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REUBEN YEROUSHALMI (SBN 193981)
DANIEL D. CHO (SBN 105409)
BEN YEROUSHALMI (SBN 232540)
YEROUSHALMI & ASSOCIATES
3700 WILSHIRE BLVD., SUITE 480
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213-382-3183

Attorneys for Plaintiff,
Environmental World Watch, Inc.

**ENDORSED
FILED**
San Francisco County Superior Court
MAR 24 2005
GORDON PARK-LI, Clerk
BY: CRISTINA E. BALTIATA
Deputy Clerk

CASE MANAGEMENT CONFERENCE SET
PLAN I AUG 26 2005 900AM

DEPARTMENT 213
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

Environmental World
Watch, Inc., in the public
interest,

Plaintiff,

v.

American Airlines, Inc.,
Delta Airlines, Inc., America West
Airlines, Inc., Continental Airlines,
Inc., Northwest Airlines, Inc.,
United Air Lines, Inc., Virgin
Atlantic Airways Limited, Ace
Aviation Holdings, Inc., (a.k.a. Air
Canada), Air China, Air France, Air
New Zealand, Air Tran Airways,
Alaska Airlines, Inc., British
Airways, Plc., Japan Airlines
International Company Ltd., KLM
Royal Dutch Airlines, Lufthansa,
Air Wisconsin Airlines Corporation
(a.k.a. United Express), and DOES
1-100,

Defendants.

Case No. **05-439749**

Action is an unlimited civil case (amount
demanded exceeds \$25,000)

COMPLAINT FOR VIOLATION OF
PROPOSITION 65, THE SAFE DRINKING
WATER AND TOXIC ENFORCEMENT ACT OF
1986 (HEALTH AND SAFETY CODE
SECTIONS 25249.5, ET SEQ.)

BY FAX

COMPLAINT FOR VIOLATION OF PROPOSITION 65, THE SAFE DRINKING WATER AND TOXIC
ENFORCEMENT ACT OF 1986 (HEALTH AND SAFETY CODE SECTIONS 25249.5, ET SEQ.)

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GENERAL ALLEGATIONS

1. Plaintiff ENVIRONMENTAL WORLD WATCH, INC. ("Plaintiff") is a corporation qualified to do business in the State of California. It brings this action in the public interest as defined under Health and Safety Code section 25249.7, subdivision (d).
2. Plaintiff is ignorant of the true names and capacities of defendants Does 1-100, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed, believes, and thereon alleges that each fictitiously named defendant is responsible in some manner for the occurrences herein alleged and the damages caused thereby.
3. At all times mentioned herein, "Defendants" include American Airlines, Inc.; Delta Airlines, Inc., America West Airlines, Inc., Continental Airlines, Inc., Northwest Airlines, Inc., United Air Lines, Inc., Virgin Atlantic Airways Limited, Ace Aviation Holdings, Inc., (a.k.a. Air Canada), Air China, Air France, Air New Zealand, Air Tran Airways, Alaska Airlines, Inc., British Airways, Plc., Japan Airlines International Company Ltd., KLM Royal Dutch Airlines, Lufthansa, Air Wisconsin Airlines Corporation (a.k.a. United Express) as well as Does 1-100 (Referred to Collectively as "Defendants".)
4. At all times mentioned each defendant was a "[p]erson in the course of doing business" within the meaning of Health and Safety Code section 25249.11, subdivision (b). Plaintiff is informed, believes, and thereon alleges that at all times mentioned herein each defendant had ten or more employees.

1 5. The Court has jurisdiction over this lawsuit pursuant California Constitution Article VI,
2 Section 10, which grants the Superior Court original jurisdiction in all causes except
3 those given by statute to other trial courts.
4

