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Attorneys for Plaintiffs Duane Page
and Michelle Carlisle, Individually
and on Behalf of All Others Similarly Situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CASE NO: 8:26-cv-01293

DUANE PAGE and MICHELLE
CARLISLE Individually And on Behalf
of All Others Similarly Situated

CLASS ACTION COMPLAINT

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

Plaintiffs,
v.

GKN AEROSPACE TRANSPARENCY
SYSTEMS INC., a California
Corporation, GKN AEROSPACE
SERVICES LTD., a United Kingdom
Private Limited Company, and
MELROSE INDUSTRIES PLC, a United
Kingdom Public Company

JURY TRIAL DEMANDED

Defendants.

INTRODUCTION

1. Plaintiffs Duane Page (“Page”) and Michelle Carlisle (“Carlisle”) bring this action against Defendants GKN AEROSPACE TRANSPARENCY SYSTEMS INC., a California Corporation (hereinafter “GATS”), GKN AEROSPACE SERVICES LTD., a United Kingdom Private Limited Company (hereinafter “GAS”), and MELROSE INDUSTRIES PLC, a United Kingdom Public Company (hereinafter “MIP” and, collectively with GATS and GAS, the “GKN Defendants”) collectively 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 Plaintiffs and members of the proposed Class, 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, and other damages.

PARTIES

3. Plaintiff Duane Page is, together with his wife Michelle Carlisle, the owner of a house in Orange County, California. He is a citizen of the State of California.

4. Plaintiff Michelle Carlisle is, together with her husband Duane Page, the owner of a house in Orange County, California. She is a citizen of the State of California.

5. Defendant GKN AEROSPACE TRANSPARENCY SYSTEMS INC., is a California Corporation with its principal place of business at 12122 Western Ave Garden Grove, CA.

6. Defendant GKN AEROSPACE SERVICES LTD., is a United Kingdom

1 Private Limited Company, with its principal place of business at 1301 Solana
2 Boulevard, Suite 1528, Westlake, Texas 76262.

3 7. Defendant MELROSE INDUSTRIES PLC, is a United Kingdom Public
4 Company, with its principal place of business at 1301 Solana Boulevard, Suite 1528,
5 Westlake, Texas 76262.

6 8. Defendant GKN Aerospace Transparency Systems Inc. is a wholly
7 owned United States subsidiary and operating business within the broader GKN
8 Aerospace group, which is headquartered in the United Kingdom and operates
9 globally through Defendant GKN Aerospace Ltd.

10 9. Defendant GKN Aerospace Transparency Systems Inc specializes in the
11 design and manufacture of aerospace transparency products, including aircraft
12 windows, cockpit windshields, and military canopies, and functions as part of GKN
13 Aerospace's "transparencies" business line.

14 10. Public corporate records and industry databases identify Defendant GKN
15 Aerospace Transparency Systems Inc as an affiliated subsidiary operating under
16 Defendant GKN Aerospace Ltd's "GKN Aerospace" brand and corporate structure.

17 11. Defendant GKN Aerospace Ltd itself is wholly owned by Defendant
18 Melrose Industries plc, a UK-based aerospace and engineering group.

19 12. Defendant GKN Aerospace oversees global operations involving
20 airframe systems, transparencies, engine structures, and related aerospace
21 technologies, with facilities in multiple countries, including the United States.

22 13. Defendant GKN Aerospace Transparency Systems Inc., is a wholly
23 owned subsidiary of Defendants GKN Aerospace Ltd.

24 14. Defendant GKN Aerospace Ltd is a wholly owned subsidiary of
25 Defendants Melrose Industries PLC.

26 15. At all relevant times, Defendants GKN Aerospace Services Ltd. and
27 Melrose Industries plc exercised centralized oversight, management, direction, and
28 control over hazardous materials policies, operational safety protocols,

1 environmental compliance procedures, risk management practices, industrial safety
2 systems, and corporate governance affecting the operations of Defendant GKN
3 Aerospace Transparency Systems Inc., including the handling, storage,
4 containment, monitoring, maintenance, and management of methyl methacrylate
5 (“MMA”) and other hazardous industrial chemicals at the Garden Grove facility.
6 Plaintiffs are informed and believe, and thereon allege, that such policies,
7 procedures, operational standards, and safety practices were implemented,
8 coordinated, directed, approved, monitored, and/or enforced on a centralized and
9 enterprise-wide basis by the GKN Defendants.

