24 handling, storage, containment, monitoring, maintenance, and management of methyl  
25 methacrylate ("MMA") and other hazardous industrial chemicals at the Garden Grove facility.  
26 Plaintiff is informed and believes, and thereon alleges, that such policies, procedures, operational  
27 standards, and safety practices were implemented, coordinated, directed, approved, monitored,  
28 and/or enforced on a centralized and enterprise-wide basis by the GKN Defendants.

1           15.     The true names and/or capacities, whether individual, corporate, associate or  
2 otherwise of Defendants DOES 1 through 100, inclusive, and each of them, are unknown to  
3 Plaintiff, who therefore sues said Defendants by such fictitious names.

4           16.     Plaintiff is informed and believes, and thereupon alleges, that each of the  
5 Defendants fictitiously named herein as a DOE is legally responsible, negligently, or in some  
6 other actionable manner, for the events and happenings hereinafter referred to, and proximately  
7 caused the injuries of Plaintiff as hereinafter alleged. Plaintiff will amend this Complaint to assert  
8 the true names and/or capacities of such fictitiously named Defendants when the same have been  
9 ascertained.

10          17.     Plaintiff is informed and believes, and thereupon alleges, that at all times  
11 mentioned herein, Defendants, including DOES 1 through 100, inclusive, and each of them, were  
12 the agents, servants, employees and/or joint ventures of the co-Defendants, and were, as such,  
13 acting within the course, scope, and authority of said agency, employment and/or venture, and  
14 that each and every Defendant, as aforesaid, when acting as a principal, employer and joint  
15 venture, was negligent in the selection and hiring of each and every other co-Defendant as an  
16 agent, employee, and/or joint venture.

17 **III.    JURISDICTION AND VENUE**

18          18.     Venue is proper in this Court pursuant to Code of Civil Procedure sections 395  
19 and 395.5 because, inter alia: (1) Defendant GATS resides in Orange County, California; and (2)  
20 Plaintiff's injuries occurred in Orange County as a result of actions that the GKN Defendants'  
21 took or failed to take in Orange County.

22          19.     This Court has jurisdiction over this action because the GKN Defendants' liability  
23 arose in Orange County as the result of Defendants' purposeful and deliberate construction,  
24 design, and maintenance of the chemical manufacturing facility Defendants owned and operated  
25 in Orange County. Defendants have conducted significant business in the County of Orange,  
26 California, so as to render the exercise of jurisdiction over Defendants by California courts  
27 consistent with the traditional notions of fair play and substantial justice.  
28

1 **IV. FACTUAL ALLEGATIONS**

2 20. Defendants own and operate an aerospace manufacturing and/or industrial facility  
3 located at 12122 Western Ave., Garden Grove, California.

4 21. At all relevant times, Defendants stored, handled, maintained, utilized,  
5 transported, processed, controlled, and/or otherwise managed Methyl Methacrylate (“MMA”)  
6 and other hazardous substances at the facility.

7 22. Methyl Methacrylate (“MMA”) is a highly flammable, clear organic liquid with  
8 an acrid, fruity odor. Primarily used as a monomer to manufacture acrylic plastics like Plexiglas,  
9 it is also essential for producing latex paints, medical bone cement, dental crowns, and high-  
10 strength adhesives.

11 23. Defendant GKN Aerospace Transparency Systems Inc. uses MMA primarily to  
12 manufacture aerospace-grade acrylic plastics and transparent aircraft components such as aircraft  
13 windows, cockpit windshields, military jet canopies, passenger cabin windows, and other  
14 “transparency systems” for aerospace applications.

15 24. Additionally, MMA is the key chemical building block used to make polymethyl  
16 methacrylate (“PMMA”), commonly known as acrylic or plexiglass. In aerospace, PMMA is  
17 valued because it is lightweight, optically clear, impact resistant, and easier to shape than glass.

18 25. GKN Aerospace’s own transparency systems division describes its business as  
19 producing cockpit windows, passenger cabin windows, military canopies (including F-35 and F-  
20 22 systems), abrasion-resistant coated aerospace transparencies, and notes that it has a “vertically  
21 integrated supply of aerospace grade acrylic material.”