5 **CAUSE OF ACTION**

6 **(BY ENVIRONMENTAL WORLD WATCH, INC. AGAINST DEFENDANTS**
7 **AMERICAN AIRLINES, INC.; DELTA AIRLINES, INC., AMERICA WEST AIRLINES,**
8 **INC., CONTINENTAL AIRLINES, INC., NORTHWEST AIRLINES, INC., UNITED AIR**
9 **LINES, INC., VIRGIN ATLANTIC AIRWAYS LIMITED, ACE AVIATION HOLDINGS,**
10 **INC., (A.K.A. AIR CANADA), AIR CHINA, AIR FRANCE, AIR NEW ZEALAND, AIR**
11 **TRAN AIRWAYS, ALASKA AIRLINES, INC., BRITISH AIRWAYS, PLC., JAPAN**
12 **AIRLINES INTERNATIONAL COMPANY LTD., KLM ROYAL DUTCH AIRLINES,**
13 **LUFTHANSA, AIR WISCONSIN AIRLINES CORPORATION (A.K.A. UNITED**
14 **EXPRESS) AND DOES 1-100 FOR VIOLATION OF PROPOSITION 65, THE SAFE**
15 **DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (HEALTH AND**
16 **SAFETY CODE SECTIONS 25249.5, ET SEQ.)**

17 6. Plaintiff ENVIRONMENTAL WORLD WATCH, INC. repeats and incorporates by
18 reference the previous paragraphs of this complaint as though fully set forth herein.

19 7. Defendants American Airlines, Inc.; Delta Airlines, Inc., America West Airlines, Inc.,
20 Continental Airlines, Inc., Northwest Airlines, Inc., United Air Lines, Inc., Virgin
21 Atlantic Airways Limited, Ace Aviation Holdings, Inc., (a.k.a. Air Canada), Air China,
22 Air France, Air New Zealand, Air Tran Airways, Alaska Airlines, Inc., British Airways,
23 Plc., Japan Airlines International Company Ltd., KLM Royal Dutch Airlines, Lufthansa,
24 Air Wisconsin Airlines Corporation (a.k.a. United Express) are and at all times
25 mentioned herein were airlines that flew airplanes in and out of airports located in
26 California. Between January 4, 2002, and the filing date of this Complaint, Defendants
27 exposed their employees to jet engine exhaust. The exposures of employees to jet engine
28 exhaust took place when Defendants landed their airplanes, during the process of
refueling, while employees exited the airplanes, while employees performed maintenance

1 on the airplanes, while employees boarded Defendants' airplanes, while the Defendants'
2 airplanes taxied upon landing, and during take-off, or any other time while Defendants
3 operated their airplanes on or near the ground. The exposed employees include baggage
4 handlers, maintenance workers, pilots, flight attendants, cleaning personnel, ticket agents
5 and all other employees working at the gate, warehouse workers, and all other airline
6 crew and personnel working at the Defendants' respective gates or terminals where
7 airplanes are docked. Defendants exposed these employees to chemicals designated to
8 cause cancer or reproductive toxicity, pursuant to California Code of Regulations, title
9 22, section 12000 ("Covered Chemicals"), contained in jet engine exhaust without first
10 giving clear and reasonable warning of such pursuant to Health and Safety Code sections
11 25249.5, et seq. ("Proposition 65"). The sources of exposures included inhalation caused
12 by the exposed employees inhaling and breathing the ambient air, which contained jet
13 engine exhaust, while the airplanes were on the runway, at the terminal, and while the
14 airplanes were taxiing at the airports listed in Exhibit A. Exposures occurred at each of
15 the airports listed in Exhibit A.

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19 8. Defendants American Airlines, Inc.; Delta Airlines, Inc., America West Airlines, Inc.,
20 Continental Airlines, Inc., Northwest Airlines, Inc., United Air Lines, Inc., Virgin
21 Atlantic Airways Limited, Ace Aviation Holdings, Inc., (a.k.a. Air Canada), Air China,
22 Air France, Air New Zealand, Air Tran Airways, Alaska Airlines, Inc., British Airways,
23 Plc., Japan Airlines International Company Ltd., KLM Royal Dutch Airlines, Lufthansa,
24 Air Wisconsin Airlines Corporation (a.k.a. United Express) are and at all times
25 mentioned herein were airlines that flew airplanes in and out of airports located in
26 California. Between January 4, 2002, and the filing date of this Complaint, Defendants
27
28

