

1 Shawn Steel, Esq. SBN: 80706
2 STEEL & EISNER, LLP
3 3010 Old Ranch PKWY, Suite 260
4 Seal Beach, CA 90740
5 T: 949-551-9000
6 F: 949-612-9797

7
8
9
10
11 Attorney for Plaintiffs
12 Marian Li, Trieu Hai Nguyen, Holly Hang Nguyen

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE – CENTRAL JUSTICE CENTER**

MARIAN LI, TRIEU HAI NGUYEN, HOLLY
HANG NGUYEN, JEREMIAH
SCHOUWEILER

Plaintiffs

vs.

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 through 50, inclusive,

Defendants.

Case No.:

COMPLAINT FOR DAMAGES

1. Negligence
2. Trespass
3. Private Nuisance
4. Public Nuisance
5. Strict Liability for Abnormally Dangerous Activity

COMES NOW Plaintiffs MARIAN LI, TRIEU HAI NGUYEN, HOLLY HANG NGUYEN and JEREMIAH SCHOUWEILER (hereinafter “Plaintiffs”), by and through their attorney of record, complains and alleges as follows:

INTRODUCTION

1. This is an individual action arising from the chemical emergency at the GKN Aerospace facility located at 12122 Western Avenue in Garden Grove, California.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. Plaintiff Marian Li is a 70-year-old homeowner who lives at and owns the residence located at 11831 Amethyst Street in Garden Grove, California. Plaintiff Trieu Hai Nguyen is a 61-year-old homeowner who lives at and owns the residence located at 8111 Stanford Spc35 in Garden Grove, California. Plaintiff Holly Hang Nguyen is a 65-year-old homeowner who lives at and owns the residence located at 12212 Matthew Place in Stanton, California. Plaintiff Jeremiah Schouweiler is a 45-year-old renter who lives at the residence located at 6950 Via Kannela in Stanton, California. Their homes sit in the residential community threatened by Defendants' chemical storage failure.
3. On or about May 21, 2026, Defendants' facility suffered a hazardous materials emergency involving methyl methacrylate, commonly referred to as MMA. MMA is a flammable and hazardous industrial chemical used in acrylic plastics and aerospace transparency products.
4. The emergency was not an abstract inconvenience to Plaintiffs Li, Nguyen, Nguyen, and Schouweiler. It forced them from their homes for approximately three days. It deprived them of the safe use and enjoyment of the property they own/rent and live in. It caused them to fear for their lives. It left them worried about what may have entered the air, soil, surfaces, and possibly groundwater around their homes. And even if the incident is ultimately resolved without diagnosed physical injury to them, the stigma and risk associated with this event have foreseeably affected the value and marketability of their property.
5. Plaintiffs are informed and believe that the incident was foreseeable and preventable. Defendants stored and controlled a dangerous chemical in a densely populated area. They had a duty to maintain the tank, cooling systems, valves, monitoring systems, emergency systems, and safety protocols necessary to keep that chemical from threatening the surrounding neighborhood. Defendants failed in that duty.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JURISDICTION AND VENUE

- 6. Jurisdiction is proper in the Superior Court of California, County of Orange pursuant to § 410.10 of the California Code of Civil Procedure because it has general subject matter jurisdiction over the causes of action alleged in the Complaint.
- 7. All events alleged herein took place in the County of Orange, State of California.
- 8. Venue is proper in the County of Orange pursuant to § 392(a) of the California Code of Civil Procedure.

PARTIES

- 9. Plaintiff Marian Li is an individual residing in Garden Grove, California. She owns and resides at the real property located at 11831 Amethyst Street, Garden Grove, California.
- 10. Plaintiff Trieu Hai Nguyen is an individual residing in Garden Grove, California. He owns and resides at the real property located at 8111 Standford SPC35, Garden Grove, California.
- 11. Plaintiff Holly Hang Nguyen is an individual residing in Stanton, California. She owns and resides at the real property located at 12212 Matthew Place, Stanton, California.
- 12. Plaintiff Jeremiah Schouweiler is an individual residing in Stanton, California. He rents and resides at the real property located at 6950 Via Kannela, Stanton, California.
- 13. Defendant GKN Aerospace Transparency Systems Inc. is, and at all relevant times was, a California corporation with its principal place of business at or associated with 12122 Western Avenue, Garden Grove, California.
- 14. Defendant GKN Aerospace Services Ltd. is, and at all relevant times was, a United Kingdom private limited company. Plaintiffs are informed and believe that it owned, controlled,