22 26. MMA is a hazardous, volatile, highly flammable industrial chemical that presents  
23 substantial risks to human health, property, animals, and the environment when improperly  
24 stored, released, or aerosolized. MMA readily vaporizes at room temperature, producing highly  
25 concentrated airborne vapors that are heavier than air and capable of settling, pooling, and  
26 migrating into low-lying areas, structures, residences, and surrounding communities. Because  
27 MMA vapors can travel beyond the point of release and accumulate in confined or poorly  
28 ventilated spaces, accidental releases create widespread and foreseeable dangers to nearby

persons and property.

27. MMA is also highly lipid-soluble, meaning it readily penetrates human skin and can pass through surgical gloves and standard protective clothing. As a result, ordinary protective barriers are often insufficient to prevent chemical exposure. MMA's chemical properties make it particularly dangerous in industrial and populated settings because individuals may unknowingly experience dermal and inhalation exposure even without direct contact with liquid MMA.

28. In addition, MMA is extremely flammable and chemically reactive. In the event of a fire, ignition, or explosion, MMA creates severe physical hazards and may generate a complex mixture of toxic and volatile airborne contaminants. The release of MMA therefore presents not only chemical exposure dangers, but also substantial risks of combustion, explosion, toxic smoke generation, and catastrophic harm to surrounding persons and properties.

29. Exposure to MMA vapors poses serious health hazards to humans. Inhalation exposure attacks mucous membranes and commonly causes burning eyes, throat irritation, coughing, chest tightness, respiratory distress, and shortness of breath. Prolonged or concentrated inhalation exposure can result in pulmonary edema, a life-threatening accumulation of fluid within the lungs that severely impairs breathing and oxygen exchange.

30. Direct contact with MMA may also cause significant dermatological injuries. MMA strips the skin of natural oils and can cause severe irritation, chemical burns, and contact dermatitis. Repeated exposure may lead to sensitization, meaning that once an individual becomes sensitized to MMA, even minimal future exposure may trigger severe itching, rashes, inflammation, and other allergic reactions.

31. MMA additionally poses substantial neurological dangers because it affects the central nervous system. Overexposure to MMA has been associated with dizziness, nausea, headaches, confusion, cognitive impairment, toxic dementia, numbness, weakness in the extremities, and generalized peripheral neuropathy. Chronic or repeated exposure may therefore result in long-term neurological impairment and diminished quality of life.

32. Repeated or chronic MMA exposure may also cause respiratory sensitization and permanent respiratory injury. Individuals exposed to MMA over time may develop occupational

1 asthma, chronic respiratory irritation, reduced lung capacity, and heightened sensitivity to  
2 airborne chemical exposures.

3 33. MMA exposure also presents serious hazards to animals. Studies involving animal  
4 exposure have demonstrated acute respiratory toxicity, including lung damage and progressive  
5 degeneration or necrosis of olfactory tissue responsible for processing smell. Animal studies have  
6 further demonstrated developmental and reproductive toxicity associated with MMA exposure,  
7 including reduced fetal weight, skeletal and vertebral abnormalities, developmental defects, and  
8 increased fetal deaths in exposed populations.

9 34. Because of these dangerous characteristics, MMA requires strict storage,  
10 containment, monitoring, handling, ventilation, emergency response planning, and safety  
11 controls to prevent releases capable of endangering nearby residents, workers, animals, and  
12 surrounding communities.

13 35. On or about May 21, 2026, a hazardous materials emergency occurred at  
14 Defendants' GKN Aerospace facility located at 12122 Western Avenue in Garden Grove,  
15 California, after a large industrial storage tank containing methyl methacrylate began  
16 experiencing dangerous thermal instability and uncontrolled chemical reactions.

17 36. Upon information and belief, the tank became overheated and entered a condition  
18 that created a substantial risk of rupture, explosion, fire, and the uncontrolled release of hazardous  
19 airborne chemicals into surrounding communities.

20 37. MMA is an extremely volatile, flammable, and reactive industrial chemical that  
21 poses severe risks when improperly stored or subjected to elevated temperatures or pressure  
22 conditions. As the incident escalated, emergency responders determined that the storage tank  
23 posed an imminent threat to public safety because it could catastrophically fail, ignite, explode,  
24 or release large quantities of toxic chemical vapors into densely populated residential  
25 neighborhoods surrounding the facility.