1 exposed persons to jet engine exhaust. Defendants caused exposures when Defendants
 2 landed their airplanes, during the process of refueling, while passengers exited the
 3 airplanes, while passengers boarded Defendants' airplanes, while the airplanes taxied,
 4 and during take-off. Exposed persons included people visiting and working at the
 5 airports listed in Exhibit A, including passengers, well-wishers, children and pregnant
 6 women, taxi and shuttle drivers, catering personnel and food service delivery personnel,
 7 police and security personnel, airport employees and ground crews, neighborhood
 8 residents, and passers-by. Defendants exposed these persons to the Covered Chemicals
 9 contained in jet engine exhaust without first giving clear and reasonable warning of such
 10 pursuant to Proposition 65. The sources of exposures included inhalation caused by the
 11 exposed persons inhaling and breathing the ambient air containing jet engine exhaust
 12 while traversing runway areas and jet bridges at the airports found in Exhibit A. Some of
 13 the exposures for which a warning is required occurred near the gate or terminal where
 14 Defendants docks its airplanes. Exposures occurred at each of the airports listed in
 15 Exhibit A.

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 19 9. Jet engine exhaust contains the following Covered Chemicals.

20 Benz[a]anthracene	Chrysene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene
21 Formaldehyde (gas)	Acetaldehyde	Naphthalene	Benzene
22 1,3-Butadiene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Dibenz[a,h]anthracene
23 Toluene	Carbon Monoxide		

24
 25 10. On July 1, 1987, Benz[a]anthracene first appeared on the Governor's Proposition 65 list
 26 of Chemicals known to cause developmental toxicity. (Cal. Code Regs., tit 22, §12000,
 27 subd. (b).) Pursuant to Health and Safety Code section 25249.9, twenty months after first
 28

1 appearing on the Governor's Proposition 65 list, Benz[a]anthracene became subject to
2 Proposition 65 warning requirements.

3
4 11. On January 1, 1990, Chrysene first appeared on the Governor's Proposition 65 list of
5 Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).) Pursuant
6 to Health and Safety Code section 25249.9, twenty months after first appearing on the
7 Governor's Proposition 65 list, Chrysene became subject to Proposition 65 warning
8 requirements.

9
10 12. On July 1, 1987, Benzo[a]pyrene first appeared on the Governor's Proposition 65 list of
11 Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).) Pursuant
12 to Health and Safety Code section 25249.9, twenty months after first appearing on the
13 Governor's Proposition 65 list, Benzo[a]pyrene became subject to Proposition 65
14 warning requirements.

15
16 13. On January 1, 1988, Indeno[1,2,3-cd]pyrene first appeared on the Governor's Proposition
17 65 list of Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).)
18 Pursuant to Health and Safety Code section 25249.9, twenty months after first appearing
19 on the Governor's Proposition 65 list, Indeno[1,2,3-cd]pyrene became subject to
20 Proposition 65 warning requirements.

21
22 14. On January 1, 1988, Formaldehyde (gas) first appeared on the Governor's Proposition 65
23 list of Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).)
24 Pursuant to Health and Safety Code section 25249.9, twenty months after first appearing
25 on the Governor's Proposition 65 list, Formaldehyde (gas) became subject to Proposition
26 65 warning requirements.
27
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- 1 15. On April 1, 1988, Acetaldehyde first appeared on the Governor's Proposition 65 list of
2 Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).) Pursuant
3 to Health and Safety Code section 25249.9, twenty months after first appearing on the
4 Governor's Proposition 65 list, Acetaldehyde became subject to Proposition 65 warning
5 requirements.
6
- 7 16. On April 19, 2002, Naphthalene first appeared on the Governor's Proposition 65 list of
8 Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).) Pursuant
9 to Health and Safety Code section 25249.9, twenty months after first appearing on the
10 Governor's Proposition 65 list, Naphthalene became subject to Proposition 65 warning
11 requirements.
12
- 13 17. On February 27, 1987, Benzene first appeared on the Governor's Proposition 65 list of
14 Chemicals known to cause cancer, and on December 26, 1997, for male reproductive
15 toxicity. (Cal. Code Regs., tit 22, §12000, subd. (b).) Pursuant to Health and Safety
16 Code section 25249.9, twenty months after first appearing on the Governor's Proposition
17 65 list, Benzene became subject to Proposition 65 warning requirements.
18
- 19 18. On April 1, 1988, 1,3-Butadiene first appeared on the Governor's Proposition 65 list of
20 Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).) Pursuant
21 to Health and Safety Code section 25249.9, twenty months after first appearing on the
22 Governor's Proposition 65 list, 1,3-Butadiene became subject to Proposition 65 warning
23 requirements.
24
- 25 19. On July 1, 1987, Benzo[b]fluoranthene first appeared on the Governor's Proposition 65
26 list of Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).)
27 Pursuant to Health and Safety Code section 25249.9, twenty months after first appearing
28

1 on the Governor's Proposition 65 list, Benzo[b]fluoranthene became subject to
2 Proposition 65 warning requirements.