1 managed, directed, supervised, or otherwise participated in the policies, operations, safety
2 practices, environmental compliance, hazardous materials handling, risk management, or
3 corporate oversight of the Garden Grove facility.
4

5 15. Defendant Melrose Industries PLC is, and at all relevant times was, a United Kingdom public
6 company. Plaintiffs are informed and believe that it owned, controlled, managed, directed,
7 supervised, or otherwise participated in the policies, operations, safety practices, environmental
8 compliance, hazardous materials handling, risk management, or corporate oversight of the
9 Garden Grove facility and the GKN Aerospace business.
10

11 16. Plaintiffs are unaware of the true names and capacities of Defendants sued as DOES 1 through
12 50, inclusive, and therefore sues those Defendants by fictitious names. Plaintiffs will amend
13 this Complaint to allege their true names and capacities when ascertained. Plaintiffs are
14 informed and believe that each fictitiously named Defendant is legally responsible in some
15 manner for the events, conduct, and damages alleged herein.
16

17 17. At all relevant times, each Defendant was the agent, employee, servant, partner, joint venturer,
18 alter ego, representative, subsidiary, parent, affiliate, successor, predecessor, contractor,
19 consultant, or co-conspirator of the other Defendants, and acted within the course and scope of
20 that relationship. Plaintiffs are informed and believe that each Defendant authorized, directed,
21 approved, ratified, or benefited from the acts and omissions alleged herein.
22
23

24 GENERAL RECITALS

25 A. Defendants Stored And Controlled MMA In A Residential Community

26 18. Defendants own, operate, control, maintain, supervise, or are otherwise responsible for the
27 GKN Aerospace facility located at 12122 Western Avenue in Garden Grove, California.
28

- 1 19. At all relevant times, Defendants stored, handled, used, processed, maintained, monitored,
2 controlled, or otherwise managed MMA and related hazardous substances at the facility.
3
- 4 20. MMA is a volatile, flammable, reactive, and hazardous industrial chemical. It can present
5 serious risks when overheated, improperly stored, released, vaporized, or allowed to migrate
6 beyond containment.
7
- 8 21. MMA exposure can cause eye, skin, throat, and respiratory irritation, headaches, dizziness,
9 nausea, and other health concerns. Its vapors and odors can cause fear and discomfort even
10 before a person knows whether a measurable exposure has occurred.
11
- 12 22. Defendants used MMA in connection with aerospace transparency manufacturing, including
13 the production of acrylic materials, aircraft windows, cockpit windshields, canopies, and other
14 aerospace transparency products.
15
- 16 23. Storing thousands of gallons of MMA in close proximity to homes required strict compliance
17 with safety rules, careful maintenance, working valves and relief systems, temperature controls,
18 pressure monitoring, cooling systems, employee training, emergency planning, and meaningful
19 oversight.
20
- 21 24. Plaintiffs are informed and believe that Defendants knew or should have known that any failure
22 in these systems could expose nearby residents to evacuation, chemical odors, fear of toxic
23 exposure, fire, explosion, property contamination, loss of use, and loss of property value.
24

25 **B. The May 2026 Chemical Emergency**

- 26 25. On or about May 21, 2026, a hazardous materials emergency developed at Defendants' Garden
27 Grove facility involving an industrial tank containing thousands of gallons of MMA.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

26. Public reports state that the tank overheated, that pressure and temperature inside the tank created an explosion risk, that a valve problem or valve failure complicated the emergency response, and that responders worked for days to cool, stabilize, neutralize, and monitor the tank.

27. Public reports further state that the tank held approximately 6,000 to 7,000 gallons of MMA, and that authorities warned of potential toxic vapor release, fire, spill, or explosion if the tank failed.

28. Emergency responders, including the Orange County Fire Authority, hazardous materials teams, law enforcement, environmental agencies, and other public agencies, responded to the scene and established evacuation zones, road closures, safety perimeters, shelters, and public warnings.

29. The incident caused mass evacuations affecting tens of thousands of residents in and around Garden Grove. Public reporting has described evacuation numbers ranging from approximately 40,000 to 50,000 residents at the height of the emergency, with thousands remaining displaced after the evacuation zone was later reduced.