26 38. As the emergency unfolded, hazardous chemical vapors and noxious odors spread  
27 beyond the boundaries of the GKN facility and into neighboring residential communities.  
28 Because MMA vapors are heavier than air, the toxic plume posed a heightened risk of migrating

1 into streets, homes, low-lying areas, structures, and occupied residential properties. Residents in  
2 surrounding areas reported strong chemical odors, burning sensations, respiratory irritation,  
3 headaches, dizziness, and fear regarding potential toxic exposure and contamination.

4 39. Upon information and belief, MMA vapors, particulates, residues, contaminants,  
5 and/or airborne chemical byproducts physically migrated onto and into Plaintiff's real and  
6 personal property, including structures, HVAC systems, outdoor surfaces, vegetation, soil, and  
7 personal belongings.

8 40. Plaintiff is informed and believes that MMA vapors and airborne contaminants  
9 infiltrated their residences and enclosed structures within the evacuation zone.

10 41. In response to the escalating danger, multiple emergency response agencies,  
11 including the Orange County Fire Authority, hazardous materials response teams, law  
12 enforcement agencies, and emergency management personnel, responded to the scene and  
13 implemented large-scale emergency measures designed to protect nearby residents and the  
14 public.

15 42. Emergency officials issued evacuation orders and shelter-in-place directives  
16 affecting broad portions of Garden Grove and neighboring communities, including Stanton,  
17 Cypress, Anaheim, Buena Park, and Westminster. Authorities closed roads, restricted access to  
18 residential neighborhoods, established emergency perimeters, and warned residents of the  
19 continuing risk of toxic exposure, fire, explosion, and environmental contamination.

20 43. Public officials acknowledged that the situation remained unstable and  
21 unpredictable for an extended period of time. Emergency responders publicly warned that the  
22 MMA storage tank could rupture or explode "at any moment," thereby placing nearby residents,  
23 occupants, businesses, schools, and properties at continuing risk of catastrophic harm.

24 44. Authorities further warned that any ignition event or structural failure involving  
25 the tank could release a massive volume of hazardous and toxic airborne contaminants into the  
26 surrounding environment.

27 45. Ultimately, approximately 40,000 residents were ordered to evacuate or otherwise  
28 affected by emergency directives associated with the incident.



1           46. Plaintiff resides in close proximity to the GKN Defendants' facility and was  
2 among those forced to evacuate, shelter in place, refrain from occupying their homes, or  
3 otherwise alter their use and enjoyment of their properties due to the dangerous conditions created  
4 by the GKN Defendants' facility and hazardous chemical release.

5           47. As a direct and proximate result of the GKN Defendants' conduct and the MMA  
6 release, Plaintiff suffered substantial interference with the use, occupancy, comfort, enjoyment,  
7 and possession of their homes and properties. Plaintiff was displaced from their residences,  
8 forced to incur evacuation-related expenses, deprived of the safe use of their homes, and  
9 subjected to fear, anxiety, annoyance, inconvenience, and distress arising from the threat of toxic  
10 exposure and catastrophic chemical storage failure.

11           48. The MMA release and resulting emergency conditions further caused widespread  
12 concern regarding contamination of homes, personal property, outdoor surfaces, pets, vegetation,  
13 soil, and the surrounding environment. Plaintiff reasonably feared both immediate and long-term  
14 health consequences associated with exposure to MMA vapors and airborne contaminants.

15           49. Plaintiff is informed and believes, and thereon alleges, that the dangerous  
16 conditions giving rise to the incident were foreseeable and preventable, and resulted from the  
17 GKN Defendants' negligent storage, maintenance, monitoring, containment, inspection,  
18 handling, supervision, and control of MMA and hazardous industrial chemicals at the facility.

19           50. Plaintiff is informed and believes, and thereon alleges, that hazardous conditions,  
20 contamination risks, vapor migration concerns, and environmental impacts associated with the  
21 MMA incident may continue to affect Plaintiff's properties and surrounding communities unless  
22 and until proper remediation, inspection, containment, monitoring, and environmental response  
23 measures are completed.

24           51. As a result of the GKN Defendants' negligence, Plaintiff's properties have been  
25 impacted by the release and will continue, for the foreseeable future, to be impacted.