10 11 JURISDICTION AND VENUE

12 16. This Court has subject matter jurisdiction over this action pursuant to the
13 Class Action Fairness Act of 2005 and 28 U.S.C. § 1332 because there are over 100
14 members of the proposed class, at least one member of the proposed class has a
15 different citizenship from a defendant, and the total matter in controversy exceeds
16 \$5,000,000.

17 17. Venue is proper pursuant to 28 U.S.C. § 1391 because a substantial part
18 of the events or omissions giving rise to the claim occurred in this judicial district
19 and because Defendant is subject to the Court’s personal jurisdiction in this judicial
20 district.

21 22 FACTUAL ALLEGATIONS

23 **I. The Storage Of Methyl Methacrylate**

24 18. Defendants own and operate an aerospace manufacturing and/or
25 industrial facility located at 12122 Western Ave., Garden Grove, California.

26 19. At all relevant times, Defendants stored, handled, maintained, utilized,
27 transported, processed, controlled, and/or otherwise managed Methyl Methacrylate
28 (MMA) and other hazardous substances at the facility.

1 20. Methyl Methacrylate (MMA) is a highly flammable, clear organic liquid
2 with an acrid, fruity odor. Primarily used as a monomer to manufacture acrylic
3 plastics like Plexiglas, it is also essential for producing latex paints, medical bone
4 cement, dental crowns, and high-strength adhesives.

5 21. Defendant GKN Aerospace Transparency Systems Inc. uses MMA
6 primarily to manufacture aerospace-grade acrylic plastics and transparent aircraft
7 components such as aircraft windows, cockpit windshields, military jet canopies,
8 passenger cabin windows and other “transparency systems” for aerospace
9 applications.

10 22. Additionally, MMA is the key chemical building block used to make
11 polymethyl methacrylate (PMMA), commonly known as acrylic or plexiglass. In
12 aerospace, PMMA is valued because it is lightweight, optically clear, impact
13 resistant, and easier to shape than glass.

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

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

28 25. MMA is also highly lipid-soluble, meaning it readily penetrates human

1 skin and can pass through surgical gloves and standard protective clothing. As a
2 result, ordinary protective barriers are often insufficient to prevent chemical
3 exposure. MMA's chemical properties make it particularly dangerous in industrial
4 and populated settings because individuals may unknowingly experience dermal and
5 inhalation exposure even without direct contact with liquid MMA.

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

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

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

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

1 30. Repeated or chronic MMA exposure may also cause respiratory
2 sensitization and permanent respiratory injury. Individuals exposed to MMA over
3 time may develop occupational asthma, chronic respiratory irritation, reduced lung
4 capacity, and heightened sensitivity to airborne chemical exposures.

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

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

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

21 34. Upon information and belief, the tank became overheated and entered a
22 condition that created a substantial risk of rupture, explosion, fire, and the
23 uncontrolled release of hazardous airborne chemicals into surrounding
24 communities.

25 35. MMA is an extremely volatile, flammable, and reactive industrial
26 chemical that poses severe risks when improperly stored or subjected to elevated
27 temperatures or pressure conditions. As the incident escalated, emergency
28 responders determined that the storage tank posed an imminent threat to public

1 safety because it could catastrophically fail, ignite, explode, or release large
2 quantities of toxic chemical vapors into densely populated residential
3 neighborhoods surrounding the facility.

4 36. As the emergency unfolded, hazardous chemical vapors and noxious
5 odors spread beyond the boundaries of the GKN facility and into neighboring
6 residential communities. Because MMA vapors are heavier than air, the toxic plume
7 posed a heightened risk of migrating into streets, homes, low-lying areas, structures,
8 and occupied residential properties. Residents in surrounding areas reported strong
9 chemical odors, burning sensations, respiratory irritation, headaches, dizziness, and
10 fear regarding potential toxic exposure and contamination.

11 37. Upon information and belief, MMA vapors, particulates, residues,
12 contaminants, and/or airborne chemical byproducts physically migrated onto and
13 into Plaintiffs' and Class members' real and personal property, including structures,
14 HVAC systems, outdoor surfaces, vegetation, soil, and personal belongings.

15 38. Plaintiffs are informed and believe that MMA vapors and airborne
16 contaminants infiltrated residences and enclosed structures throughout the
17 evacuation zone.