3
4 20. On July 1, 1987, Benzo[k]fluoranthene first appeared on the Governor's Proposition 65
5 list of Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).)
6 Pursuant to Health and Safety Code section 25249.9, twenty months after first appearing
7 on the Governor's Proposition 65 list, Benzo[k]fluoranthene became subject to
8 Proposition 65 warning requirements.

9
10 21. On January 1, 1988, Dibenz[a,h]anthracene first appeared on the Governor's Proposition
11 65 list of Chemicals known to cause cancer. (Cal. Code Regs., tit 22, §12000, subd. (b).)
12 Pursuant to Health and Safety Code section 25249.9, twenty months after first appearing
13 on the Governor's Proposition 65 list, Dibenz[a,h]anthracene became subject to
14 Proposition 65 warning requirements.

15
16 22. On January 1, 1991, Toluene first appeared on the Governor's Proposition 65 list of
17 Chemicals known to cause reproductive toxicity. (Cal. Code Regs., tit 22, §12000, subd.
18 (b).) Pursuant to Health and Safety Code section 25249.9, twenty months after first
19 appearing on the Governor's Proposition 65 list, Toluene became subject to Proposition
20 65 warning requirements.

21
22 23. On January 1, 1989, Carbon Monoxide first appeared on the Governor's Proposition 65
23 list of Chemicals known to cause reproductive toxicity. (Cal. Code Regs., tit 22, §12000,
24 subd. (b).) Pursuant to Health and Safety Code section 25249.9, twenty months after first
25 appearing on the Governor's Proposition 65 list, Carbon Monoxide became subject to
26 Proposition 65 warning requirements.
27
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1 24. At least 60 days prior to the filing of this complaint, Plaintiff gave notices of alleged
2 violations of Health and Safety Code section 25249.6 subject to a private action to the
3 Attorney General and applicable district attorneys and city attorneys in whose
4 jurisdictions the violations allegedly occurred, and to each named defendant.
5

6 25. Plaintiff gave these notices and filed this action more than twenty months after each of
7 the chemicals listed in Paragraph 9 of this Complaint first appeared on the Governor's
8 Proposition 65 list, and after such chemicals became subject to Proposition 65 warning
9 requirements.
10

11 26. Each of Plaintiff's respective notices of the alleged violations included a certificate of
12 merit executed by the attorney for the noticing party, Plaintiff. The certificate of merit
13 stated that the attorney for Plaintiff who executed the certificate had consulted with at
14 least one person with relevant and appropriate expertise who had reviewed data regarding
15 the exposure to the chemicals listed in Paragraph 9 of this Complaint that are subjects of
16 this action. Based on that information, the attorney for Plaintiff who executed the
17 certificate believed there was a reasonable and meritorious case for this private action.
18 The attorney for Plaintiff attached to the certificate of merit served on the Attorney
19 General information sufficient to establish the basis of the certificate of merit.
20

21
22 27. Plaintiff is commencing this action more than sixty days from the date that Plaintiff gave
23 the notices of the alleged violations to each named defendant to the Attorney General,
24 and to applicable district attorneys and city attorneys in whose jurisdictions the violations
25 allegedly occurred.
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1 28. Plaintiff is informed, believes, and thereon alleges that neither the Attorney General, nor
2 any applicable district attorney or city attorney has commenced and is diligently
3 prosecuting an action against the alleged violations.
4

5 29. At all times relevant to this action, Defendants knew they were exposing their employees
6 and people visiting and working at the airports, including passengers, police and security
7 personnel, catering personnel, and food service delivery personnel to the chemicals listed
8 in Paragraph 9 of this Complaint without first giving clear and reasonable warning of
9 such to the persons exposed. The State of California has designated that these chemicals
10 cause cancer and/ or developmental toxicity. Therefore, between January 4, 2002, and
11 the filing date of this complaint, Defendants, without first giving clear and reasonable
12 warning, knowingly and intentionally exposed the aforementioned persons to the
13 chemicals listed in Paragraph 9 of this Complaint and known to the State of California to
14 cause cancer or developmental toxicity.
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17 30. The route of exposure for the chemicals listed in Paragraph 9 of this Complaint included
18 inhalation caused by the exposed persons inhaling and breathing the ambient air
19 containing jet engine exhaust while traversing runway areas, terminals and jet bridges at
20 the airports found in Exhibit A.
21