26           52. At present, Plaintiff primarily seeks damages arising from property damage,  
27 evacuation-related harm, nuisance conditions, displacement, and interference with the use and  
28 enjoyment of property, in addition to emotional distress damages Plaintiff has suffered and will

continue to suffer as the result of Defendants' actions. Plaintiff expressly reserves all rights and remedies relating to latent injuries, future toxic exposure claims, and medical monitoring relief to the extent permitted by applicable law.

53. The presence of MMA has caused harm to the property owners and residents for a number of reasons.

54. First, the affected properties need to be properly cleaned to remove the notoriously harsh, pungent, "fruity" odor of MMA that easily embeds itself into porous materials like woods, fabrics, carpets, and drywall.

55. Second, MMA is a strong organic solvent and easily dissolves, softens, or degrades many common plastics and rubbers including natural rubber, ABS, and polycarbonate. It can also permanently cloud or craze acrylic glass surfaces and is highly reactive with and corrosive to carbon steel, cast iron, and ductile iron. This means that many items exposed to the MMA will need to be properly cleaned and/or replaced.

56. Third, MMA is highly toxic and destructive to plants. Many property owners, occupants, and tenants have outdoor plants and gardens vulnerable to MMA.

57. Fourth, the land and the properties themselves need to be properly cleaned in order to prevent the further contamination of land, waterways, and the general environment.

58. Plaintiff has incurred out-of-pocket damages, including, but not limited to, the cost of alternate housing and the cost required to restore their property and residence to the state it was in prior to being affected by the MMA release. Their home has become temporarily unsafe, unusable, and/or unsuitable for normal residential occupancy.

59. Plaintiff has been evacuated since on or about May 22, 2026.

## **V. CAUSES OF ACTION**

### **FIRST CAUSE OF ACTION**

#### **Negligence**

*(Against All Defendants)*

60. Plaintiff realleges and incorporates all of the paragraphs above as if fully set forth herein.

1           61. Defendants owed a duty to Plaintiff to exercise reasonable care in the ownership,  
2 operation, maintenance, storage, containment, monitoring, supervision, inspection, handling, and  
3 control of MMA and other hazardous industrial chemicals maintained at the GKN facility located  
4 at 12122 Western Avenue in Garden Grove, California.

5           62. Defendants further owed a duty to design, implement, maintain, and enforce  
6 adequate safety procedures, emergency response protocols, inspection systems, containment  
7 measures, warning systems, ventilation systems, cooling systems, and operational safeguards  
8 sufficient to prevent the release, overheating, ignition, migration, or uncontrolled discharge of  
9 hazardous chemical substances into neighboring communities.

10           63. Defendants knew or reasonably should have known that MMA is an extremely  
11 volatile, flammable, reactive, and toxic chemical substance capable of causing catastrophic harm  
12 if improperly stored, maintained, monitored, or contained.

13           64. Defendants further knew or should have known that any release, overheating  
14 event, containment failure, or uncontrolled chemical reaction involving MMA could foreseeably  
15 result in airborne toxic vapor migration, fire, explosion, environmental contamination,  
16 mandatory evacuations, respiratory exposure, and widespread harm to nearby residents and  
17 properties. Despite such knowledge, Defendants failed to exercise reasonable care in the  
18 management and control of the hazardous substances maintained at the facility.

19           65. Defendants breached their duties of care by, among other things, negligently  
20 storing MMA in dangerous conditions; failing to properly inspect and maintain storage systems  
21 and equipment; failing to implement adequate temperature monitoring, pressure monitoring,  
22 cooling, containment, and emergency mitigation systems; failing to properly supervise hazardous  
23 chemical operations; failing to adequately train personnel responsible for the handling and  
24 maintenance of MMA; failing to implement proper emergency procedures; failing to timely warn  
25 surrounding residents and governmental agencies of dangerous conditions; and otherwise failing  
26 to prevent the hazardous conditions and chemical emergency described herein.

27           66. Defendants further breached their duties by maintaining substantial quantities of  
28 hazardous industrial chemicals in close proximity to densely populated residential communities

without adequate safeguards sufficient to protect neighboring residents and properties from foreseeable chemical releases, toxic vapor migration, evacuation conditions, and catastrophic industrial failures. Plaintiff is informed and believes that Defendants prioritized operational convenience, production concerns, cost savings, and/or profit over the implementation of adequate industrial safety measures necessary to protect the public.