30. On or about May 22, 2026, the Governor of California declared a state of emergency related to the incident.

31. Plaintiffs are informed and believe that, although public officials later reported that the risk of a catastrophic explosion had been reduced or eliminated, officials also warned that the crisis was not fully over, that the tank remained compromised, and that monitoring and cleanup issues remained ongoing creating confusion among those in the evacuation zone as to the safety of returning to their homes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

C. Defendants Had Prior Notice Of The Need For Strict Safety Compliance

32. Plaintiffs are informed and believe that Defendants and their managing agents knew that the Garden Grove facility handled hazardous substances in quantities and under conditions that could endanger nearby residents if not properly controlled.

33. Plaintiffs are informed and believe that the facility had prior regulatory history relevant to environmental or air quality compliance, including a reported 2025 settlement involving air quality violations and a substantial civil penalty.

34. Plaintiffs are informed and believe that this prior history placed Defendants on additional notice that their hazardous materials operations required strict compliance, careful monitoring, and conservative safety practices.

35. Plaintiffs are informed and believe that despite this knowledge, Defendants failed to implement, maintain, inspect, repair, supervise, or enforce the systems necessary to prevent the May 2026 emergency.

D. Plaintiffs Were Forced From their Homes And Lost The Use Of Their Property

36. Plaintiffs live and own real property in the affected areas of Orange County, California.

37. As a result of the chemical emergency, Plaintiffs were evacuated from their homes for approximately three days.

38. During that time, Plaintiffs could not safely use, occupy, access, enjoy, maintain, or rely on their homes as a home.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

39. Plaintiffs were forced to leave behind the security, comfort, and stability of their residences because Defendants' chemical tank threatened the surrounding community.

40. Plaintiffs feared for their lives during the evacuation and emergency. That fear was reasonable. Public officials had warned of serious risks, including toxic exposure, chemical release, fire, and explosion.

41. Plaintiffs continue to fear the consequences of the incident because the situation has been ongoing, because the full scope of any chemical release or environmental impact is not yet known, and because the long-term effect on the air, soil, groundwater, surfaces, vegetation, and property in the area remains uncertain.

42. Plaintiffs are concerned about long-term health effects from MMA, any byproducts of the incident, any releases into the ground, any migration into groundwater, any contamination of outdoor surfaces or vegetation, and any infiltration into her home or personal property.

43. Plaintiffs are informed and believe that no reasonable homeowner would consider this incident harmless simply because the worst possible explosion may have been avoided. A person's home is supposed to be safe. Plaintiffs' homes were made unsafe, unusable, stigmatized, and uncertain because of Defendants' conduct.

44. Plaintiffs have suffered loss of use of their homes and property, inconvenience, annoyance, discomfort, fear, emotional distress, evacuation-related damages, property-related damages, diminution in value, stigma damages, and other harm according to proof.

45. Plaintiffs are informed and believe that the market value and marketability of their homes have been affected by the incident. A home located near the site of a major chemical emergency

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

involving thousands of gallons of MMA carries a stigma that would concern reasonable buyers, lenders, insurers, and occupants.

46. Plaintiffs are informed and believe that their property will require investigation, testing, cleaning, remediation, monitoring, or other measures to determine whether chemical vapors, residues, runoff, or related contaminants affected her land, structures, air, HVAC system, surfaces, vegetation, soil, water, or personal property.

E. Defendants' Conduct Was A Substantial Factor In Plaintiff's Harm

47. Plaintiffs' damages were not caused by a natural disaster, an unavoidable accident, or ordinary community inconvenience. They were caused by Defendants' storage and control of a hazardous industrial chemical and the failure of Defendants' systems to keep that chemical from threatening nearby residents.

48. Plaintiffs are informed and believe that Defendants' acts and omissions included, but were not limited to, the failure to properly design, maintain, repair, inspect, monitor, cool, vent, contain, supervise, staff, and control the MMA tank and related systems.

49. Plaintiffs are further informed and believe that Defendants failed to timely and adequately warn nearby residents, failed to maintain adequate emergency procedures, failed to prevent foreseeable thermal instability, failed to prevent hazardous vapor migration and chemical danger, and failed to prevent the evacuation and loss of use suffered by Plaintiffs.

