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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

ROSA CERDA, JENIFFER CERDA, VERONICA CERDA, VICTOR ARMANDO CERDA, and GUILLERMO CERDA ZUNIGA; Plaintiffs, vs. GKN AEROSPACE TRANSPARENCY SYSTEMS, INC.; GKN AEROSPACE CHEM-TRONICS, INC.; GKN AEROSPACE; and DOES 1 through 100, Inclusive, Defendants.	CASE NO. **COMPLAINT FOR DAMAGES** **1. NEGLIGENCE;** **2. PRIVATE NUISANCE;** **3. TRESPASS TO REAL PROPERTY AND CHATTEL;** **4. STRICT LIABILITY FOR ULTRAHAZARDOUS ACTIVITIES** **DEMAND FOR JURY TRIAL**

Plaintiffs, ROSA CERDA, JENIFFER CERDA, VERONICA CERDA, VICTOR ARMANDO CERDA, and GUILLERMO CERDA ZUNIGA, (collectively referred to as "Plaintiffs") by and through their counsel(s), claims and alleges as follows:

PARTIES

1. Plaintiffs, at all times relevant to this action, resided in the County of Orange, in the State of California, in close proximity to 12122 Western Avenue, Garden Grove, California

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92841 (area impacted by the chemical incident at Defendants' aerospace manufacturing facility).

2. Plaintiff is informed, believes and thereupon alleges that at all times mentioned herein, Defendant GKN Aerospace Chem-Tronics, Inc., was a California corporation.

3. Plaintiff is informed, believes and thereupon alleges that at all times mentioned herein, Defendant GKN Aerospace Transparency Systems, Inc., was a California corporation.

4. Plaintiff is informed, believes and thereupon alleges that at all times mentioned herein, Defendant GKN Aerospace, was an entity of unknown form.

5. Plaintiff is ignorant of the true names and capacities—whether individual, corporate, associate, managing member or other—of the Defendants sued herein under fictitious names Does 1 through 100 inclusive and for that reason sues said Defendants, and each of them, by such fictitious names. Plaintiff is informed, believes and thereupon alleges that each of the Defendants Does 1 through 100 inclusive, is and was in some manner responsible for, had participated in or contributed to the matters and things of which Plaintiff complains herein, and in some fashion has legal responsibility, therefore. When Plaintiff ascertains the names and capacities of the fictitiously named Defendants Does 1 through 100 inclusive, Plaintiff will seek leave to amend this Complaint to set forth such facts.

6. Plaintiff is informed, believes and thereupon alleges that each Defendant is, and at all times relevant herein was, the agent of its, their or its/their co-defendants, and in committing the acts alleged herein, was acting within the scope of its/their authority as such agent, with the knowledge, permission and consent of its co-defendants.

JURISDICTION & VENUE

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

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

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FACTUAL OVERVIEW

9. Defendants GKN Aerospace Transparency Systems, Inc., GKN Aerospace Chem-Tronics, Inc., and GKN Aerospace (collectively referred to as Defendants "GKN") operate an aerospace manufacturing facility at or near 12122 Western Avenue, Garden Grove, California 92841, sometimes referred to as the "facility."

10. The facility sits on over 10 acres and is one of the largest providers of military transparency systems and commercial aircraft transparencies. GKN offers for testing, design, analysis, and certification of military canopies, cockpit windows, and passenger windows. The facility's products include, but not limited to, the F-35 fighter jet canopy, as well as transparencies for the Boeing 787 Dreamliner, 737, Airbus A350, HondaJet, and Bombardier C-Series.

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

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

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

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

15. On or about May 22, 2026, a 34,000-gallon tank designed, constructed, owned, and operated by GKN at the facility began leaking and releasing MMA into the

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surrounding communities. The tank was classified as being in a state of crisis.

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

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

18. Residents near the facility reported being exposed to toxic emissions. Some area residents report physical symptoms due to the exposure. Defendants knew or should have known of the significant risks posed by the storage and use of MMA, including the potential for catastrophic toxic emissions and environmental damage.

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

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

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

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

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FIRST CAUSE OF ACTION

NEGLIGENCE

(Against All Defendants)

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

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

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

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

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

a. Failing to monitor and mitigate risks associated with MMA storage and utilization;

b. Failing to design, operate, maintain, and/or repair their facility, including the MMA tanks, in such a way as to ensure its safe and proper operation;

c. Failing to implement adequate safety protocols to prevent MMA tank failure;

d. Failing to ensure proper procedures or systems for timely identifying any malfunctions or limitations of the MMA tanks;

e. Failing to properly maintain the valves on the MMA tanks;

f. Failing to maintain a functional repair/mitigation system;

g. Failing to ensure proper safety procedures in the event of a

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malfunction;

h. Failing to warn Plaintiffs and the public of the risks associated with the facility;

i. Storing and utilizing large volumes of chemicals in such a way that the public was likely to be exposed; and

j. Any other negligent acts and/or omissions which may be discovered and proven at the trial of this matter.