67. As a direct and proximate result of Defendants' negligent acts and omissions, MMA and hazardous chemical vapors were released into the surrounding environment, creating dangerous emergency conditions that caused governmental evacuation orders, shelter-in-place directives, road closures, public safety warnings, and substantial interference with the use and enjoyment of nearby homes and properties.

68. Plaintiff was forced to evacuate, refrain from occupying their residences, alter their daily activities, incur displacement-related expenses, and endure fear, anxiety, inconvenience, annoyance, contamination concerns, and other damages arising from the hazardous conditions created by Defendants.

69. The injuries and damages suffered by Plaintiff were foreseeable consequences of Defendants' negligent conduct. Defendants knew or reasonably should have known that the negligent storage, handling, maintenance, containment, and supervision of MMA created an unreasonable risk of catastrophic chemical failure and substantial harm to neighboring communities. Nevertheless, Defendants failed to take reasonable precautions necessary to prevent the MMA emergency and resulting injuries and damages suffered by Plaintiff.

## **SECOND CAUSE OF ACTION**

### **Trespass**

*(Against All Defendants)*

70. Plaintiff realleges and incorporates all of the paragraphs above as if fully set forth herein.

71. Plaintiff is an owner, occupant, and/or tenant of real property.

72. The GKN Defendants caused MMA to be released near the real properties of Plaintiff, which in turn caused the MMA to travel to the property of Plaintiff.

1           73.     Plaintiff did not give the GKN Defendants permission to cause MMA to enter  
2 their properties.

3           74.     As a result of the GKN Defendants' conduct, Plaintiff has suffered damages.

4           75.     The GKN Defendants acted with a conscious disregard of the rights of others and  
5 put their own financial interests ahead of the interests of Plaintiff, which constitutes malice.

6           76.     The GKN Defendants engaged in despicable conduct that subjected Plaintiff to  
7 cruel and unjust hardship in conscious disregard of their rights, which constitutes oppression.

8           77.     Thus, the GKN Defendants acted with oppression and/or malice and Plaintiff is  
9 therefore entitled to punitive damages in an amount according to proof at trial.

### 10                               **THIRD CAUSE OF ACTION**

#### 11                               **Private Nuisance**

12                               *(Against All Defendants)*

13           78.     Plaintiff realleges and incorporates all of the paragraphs above as if fully set forth  
14 herein.

15           79.     Plaintiff is an owner, occupant, and/or tenant of real property.

16           80.     In releasing MMA near the real properties Plaintiff owned, occupied, and/or  
17 resided in, the GKN Defendants created a condition that is an obstruction to the free use of the  
18 properties, so as to interfere with the comfortable enjoyment of the properties.

19           81.     The MMA has interfered with the use or enjoyment of the properties by Plaintiff.

20           82.     Plaintiff did not consent to the GKN Defendants' conduct.

21           83.     The seriousness of the harm outweighs the public benefit of the GKN Defendants'  
22 conduct.

23           84.     An ordinary person would be reasonably annoyed or disturbed by the GKN  
24 Defendants' conduct.

25           85.     As a result of the GKN Defendants' conduct, Plaintiff has suffered damages.

26           86.     The GKN Defendants acted with a conscious disregard of the rights of others and  
27 put their own financial interests ahead of the interests of Plaintiff, which constitutes malice.

28           87.     The GKN Defendants engaged in despicable conduct that subjected Plaintiff to

1 cruel and unjust hardship in conscious disregard of their rights, which constitutes oppression.

2 88. Therefore, the GKN Defendants acted with oppression and/or malice and Plaintiff  
3 is therefore entitled to punitive damages in an amount according to proof at trial.

#### 4 **FOURTH CAUSE OF ACTION**

##### 5 **Public Nuisance**

6 *(Against All Defendants)*

7 89. Plaintiff realleges and incorporates all of the paragraphs above as if fully set forth  
8 herein.

9 90. At all relevant times, all relevant times, Defendants owned, operated, controlled,  
10 maintained, supervised, managed, and/or were otherwise responsible for the GKN Aerospace  
11 facility located at 12122 Western Avenue in Garden Grove, California, including the storage,  
12 handling, containment, maintenance, monitoring, and control of MMA and related hazardous  
13 industrial chemicals.