50. Plaintiffs' injuries and damages were the direct, legal, and proximate result of Defendants' acts and omissions.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FIRST CAUSE OF ACTION

NEGLIGENCE

(AGAINST ALL DEFENDANTS)

51. Plaintiffs incorporate by reference paragraphs 1 through 50 as though fully set forth herein.
52. Defendants owed Plaintiffs a duty to use reasonable care in the ownership, operation, maintenance, repair, inspection, monitoring, storage, handling, containment, cooling, venting, supervision, and control of MMA and other hazardous substances at the Garden Grove facility.
53. Defendants owed Plaintiffs a duty to maintain the facility and its hazardous materials systems in a condition that would not create an unreasonable risk of harm to nearby residents, homeowners, and property owners.
54. Defendants owed Plaintiffs a duty to implement and enforce adequate safety policies, maintenance practices, training, emergency procedures, warning systems, containment plans, and environmental safeguards.
55. Defendants breached these duties by failing to exercise reasonable care in the storage, maintenance, monitoring, cooling, venting, inspection, control, and emergency management of MMA at the facility.
56. Plaintiffs are informed and believe that Defendants' negligence caused or contributed to the overheating, instability, pressure buildup, vapor release risk, evacuation orders, emergency response, and loss of use suffered by Plaintiff.
57. Plaintiffs were harmed. Their damages include, but are not limited to, loss of use, evacuation-related damages, annoyance, inconvenience, discomfort, fear, emotional distress, property-

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

related damages, testing and remediation costs, diminution in value, stigma damages, and other damages according to proof.

58. Defendants' negligence was a substantial factor in causing Plaintiffs' harm.

59. Plaintiffs are informed and believe that Defendants acted with conscious disregard for the safety and rights of nearby residents, including Plaintiffs, by storing and controlling hazardous chemicals in a populated area while failing to maintain adequate safety systems and practices. Plaintiffs therefore seek punitive damages according to proof, subject to the requirements of Civil Code section 3294 and any applicable motion practice.

SECOND CAUSE OF ACTION

TRESPASS

(AGAINST ALL DEFENDANTS)

60. Plaintiffs incorporate by reference paragraphs 1 through 59 as though fully set forth herein.

61. Plaintiffs did not consent to Defendants causing MMA vapors, fumes, odors, residues, particulates, runoff, contaminants, or related hazardous substances to enter, invade, burden, or interfere with their property.

62. Plaintiffs are informed and believe that Defendants caused, permitted, or allowed MMA vapors, chemical odors, airborne contaminants, residues, runoff, or related hazardous substances to migrate beyond the boundaries of Defendants' facility and into the surrounding residential community, including the area of Plaintiffs' property.

63. Plaintiffs are informed and believe that these substances invaded or affected their property, including the airspace, outdoor surfaces, soil, vegetation, structures, HVAC system, and other

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

portions of their property, or at minimum created conditions that made the property unsafe and unusable during the evacuation period.

64. Defendants' conduct interfered with Plaintiffs' exclusive possession of their property and caused damage according to proof.

65. As a direct and proximate result of Defendants' trespass, Plaintiffs suffered loss of use, property-related damages, testing and remediation costs, diminution in value, annoyance, discomfort, inconvenience, fear, emotional distress, and other damages according to proof.

66. Plaintiffs seek punitive damages because Defendants' conduct was willful, wanton, malicious, oppressive, or in conscious disregard of Plaintiffs' property rights and safety, according to proof.

THIRD CAUSE OF ACTION

PRIVATE NUISANCE

(AGAINST ALL DEFENDANTS)

67. Plaintiffs incorporate by reference paragraphs 1 through 66 as though fully set forth herein.

68. Defendants, by their acts and omissions, created and maintained a condition that was harmful to health, offensive to the senses, an obstruction to the free use of property, and an interference with the comfortable enjoyment of life and property.

69. The condition included the threatened release, actual release, or suspected release of hazardous MMA vapors, fumes, odors, residues, runoff, or related contaminants, together with the risk of fire, explosion, toxic exposure, environmental contamination, evacuation, and ongoing uncertainty about the safety of Plaintiffs' home and surrounding area.

1 70. The interference with Plaintiffs' use and enjoyment of their property was substantial and
2 unreasonable.

3
4 71. Plaintiffs did not consent to Defendants' conduct or the resulting nuisance conditions.

5 72. An ordinary reasonable person would be annoyed, disturbed, frightened, inconvenienced, and
6 deprived of the comfortable use and enjoyment of property under these circumstances.

7
8 73. The seriousness of the harm to Plaintiffs outweighs any social utility of Defendants' conduct,
9 particularly because any industrial utility depended on Defendants safely controlling hazardous
10 chemicals and not threatening surrounding homes.

11
12 74. As a direct and proximate result of Defendants' nuisance, Plaintiffs suffered loss of use,
13 evacuation-related damages, annoyance, discomfort, inconvenience, fear, emotional distress,
14 property-related damages, diminution in value, stigma damages, investigation and remediation
15 costs, and other damages according to proof.