22 31. Individuals exposed to the chemicals listed in Paragraph 9 of this Complaint suffered and
23 continue to suffer irreparable harm due to exposure to such chemicals without prior clear
24 and reasonable warning.
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1 **PRAYER FOR RELIEF**

2 Plaintiff demands against each defendant as follows:

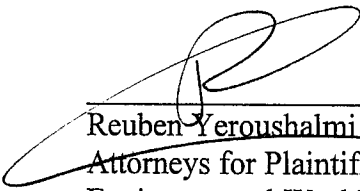
- 3 1. A permanent injunction;
- 4
- 5 2. Penalties pursuant to Health and Safety Code section 25249.7, subdivision (b) of
- 6 \$2,500.00 per day per violation;
- 7 3. Costs of suit;
- 8 4. Reasonable attorney's fees and costs; and
- 9
- 10 5. Any further relief that the court may deem just and equitable.

11

12 Dated:

13 3-23-05

YEROUSHALMI & ASSOCIATES

14 

15 _____

16 Reuben Yeroushalmi

17 Attorneys for Plaintiff,

18 Environmental World Watch, Inc.

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EXHIBIT A

EXHIBIT A

The alleged violations by Defendant American Airlines, Inc. took place at the following locations:

Burbank-Glendale-Pasadena (Bob Hope) Airport
2627 Hollywood Way
Burbank, CA 91505
Airport Latitude: 34-12-02.4000N ESTIMATED
Airport Longitude: 118-21-31.2000W

Fresno Yosemite International Airport
4995 E. Clinton Way
Fresno, CA 93727
Airport Latitude: 36-46-34.3000N ESTIMATED
Airport Longitude: 119-43-05.3000W

Long Beach Airport/Daugherty Field
4100 Donald Douglas Dr.
Long Beach, CA 90808
Airport Latitude: 33-49-03.8000N ESTIMATED
Airport Longitude: 118-09-05.8000W

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Monterey Peninsula Airport
200 Fred Kane Dr.
Monterey, CA 93940
Airport Latitude: 36-35-13.2000N ESTIMATED
Airport Longitude: 121-50-34.6000W

Metropolitan Oakland International Airport
1 Airport Drive
Oakland, CA 94621
Airport Latitude: 37-43-16.6470N ESTIMATED
Airport Longitude: 122-13-14.5800W

Palm Springs International Airport
3400 E. Tahquitz-Canyon Way.
Palm Springs, CA 92262
Airport Latitude: 33-49-46.8000N ESTIMATED
Airport Longitude: 116-30-24.1000W

Sacramento International Airport
6900 Airport Blvd.
Sacramento, CA 95837
Airport Latitude: 38-41-43.5000N ESTIMATED
Airport Longitude: 121-35-26.8000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED
Airport Longitude: 117-36-04.3000W

The alleged violations by Defendant Delta Airlines; Inc. took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Fresno Yosemite International Airport
4995 E. Clinton Way
Fresno, CA 93727
Airport Latitude: 36-46-34.3000N ESTIMATED
Airport Longitude: 119-43-05.3000W

Metropolitan Oakland International Airport
1 Airport Drive
Oakland, CA 94621
Airport Latitude: 37-43-16.6470N ESTIMATED
Airport Longitude: 122-13-14.5800W

Palm Springs International Airport
3400 E. Tahquitz-Canyon Way.
Palm Springs, CA 92262
Airport Latitude: 33-49-46.8000N ESTIMATED
Airport Longitude: 116-30-24.1000W

Sacramento International Airport
6900 Airport Blvd.
Sacramento, CA 95837
Airport Latitude: 38-41-43.5000N ESTIMATED
Airport Longitude: 121-35-26.8000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

Norman Y. Mineta San Jose International Airport
2077 Airport Blvd.
San Jose, CA 95110
Airport Latitude: 37-21-45.4500N ESTIMATED
Airport Longitude: 121-55-44.4300W