18 39. In response to the escalating danger, multiple emergency response
19 agencies, including the Orange County Fire Authority, hazardous materials response
20 teams, law enforcement agencies, and emergency management personnel,
21 responded to the scene and implemented large-scale emergency measures designed
22 to protect nearby residents and the public.

23 40. Emergency officials issued evacuation orders and shelter-in-place
24 directives affecting broad portions of Garden Grove and neighboring communities,
25 including Stanton, Cypress, Anaheim, Buena Park, and Westminster. Authorities
26 closed roads, restricted access to residential neighborhoods, established emergency
27 perimeters, and warned residents of the continuing risk of toxic exposure, fire,
28 explosion, and environmental contamination.

1 41. Public officials acknowledged that the situation remained unstable and
2 unpredictable for an extended period of time. Emergency responders publicly
3 warned that the MMA storage tank could rupture or explode “at any moment,”
4 thereby placing nearby residents, occupants, businesses, schools, and properties at
5 continuing risk of catastrophic harm.

6 42. Authorities further warned that any ignition event or structural failure
7 involving the tank could release a massive volume of hazardous and toxic airborne
8 contaminants into the surrounding environment.

9 43. Ultimately, approximately 40,000 residents were ordered to evacuate or
10 otherwise affected by emergency directives associated with the incident.

11 44. Class Plaintiffs (who reside less than 0.4 miles from the GKN
12 Defendants facility) and members of the proposed Class were among those forced
13 to evacuate, shelter in place, refrain from occupying their homes, or otherwise alter
14 their use and enjoyment of their properties due to the dangerous conditions created
15 by the GKN Defendants’ facility and hazardous chemical release.

16 45. As a direct and proximate result of the GKN Defendants’ conduct and
17 the MMA release, Plaintiffs and members of the proposed Class suffered substantial
18 interference with the use, occupancy, comfort, enjoyment, and possession of their
19 homes and properties. Plaintiffs and Class members were displaced from their
20 residences, forced to incur evacuation-related expenses, deprived of the safe use of
21 their homes, and subjected to fear, anxiety, annoyance, inconvenience, and distress
22 arising from the threat of toxic exposure and catastrophic chemical storage failure.

23 46. The MMA release and resulting emergency conditions further caused
24 widespread concern regarding contamination of homes, personal property, outdoor
25 surfaces, pets, vegetation, soil, and the surrounding environment. Plaintiffs and
26 members of the proposed Class reasonably feared both immediate and long-term
27 health consequences associated with exposure to MMA vapors and airborne
28 contaminants.

1 47. Plaintiffs are informed and believe, and thereon allege, that the
2 dangerous conditions giving rise to the incident were foreseeable and preventable,
3 and resulted from the GKN Defendants' negligent storage, maintenance,
4 monitoring, containment, inspection, handling, supervision, and control of MMA
5 and hazardous industrial chemicals at the facility.

6 48. Plaintiffs are informed and believe, and thereon allege, that hazardous
7 conditions, contamination risks, vapor migration concerns, and environmental
8 impacts associated with the MMA incident may continue to affect Plaintiffs' and
9 Class members' properties and surrounding communities unless and until proper
10 remediation, inspection, containment, monitoring, and environmental response
11 measures are completed.

12 13 **II. Property Owners And Residents Incur Substantial Damages.**

14 49. As a result of the GKN Defendants negligence, tens of thousands of
15 properties have become impacted by the release, and will continue, for the
16 foreseeable future, to be impacted.

17 50. At present, Plaintiffs primarily seek damages arising from property
18 damage, evacuation-related harm, nuisance conditions, displacement, and
19 interference with the use and enjoyment of property. Plaintiffs expressly reserve all
20 rights and remedies relating to latent injuries, future toxic exposure claims and
21 medical monitoring relief to the extent permitted by applicable law.

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

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

27 53. Second, MMA is a strong organic solvent and easily dissolves, softens
28 or degrades many common plastics and rubbers including natural rubber, ABS, and

1 polycarbonate. It can also permanently cloud or craze acrylic glass surfaces and is
2 highly reactive with and corrosive to carbon steel, cast iron, and ductile iron. This
3 means that many items exposed to the MMA will need to be properly cleaned and/or
4 replaced.

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

8 55. Last, the land and the properties themselves need to be properly cleaned
9 in order to prevent the further contamination of land, waterways, and the general
10 environment.