16
17 75. Plaintiffs seek all available nuisance remedies, including damages, abatement, injunctive relief,
18 testing, remediation, monitoring, and any other relief necessary to protect Plaintiffs' property
19 and rights.

20
21 76. Plaintiffs seek punitive damages because Defendants' conduct was willful, wanton, malicious,
22 oppressive, or in conscious disregard of Plaintiffs' rights and safety, according to proof.

23 **FOURTH CAUSE OF ACTION**

24 **PUBLIC NUISANCE**

25 **(AGAINST ALL DEFENDANTS)**

26
27 77. Plaintiffs incorporate by reference paragraphs 1 through 76 as though fully set forth herein.

28

- 1 78. Defendants' conduct created a nuisance affecting rights common to the general public,
2 including public health, public safety, public comfort, public convenience, public peace, and
3 the safe use of streets, homes, schools, businesses, shelters, and community spaces.
4
- 5 79. The public nuisance included a major hazardous materials emergency, mass evacuations, road
6 closures, emergency perimeters, warnings of toxic exposure, warnings of fire or explosion,
7 disruption of schools and neighborhoods, and the threat or suspected threat of environmental
8 contamination.
9
- 10 80. The interference was substantial and unreasonable. It affected tens of thousands of residents
11 and required a large public emergency response.
12
- 13 81. Plaintiffs suffered harm different in kind from that suffered by the general public because they
14 lived within the evacuation zone, were evacuated from their own homes for approximately
15 three days, lost the use and enjoyment of their own property, feared for their own lives and
16 health, and face potential diminution in value, stigma, testing, remediation, and property-
17 specific damages.
18
- 19 82. As a direct and proximate result of Defendants' public nuisance, Plaintiffs suffered loss of use,
20 evacuation-related damages, annoyance, discomfort, inconvenience, fear, emotional distress,
21 property-related damages, diminution in value, stigma damages, investigation and remediation
22 costs, and other damages according to proof.
23
- 24 83. Plaintiffs seek damages, abatement, injunctive relief, and all other remedies available under
25 California law.
26
- 27 84. Plaintiffs seek punitive damages because Defendants' conduct was willful, wanton, malicious,
28 oppressive, or in conscious disregard of Plaintiffs' rights and safety, according to proof.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FIFTH CAUSE OF ACTION

**STRICT LIABILITY FOR ABNORMALLY DANGEROUS ACTIVITY
(AGAINST ALL DEFENDANTS)**

85. Plaintiffs incorporate by reference paragraphs 1 through 84 as though fully set forth herein.

86. Defendants stored, handled, maintained, controlled, processed, or otherwise used large quantities of MMA at the Garden Grove facility.

87. MMA is a volatile, flammable, reactive, and hazardous chemical. When overheated, improperly contained, or released, it can create a high risk of serious harm through toxic vapor migration, fire, explosion, chemical exposure, environmental contamination, and forced evacuation.

88. Plaintiffs are informed and believe that Defendants' large-scale storage and handling of MMA in close proximity to residential neighborhoods constituted an abnormally dangerous activity under California law.

89. The activity created a high degree of risk of harm, the potential harm was severe, the risk could not be eliminated entirely through ordinary care, and the activity was not a matter of common usage in the residential community surrounding the facility.

90. The harm suffered by Plaintiffs was the kind of harm that made Defendants' activity abnormally dangerous, including evacuation, loss of use, fear of toxic exposure, property stigma, contamination concerns, testing and remediation needs, and diminution in property value.

91. Defendants are strictly liable for the damages proximately caused by their abnormally dangerous activity, regardless of the degree of care they claim to have used.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

92. As a direct and proximate result of Defendants' abnormally dangerous activity, Plaintiffs suffered damages according to proof.

PUNITIVE DAMAGES ALLEGATIONS

93. Plaintiffs are informed and believe that Defendants, acting through officers, directors, managing agents, and persons with substantial discretionary authority over facility safety, environmental compliance, hazardous materials operations, budgeting, maintenance, and emergency planning, knew or should have known that the Garden Grove facility's MMA storage and control systems posed a serious danger to nearby residents if not properly maintained.

94. Plaintiffs are informed and believe that Defendants consciously disregarded the rights and safety of Plaintiffs and other nearby residents by failing to implement, fund, maintain, inspect, repair, and enforce adequate safety systems despite the known risks associated with MMA and the facility's hazardous materials operations.