28. As the direct and proximate result of the Defendants' negligence, the plaintiffs were harmed.

29. The harm to the plaintiffs was reasonably foreseeable.

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

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

SECOND CAUSE OF ACTION

PRIVATE NUISANCE

(Against All Defendants)

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

33. Plaintiffs are in lawful possession of their property.

34. Defendants owned, maintained, operated, and otherwise controlled the facility, including the MMA tanks.

35. Defendants' negligent, reckless, intentional and/or abnormally dangerous actions and inactions created conditions and/or permitted conditions to exist that were harmful to

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health, offensive to the senses, obstructed and/or entirely prevented free use of property, as to substantially interfere with the comfortable use and enjoyment of property by persons of ordinary sensibilities.

36. These conditions, including, but not limited to, the failure of the tank caused mandatory evacuations due to the likelihood of toxic chemicals being emitted and significantly interfered with Plaintiffs' right of use and quiet enjoyment of their property in a way unique to each Plaintiff.

37. Plaintiffs' enjoyment of life and property has been rendered materially uncomfortable and annoying. As the result of the incident at Defendants' facility, Plaintiffs' homes and properties unfit for occupancy and use.

38. Those exposed to these emissions have suffered, and continue to suffer damages from inconvenience, annoyance, and/or personal discomfort.

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

40. At no time did the Plaintiffs consent to the Defendants' actions and inactions in creating these conditions.

41. As a direct and proximate result of the Defendants' creation of the nuisance, Plaintiffs have suffered damages and losses. Such harms were unique to each Plaintiff and different from damages suffered by other Plaintiffs.

42. Accordingly, Plaintiffs each seek damages to be determined, on an individual basis, according to proof at trial, including, but not limited to compensatory damages for injury to property and interference with its use and enjoyment, and damages for physical discomfort, loss of peace of mind, unhappiness and annoyance caused by the nuisance.

THIRD CAUSE OF ACTION

TRESPASS TO REAL PROPERTY AND CHATTEL

(Against All Defendants)

43. Plaintiffs incorporates by reference all of the allegations in this Complaint, as

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though fully set forth herein.

44. Plaintiffs are in lawful possession of their properties.

45. As a result of the conduct and activities of the Defendants, contaminants from the incident are expected to physically intrude onto and wrongfully enter Plaintiffs' properties, thereby interfering with the Plaintiffs' possessory interests in their properties without Plaintiffs' permission.

46. The expected physical intrusion of the contaminants emitted by Defendants onto and into the Plaintiffs' properties is expected to physically injure and damage Plaintiffs' properties by contaminating the soil, fixtures, structures and other physical aspects of Plaintiffs' properties. Also, Defendants' trespass to Plaintiffs' personal property will physically injure and damage Plaintiffs' personal properties by contaminating the properties, fixtures, structures, and other physical aspects of Plaintiffs' personal properties. This would not have occurred but for the actions of the Defendants. The expected physical intrusion of the contaminants onto and into the properties owned by the Plaintiffs will diminish the value of Plaintiffs' real properties.

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

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

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

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FOURTH CAUSE OF ACTION

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STRICT LIABILITY FOR ULTRAHAZARDOUS ACTIVITIES

(Against All Defendants)

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

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

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

53. The potential harm caused by the MMA release includes severe health effects, property damage, and prolonged disruption to the lives and livelihoods of those affected.

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

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

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

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

58. As a direct and proximate result of Defendants' engagement in ultrahazardous activities, Plaintiffs suffered injuries, damages and losses, including, but not limited to, those

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damages previously described.

59. Accordingly, Plaintiffs each seek damages to be determined, on an individual basis, according to proof at trial, including, but not limited to, compensatory damages for medical care, pain and suffering, emotional anguish, injury to real and personal property, remediation costs, loss of income, relocation and evacuation expenses, and substantial interference with their use and enjoyment of their properties.

PRAYER FOR RELIEF

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

a. For compensatory damages in an amount to be proven at trial;

b. For punitive damages sufficient to deter future misconduct;

c. For pre- and post-judgment interest as allowed by law; and

d. For such other and further relief as this Court deems just and proper.

Dated: October 28, 2026

SANAZ LAW CORPORATION

Sanaz Imani

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By: SANAZ IMANI
Attorney for Plaintiffs,
ROSA CERDA, JENIFFER CERDA,
VERONICA CERDA, VICTOR ARMANDO CERDA,
and GUILLERMO CERDA ZUNIGA

DEMAND FOR JURY TRIAL

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Plaintiff hereby demands a jury trial for the causes of action set forth herein.

Dated: October 28, 2026

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_____

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Attorney for Plaintiffs,
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