14 91. Defendants' acts and omissions, including the negligent storage, containment,  
15 maintenance, monitoring, supervision, and control of MMA, created dangerous conditions that  
16 substantially and unreasonably interfered with rights common to the general public, including  
17 public health, public safety, public peace, public comfort, public convenience, and the safe use  
18 of public and private property throughout the surrounding communities.

19 92. The hazardous conditions created by Defendants resulted in widespread  
20 emergency response measures, including evacuation orders, shelter-in-place directives, road  
21 closures, emergency perimeters, hazardous materials response operations, public safety  
22 warnings, and substantial disruption to residential neighborhoods and surrounding communities  
23 in Garden Grove, Stanton, Cypress, Anaheim, Buena Park, Westminster, and nearby areas.

24 93. Defendants' conduct created a substantial and continuing risk of fire, explosion,  
25 toxic vapor migration, environmental contamination, airborne chemical exposure, and  
26 catastrophic harm affecting tens of thousands of residents, businesses, schools, roadways, public  
27 infrastructure, and properties located near the facility.

28 94. The interference caused by Defendants was substantial, unreasonable, offensive,

1 and harmful to the public, and would be highly offensive to an ordinary reasonable person.

2 95. Plaintiff suffered injuries and damages different in kind from those suffered by  
3 the general public because Plaintiff resided within or near the evacuation and impact zones, were  
4 forced to evacuate or shelter in place, suffered direct interference with the use and enjoyment of  
5 their homes and properties, incurred displacement-related expenses, and experienced heightened  
6 contamination concerns, fear, annoyance, inconvenience, and property-related damages.

7 96. As a direct and proximate result of Defendants' conduct and the public nuisance  
8 created thereby, Plaintiff suffered damages including, but not limited to, loss of use and  
9 enjoyment of property, evacuation-related damages, displacement costs, diminution in value,  
10 nuisance damages, emotional distress, annoyance, inconvenience, remediation-related damages,  
11 and other economic and non-economic harm.

12 97. Defendants acted with conscious disregard for the rights, safety, and well-being  
13 of Plaintiff and the surrounding public, thereby entitling Plaintiff to punitive damages according  
14 to proof at trial.

## 15 **FIFTH CAUSE OF ACTION**

### 16 **Strict Liability for Ultrahazardous Activity**

17 *(Against All Defendants)*

18 98. Plaintiff realleges and incorporates all of the paragraphs above as if fully set forth  
19 herein.

20 99. Defendants' storage, handling, containment, maintenance, processing,  
21 monitoring, and control of large quantities of methyl methacrylate ("MMA") and related  
22 hazardous industrial chemicals constituted ultrahazardous and/or abnormally dangerous  
23 activities. MMA is an inherently volatile, flammable, reactive, and toxic chemical substance that  
24 presents a substantial risk of catastrophic harm to persons, property, animals, and the  
25 environment when released, overheated, improperly contained, or otherwise uncontrolled. The  
26 dangers associated with MMA include fire, explosion, toxic vapor migration, airborne  
27 contamination, respiratory injury, chemical exposure, environmental contamination, and mass  
28 evacuation events affecting surrounding communities.

1           100. The risks associated with the storage and management of MMA are extraordinary  
2 and extend far beyond those ordinarily associated with routine industrial operations. Because  
3 MMA vapors readily aerosolize, migrate through the air, and accumulate in populated and low-  
4 lying areas, any loss of containment creates a substantial and foreseeable danger to neighboring  
5 residences, occupants, businesses, schools, and the public at large. Moreover, MMA's highly  
6 flammable and reactive nature creates a continuing risk of catastrophic ignition, combustion,  
7 explosion, and uncontrolled toxic release capable of causing widespread property damage,  
8 physical injury, contamination, displacement, and environmental harm.

9           101. The ultrahazardous nature of the GKN Defendants' activities is further  
10 demonstrated by the fact that the risks posed by large-scale MMA storage and handling cannot  
11 be entirely eliminated through the exercise of reasonable care. Even where precautions are  
12 undertaken, the storage of substantial quantities of volatile industrial chemicals in close  
13 proximity to residential communities necessarily creates a high degree of risk of serious harm in  
14 the event of equipment failure, overheating, containment failure, human error, chemical  
15 instability, mechanical malfunction, fire, or other operational failure. The magnitude of potential  
16 harm associated with an MMA release--including toxic airborne plume migration, mandatory  
17 evacuations, exposure to hazardous vapors, and the threat of catastrophic explosion--renders such  
18 activities abnormally dangerous as a matter of law.