11 12 **III. The Class Representatives.**

13 56. Class Plaintiffs Duane Page and Michelle Carlisle are the owners and
14 residents of a house in Orange County, California that is approximately 0.4 miles
15 away from the GKN Defendants' facility. Like other property owners, occupants,
16 and tenants whose properties are in the evacuation zone, Plaintiffs have incurred
17 damages, including, but not limited to, the cost of alternate housing, the cost
18 required to restore their property and residence to the state it was prior to being
19 affected by the MMA release. Like other class members, their home has become
20 temporarily unsafe, unusable, and/or unsuitable for normal residential occupancy.

21 57. Class Plaintiffs have been evacuated since May 22, 2026.
22

23 **CLASS ACTION ALLEGATIONS**

24 58. Plaintiffs bring this action on their own behalf, and as a class action on
25 behalf of the Class defined herein, pursuant to, and properly maintainable under Fed.
26 R. Civ. P. 23(a) and Fed. R. Civ. P. 23(b)(3). The Class is also maintainable under
27 Fed. R. Civ. P. 23(c)(4) on the issue of liability. The Class consists of thousands of
28 property owners whose properties were affected by the MMA risk created by the

1 GKN Defendants. Specifically, Plaintiffs bring this suit on behalf of the following
 2 Class:

3 The “**PROPERTY DAMAGE CLASS**”: All persons who own, rent,
 4 or reside in real property within the containment area, as defined by the
 5 evacuation area determined by the primarily the Orange County Fire
 6 Authority (OCFA), on May 22, 2026. The class excludes counsel
 7 representing the class and all persons employed by said counsel,
 8 governmental entities, GKN Aerospace Transparency Systems Inc.,
 9 GKN Aerospace Services Ltd., and Melrose Industries Plc, its officers,
 10 directors, affiliates, legal representatives, employees, co-conspirators,
 11 successors, subsidiaries, and assigns, any judicial officer presiding over
 12 this matter, the members of their immediate families and judicial staff,
 13 any individual having filed a personal injury claim against GKN
 14 Aerospace Transparency Systems Inc., GKN Aerospace Services Ltd.,
 15 and Melrose Industries Plc arising out of the same incident and any other
 16 individual whose interests are antagonistic to other class members.

17 59. Plaintiffs shall serve as class representatives of the Property Damage
 18 Class.

19 60. The GKN Defendants subjected Plaintiffs and the Class to the same
 20 wrongdoing and harmed them in the same manner. Now, Plaintiffs and the Class
 21 seek to enforce the same rights and remedies pursuant to the same legal theories:
 22 negligence, private nuisance, and trespass.

23 61. Numerosity: The proposed class and subclass are so numerous that
 24 individual joinder of all their members is impracticable. While the exact number and
 25 identities of the Class Members are unknown at this time, such information can be
 26 ascertained through appropriate investigation and discovery. It is estimated that the
 27 “Property Damage Class” consists of tens of thousands of members. The disposition
 28 of the claims of these Class Members in a single class action will provide substantial
 benefits to all parties and to the Court.

62. Typicality: Plaintiffs’ claims are typical of the claims of the Class in that
 their claims arise from the same event or practice or course of conduct that gives
 rise to the claims of other class members and is based on the same legal theory as
 their claims.

1 63. Adequacy of Representation: Plaintiffs will fairly and adequately
2 represent and protect the interests of the Class. Plaintiffs have further retained the
3 undersigned counsel, who have substantial experience in prosecuting complex
4 lawsuits and class action litigation. Plaintiffs and undersigned counsel are
5 committed to vigorously prosecuting this action on behalf of the Class and have the
6 financial resources to do so. Neither Plaintiffs nor their counsel have any interests
7 adverse to the Class.

8 64. Superiority of Class Action and Impracticability of Individual Actions:
9 Plaintiffs and the members of the Class suffered harm as a result of Defendant's
10 unlawful conduct. A class action is superior to other available methods for the fair
11 and efficient adjudication of the controversy. Individual joinder of all members of
12 the Class is impractical. Even if individual Class Members had the resources to
13 pursue individual litigation, it would be unduly burdensome to the courts in which
14 the individual litigation would proceed. Individual litigation magnifies the delay and
15 expense to all parties in the court system of resolving the controversies engendered
16 by the Defendant's common course of conduct. The class action device allows a
17 single court to provide the benefits of unitary adjudication, judicial economy, and
18 the fair and equitable handling of all Class Members' claims in a single forum. The
19 conduct of this action as a class action conserves the resources of the parties and of
20 the judicial system and protects the rights of the Class Members. Adjudication of
21 individual Class Members' claims with respect to Defendant would, as a practical
22 matter, be dispositive of the interests of other members not parties to the
23 adjudication and could substantially impair or impede the ability of other Class
24 Members to protect their interests.