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

San Luis County Regional Airport
903-5 Airport Drive
San Luis Obispo, CA 93401
Airport Latitude: 35-14-12.6000N ESTIMATED
Airport Longitude: 120-38-30.7000W

The alleged violations by Defendant American West Airlines, Inc. took place at the following locations:

Bakersfield Municipal Airport
2000 S. Union Ave
Bakersfield, CA 93301
Airport Latitude: 35-19-29.4000N ESTIMATED
Airport Longitude: 118-59-45.0000W

Burbank-Glendale-Pasadena (Bob Hope) Airport
2627 Hollywood Way
Burbank, CA 91505
Airport Latitude: 34-12-02.4000N ESTIMATED
Airport Longitude: 118-21-31.2000W

Fresno Yosemite International Airport
4995 E. Clinton Way
Fresno, CA 93727
Airport Latitude: 36-46-34.3000N ESTIMATED
Airport Longitude: 119-43-05.3000W

Long Beach Airport/Daugherty Field
4100 Donald Douglas Dr.
Long Beach, CA 90808
Airport Latitude: 33-49-03.8000N ESTIMATED
Airport Longitude: 118-09-05.8000W

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Monterey Peninsula Airport
200 Fred Kane Dr.
Monterey, CA 93940
Airport Latitude: 36-35-13.2000N ESTIMATED
Airport Longitude: 121-50-34.6000W

Metropolitan Oakland International Airport
1 Airport Drive
Oakland, CA 94621
Airport Latitude: 37-43-16.6470N ESTIMATED
Airport Longitude: 122-13-14.5800W

Palm Springs International Airport
3400 E. Tahquitz-Canyon Way.
Palm Springs, CA 92262
Airport Latitude: 33-49-46.8000N ESTIMATED
Airport Longitude: 116-30-24.1000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Norman Y. Mineta San Jose International Airport
2077 Airport Blvd.
San Jose, CA 95110
Airport Latitude: 37-21-45.4500N ESTIMATED
Airport Longitude: 121-55-44.4300W

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED
Airport Longitude: 117-36-04.3000W

Santa Barbara Municipal Airport
601 Firestone Rd.
Goleta, CA 93117
Airport Latitude: 34-25-34.3630N ESTIMATED
Airport Longitude: 119-50-25.3440W

The alleged violations by Defendant Continental Airlines, Inc. took place at the following locations:

Bakersfield municipal Airport
2000 S. Union Ave
Bakersfield, CA 93301
Airport Latitude: 35-19-29.4000N ESTIMATED
Airport Longitude: 118-59-45.0000W

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Metropolitan Oakland International Airport
1 Airport Drive
Oakland, CA 94621
Airport Latitude: 37-43-16.6470N ESTIMATED
Airport Longitude: 122-13-14.5800W

Palm Springs International Airport
3400 E. Tahquitz-Canyon Way.
Palm Springs, CA 92262
Airport Latitude: 33-49-46.8000N ESTIMATED
Airport Longitude: 116-30-24.1000W

Sacramento International Airport
6900 Airport Blvd.
Sacramento, CA 95837
Airport Latitude: 38-41-43.5000N ESTIMATED
Airport Longitude: 121-35-26.8000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED
Airport Longitude: 117-36-04.3000W

The alleged violations by Defendant Northwest Airlines, Inc. took place at the following locations:

Fresno Yosemite International Airport
4995 E. Clinton Way
Fresno, CA 93727
Airport Latitude: 36-46-34.3000N ESTIMATED
Airport Longitude: 119-43-05.3000W

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Sacramento International Airport
6900 Airport Blvd.
Sacramento, CA 95837
Airport Latitude: 38-41-43.5000N ESTIMATED
Airport Longitude: 121-35-26.8000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED
Airport Longitude: 117-36-04.3000W

Palm Springs International Airport
3400 E. Tahquitz-Canyon Way.
Palm Springs, CA 92262
Airport Latitude: 33-49-46.8000N ESTIMATED
Airport Longitude: 116-30-24.1000W

Norman Y. Mineta San Jose International Airport
2077 Airport Blvd.
San Jose, CA 95110
Airport Latitude: 37-21-45.4500N ESTIMATED
Airport Longitude: 121-55-44.4300W

The alleged violations by Defendant United Airlines, Inc. took place at the following locations:

Burbank-Glendale-Pasadena (Bob Hope) Airport
2627 Hollywood Way
Burbank, CA 91505
Airport Latitude: 34-12-02.4000N ESTIMATED
Airport Longitude: 118-21-31.2000W

Bakersfield Municipal Airport
2000 S. Union Ave
Bakersfield, CA 93301
Airport Latitude: 35-19-29.4000N ESTIMATED
Airport Longitude: 118-59-45.0000W

Fresno Yosemite International Airport
4995 E. Clinton Way
Fresno, CA 93727
Airport Latitude: 36-46-34.3000N ESTIMATED
Airport Longitude: 119-43-05.3000W

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Monterey Peninsula Airport
200 Fred Kane Dr.
Monterey, CA 93940
Airport Latitude: 36-35-13.2000N ESTIMATED
Airport Longitude: 121-50-34.6000W

Metropolitan Oakland International Airport
1 Airport Drive
Oakland, CA 94621
Airport Latitude: 37-43-16.6470N ESTIMATED
Airport Longitude: 122-13-14.5800W

Palm Springs International Airport
3400 E. Tahquitz-Canyon Way.
Palm Springs, CA 92262
Airport Latitude: 33-49-46.8000N ESTIMATED
Airport Longitude: 116-30-24.1000W

Sacramento International Airport
6900 Airport Blvd.
Sacramento, CA 95837
Airport Latitude: 38-41-43.5000N ESTIMATED
Airport Longitude: 121-35-26.8000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED
Airport Longitude: 117-36-04.3000W

Norman Y. Mineta San Jose International Airport
2077 Airport Blvd.
San Jose, CA 95110
Airport Latitude: 37-21-45.4500N ESTIMATED
Airport Longitude: 121-55-44.4300W

The alleged violations by Defendant Virgin Atlantic Airways Limited took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Ace Aviation Holdings, Inc. (a.k.a. Air Canada) took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED
Airport Longitude: 117-36-04.3000W

The alleged violations by Defendant Air China took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Air France took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Air New Zealand took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Air Tran Airways took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Alaska Airlines, Inc. took place at the following locations:

Fresno Yosemite International Airport
4995 E. Clinton Way
Fresno, CA 93727
Airport Latitude: 36-46-34.3000N ESTIMATED
Airport Longitude: 119-43-05.3000W

Burbank-Glendale-Pasadena (Bob Hope) Airport
2627 Hollywood Way
Burbank, CA 91505
Airport Latitude: 34-12-02.4000N ESTIMATED
Airport Longitude: 118-21-31.2000W

Long Beach Airport/Daugherty Field
4100 Donald Douglas Dr.
Long Beach, CA 90808
Airport Latitude: 33-49-03.8000N ESTIMATED
Airport Longitude: 118-09-05.8000W

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Metropolitan Oakland International Airport
1 Airport Drive
Oakland, CA 94621
Airport Latitude: 37-43-16.6470N ESTIMATED
Airport Longitude: 122-13-14.5800W

Palm Springs International Airport
3400 E. Tahquitz-Canyon Way.
Palm Springs, CA 92262
Airport Latitude: 33-49-46.8000N ESTIMATED
Airport Longitude: 116-30-24.1000W

Sacramento International Airport
6900 Airport Blvd.
Sacramento, CA 95837
Airport Latitude: 38-41-43.5000N ESTIMATED
Airport Longitude: 121-35-26.8000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Norman Y. Mineta San Jose International Airport
2077 Airport Blvd.
San Jose, CA 95110
Airport Latitude: 37-21-45.4500N ESTIMATED
Airport Longitude: 121-55-44.4300W

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED
Airport Longitude: 117-36-04.3000W

Arcata Airport
3561 Boeing Ave.
Mckinleyville, CA 95519
Airport Latitude: 40-58-41.2150N ESTIMATED
Airport Longitude: 124-06-31.0277W

Redding Municipal Airport
6751 Woodrum Circle
Redding, CA 96002
Airport Latitude: 40-30-32.3410N ESTIMATED
Airport Longitude: 122-17-36.2470W

Santa Barbara Municipal Airport
601 Firestone Rd.
Goleta, CA 93117
Airport Latitude: 34-25-34.3630N ESTIMATED
Airport Longitude: 119-50-25.3440W