19           102. At all relevant times, the GKN Defendants engaged in, authorized, controlled,  
20 supervised, and/or benefited from such ultrahazardous activities at the GKN facility located at  
21 12122 Western Avenue in Garden Grove, California. The GKN Defendants knew or should have  
22 known that the storage and handling of MMA in substantial quantities created a foreseeable and  
23 unreasonable risk of catastrophic harm to nearby residents and properties, particularly given the  
24 facility's proximity to densely populated residential communities.

25           103. As a direct and proximate result of the GKN Defendants' ultrahazardous  
26 activities, MMA and hazardous vapors were released from the facility into the surrounding  
27 environment, creating emergency conditions that resulted in evacuation orders, shelter-in-place  
28 directives, widespread fear of toxic exposure, interference with the use and enjoyment of



1 residential properties, contamination concerns, and other damages suffered by Plaintiff.

2 104. Because the GKN Defendants engaged in ultrahazardous and abnormally  
3 dangerous activities, the GKN Defendants are strictly liable for all injuries, damages, losses,  
4 interference with property rights, evacuation-related harm, nuisance conditions, contamination-  
5 related damages, diminution in value, emotional distress, and other injuries proximately resulting  
6 from the MMA release and related hazardous conditions, regardless of the degree of care  
7 exercised by the GKN Defendants.

## 8 **SIXTH CAUSE OF ACTION**

### 9 **Trespass to Chattels**

10 *(Against All Defendants)*

11 105. Plaintiff realleges and incorporates all of the paragraphs above as if fully set forth  
12 herein.

13 106. At all times relevant to this Complaint, Plaintiff had and continues to have actual  
14 and constructive possession, and the immediate right to possession, of personal property.

15 107. The GKN Defendants' improper storage of MMA, as described herein, near  
16 Plaintiff's personal property has caused an intrusion upon, changes to, damage to, and destruction  
17 of Plaintiff's property interest therein, and has deprived Plaintiff of the possession, control, and  
18 use of their property interests.

19 108. Such dominion and control by the GKN Defendants has and continues to  
20 wrongfully interfere with Plaintiff's rights of ownership of the personal property so as to  
21 constitute conversion of Plaintiff's property interest in their personal property.

22 109. As a direct and proximate result of the GKN Defendants' exercise of dominion  
23 and control over Plaintiff's personal property, Plaintiff has suffered all of the injuries and  
24 damages described herein. The GKN Defendants are liable for all such damage and punitive  
25 damages as set forth herein.

26 110. The aforementioned acts of the GKN Defendants were willful, wanton, malicious,  
27 and oppressive, were taken with intent to interfere with or in reckless disregard to Plaintiff's  
28 property rights, and justify the awarding of exemplary and punitive damages.

1 **VI. PRAYER FOR RELIEF**

2 Plaintiff seeks to recover the following damages and obtain the following relief from the  
3 GKN Defendants:

- 4 i. Loss of the use, benefit, goodwill, and enjoyment of Plaintiff's real and/or personal  
5 property;  
6 ii. Remediation damages;  
7 iii. Diminution in value damages;  
8 iv. Evacuation/displacement damages;  
9 v. Nuisance damages;  
10 vi. Emotional distress damages;  
11 vii. Past and future medical expenses and incidental expenses;  
12 viii. Any other compensatory damages suffered by Plaintiff;  
13 ix. Punitive damages;  
14 x. All reasonable and necessary attorneys' fees;  
15 xi. Court costs;  
16 xii. Pre- and post-judgment interest; and  
17 xiii. Such other relief to which Plaintiff may show himself justly entitled.

18  
19 DATED: May 26, 2026

**FRANTZ LAW GROUP, APLC**

20  
21 /s/ James P. Frantz

22 James P. Frantz, Esq.  
23 Edward M. Burak, Esq.  
24 George T. Stiefel, Esq.  
25 M. Regina Bagdasarian, Esq.  
26 Attorneys for Plaintiff  
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DATED: May 26, 2026

/s/ James P. Frantz

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