25 65. Common Questions of Law and Fact Predominate: In addition, the
26 requirements of Federal Rule of Civil Procedure 23 are satisfied by questions of law
27 and fact common to the claims of Plaintiffs and of each member of the Property
28 Damage Class and which predominate over any question of law or fact affecting

only individual members of the Property Damage Class. Common questions of law and fact include, but are not limited to, the following:

1. Prior to May 22, 2026, were Defendants negligent in their storage of MMA?
2. Did MMA stored and under the control of Defendants escape their control?
3. Does having one's property reached by MMA interfere with the free use or enjoyment of one's property?
4. Did Plaintiffs and the Class give Defendants permission to release MMA on their properties?
5. Did Defendants commit trespass?
6. Did Defendants commit private nuisance?
7. Did Defendants convert Plaintiffs' property?
8. Are Plaintiffs and the Class entitled to compensatory damages?
9. Are Plaintiffs and the Class entitled to nominal damages?
10. Are Plaintiffs and the Class entitled to punitive damages?
11. Are Plaintiffs and the Class entitled to an award of attorneys' fees?

66. Notice: Notice can be provided via internet publication, published notice and/or through mail and paid for by the Defendants.

FIRST CLAIM FOR RELIEF

NEGLIGENCE

67. The allegations of paragraphs 1 through 57 are re-alleged and incorporated herein by reference, and Plaintiffs allege as follows a cause of action on behalf of themselves and the class of similarly situated Property Damage Class members.

68. Defendants owed Plaintiffs and members of the proposed Class a duty to

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

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

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

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

22 72. Defendants breached their duties of care by, among other things,
23 negligently storing MMA in dangerous conditions; failing to properly inspect and
24 maintain storage systems and equipment; failing to implement adequate temperature
25 monitoring, pressure monitoring, cooling, containment, and emergency mitigation
26 systems; failing to properly supervise hazardous chemical operations; failing to
27 adequately train personnel responsible for the handling and maintenance of MMA;
28 failing to implement proper emergency procedures; failing to timely warn

1 surrounding residents and governmental agencies of dangerous conditions; and
2 otherwise failing to prevent the hazardous conditions and chemical emergency
3 described herein.

4 73. Defendants further breached their duties by maintaining substantial
5 quantities of hazardous industrial chemicals in close proximity to densely populated
6 residential communities without adequate safeguards sufficient to protect
7 neighboring residents and properties from foreseeable chemical releases, toxic
8 vapor migration, evacuation conditions, and catastrophic industrial failures.
9 Plaintiffs are informed and believe that Defendants prioritized operational
10 convenience, production concerns, cost savings, and/or profit over the
11 implementation of adequate industrial safety measures necessary to protect the
12 public.

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

19 75. Plaintiffs and members of the proposed Class were forced to evacuate,
20 refrain from occupying their residences, alter their daily activities, incur
21 displacement-related expenses, and endure fear, anxiety, inconvenience, annoyance,
22 contamination concerns, and other damages arising from the hazardous conditions
23 created by Defendants.

24 76. The injuries and damages suffered by Plaintiffs and the proposed Class
25 were foreseeable consequences of Defendants' negligent conduct. Defendants knew
26 or reasonably should have known that the negligent storage, handling, maintenance,
27 containment, and supervision of MMA created an unreasonable risk of catastrophic
28 chemical failure and substantial harm to neighboring communities. Nevertheless,

1 Defendants failed to take reasonable precautions necessary to prevent the MMA
2 emergency and resulting injuries and damages suffered by Plaintiffs and the
3 proposed Class.

4
5 **SECOND CLAIM FOR RELIEF**
6 **TRESPASS**

7 77. The allegations of paragraphs 1 through 57 are re-alleged and
8 incorporated herein by reference, and Plaintiffs allege as follows a cause of action
9 on behalf of themselves and the class of similarly situated Property Damage Class
10 members.

11 78. Plaintiffs and the Class are owners, occupants, and/or tenants of real
12 property.