95. Plaintiffs are informed and believe that Defendants' officers, directors, or managing agents authorized, ratified, or participated in the wrongful conduct alleged herein, including decisions concerning hazardous materials storage, safety systems, maintenance, environmental compliance, emergency planning, and public warnings.

96. Plaintiffs therefore seek punitive and exemplary damages in an amount sufficient to punish Defendants and deter similar conduct, subject to proof and the requirements of California law.

PRAYER

Plaintiffs pray:

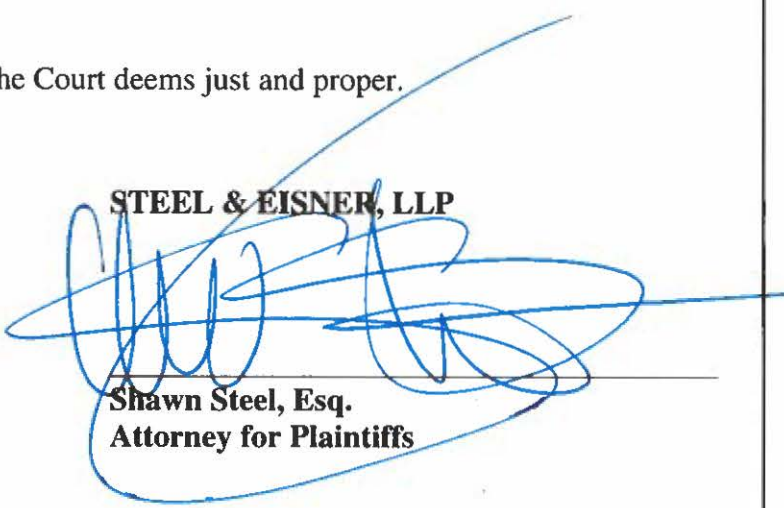
- 1. For general damages according to proof;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. For special damages according to proof;
3. For loss of use damages;
4. For evacuation and displacement damages;
5. For annoyance, discomfort, inconvenience, fear, emotional distress, and nuisance damages;
6. For property damage, investigation costs, testing costs, remediation costs, cleaning costs, monitoring costs, and related expenses according to proof;
7. For diminution in value, stigma damages, and loss of marketability according to proof;
8. For abatement, injunctive relief, testing, monitoring, remediation, and all other equitable relief necessary to protect Plaintiffs' property and rights;
9. For punitive and exemplary damages according to proof;
10. For prejudgment and post-judgment interest as allowed by law;
11. For costs of suit incurred herein;
12. For attorneys' fees to the extent permitted by contract, statute, common law, or other applicable authority; and
13. For such other and further relief as the Court deems just and proper.

Dated: May 27, 2026

STEEL & EISNER, LLP



**Shawn Steel, Esq.
Attorney for Plaintiffs**

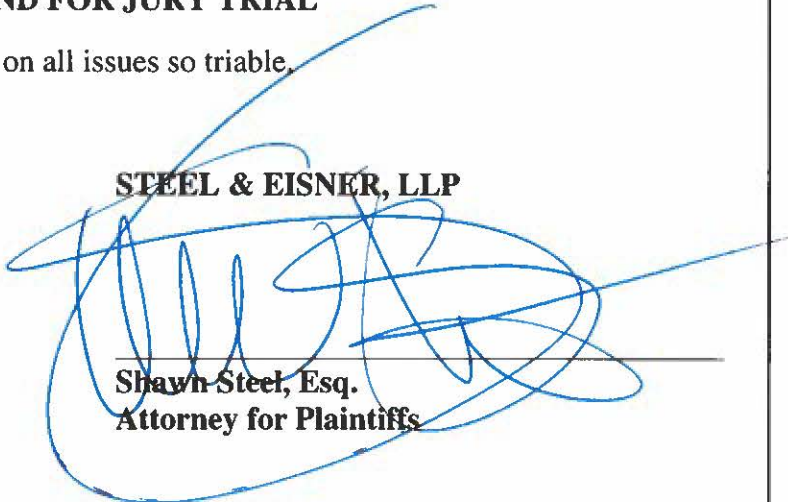
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DEMAND FOR JURY TRIAL

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

Dated: May 27, 2026

STEEL & EISNER, LLP



**Shawn Steel, Esq.
Attorney for Plaintiffs**

STEEL & EISNER, LLP
3010 OLD RANCH PKWY, SUITE 260
SEAL BEACH, CA 90740