The alleged violations by Defendant British Airways, Plc. took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Japan Airlines International Company Ltd. took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant KLM Royal Dutch Airlines took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Lufthansa took place at the following locations:

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Air Wisconsin Airlines Corporation (a.k.a. United Express) took place at the following locations:

Fresno Yosemite International Airport
4995 E. Clinton Way
Fresno, CA 93727
Airport Latitude: 36-46-34.3000N ESTIMATED
Airport Longitude: 119-43-05.3000W

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Monterey Peninsula Airport
200 Fred Kane Dr.
Monterey, CA 93940
Airport Latitude: 36-35-13.2000N ESTIMATED
Airport Longitude: 121-50-34.6000W

Metropolitan Oakland International Airport
1 Airport Drive
Oakland, CA 94621
Airport Latitude: 37-43-16.6470N ESTIMATED
Airport Longitude: 122-13-14.5800W

Sacramento International Airport
6900 Airport Blvd.
Sacramento, CA 95837
Airport Latitude: 38-41-43.5000N ESTIMATED
Airport Longitude: 121-35-26.8000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

Norman Y. Mineta San Jose International Airport
2077 Airport Blvd.
San Jose, CA 95110
Airport Latitude: 37-21-45.4500N ESTIMATED
Airport Longitude: 121-55-44.4300W

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

Santa Maria Public Airport
3217 Terminal Dr.
Santa Maria, CA 93455
Airport Latitude: 34-53-56.1000N ESTIMATED
Airport Longitude: 120-27-26.8000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED
Airport Longitude: 117-36-04.3000W

Jack McNamara Field Airport
981 H Street
Crescent City, CA 95531
Airport Latitude: 41-46-48.5660N ESTIMATED
Airport Longitude: 124-14-11.5200W

Arcata Airport
3561 Boeing Ave.
Mckinleyville, CA 95519
Airport Latitude: 40-58-41.2150N ESTIMATED
Airport Longitude: 124-06-31.0277W

Imperial County Airport
1099 Airport Road
Imperial, CA 92251
Airport Latitude: 32-50-03.1930N ESTIMATED
Airport Longitude: 115-34-43.4840W

Redding Municipal Airport
6751 Woodrum Circle
Redding, CA 96002
Airport Latitude: 40-30-32.3410N ESTIMATED
Airport Longitude: 122-17-36.2470W

Chico Municipal Airport
PO Box 3420
Chico, CA 95927
Airport Latitude: 39-47-43.3780N ESTIMATED
Airport Longitude: 121-51-30.3230W

Modesto City-County Airport-Harry Sham Field
517 Airport Way
Modesto, CA 95354
Airport Latitude: 37-37-32.9420N ESTIMATED
Airport Longitude: 120-57-15.9170W

Visalia Municipal Airport
9501 Airport Drive
Visalia, CA 93277
Airport Latitude: 36-19-07.2000N ESTIMATED
Airport Longitude: 119-23-34.4000W

Inyokern Airport
1669 Airport Road
Inyokern, CA 93527
Airport Latitude: 35-39-31.8350N ESTIMATED
Airport Longitude: 117-49-46.2440W

Bakersfield Municipal Airport
2000 S. Union Ave
Bakersfield, CA 93301
Airport Latitude: 35-19-29.4000N ESTIMATED
Airport Longitude: 118-59-45.0000W

San Luis County Regional Airport
903-5 Airport Drive
San Luis Obispo, CA 93401
Airport Latitude: 35-14-12.6000N ESTIMATED
Airport Longitude: 120-38-30.7000W

Santa Barbara Municipal Airport
601 Firestone Rd.
Goleta, CA 93117
Airport Latitude: 34-25-34.3630N ESTIMATED
Airport Longitude: 119-50-25.3440W

Oxnard Airport
2889 W. 5th St.
Oxnard, CA 93030
Airport Latitude: 34-12-02.8837N ESTIMATED
Airport Longitude: 119-12-25.9797W

Mc Clellan-Palomar Airport
2210 Palomar Airport Road
Carlsbad, CA 92008

Palm Springs International Airport
3400 E. Tahquitz-Canyon Way.
Palm Springs, CA 92262
Airport Latitude: 33-49-46.8000N ESTIMATED
Airport Longitude: 116-30-24.1000W