13 79. The GKN Defendants caused MMA to be released near the real
14 properties of Plaintiffs and the Class, which in turn caused the MMA to travel to the
15 properties of Plaintiffs and the Class.

16 80. Plaintiffs and the Class did not give the GKN Defendants permission to
17 cause MMA to enter their properties.

18 81. As a result of the GKN Defendants' conduct, Plaintiffs and the Class
19 have suffered damages.

20 82. The GKN Defendants acted with a conscious disregard of the rights of
21 others and put their own financial interests ahead of the interests of Plaintiffs and
22 the Class, which constitutes malice.

23 83. The GKN Defendants engaged in despicable conduct that subjected
24 Plaintiffs and the Class to cruel and unjust hardship in conscious disregard of their
25 rights, which constitutes oppression.

26 84. Therefore, the GKN Defendants acted with oppression and/or malice and
27 Plaintiffs and the Class are therefore entitled to punitive damages in an amount
28 according to proof at trial.

THIRD CLAIM FOR RELIEF

PRIVATE NUISANCE

85. The allegations of paragraphs 1 through 57 are re-alleged and incorporated herein by reference, and Plaintiffs allege as follows a cause of action on behalf of themselves and the class of similarly situated Property Damage Class members.

86. Plaintiffs and the Class are owners, occupants, and/or tenants of real property.

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

88. The MMA has interfered with the use or enjoyment of the properties by Plaintiffs and the Class.

89. Plaintiffs and the Class did not consent to the GKN Defendants' conduct.

90. The seriousness of the harm outweighs the public benefit of the GKN Defendants' conduct.

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

92. As a result of the GKN Defendants' conduct, Plaintiffs and the Class have suffered damages.

93. The GKN Defendants acted with a conscious disregard of the rights of others and put their own financial interests ahead of the interests of Plaintiffs and the Class, which constitutes malice.

94. The GKN Defendants engaged in despicable conduct that subjected Plaintiffs and the Class to cruel and unjust hardship in conscious disregard of their rights, which constitutes oppression.

95. Therefore, the GKN Defendants acted with oppression and/or malice and

1 Plaintiffs and the Class are therefore entitled to punitive damages in an amount
2 according to proof at trial.

3
4 **FOURTH CLAIM FOR RELIEF**
5 **PUBLIC NUISANCE**

6 96. The allegations of paragraphs 1 through 57 are re-alleged and
7 incorporated herein by reference, and Plaintiffs allege as follows a cause of action
8 on behalf of themselves and the class of similarly situated Property Damage Class
9 members.

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

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

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

27 100. Defendants’ conduct created a substantial and continuing risk of fire,
28 explosion, toxic vapor migration, environmental contamination, airborne chemical

1 exposure, and catastrophic harm affecting tens of thousands of residents, businesses,
2 schools, roadways, public infrastructure, and properties located near the facility.

3 101. The interference caused by Defendants was substantial, unreasonable,
4 offensive, and harmful to the public, and would be highly offensive to an ordinary
5 reasonable person.

6 102. Plaintiffs and members of the proposed Class suffered injuries and
7 damages different in kind from those suffered by the general public because
8 Plaintiffs and Class members resided within or near the evacuation and impact
9 zones, were forced to evacuate or shelter in place, suffered direct interference with
10 the use and enjoyment of their homes and properties, incurred displacement-related
11 expenses, and experienced heightened contamination concerns, fear, annoyance,
12 inconvenience, and property-related damages.

13 103. As a direct and proximate result of Defendants' conduct and the public
14 nuisance created thereby, Plaintiffs and members of the proposed Class suffered
15 damages including, but not limited to, loss of use and enjoyment of property,
16 evacuation-related damages, displacement costs, diminution in value, nuisance
17 damages, emotional distress, annoyance, inconvenience, remediation-related
18 damages, and other economic and non-economic harm.

19 104. Defendants acted with conscious disregard for the rights, safety, and
20 well-being of Plaintiffs, the Class, and the surrounding public, thereby entitling
21 Plaintiffs and the Class to punitive damages according to proof at trial.

22 23 **FIFTH CLAIM FOR RELIEF**

24 **STRICT LIABILITY FOR ULTRAHAZARDOUS ACTIVITY**

25 105. The allegations of paragraphs 1 through 57 are re-alleged and
26 incorporated herein by reference, and Plaintiffs allege as follows a cause of action
27 on behalf of themselves and the class of similarly situated Property Damage Class
28 members.

1 106. The GKN Defendants’ storage, handling, containment, maintenance,
2 processing, monitoring, and control of large quantities of methyl methacrylate
3 (“MMA”) and related hazardous industrial chemicals constituted ultrahazardous
4 and/or abnormally dangerous activities. MMA is an inherently volatile, flammable,
5 reactive, and toxic chemical substance that presents a substantial risk of catastrophic
6 harm to persons, property, animals, and the environment when released, overheated,
7 improperly contained, or otherwise uncontrolled. The dangers associated with
8 MMA include fire, explosion, toxic vapor migration, airborne contamination,
9 respiratory injury, chemical exposure, environmental contamination, and mass
10 evacuation events affecting surrounding communities.

11 107. The risks associated with the storage and management of MMA are
12 extraordinary and extend far beyond those ordinarily associated with routine
13 industrial operations. Because MMA vapors readily aerosolize, migrate through the
14 air, and accumulate in populated and low-lying areas, any loss of containment
15 creates a substantial and foreseeable danger to neighboring residences, occupants,
16 businesses, schools, and the public at large. Moreover, MMA’s highly flammable
17 and reactive nature creates a continuing risk of catastrophic ignition, combustion,
18 explosion, and uncontrolled toxic release capable of causing widespread property
19 damage, physical injury, contamination, displacement, and environmental harm.

20 108. The ultrahazardous nature of the GKN Defendants’ activities is further
21 demonstrated by the fact that the risks posed by large-scale MMA storage and
22 handling cannot be entirely eliminated through the exercise of reasonable care. Even
23 where precautions are undertaken, the storage of substantial quantities of volatile
24 industrial chemicals in close proximity to residential communities necessarily
25 creates a high degree of risk of serious harm in the event of equipment failure,
26 overheating, containment failure, human error, chemical instability, mechanical
27 malfunction, fire, or other operational failure. The magnitude of potential harm
28 associated with an MMA release—including toxic airborne plume migration,

1 mandatory evacuations, exposure to hazardous vapors, and the threat of catastrophic
2 explosion—renders such activities abnormally dangerous as a matter of law.

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

10 110. As a direct and proximate result of the GKN Defendants' ultrahazardous
11 activities, MMA and hazardous vapors were released from the facility into the
12 surrounding environment, creating emergency conditions that resulted in evacuation
13 orders, shelter-in-place directives, widespread fear of toxic exposure, interference
14 with the use and enjoyment of residential properties, contamination concerns, and
15 other damages suffered by Plaintiffs and members of the proposed Class.

16 111. Because the GKN Defendants engaged in ultrahazardous and abnormally
17 dangerous activities, the GKN Defendants are strictly liable for all injuries,
18 damages, losses, interference with property rights, evacuation-related harm,
19 nuisance conditions, contamination-related damages, diminution in value,
20 emotional distress, and other injuries proximately resulting from the MMA release
21 and related hazardous conditions, regardless of the degree of care exercised by the
22 GKN Defendants.

23 **SIXTH CLAIM FOR RELIEF**

24 **TRESPASS TO CHATTELS (CONVERSION)**

25 112. The allegations of paragraphs 1 through 57 are re-alleged and
26 incorporated herein by reference, and Plaintiffs allege as follows a cause of action
27 on behalf of themselves and the class of similarly situated Property Damage Class
28 members.

- 1 (b) Loss of use damages;
2 (c) Diminution in value damages;
3 (d) Evacuation/displacement damages;
4 (e) Nuisance damages;
5 (f) Any other compensatory damages suffered by Plaintiffs and the Class;
6 (g) Punitive damages;
7 (h) All reasonable and necessary attorneys' fees;
8 (i) Court costs;
9 (j) Pre and post-judgment interest;
10 (k) And such other relief to which Plaintiffs and the Class may show
11 themselves justly entitled.
12
13
14

15 DATED: May 23, 2026

THE X-LAW GROUP, P.C.

16
17 By: 

FILIPPO MARCHINO, ESQ.,
Attorneys for Plaintiffs

19 In association with
20 **PRESIDIO LAW FIRM LLP**
21 LAWRENCE J. CONLAN, ESQ.,
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JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues so triable.

DATED: May 23, 2026

THE X-LAW GROUP, P.C.

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